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

A293126192

FACILITY: DIAMOND CHROME PLATING INC		SRN / ID: A2931
LOCATION: 604 S MICHIGAN, HOWELL		DISTRICT: Lansing
CITY: HOWELL		COUNTY: LIVINGSTON
CONTACT: John Wagner , Director - Health, Safety & Environmental Affairs		ACTIVITY DATE: 07/28/2014
STAFF: Daniel McGeen	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection, and review of facility recordkeeping.		
RESOLVED COMPLAINTS:		

On 7/28/2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a scheduled inspection of Diamond Chrome Plating, Inc. (DCP).

PTI, rule, or requirement	Emission unit description	Control device	Scrubber location	Operating status
PTI No. 367-83B; 40 CFR Part 63 Subparts A & N; Joint Consent Decree (JCD)	Open surface chrome plating tank nos. 9, 11, and 12 (10 and 13 have been removed), aka Dept. 2	Scrubber system #3; a Ceilcote vertical composite mesh pad (CMP) scrubber; *Tank 8 now exhausts to scrubber #3	South scrubber on east roof	Noncompliance with Rule 910, being resolved through amended JCD
PTI No. 367-83B; 40 CFR Part 63 Subparts A & N; JCD	Open surface chrome plating tank nos. 1-4, 6, and 8*, aka Dept. 1 *Tank 8 now exhausts to scrubber #3	Scrubber system #4; a Ceilcote vertical composite mesh pad (CMP) scrubber	North scrubber on east roof	Noncompliance with Rule 910, being resolved through amended JCD
PTI No. 386-85A; 40 CFR Part 63 Subparts A and N; JCD	Open surface chrome plating tank nos. 5 (recently relocated from Dept. 1), 7, 15, 17; west side of plant	Scrubber system #5; a Ceilcote vertical wet scrubber with kimre mesh pad, fume suppressant	SW portion of bldg., inside plant, exhausts outdoors	Compliance
PTI No. 386-85A; 40 CFR Part 63 Subparts A and N; JCD	Not in use; open surface chrome plating tanks 19-21	Not in use; scrubber #6, a Ceilcote packed bed/CMP scrubber with kimre mesh pad	NW of building, on outside ground	Has not been used in recent years
40 CFR Part 63 Subpart T	Batch vapor degreaser, uses TCE	Freeboard refrigeration, dwell, reduced draft		Not observed
PTI No. 489-91; 40 CFR Part 61 Subpart E	Sludge dryer	Cyclone collector		Removed
PTI No. 672-88	Chrome redox tank	MAPCO mist eliminator		Not observed
PTI No. 673-88; 40 CFR Part 63, Subpart WWWWWW	Metal cleaning and electroless nickel plating operation	Scrubber, south of plant, on ground		Compliance
PTI No. 675-88A; 40 CFR Part 63, Subpart WWWWWW	Cadmium plating line (two tanks)	Wet scrubber, inside plant, some ductwork on plant exterior		Compliance
PTI No. 676-88	Two alkaline chrome strip tanks	In-line mesh pad in stack, exhausts to outside air		Compliance
PTI No. 677-88	Cooling tower			Compliance
Rule 285(r)	Pickling tanks			Not observed
Rule 285(r)	Phosphate wash tanks			Not observed
Rule 285(l)(vi)(B)	Small sandblasters	Exhaust to wet scrubber	SW portion of bldg.	Not operating
Rule 282	6 electric ovens			Compliance
Rule 285(g); 40 CFR Part 63 Subpart ZZZZ; 40 CFR Part 60 Subpart JJJJ	Emergency generator; 150 kW			Not operating

Environmental contacts:

John D. Wagner, PE, REM, CSP, Director of Health, Safety & Environmental Affairs; 517-546-0150; env@diamondchromeplating.com

Tom Poplawski; Laboratory Manager; 517-546-0150; labdcp@ameritech.net

Facility description:

DCP is a hard chromium electroplater, which also conducts cadmium and nickel plating. They are a job shop, and plate aircraft landing gear, commercial hydraulics, industrial dies, and miscellaneous parts.

