

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : LACKS INDUSTRIES INC	SRN : N0895
Location : 4260 AIRLANE SE	District : Grand Rapids
	County : KENT
City : KENTWOOD State: MI Zip Code : 49512	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : April Lazzaro
FCE Begin Date : 9/10/2019	FCE Completion Date : 9/10/2020
Comments : Announced, scheduled inspection.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/27/2020	MACT (Part 63)	Non Compliance	Ongoing Compliance Status Reports for Airlane North and South for Subpart N. South Plater continues to be shut down. North Plater hexavalent chrome tanks 1 & 3 combined exceeded the surface tension limits as established in the O&M Plan 14 times during the reporting period.
08/18/2020	Scheduled Inspection	Non Compliance	Announced, scheduled inspection.
08/12/2020	MACT (Part 63)	Compliance	Ongoing Compliance with Subpart N (North & South Platers) South plater has been shut down. North plater reported in compliance w/ scrubber pressure drop compliance method.
06/04/2020	ROP Annual Cert	Compliance	Lacks continues to submit failure to test deviations for the Airlane South plating line. The line has been shut down due to lack of work. There were three new instances at Airlane North plating line where etch tank two surface tension exceeded the limit of 45 dynes/cm. The company reports that the composite mesh pad scrubber was properly operating at the time and as such no emission limits were exceeded.

Activity Date	Activity Type	Compliance Status	Comments
06/04/2020	ROP SEMI 2 CERT	Compliance	Lacks continues to submit failure to test deviations for the Airline South plating line. The line has been shut down due to lack of work. There were three new instances at Airline North plating line where etch tank two surface tension exceeded the limit of 45 dynes/cm. The company reports that the composite mesh pad scrubber was properly operating at the time and as such no emission limits were exceeded.
04/02/2020	MAERS	Compliance	ROP Certification form for MAERS received 3/17/20. Material usage for the North Plating Line was 351% higher this year than last. I contacted Karen Baweja at Lacks to let her know. She determined that there had been an incorrect conversion, and reported to me via email on 4/2/20 that the correct material usage was 325,908 gallons and provided permission to me to make the change. I made the change and ran the completeness check and resubmitted. No other changes were made to the submittal. Otherwise, all information appeared in line with previous years. Emissions are based on the most recent stack tests as identified by date in the attachments provided.
09/25/2019	ROP Semi 1 Cert	Compliance	The deviations reported are for failure to conduct stack testing as a result of FGS-1 being shut down in February (prior to due date of testing) due to lack of work. I contacted the Environmental Manager to inquire as to the status of the facility and learned that there are currently no plans for FGS-1 to start back up. Additionally, the repairs to the ductwork that were the basis of a VN response have been completed. No further action necessary at this time. Postmarked 9/12/19

Name: April Lazzaro Date: 09/10/2020 Supervisor: HH