

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Plastic Plate Kraft	<b>SRN :</b> N7374
<b>Location :</b> 5675 KRAFT AVENUE	<b>District :</b> Grand Rapids
	<b>County :</b> KENT
<b>City :</b> CASCADE TWP <b>State:</b> MI <b>Zip Code :</b> 48064	<b>Compliance Status :</b> Non Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> April Lazzaro
<b>FCE Begin Date :</b> 4/11/2021	<b>FCE Completion Date :</b> 4/11/2022
<b>Comments :</b> Unannounced scheduled inspection and records review.	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
04/11/2022	MACT (Part 63)	Compliance	Ongoing compliance status report for subpart N. The report included a typo for the updated scrubber pressure drop range. All readings included in the report indicate compliance with the correct range of 1.5"-5.5" H2O. Future reports should include both surface tension and scrubber pressure drop readings to demonstrate continuous compliance.
04/11/2022	MAERS	Compliance	Report certification with Supplemental Control Template submittal certification received on 3/21/22 (postmarked 3/17/22) VOC increase due to updated stack test results, methanol emissions increased significantly. Calculations appear accurate based on stack test, EF's and hours of operation.
04/11/2022	ROP Annual Cert	Compliance	Postmarked 3/17/22. Report received timely, new deviations are addressed in semi-annual review.

Activity Date	Activity Type	Compliance Status	Comments
04/11/2022	ROP SEMI 2 CERT	Compliance	Postmarked 3/17/22. During approved engineering testing, EUCHROMEETCH emission limit was exceeded for 23 hours. A VN was not issued for this, as it was an approved testing scenario. Lacks increased surface tension in EUCHROMEETCH in preparation for stack testing. A VN will not be issued for this as was an approved operational scenario and testing indicated compliance at those levels. AQD provided flexibility for the stack test submittal date do to the use of new out of state test company.
04/11/2022	MACT (Part 63)	Compliance	Postmarked 3/17/22. Ongoing Compliance for Subpart N. The report included a typo for the updated scrubber pressure drop range. All readings included in the report indicate compliance with the correct range of 1.5"-5.5" H2O. Future reports should include both surface tension and scrubber pressure drop readings to demonstrate continuous compliance.
04/11/2022	Off-site Inspection	Non Compliance	Records review Partial Compliance Evaluation to complete a Full Compliance Evaluation.
12/08/2021	Stack Test	Compliance	Compliance Emissions Testing report for Chrome Etch emission unit EUCHROMEETCH (SVK2). Testing w/ HEPA filter indicates compliance with emission limit pending TPU methodology verification. Testing w/out HEPA filter indicates non-compliance. This emission unit has not met emission limit w/out HEPA in past few years.
11/24/2021	MACT (Part 63)	Compliance	Ongoing Compliance for Subpart N. Lacks reports compliance with the pressure drop operating parameter. The data attached to the report supports this determination.
11/24/2021	ROP Semi 1 Cert	Compliance	Lacks reported zero deviations during the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
11/17/2021	Rule 912	Non Compliance	Rule 912 report for the Chrome etch tank and scrubber for the duration the HEPA filters were removed. This was done in order to conduct a stack test engineering study to determine if the HEPA filters are required for compliance with the permit emission limit. Total duration of exceedance was 23 hours. This is the second consecutive time the etch emission unit has exceeded the emission limit during an engineering study. Since the AQD knew of the engineering study, a Violation Notice will not be issued. However, if Lacks chooses to conduct an engineering study in the future, AQD will notify them that if an exceedance occurs it will be cited as a violation.
10/19/2021	Stack Test Observation	Unknown	Stack test observation, and Partial Compliance Evaluation of process control parameters and visual inspection of control devices.

Name: April Lazzaro Date: 04/11/2022 Supervisor: HL