

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N737454254

FACILITY: Plastic Plate Kraft		SRN / ID: N7374
LOCATION: 5675 KRAFT AVENUE, CASCADE TWP		DISTRICT: Grand Rapids
CITY: CASCADE TWP		COUNTY: KENT
CONTACT: Karen Baweja , Supervisor of Air Quality		ACTIVITY DATE: 07/08/2020
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Announced, scheduled inspection.		
RESOLVED COMPLAINTS:		

This report represents a Partial Compliance Evaluation (PCE) records review and an on-site inspection pursuant to Renewable Operating Permit MI-ROP-N7374-2020. An email was sent to facility Environmental Manager, Karen Baweja, on May 27, 2020 requesting recordkeeping pursuant to the permit. A detailed list of the records requested was provided to Lacks with a due date of June 5, 2020. The requested records were received in multiple emails and will be attached to this report. All information was received from the facility contact in a timely manner. The on-site inspection was conducted on July 8, 2020. I contacted Karen Baweja, Environmental Manager to inform her I would be there between 10:00 and 10:30 AM. Upon arrival I met with Jeff Cowdry and Ms. Baweja. I filled out the COVID-19 screening form to indicate I was feeling well at the time of the inspection. At the time of the inspection I had not recently been in contact with anyone who has tested positive for COVID-19. Proper PPE was utilized and social distancing was maintained to the extent possible during the inspection.

FACILITY DESCRIPTION

The Lacks Plastic Plate Kraft location is a decorative hexavalent chrome electroplating facility that primarily electroplates on automotive parts but also on plumbing fixtures, household appliances and business machines. The process consists of pretreatment, alkaline cleaning, acid dipping, and strike plating of copper, copper electroplating, nickel electroplating, and chromium electroplating. Electroless copper, conditioner, and rack stripping is controlled by packed bed scrubbers while the chrome plating and etching are controlled by composite mesh pad scrubbers. The facility is a major source of Hazardous Air Pollutants.

The hexavalent chrome plating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chromium emissions in Subpart N.

COMPLIANCE EVALUATION

The data presented below was compiled from information provided by Lacks based on stack test results per the dates indicated.

Equipment	Control	Observed Pressure Drop (inches of H ₂ O)	Observed Water Flow (gpm)	Water Bleed Off Rate (gpm)	Surface Tension at time of Inspection (dynes/cm)	Emission Limits	Test data
EUCONDITIONER (K-1)	PBS	2.1	73	3.46	NA	DCP 1.5 pph	6/16/17 0.0446 pph
EUCHROMEETCH (K-2)	CMP	Scrubber 3.5 Evaporator 0.665	56	NA	Tank 1 38 Tank 2 Empty Tank 3 40	Total Chromium 0.016 mg/dscm 0.0032 pph	12/04/19 0.0088 mg/dscm 0.0013 pph
EUELECTROLESSCU (K-4)	PBS	0.636	168	1.7	NA	Formaldehyde 1.1 pph	4/20/2017 0.1779 pph

						Methanol 9.00 pph	0.4413 pph
						Sodium hydroxide 0.22 pph	0.0216 pph
FGNICKEL	NA	NA	NA	NA	NA	Nickel (semibri) 0.19 pph Formaldehyde 0.04 pph Nickel (all others) 0.27 pph Formaldehyde 0.04 pph Sodium hydroxide 0.33 pph	4/20/17 0.00153 pph 0.0137 pph 0.00077 pph 0.0144 pph 0.0312 pph
FGCHROME1 (K-8)	CMP	Scrubber 3.4 Evaporator 3.0	NA	NA	Tank 1 38 Tank 2 37 Tank 3 40	Total chromium 0.006 mg/dscm 0.003 pph	4/06/19 0.0007 mg/dscm 0.0001 pph
FGSTRIPTANKS	PBS	1.955	266.8	3.7	NA	Nitric acid 1.9 pph Sodium hydroxide 0.4 pph	02/25/20 0.067 pph 0.053 pph

EUCONDITIONER

This emission unit includes one 1,3-dichloro-2-propanol (DCP) tank and associated controls which consists of a packed bed scrubber system with mist eliminator. The DCP emission limit is 1.5 lb/hr and a stack test conducted in April 2017 found actual emissions 0.0446 lb/hr. The stack test results indicate compliance with the limit. The MAP was updated in January 2020, and again in July 2020 following the on-site inspection. All monitoring and recordkeeping requirements for this emissions unit appear to be met at this time. This emission unit will need to be tested again before April of 2021.