Regulatory overview:

There is an existing 2006 multi-media Joint Consent Decree (JCD) for this facility, to address not only air issues, but also contamination of soil, storm water, and ground water. Discussions with DCP on amending the JCD are ongoing.

In addition, DCP has several air use permits, and state and federal air regulations apply to various emission units. The chrome plating processes are subject to 40 CFR Part 63 Subpart A, General Provisions, and Subpart N, the National Emissions Standards for Hazardous Air Pollutants for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (Chrome NESHAP). DCP considers their facility to be a small hard chromium electroplating facility, under the NESHAP, and they plate in open surface chrome tanks. They also have a large batch vapor degreaser, which is subject to 40 CFR Part 63 Subpart T, the National Emissions Standards for Halogenated Solvent Cleaning. Additionally, 40 CFR Part 63 Subpart WWWWWW, the NESHAP for Area Source Standards for Plating and Polishing Operations applies to their nickel plating and cadmium plating processes, but AQD does not have delegated authority from the Environmental Protection Agency to regulate this Area Source MACT. They have a small emergency generator onsite, which is exempt from the requirement of Rule 201 to obtain a permit to install (PTI). The generator may be subject to 40 CFR Part 63, Subpart ZZZZ, the National Emissions Standards for Stationary Reciprocating Internal Combustion Engines, also known as the RICE MACT, but AQD does not have delegation of authority for this Area Source MACT standard.

Fee status:

Because it is subject to a MACT standard (the chromium NESHAP), DCP is classified as a Category III fee source, and pays $250.00 annually to the AQD. The facility reports each year to the Michigan Air Emission Reporting System, though the company expressed interest, in May 2014, in being removed from MAERS. AQD's Emissions Reporting & Assessment (ERA) Unit has indicated that statewide, about 2/3 of chrome platers report to MAERS, and the decision is typically left to the AQD district offices. Facilities with past compliance issues are usually required to report to MAERS.

Location:

The facility is located on the south side of the City of Howell. It was established in 1954. Immediately north of the plant are a DCP parking lot, and some residences. To the immediate east are additional residences. To the west is a community park, and a residential area. To the south is the CSX railroad line, with industrial and commercial facilities to the south and southeast.

Recent history:

In 2013, DCP reportedly tried at least 2 surfactants free of perfluorooctane sulfonic acid (PFOS), to see if either one could reduce the generation of chromic acid mist, while providing product quality for their plated parts. The purpose of reducing chromic acid mist would be to reduce the amount of chromic acid condensing in rooftop ductwork, and thereby reduce potential for leaks from the ducts. However, they reported that during the winter of 2013-2014, they discovered that the most promising of the two surfactants had some product quality issues which they could not resolve, and it was discontinued. They have explained that they began trying other surfactants at this point, to find one that would not have negative impacts on the quality of their work. The chrome plating NESHAP prohibits use of surfactants which contain PFOS, after 9/21/2015.

Arrival:

This was not an unannounced inspection. I had called Mr. John Wagner, Director - Health, Safety, & Environmental Affairs, this morning, to see if DCP staff would be available to take me through the plant today. This was done to avoid making a wasted trip, due to limited time and resources for completing inspections. I arrived at 11:05 AM. No visible emissions were detected coming from the exhaust stacks of scrubbers 3 and 4, or the cooling tower, as viewed from the parking lot immediately northwest of DCP. No odors were detectable. Weather conditions were cloudy, humid, and 66 degrees F, with no breeze.

I signed in at the plant, and I met with Mr. Wagner. I provided him with a copy of the DEQ brochure *Environmental Inspections: Rights and Responsibilities*, per AQD procedure. I obtained a DCP brochure (please see attachment A) which identifies 2014 as their 60th year of operation.

Discussion of recent changes to chrome plating lines:

Chrome plating departments 1 and 2 are served by scrubbers #4 and 3, respectively. Scrubber #4 is the north one on the east roof, while #3 is to the south. Chrome plating department 3 is served by scrubber #5. Scrubber #6 is not in use, but is kept onsite, in case it is ever needed again. Mr. Wagner explained that there have been a number of recent changes to their chrome plating lines, which are summarized below:

a.) Chrome plating tank no. 8 ductwork:

Tank no. 8 has historically been served by scrubber #4, the north scrubber. According to their quarterly Compliance Progress Report for the period 4/15 through 7/15/2014, on 6/21/2014 they removed the ductwork connecting tank no. 8 to scrubber #4, and replaced it with ductwork connecting to scrubber #3. This change was done to balance their scrubber systems. They felt there had been more of a load on scrubber #4, though they do not believe that this affected the scrubber's performance.

