

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Lacks Industries, Inc.	SRN : N2079
Location : 4375 52ND STREET SE	District : Grand Rapids
	County : KENT
City : KENTWOOD State: MI Zip Code : 49512	Compliance Status : Compliance
Source Class : MEGASITE	Staff : April Lazzaro
FCE Begin Date : 9/23/2021	FCE Completion Date : 9/23/2022
Comments : Full Compliance Evaluation	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/23/2022	ROP Semi 1 Cert	Compliance	No deviations were reported during the compliance period.
09/23/2022	ROP Semi 1 Cert	Non Compliance	Two deviations are related to RTO temperature automatic shutdowns, which are reoccurring. No emissions exceedances occurred as the line stops all operations any time the temperature dips. The third deviation is related to a previously identified issue and a Violation Notice has been issued and Enforcement Action is being taken.
09/23/2022	MACT (Part 63)	Compliance	Semiannual Compliance Report for NESHAP Surface Coating of Plastic Parts, Subpart PPPP. Lacks reports compliance with Subpart PPPP.
09/23/2022	CAM Excursions/Exceedances	Compliance	No excursions or exceedances were reported.
09/23/2022	CAM monitor downtime	Compliance	No monitor downtime reported.
07/20/2022	ROP Other	Compliance	Paint West Robotic Spray Booth Air Flow Test Report. Report indicates all flow into booth at acceptable level.
06/20/2022	ROP Other	Compliance	2022 Paint East Robotic Spray Booth Air Flow Test Report. Report indicates all flow into booth at acceptable level.

Activity Date	Activity Type	Compliance Status	Comments
06/13/2022	ROP Other	Compliance	Paint West robot spray booth airflow directional testing notification.
05/31/2022	MACT (Part 63)	Compliance	Ongoing compliance status report for subpart N- email received on 2/10/22 hardcopy date stamped 2/15/22. Lacks reports compliance with Subpart N, based on scrubber pressure drop readings. However, they have been informed that going forward, both surface tension and pressure drop are the compliance demonstration method. This is clarified based on language contained in NESHAP N that says if testing has not been conducted without a surfactant, it is assumed that both the scrubber and surfactant are required to meet the emission limit.
05/31/2022	ROP SEMI 2 CERT	Non Compliance	Postmarked 3/17/22. Reported deviations of RTO temperature are not citable violations since the line shuts down automatically and no paint spray occurs. Lacks included the deviations for the VOC coating content exceedances that were identified and cited during a compliance evaluation. Lacks is currently in Escalated Enforcement.
05/31/2022	ROP Annual Cert	Non Compliance	Postmarked 3/17/22. Lacks correctly included deviations cited in violation during the last reporting period in this report. Lacks is currently in Escalated Enforcement.
05/31/2022	MACT (Part 63)	Compliance	Postmarked 3/17/22. Semiannual compliance for Subpart P. The company reports compliance with the emission rate without add-on controls option. The coatings used in the calculations are currently under review.
05/31/2022	CAM Excursions/Exceedances	Compliance	Postmarked 3/17/22. Several instances of downtime occurred at FGEASTPAINT and FGWESTROBOPAINT. All are related to RTO temp going below 1,400 F. In these instances, an interlock shuts the paint line down before the temp is below 1,400 F, so no excess emissions occur.

Activity Date	Activity Type	Compliance Status	Comments
05/31/2022	CAM monitor downtime	Compliance	Postmarked 3/17/22. One instance of monitor downtime was reported; the RTO temperature chart for FGEASTPAINT came off for a 4 hour duration. A Violation Notice is not needed for this short duration.
05/31/2022	ROP SEMI 2 CERT	Non Compliance	Postmarked 3/17/22. Two deviations are related to a failure to conduct a weekly scrubber washdown on 2 chrome scrubbers and one deviation was for a surface tension exceedance. This appears to be an isolated incident due to staffing issues and COVID. Company states that the responsible employee was disciplined. No additional action needed as the facility is already in Escalated Enforcement.
05/31/2022	ROP Annual Cert	Non Compliance	Postmarked 3/17/22. The submittal covers a variety of old issues, and 3 new issues. This facility is currently in Escalated Enforcement, and the compliance plan will address the issues.
05/31/2022	MACT (Part 63)	Compliance	Postmarked 3/17/22. Subpart N Ongoing Compliance Report certification. Actual report submitted on 2/10/22.
05/31/2022	MAERS	Compliance	Report appears to align with expected emissions.
05/25/2022	On-site Inspection	Compliance	Unannounced, scheduled inspection.
12/21/2021	ROP Other	Compliance	Paint West Robotic Spray Booth Air Flow Test Report. This test was observed, and suggestions were made to use a 4 point method of air flow check to ensure the air flows into each booth at different points. All booths showed air flow was into the booth, although some were considered "weak".
12/16/2021	On-site Inspection	Non Compliance	Partial Compliance Evaluation of Paint West facility that coincided with the Robotic Spray Booth Air Flow Test.