The O&M Plan requirements are contained in the facility MAP. The quarterly scrubber inspections were requested for calendar year 2019. Lacks did not identify any issues with the scrubber on the quarterly inspection reports. The quarterly reports are attached. Additionally, graphical representation of pressure drop readings for a selected eight (8) months were requested and provided. These graphs did not identify issues with the pressure drop of the scrubber. Further discussions with the facility staff indicate the scrubber has been operating well.

During the on-site inspection, the visual inspection of the scrubber was satisfactory. Readings were taken from the automated monitoring system and were as follows: Bleed off- 4.1 gpm, flow 67 gpm and pressure drop 2.7" H₂O. These values are within the parameters identified in the MAP.

EUPREETCHTANK

This emission unit is new and is still in the testing phase. The current plan is for this emission unit to be vented through the existing packed bed scrubber that is currently used for the conditioner tank. The permit does allow for this tank to be vented internally as well. If Lacks chooses to vent the tank internally, notification in writing (email is acceptable) within 7 days is required. Emissions records will be requested during the next inspection.

EUCHROMEETCH

This emission unit includes two etch tanks currently filled w/ chromic etch solution, however the permit allows for three. The third tank is empty and is used when one of the other tanks is switched out or for future use as a third production tank. For clarity, the AQD would require that a new stack test be conducted ASAP following the use of the three chromic etch tanks all at one time because emissions from the 3 tanks operating at one time has not been tested before. The chromic acid etch tanks are not subject to the Chrome NESHAP, however they do utilize a PFOS free mist suppressant to help reduce chromic acid mist as required by the permit. The current total chromium emission limit is 0.016 mg/dscm and 0.0032 lb/hr. Testing was conducted in December 2019 and the results with the HEPA filter in place was 0.0088 mg/dscm and 0.0013 lb/hr, which indicate compliance. Lacks conducted a separate engineering test with the HEPA filters removed. The test results indicate that the scrubber cannot meet the permit limits without the HEPA filters installed. As such, the MAP has been updated to require the use of the HEPA filters. If the HEPA filters are not properly operated, it could result in a determination of non-compliance. The surface tension during testing as established by a three-run average per tank are as follows Tank 1: 45.3 dynes/cm (which was set during stack test conducted in 2017) Tank 2: 34.11 dynes/cm and Tank 3: 42.81 dynes/cm.

Special Condition III.2 of the permit states that,

"The permittee shall not operate any tank in EUCHROMEETCH unless the chemical fume suppressant containing a wetting agent is applied in quantities and at a frequency to ensure the surface tension of each tank does not exceed, at any time during operation, the surface tension as specified in the MAP or the surface tension as measured during the most recent stack test, whichever is lower.

A review of surface tension readings take for each of the three tanks was conducted based on the data provided by Lacks. This review indicated the following:

Tank #1- Surface tension value of 45.3 dynes/cm established during testing was exceeded 9 times. The surface tension on the day of the inspection was not available because Lacks only uses two tanks at any one time, and Tank #2 and #3 were in use.

1Et	Surface Tension	5/15/2019	45.7	dynes/cm
1Et	Surface Tension	6/7/2019	45.7	dynes/cm
1Et	Surface Tension	6/6/2019	45.67	dynes/cm
1Et	Surface Tension	5/27/2019	45.6	dynes/cm
1Et	Surface Tension	5/28/2019	45.6	dynes/cm
1Et	Surface Tension	4/24/2019	45.51	dynes/cm

1Et	Surface Tension	5/14/2019	45.42	dynes/cm
1Et	Surface Tension	5/29/2019	45.41	dynes/cm

Tank #2- Surface tension value of 34.11 dynes/cm established during testing was exceeded more than 100 times:

