DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility :	LACKS ENTERPRISES INC.	SRN :	N7374
Location	: 5675 KRAFT AVENUE	District :	Grand Rapids
		County :	KENT
City :	CASCADE TWP State: MI Zip Code: 4806	4 Compliance Status :	Compliance
Source C	Class : MAJOR	Staff: David	Morgan
FCE Begi	in Date : 5/1/2015	FCE Completion Date :	6/20/2016
Commen	its :		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
06/01/2016	MACT (Part 63)	Compliance	Semiannual Ongoing Compliance Report under 40 CFR Part 63, Subpart N. Certification by responsible official submitted on 3/14/16. Total plating time for the reporting period was 2,575 hours. Composite meshpads had a pressure drop within +/- 2 inches of the acceptable value. O&M procedures were followed.
06/01/2016	ROP Annual Cert	Compliance	The company certified compliance with an original responsible official signature. Deviations were reported in the first and second semi-annual reports.

Activity Date	Activity Type	Compliance Status	Comments
06/01/2016	ROP SEMI 2 CERT	Compliance	For ROP No. MI-ROP-N7374- 2015, the company had the following deviations: EUCHROMEETCH, I.1 and I.2 -
			Total chromium emissions from the chrome etch exhaust was determined through stack testing to exceed permitted emission limits. A violation notice was previously cited for the violation and all violations have been resolved.
			EUCHROMEETCH III.2 - From 8/26/15 to 10/9/15 the surface tension of the chrome etch tanks exceeded the surface tension determined during the most recent compliant stack test which occurred in August 2015. Surface tension during the test was 47 dynes/cm however the company operated 58 readings above that value. See Activity Report 737434687 for a discussion.
06/01/2016	ROP Semi 1 Cert	Compliance	For ROP No. MI-ROP-N7374- 2015, the company had the following deviations:
			EUCHROMEETCH, I.1 and I.2 - Total chromium emissions from the chrome etch exhaust was determined through stack testing to exceed permitted emission limits. A violation notice was previously cited for the violation and all violations have been resolved.
05/24/2016	Scheduled Inspection	Compliance	
05/11/2016	MAERS	Compliance	ROP Certification form for MAERS received 3/14/16. Chrome emissions are not required to be reported. VOC emissions are based on stack test data. This MAERS is acceptableDLM
12/11/2015	MACT (Part 63)	Compliance	Semiannual Ongoing Compliance Report under 40 CFR Part 63, Subpart N. Certification by responsible official submitted on 2/2/2015. Total plating time for the reporting period was 2,337 hours. Composite meshpads had a pressure drop within +/- 2 inches of the acceptable value. O&M procedures were followed.

Activity Date	Activity Type	Compliance Status	Comments
12/11/2015	MACT (Part 63)	Compliance	Semiannual Ongoing Compliance Report under 40 CFR Part 63, Subpart N. Certification by responsible official submitted on 7/20/2015. Total plating time for the reporting period was 2,858 hours. Composite meshpads had a pressure drop within +/- 2 inches of the acceptable value. O&M procedures were followed. ROP Report Certification was later submitted on 8/10/2015.
10/26/2015	Stack Test	Non Compliance	Re-test of Chrome Etch Tanks. Compliance Emission Testing conducted on 6/30/15 - Received 7/21/2015 Stack Test under Permit No. MI-ROP-N7374-2015 for chromium emissions from EUCHROMEETCH. EUCHROMEETCH. EUCHROMEETCH = 0.025 mg/dscm (0.016 mg/dscm limit) and 0.0048 lb/hr (0.0032 lb/hr limit). The facility continues to be in non-compliance with applicable limits.
10/26/2015	Stack Test	Compliance	Re-test of Chrome Etch Tanks. Compliance Emission Testing conducted on 8/26/15 - Received 10/8/2015 Stack Test under Permit No. MI-ROP-N7374-2015 for chromium emissions from EUCHROMEETCH. EUCHROMEETCH = 0.0054 mg/dscm (0.016 mg/dscm limit) and 0.0012 lb/hr (0.0032 lb/hr limit).
10/26/2015	Stack Test	Compliance	Re-test of Chrome Etch Tanks. Compliance Emission Testing conducted on 7/17/15 - Received 8/21/2015 Stack Test under Permit No. MI-ROP-N7374-2015 for chromium emissions from EUCHROMEETCH. EUCHROMEETCH = 0.0027 mg/dscm (0.016 mg/dscm limit) and 0.00055 lb/hr (0.0032 lb/hr limit).
08/26/2015	Stack Test Observation		Stack test of EUCHROMEETCH.

Activity Date	Activity Type	Compliance Status	Comments
07/09/2015	Stack Test	Non Compliance	Compliance Emission Testing - Received 7/6/2015 Required Stack Test under Permit No. MI- ROP-N7374-2015 for chromium emissions from EUCHROME and EUETCH was conducted on 5/1915 at the Kraft plating facility. EUCHROME (chrome plate) = 0.0019 mg/dscm (0.006 mg/dscm limit) and 0.0003 lb/hr (0.003 lb/hr limit). EUCHROMEETCH = 0.017 mg/dscm (0.016 mg/dscm limit) and 0.0033 lb/hr (0.0032 lb/hr limit). The average pressure drop was 3.30 inches of water for EUCHROME and 4.00 inches of water for EUCHROMEETCH. An average of 63 bars were ran for EUCHROMEETCH and 61 bars for EUCHROME.

Name: Date: 6/20/16 Supervisor: PAB Page 4 of 4