Activity Date	Activity Type	Compliance Status	Comments
12/08/2021	Stack Test	Compliance	Stack test report for total chromium emissions from EUSPINELLE, PTI No. 110-18A. No ROP certification needed as it is an off permit change. Report indicates compliance with permit limit pending TPU methodology verification.
11/24/2021	Stack Test		This was a re-test at Barden for FGCHROME1 (SVK-2 etch) and FGCHROME2 (SVK-8 plate). A review of operational data in the report aligns with data collected during testing. Emissions data indicates compliance, however the outlet sample port on both stacks do not meet Method 1. Further evaluation found that the port also doesn't meet the Alternative to Method 1. This location has been used for all past stack tests. This will be addressed by the Technical Programs Unit staff during their review of the test parameters, as such the Compliance Status field for this report is blank and will be updated as needed.
11/24/2021	MACT (Part 63)	Compliance	This report includes information related to compliance with 40 CFR Part 63 Subpart P and includes the 4 affected sources: Paint East, Paint Central, Paint West and Barden Assembly. The limit is 0.16 lb HAP/lb of solids on a 12- month rolling basis. Reported emissions were highest in March and April 2021 at 0.087 lb HAP/lb solids. This data indicates compliance with the limit.
11/24/2021	ROP Semi 1 Cert	Compliance	The two deviations are related to CAM excursions and monitor downtime. These were addressed properly and no further compliance action is necessary at this time.
11/24/2021	CAM Excursions/Exceedances	Compliance	Two instances of a VFD fault were reported during the compliance period. During times when the temperature falls below 1,400F, the paint line automatically shuts down, as such Lacks reports there are no excess emissions.

Activity Date	Activity Type	Compliance Status	Comments
11/24/2021	CAM monitor downtime	Compliance	One instance of monitor downtime was recorded due to the chart slipping off the pin that holds it in place. The duration was ~2 hours and Lacks staff corrected it when it was identified during a routine plant observation. There were no temperature alarms during that period and the RTO was believed to have been functioning properly.
11/24/2021	ROP Semi 1 Cert	Non Compliance	Lacks properly reported 6 deviations in this report. There was one deviation not previously known about related to the 1st quarter FGSTRIPTANKS alarm test not being conducted, however it was done on 4/21/21 which is outside the 1st quarter. Lacks has appropriately addressed this deviation. The other deviations have been addressed through Violation Notices, and it is noted that the 2 deviations for failure to meet emission limits were likely faulty tests. A retest was conducted on both FGCHROME1 and FGCHROME2, and both demonstrated compliance. Finally, Lacks appears to have checked the incorrect box on page one of the form, indicating compliance with all requirements, where there were several deviations and items of non-compliance. AQD has requested that Lacks resubmit the form with the proper box checked for our files. The updated form was received via email on 11/30/2021.
10/21/2021	Stack Test Observation	Compliance	Observations of stack testing on EUSPINELLE. This is an initial compliance demonstration.
10/06/2021	Stack Test		The outlet port on the Chrome Plate scrubber does not meet Method 1. TPU will request that Lacks determine an alternate to Method 1 is acceptable before the test results can be considered accurate.
10/06/2021	Stack Test	Compliance	Stack test report for Paint Central RTO. Report indicates a DE of 98.19%

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10/06/2021	ROP Other	Compliance	The company has a date error on cert form, however the Paint West and Paint East low temperature and shut down tests were both performed in an acceptable manner that indicates compliance.
10/06/2021	ROP Other	Compliance	FGWESTROBOPAINT air flow verification. Results indicate air flow into all booths.

Name: April Lazzaro

Date: 09/23/2022

Supervisor: HH