2Et	Surface Tension	1/15/2020	38.8	dynes/cm
2Et	Surface Tension	1/15/2020	38.19	dynes/cm
2Et	Surface Tension	1/15/2020	45	dynes/cm
2Et	Surface Tension	1/16/2020	35.19	dynes/cm
2Et	Surface Tension	1/16/2020	35.66	dynes/cm
2Et	Surface Tension	1/19/2020	38.03	dynes/cm
2Et	Surface Tension	1/20/2020	35.47	dynes/cm
2Et	Surface Tension	1/20/2020	34.34	dynes/cm
2Et	Surface Tension	1/20/2020	35.24	dynes/cm
2Et	Surface Tension	1/21/2020	39.83	dynes/cm
2Et	Surface Tension	1/21/2020	43.69	dynes/cm
2Et	Surface Tension	1/21/2020	44.66	dynes/cm
2Et	Surface Tension	1/22/2020	35.54	dynes/cm
2Et	Surface Tension	1/22/2020	35.41	dynes/cm
2Et	Surface Tension	1/23/2020	34.56	dynes/cm
2Et	Surface Tension	1/23/2020	35.95	dynes/cm
2Et	Surface Tension	1/24/2020	35.02	dynes/cm
2Et	Surface Tension	1/24/2020	38.54	dynes/cm
2Et	Surface Tension	1/26/2020	35.02	dynes/cm
2Et	Surface Tension	1/27/2020	36.27	dynes/cm
2Et	Surface Tension	1/27/2020	43.8	dynes/cm
2Et	Surface Tension	1/27/2020	37.57	dynes/cm
2Et	Surface Tension	1/28/2020	35.46	dynes/cm
2Et	Surface Tension	1/28/2020	37.09	dynes/cm
2Et	Surface Tension	1/28/2020	38.25	dynes/cm
2Et	Surface Tension	1/29/2020	35.43	dynes/cm
2Et	Surface Tension	1/29/2020	35.18	dynes/cm
2Et	Surface Tension	1/30/2020	34.93	dynes/cm
2Et	Surface Tension	1/30/2020	39.21	dynes/cm
2Et	Surface Tension	1/30/2020	37.15	dynes/cm
2Et	Surface Tension	1/31/2020	35.69	dynes/cm
2Et	Surface Tension	2/2/2020	41.41	dynes/cm
2Et	Surface Tension	2/3/2020	36.83	dynes/cm
2Et	Surface Tension	2/3/2020	41.24	dynes/cm
2Et	Surface Tension	2/3/2020	43.83	dynes/cm
2Et	Surface Tension	2/4/2020	37.92	dynes/cm
2Et	Surface Tension	2/4/2020	35.41	dynes/cm
2Et	Surface Tension	2/5/2020	36.35	dynes/cm
2Et	Surface Tension	2/5/2020	39.52	dynes/cm
2Et	Surface Tension	2/5/2020	34.51	dynes/cm

2Et	Surface Tension	2/6/2020	38.28	dynes/cm
2Et	Surface Tension	2/6/2020	43.52	dynes/cm
2Et	Surface Tension	2/6/2020	35.85	dynes/cm
2Et	Surface Tension	2/7/2020	36.69	dynes/cm
2Et	Surface Tension	2/7/2020	42.29	dynes/cm
2Et	Surface Tension	2/9/2020	41.41	dynes/cm
2Et	Surface Tension	2/10/2020	37.85	dynes/cm
2Et	Surface Tension	2/10/2020	39.77	dynes/cm
2Et	Surface Tension	2/10/2020	42.94	dynes/cm
2Et	Surface Tension	2/11/2020	37.9	dynes/cm
2Et	Surface Tension	2/11/2020	36.79	dynes/cm
2Et	Surface Tension	2/11/2020	42.06	dynes/cm
2Et	Surface Tension	2/12/2020	34.97	dynes/cm
2Et	Surface Tension	2/12/2020	36.44	dynes/cm
2Et	Surface Tension	2/16/2020	34.32	dynes/cm
2Et	Surface Tension	2/17/2020	34.49	dynes/cm
2Et	Surface Tension	2/18/2020	35.25	dynes/cm
2Et	Surface Tension	2/20/2020	34.35	dynes/cm
2Et	Surface Tension	2/23/2020	38.24	dynes/cm
2Et	Surface Tension	2/24/2020	35.76	dynes/cm
2Et	Surface Tension	2/24/2020	36.23	dynes/cm
2Et	Surface Tension	2/24/2020	38.58	dynes/cm
2Et	Surface Tension	2/25/2020	35.25	dynes/cm
2Et	Surface Tension	2/25/2020	34.31	dynes/cm
2Et	Surface Tension	2/25/2020	39.54	dynes/cm
2Et	Surface Tension	2/26/2020	36.59	dynes/cm
2Et	Surface Tension	2/26/2020	38.86	dynes/cm
2Et	Surface Tension	2/26/2020	37.89	dynes/cm
2Et	Surface Tension	2/27/2020	36.84	dynes/cm
2Et	Surface Tension	2/27/2020	36.01	dynes/cm
2Et	Surface Tension	2/27/2020	37.61	dynes/cm
2Et	Surface Tension	2/28/2020	35.28	dynes/cm
2Et	Surface Tension	2/28/2020	36.82	dynes/cm
2Et	Surface Tension	3/1/2020	37.04	dynes/cm
2Et	Surface Tension	3/2/2020	35.77	dynes/cm
2Et	Surface Tension	3/2/2020	37.76	dynes/cm
2Et	Surface Tension	3/2/2020	35.75	dynes/cm
2Et	Surface Tension	3/3/2020	38.1	dynes/cm
2Et	Surface Tension	3/3/2020	36.67	dynes/cm
2Et	Surface Tension	3/4/2020	35.51	dynes/cm
2Et	Surface Tension	3/4/2020	38.37	dynes/cm
2Et	Surface Tension	3/5/2020	35.02	dynes/cm
2Et	Surface Tension	3/5/2020	38.11	dynes/cm
2Et	Surface Tension	3/6/2020	34.49	dynes/cm
2Et	Surface Tension	3/8/2020	37.34	dynes/cm
2Et	Surface Tension	3/9/2020	36.57	dynes/cm