This change was brought to the attention of AQD by the quarterly Compliance Progress Report. AQD was not informed in advance. Rule 285(b) allows for "changes in a process or process equipment which do not involve installing, constructing, or reconstructing an emission unit, and which does not involve any meaningful change in the quality and nature or any meaningful increase in the quantity of the emission of an air contaminant therefrom." Stack testing of scrubbers #3 and 4 from 9/10 through 9/11/2014 will provide emissions data, which can be checked against permitted emission limits.

b.) Chrome tank no. 5 relocation:

Chrome plating tank no. 5, which originally was located in department 1, has been relocated to the west side of the plant, to department 3. It is now served by scrubber #5. Rule 285(a) allows for the "relocation of process equipment within the same geographical site not involving any change in the quality, nature, quantity, or impact of the emission of an air contaminant therefrom." I asked if scrubber #5 would provide equivalent control to the scrubber #4, which previously served this tank. DCP believes it will be controlled at least as well as before, Mr. Wagner explained, because use of a surfactant is their compliance technique for the tanks in department 3, including the relocated tank 5, and scrubber #5 provides additional control. I asked if the addition of tank 5 to department 3 increases the number of tanks beyond that which the air permit allows. Mr. Wagner indicated that they have less surface area of chromic acid now than scrubber 5 was originally permitted to serve.

AQD was not informed by DCP in advance of this change, but by Water Resources Division's Carla Davidson, during July. She had photographed the relocated tank no. 5, during an inspection on 5/16/2014.

c.) Chrome tank no. 3 relocation:

Chrome plating tank no. 3 has been relocated to where chrome tank no. 5 used to be. It is still served by the same control device as before, scrubber #4. Additionally, tank no. 3 is smaller than no. 5, with less surface area of chromic acid exposed, I was informed. Plus, with the removal of tank 5 to the west side of the plant, department 1 now has reduced surface area for chrome plating, the company explained. No

equipment has been installed where tank no. 3 used to be, I was shown. Again, AQD was not informed in advance of this change, but was informed by WRD's Carla Davidson, following her 5/16/2014 inspection.

d.) Surfactant status:

I was told that in the east plant (Departments 1 and 2), DCP is conducting trials in chrome plating tank no. 12, using a PFOS-free surfactant. DCP feels that the product quality with this surfactant is promising, so far. They indicated that it appears to be reducing bubbles in the chrome finish to their parts, compared with earlier PFOS-free surfactants they tried. Mr. Wagner indicated they are not done with their trials, and are plating a variety of different part configurations and thicknesses, to evaluate the results. Bubbles would be a flaw in the finish of their products, and would not be acceptable quality to their customers, I was informed. Department 3, the west side of the plant, uses the same PFOS-containing surfactant in all its tanks that it has in years past, Mr. Wagner explained.

Inspection:

Chrome plating departments 1 and 2; PTI No. 367-83B:

After discussing the above changes, we walked out onto the plant's east roof. A diagram of the roof ductwork is attached as Attachment B. We observed scrubbers #3 and 4, which had no visible emissions. Weather conditions were roughly 65 degrees F, cloudy, and humid. The scrubbers showed no indications of any chromic acid leaks. There were small traces of rust, rather than chromic acid, where scrubber 3 was attached to a steel framework. At 12:55 PM, scrubber #3 pressure drop was 2.9 inches water column (w.c.), and scrubber #4 pressure drop was 3.3 inches, w.c. Mr. Wagner explained that they check scrubber pressure drop daily.

