



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 26, 2014

Mr. Tom Sosnowski
Sodus Hard Chrome
3085 Yore Avenue
Sodus, Michigan 49126

SRN: A0083, Berrien County

Dear Mr. Sosnowski:

VIOLATION NOTICE

On September 19, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Sodus Hard Chrome (Facility), located at 3085 Yore Avenue, Sodus, Michigan. The purpose of this inspection was to determine the Facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the administrative rules; and the conditions of Permit to Install (PTI) No. 02-00.

During the inspection, staff of the DEQ, AQD, observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCHROME 3/5	40 CFR 36.342 (c)(1)(ii), and Special Conditions 6 and 17(c) of PTI No. 02-00	The total of the differential pressures established during the performance testing that would indicate ongoing compliance with the emission limit was 5 inches of water column. The permit condition allows for +/- 1 inch of variation to indicate compliance. Readings taken during the inspection, as well as a review of company records, indicate that the total differential pressures have been non-compliant for quite some time. Also, the Facility is supposed to take corrective actions and document when the variation exceeds +/- 1 inch.
FGFACILITY	40 CFR 63.342(f)Table 1, and Special Conditions 17(a) and 18 of PTI No. 02-00	The Facility must perform applicable work practice standards and inspections on a quarterly basis. The AQD was told during the inspection that they are being performed semi-annually.

FGFACILITY	Special Condition 17(b) of PTI No. 02-00	For EUChrome 3/5, the hourly washdown cycle of stages 1 and 2 of the scrubber system are required to be 15 seconds each. During the inspection, the AQD was told that they are programmed for 9 seconds each.
FGFACILITY	40 CFR 63.346(b), and Special Conditions 19 and 20 of PTI No. 02-00	The Facility is required to keep records of inspections, maintenance performed on the control devices, any malfunctions, and the actions taken during a malfunction. It does not appear these records are being kept.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 24, 2014. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If the Facility believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of your Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Matt Deskins
Environmental Quality Analyst
Air Quality Division
269-567-3542

MD:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