2Et	Surface Tension	3/9/2020	39.53	dynes/cm
2Et	Surface Tension	3/9/2020	40.94	dynes/cm
2Et	Surface Tension	3/10/2020	37.62	dynes/cm
2Et	Surface Tension	3/10/2020	42.21	dynes/cm
2Et	Surface Tension	3/10/2020	35.56	dynes/cm
2Et	Surface Tension	3/11/2020	36.81	dynes/cm
2Et	Surface Tension	3/11/2020	40.05	dynes/cm
2Et	Surface Tension	3/11/2020	38.37	dynes/cm
2Et	Surface Tension	3/12/2020	35.63	dynes/cm
2Et	Surface Tension	3/12/2020	39.39	dynes/cm
2Et	Surface Tension	3/12/2020	35.98	dynes/cm
2Et	Surface Tension	3/13/2020	36.66	dynes/cm
2Et	Surface Tension	3/15/2020	41.64	dynes/cm
2Et	Surface Tension	3/16/2020	39.6	dynes/cm
2Et	Surface Tension	3/16/2020	44.19	dynes/cm
2Et	Surface Tension	3/16/2020	39.58	dynes/cm
2Et	Surface Tension	3/17/2020	38.86	dynes/cm
2Et	Surface Tension	3/17/2020	40.45	dynes/cm
2Et	Surface Tension	3/17/2020	39.77	dynes/cm
2Et	Surface Tension	3/18/2020	40.05	dynes/cm
2Et	Surface Tension	3/18/2020	43.44	dynes/cm
2Et	Surface Tension	3/18/2020	37.82	dynes/cm
2Et	Surface Tension	3/19/2020	35.3	dynes/cm
2Et	Surface Tension	3/19/2020	41.34	dynes/cm
2Et	Surface Tension	3/19/2020	40.88	dynes/cm
2Et	Surface Tension	3/19/2020	44.89	dynes/cm
2Et	Surface Tension	3/20/2020	39.8	dynes/cm

The surface tension exceedances continued until the on-site inspection which was conducted on July 8, 2020. The surface tension on the day of the inspection was 44.9 dynes/cm. Since they re-started the plant on May 17, 2020 the surface tension high value was 45 dynes/cm and the lowest value was 30.7 dynes/cm. The mean for that time frame was 37.2.

Tank #3- Surface tension value established during testing was 42.8 dynes/cm. This value was exceeded four times.

3Et	Surface Tension	3/16/2020	44.94	dynes/cm
3Et	Surface Tension	3/20/2020	44.73	dynes/cm
3Et	Surface Tension	3/16/2020	44.24	dynes/cm
3Et	Surface Tension	3/19/2020	44.19	dynes/cm

The surface tension on the day of the inspection was not recorded. Since they re-started the plant on May 17, 2020, the surface tension high value was 51.5 dynes/cm, at a time where production was not occurring. The lowest value was 33 dynes/cm. The mean for that time frame was 37.8 dynes/cm.