DCP keeps written logs of the maintenance performed on each scrubber. Copies of these are provided in each DCP quarterly Compliance Progress Report. The submittal for 4/15 through 7/15/2014 showed that:

- The Magnahelic pressure drop gauges were most recently calibrated on 5/14/2014.
- On 6/7, the #2 mesh pad for scrubber #3 was replaced with a clean pad.
- On 6/14, the #2 pad for scrubber #4 was replaced with a clean pad. (The pads are cleaned when they are removed). Each scrubber has 3 stages, each of which receives a mesh pad.

The upper surfaces appeared clean, of all the ductwork which I could see from my vantage point on the scrubber platform, and from the center of the east roof. I looked on the underside of about 1/3 of the rooftop ductwork. My schedule today did not allow for checking every single section on the roof. I first examined sections SH1 to SH15 and beyond; which are identified on the attached diagram of ductwork The only unrepaired leak of chromic acid which I found was on the underside of SH15, where there were dried stains, about one inch across. Substantial side shields or wind baffles along this section of ductwork appeared to offer shelter from wind and/or rain. There was a catch tray underneath the duct, but there was not enough clearance for me to peer into the catch tray, to see if any chromic acid might have collected. Mr. Wagner indicated that the leak would be cleaned and repaired today, and informed Mr. Jerry Chinn, General Manager, of the leak.

In one catch basin a few to several sections north of SH15, I observed a few small puddles, about 12 to 18 inches long, in the catch tray. Mr. Wagner stuck his hand in one of the puddles to show that it was clear water in the tray, and not chromic acid. There was no discoloration to the water that I could see.

Mr. Wagner pointed out that there were no chromic acid stains visible on the asphalt-covered roof.

Mr. Wagner showed me where the sections of ductwork, NH21 through NH24, had been. These sections had once connected the ductwork for chrome plating tank #8 to scrubber #4 (north scrubber). They had been removed so that chrome tank #8 could be routed to scrubber #3 (south scrubber). This allowed them to balance their scrubber system, as scrubber #4 previously had more demand on it. Mr. Wagner explained that as an additional benefit, they have eliminated a long section of ductwork, reducing the

opportunity for leaks. He added that DCP staff have informed him that NH21 through NH24 was their most problematic section of ductwork, for leaks or weeps, to utilize DCP's terminology. DCP did not feel that the extra loading on scrubber #4 in the past had reduced its performance. Where duct NH21 had once connected to a larger piece of ductwork, NH9, was a large patch of PVC plastic. There was no evidence of any leakage.

Mr. Wagner showed me where the duct, V8, for chrome plating tank #8, comes up through the roof and immediately connects with SH10. The ductwork was free of leaks or stains.

On the underside of section NH16, near the east edge of the roof, I could see where stains had been cleaned away, when it had been fixed/repaired at some point in the past. The plastic had a grayish or silver tint to it, and Mr. Wagner explained that it is very difficult to eliminate every trace of discoloration. The underside of sections NH17 through NH19 looked to be clean, from where I stood, on their west side.

On the inside of the plant, I observed the interior ductwork for chrome plating tanks in both the east and west sides of the plant. The interior ductwork for chrome tanks was almost completely painted brown, other than new gray PVC ductwork for chrome tank 6, and some metal overhead ductwork in the west side of the plant which the four chrome tanks of Department 3 connected to. There were few weeps visible on the ductwork, overall. Some dried stains of individual drips were noted, see notes below.

Chrome tank no. 1 was plating. All of the chrome tanks in the plant have pits beneath them, I was informed.

Chrome tank no.2 was plating.

Chrome tank no. 3: This titanium steel tank was recently relocated to where tank no. 5 used to be. Titanium steel is inert against chromic acid, Mr. Wagner explained, and is therefore superior to ordinary steel. He also pointed out that tank no. 5 was the one which DEQ's Bill Yocum had seen removed. The pit beneath tank 5 has historically been a source of concern for the DEQ. It has been reworked, so that it is now shallower. Where tank no. 3 used to be, there is nothing, I was shown. Tank 3 was plating parts, at the time of the inspection.

Chrome tank no. 4 was plating. I examined the brown PVC ductwork for leaks, and did not find any.