The O&M Plan requirements are contained in the facility MAP. The quarterly scrubber inspections were requested for calendar year 2019. Lacks did not identify any issues with the scrubber on the quarterly inspection reports. The quarterly reports are attached.

During the on-site inspection, the visual inspection of the scrubber was satisfactory. Readings were taken from the automated monitoring system and were as follows: scrubber overall pressure drop across stage 1-3 was 3.8" H₂O the pressure drop of the evaporator was 0.8" H₂O. The MAP also required that a weekly reading of the magnehelic gauge on the

HEPA filters be taken. I asked for that weekly value via email, and for the week of July 6, 2020 was 1.2" H₂O. These values are within the parameters identified in the MAP.

The surface tension was discussed during the on-site inspection closing meeting. I informed Mr. Cowdry and Ms. Baweja that the values were higher than the values recorded during the stack test conducted in December 2019. There was some confusion, and I read Special Condition III.2 out loud. This seemed to clarify the misunderstanding about the requirement for surface tension related to EUCHROMEETCH. Lacks asked if it was an average of both tanks, and I clarified that the condition specifies "any tank", and my interpretation of that is that it is on a per tank basis. I also specified that I have pointed that out before and wrote up my inspection report to specify this last time. The values of surface tension in Tank #2 were particularly low during the test. To see if an average of both tanks would help with compliance, I quickly averaged the 6 surface tension readings taken for both tanks during the test. That value is 38.4 dynes/cm and is still lower than the value identified in the MAP, or that is routinely achieved at the facility.

A Violation Notice will be issued for the violations of Special Condition III.2 for Tank #1, #2 and #3.

EUELECTROLESSCU

EUELECTROLESSCU was subject to a case-by-case Maximum Achievable Control Technology (MACT) review under Section 112(g) of the federal Clean Air Act because HAP emissions for formaldehyde and methanol are greater than 10 tons per year for an individual HAP and 25 tons per year for combined HAPs. Section 112(g) (and adopted by reference in Rule 299(2)(b)) requires that any constructed or reconstructed major source of HAPs be equipped with MACT to control HAP emissions if a source specific MACT standard for the source category has not been promulgated under Section 112(d) or Section 112(h). MACT for EUELECTROLESSCU was determined to be a packed bed scrubber system with methanol and formaldehyde emission limits.

This emission unit consists of one electroless copper tank. Stack testing was most recently conducted in April of 2017. Emission limits are in place for formaldehyde- 1.1 lb/hr, methanol- 9.00 lb/hr and sodium hydroxide- 0.22 lb/hr. Emission rates reported are formaldehyde- 0.1779 lb/hr, methanol 0.4413 lb/hr and sodium hydroxide- 0.0216 lb/hr, which is basically 0.022 and right at the emission limit. This should be closely evaluated/observed during the next stack test which is required by April of 2021.

The O&M Plan requirements are contained in the facility MAP. The quarterly scrubber inspections were requested for calendar year 2019. Lacks did not identify any issues with the scrubber on the quarterly inspection reports. The quarterly reports are attached.

During the on-site inspection, the visual inspection of the scrubber was satisfactory. Readings were taken from the automated monitoring system and were as follows: bleed off- 3.0 gpm, flow- 175 gpm and the pressure drop was 0.55" H₂O. These values are within the parameters identified in the MAP.

EUKPGENSET

This is one 190 brake horsepower natural gas fired 4 stroke rich burn spark ignition internal combustion engine. The unit is properly maintained and is listed as a certified engine on EPA's spreadsheet for large spark ignition 2011 to present list which was confirmed by using the family name of the engine as listed in the ROP application. (ECESB06.8GDB) The engine is being operated pursuant to manufacturer's instructions.

FGNEUTCATACC

This flexible group includes the neutralizer tank (sulfuric acid), two catalyst tanks (hydrochloric acid) and accelerator tank (hydrochloric acid). There are no emission limits, however the permit requires that the facility include this FG in the MAP to ensure proper ventilation/fan operation. This equipment is continuously monitored for electrical current draw and a visual inspection is conducted once per quarter.