Chrome tank no. 6 was not plating any parts at the moment. New, gray PVC ductwork had been installed, where the exhaust is ducted through the roof. On the older PVC ductwork, which is painted brown, there was a single dried trickle of chromic acid. There was a containment system at the base of the exhaust duct, to route any liquid that might make it that far into the pit beneath the tank.

Chrome tank no. 8 was plating. The brown painted ductwork showed a few dried leaks of chromic acid. Any liquid would be routed to the pit beneath it.

Chrome tank no. 9 was not plating. The ductwork, painted brown, appeared clean.

Chrome plating tank no. 11: Tank 11 was plating parts. It is a long, narrow tank in the southeast corner of the east plant. On the attached map of the plant, Attachment C, it is identified as "CR11". Mr. Wagner explained that DCP is trying to save money for a titanium steel tank, to replace the current steel one. This would be done to avoid corrosion and potential leaks of chromic acid, he said, and will cost roughly $100,000.00. The brown PVC ductwork for tank 11 had a single dried leak visible, but there was a recently added containment system at the base of the ductwork,which would route any liquid from the duct to the pit beneath the tank.

Chrome tank no. 12 is the one in which trials with a low foam, PFOS-free surfactant are being conducted. There were no leaks visible on the ductwork for this tank. Parts were being plated in it, at the time of the inspection.

Recordkeeping for tank 12:

On 8/6, per a request I made that day, Mr. Wagner e-mailed me an example of the recordkeeping forms they use to track surface tension on tank 12 (please see Attachment D). This is the same form they use to record surface tension on other tanks at the plant which use surfactant, in Department 3. For tank 12, the form shows that in July, they were conducting trials with a surfactant or fume suppressant, ATOTECH Fumetrol 21 LF 2. They found it to not be acceptable, for their purposes, Mr. Wagner explained. Notes on the form indicate that an initial tension reading was 72 dynes/cm, prior to their adding 3 liters of the fume suppressant. The surface tension reading on 7/1 was then found to be 57 dynes. This is not a violation of the chromium NESHAP surface tension limit. Although this limit is currently 35 dynes/cm (it will be 33 dynes/cm on and after 9/19/2014), surface tension is not the compliance option DCP chose for this tank, so the limit does not apply.

As indicated in Mr. Wagner's 8/6 e-mail (which is attached to the recordkeeping form for tank 12, i.e. Attachment E to this report)):

1. DCP removed some of this surfactant from the plating bat,h by plating with dummy parts, but this process was somewhat slow.
2. DCP then removed 300 gallons of plating solution, around 7/29, to be disposed of as hazardous waste.
3. DCP added fresh plating solution, to replace the removed volume.

I was informed that they then began trials with another surfactant, which is the one they are currently using. .

Mr. Wagner informed me that about a month ago, they had conducted an unofficial stack test, to evaluate where they are with regard to their emission limits for the plating lines on the east side of the plant. The results were described to me as less than 10% of the allowable level. They are planning on stack testing scrubbers #3 and 4 in September, Mr. Wagner explained, and are preparing a stack test protocol to submit to AQD, as soon as possible. The protocol will be reviewed by AQD's Technical programs Unit. He added that he had recently spoken with AQD's Tom Maza, when Tom was presenting a webinar on stack testing. Mr. Wagner said he found his expertise on technical matters to be very valuable. Based on their discussion, Mr. Wagner informed me that DCP will conduct plating on dummy parts during the upcoming testing, so they can run at a high normal load, what AQD district staff would call "maximum routine operating conditions."

Chrome plating department 3; PTI No. 386-85A:

The west side of the plant is served by scrubber #5. Chrome plating tank no. 5 has recently been relocated there, and is now one of four tanks in use. All four tanks are using the same PFOS-containing surfactant which Department 3 has used during recent years, Mr. Wagner said. There is a shared containment pit for all of the tanks in this department, I was informed. Scrubber #5 pressure drop was 2.8-2.9 inches, w.c.

Tank no. 5 was plating, at this time. The ductwork appeared to be clean.

Tank 7 was not plating. A couple trickles of chromic acid were visible. Mr. Huckaby demonstrated that they were dried stains, by touching the stains with his hand.