FGCOPPER

This flexible group includes one copper strike tank containing copper sulfate and sulfuric acid and six acid copper tanks containing copper sulfate, ferrous sulfate and sulfuric acid. There are no emission limits, however the permit requires that the facility include this FG in the MAP to ensure proper ventilation/fan operation. This equipment is continuously monitored for electrical current draw and a visual inspection is conducted once per quarter.

FGNICKEL

This flexible group includes 5 semi brite nickel plating tanks, two brite nickel plating tanks, six platinum/nickel plating tanks and one durni (micro-porous) nickel plating tank. Emissions from this equipment is uncontrolled.

Emission limits for EUSEMIBRINI include nickel- 0.19 lb/hr, formaldehyde- 0.04 lb/hr. Emissions from the 2017 test were nickel- 0.00153 lb/hr and formaldehyde 0.0137. Both results indicate compliance. Limits for EUBRITENI, EUPLATINUM and EUDURNINI combined include nickel- 0.27 lb/hr, formaldehyde- 0.04 lb/hr and sodium hydroxide 0.33 lb/hr. Emissions from

the 2017 test were nickel- 0.00077 lb/hr, formaldehyde- 0.0144 lb/hr and sodium hydroxide 0.0312 lb/hr. Sodium hydroxide was near the limit and should be closely evaluated/observed during the next stack test which is required by April of 2021.

FGCHROME1

This flexible group includes three decorative hexavalent chrome electroplating tanks with a shared composite mesh pad scrubber system and fume suppressant for control. The start-up date for each tank is June 2013. Compliance with NESHAP Subpart N is met using the control device. The surface tension requirement is limited to 45 dynes/cm and is a state only requirement.

Emission limits for FGCHROME1 include total chromium- 0.006 mg/dscm and total chromium- 0.003 pph. Emissions from the 2017 test was total chromium- 0.00183 mg/dscm and total chromium- 0.000248 lb/hr. Both results indicate compliance with permitted limits and testing was conducted within the required timeframe.

As indicated above all Lacks facilities use the same mist suppressant, and no PFOS has been used at this facility.

The O&M Plan requirements are contained in the facility MAP. The quarterly scrubber inspections were requested for calendar year 2019. Lacks did not identify any issues with the scrubber on the quarterly inspection reports. The quarterly reports are attached.

Surface tension readings were reviewed and found to be below the limit of 45 dynes/cm during the timeframe requested for tanks 1-3.

During the on-site inspection, the visual inspection of the scrubber was satisfactory. Readings were taken from the automated monitoring system and were as follows: pressure drop across stage 1-3 was 3.8" H₂O and the evaporator pressure drop was 1.5" H₂O. These values are within the parameters identified in the MAP.

FGSTRIPTANKS

This flexible group includes one chrome strip tank containing sodium hydroxide and one nitric acid strip tank. These two tanks are controlled by a packed bed scrubber equipped with mist eliminators. Visual inspection did not identify any obvious issues. Emission limits include nitric acid 1.9 lb/hr and sodium hydroxide 0.4 lb/hr. The nitric scrubber was tested on February 25, 2020 with emissions of nitric acid at 0.067 lb/hour and emissions of sodium hydroxide at 0.053 lb/hr both of which indicate compliance. No further testing is required at this time. The facility is performing inspections of the packed bed scrubber system as required. Data collected during the inspection on the control device is as follows: Flow- 266.8 gpm, bleed off 3.7 gpm and pressure drop of scrubber was 1.955" H₂O.

The O&M Plan requirements are contained in the facility MAP. The quarterly scrubber inspections were requested for calendar year 2019. Lacks identified a work order associated with the Second Quarter inspection. Upon further inquiry with Lacks this was determined to be appropriately addressed. No additional issues were reported. The quarterly reports are attached.

FGBOILERS

This flexible group includes 5, natural gas fired, 1.8 MMBtu/hr boilers subject to minimal requirements of 40 CFR Part 63, Subpart DDDDD. The first 5-year compliance report for these boilers is due no later than January 31, 2019. The USEPA CEDRI reporting system must be used.

CONCLUSION

Lacks Plastic Plate Kraft facility was in non-compliance at the time of the inspection.

NAME

April Lazzaro

DATE

07/23/20

SUPERVISOR

[Signature]