Tank no. 15 was not plating. It is a titanium tank. The vertical ductwork, painted brown, appeared to be clean, with no signs of leaks. Overhead, a large, unpainted metal horizontal section of ductwork showed chromic acid stains, but I was informed these stains were old.

Tank.no. 17 was not plating. No leaks were visible on the brown ductwork.

Recordkeeping for tanks 5, 7, 15, and 17:

On 8/6, Mr. Wagner e-mailed me copies of the July 2014 recordkeeping for each of tanks 5, 7, 15, and 17

(please see Attachment E). For the month of July, all four tanks were at or below 35 dynes/cm. The current limit in the chromium NESHAP is no greater than 35 dynes/cm, as measured with a tensiometer, but the limit will become no greater than 33 dynes/cm, on and after 9/19/2014. As noted previously in this report, 9/19 is the implementation date for Section 343 (Compliance Provisions) in the revised chromium NESHAP, which was published in the Federal Register on 9/19/2012.

No sand blasting was taking place in the small sand blast booths near scrubber #5.

Chrome plating tanks 19-21 and scrubber system 6; PTI No. 386-85A:

The PBS/CMP scrubber system 6 is not in use, nor were the chrome plating tanks (numbers 19-21) associated with it.

Batch vapor degreaser; Rule 285(r), and 40 CFR Part 63 Subpart T:

I did not observe the vapor degreaser during this inspection. It uses TCE and is therefore subject to the National Emissions Standards for Halogenated Solvent Cleaning. In the past, Mr. Tom Poplawski, Lab manager, had explained that they monitor and record the drop speed, wind speed, and dwell time. The drop speed or hoist speed was said to be constant, except for a pause when parts removed from the degreaser are allowed to drip, over the unit. The wind speed in that part of the plant was described as 10-15 feet per minute, except when a fan is used in a nearby work area, and the speed is about 20 feet per minute. I e-mailed Mr. Wagner after the inspection, on 8/6, to verify that the above practices are still the same for 2014, and to request a copy of recent recordkeeping.

Mr. Wagner scanned and e-mailed records for the vapor degreaser on 8/6 (please see Attachment F). The records indicated freeboard temperature was less than the required 30% of the solution temperature (189 degrees F). The NESHAP requires the chilled air blanket to be less than 30% of the boiling point of the solvent. The hoist speed was less than the maximum allowable hoist speed of 11 feet per minute. The highest reading weekly reading was 9.44 feet per minute, with 9.2 being the norm. The dwell time, according to the forms, is 85.6 seconds, minimum. On each date measured from 6/16 to 8/4/2014, the dwell time was either 95 or 96 seconds.

Metal cleaning and electroless nickel plating operation with scrubber, PTI No. 673-88:

The nickel scrubber is physically located outside of the plant, on the south side, and has a conical exhaust outlet. From atop the plant's east roof, looking south, I could see a thin, faint plume of some kind of emissions from the scrubber exhaust. The plume gradually faded after about 10-15 feet. At 1:30 PM, weather conditions were about 65 degrees F and mostly cloudy, with winds out of the northwest around 5-10 miles per hour. I could not tell if I was seeing steam, or some other liquid in the form of a mist. Mr. Wagner believed this was water, as their nickel plating baths are heated. I was looking south, towards the mostly obscured sun, so this was not a proper angle for visible emission reading.

Later, at ground level, to the south of the plant, I could not see any visible emissions. Mr. Monroe Huckaby accompanied us. He explained that the nickel plating tanks are 190 degrees F, and so are the hottest plating baths at the plant. He felt that water vapor was most likely what I had seen earlier.

40 CFR Part 63 Subpart WWWWWW, the NESHAP for Area Source Standards for Plating and Polishing Operations applies to their nickel plating processes, but AQD does not have delegated authority from the Environmental Protection Agency to regulate this Area Source MACT.

Cadmium plating line (two tanks) with wet scrubber, PTI No. 675-88:

The cadmium scrubber is located inside the plant. Some of the ductwork extends outside of the plant, for a short, horizontal run, which was pointed out to me. The scrubber exhaust is atop the roof of the east plant, and could not be seen from ground level, or from atop the east roof of the plant, as the view was blocked by other ductwork. However, there were no visible emissions seen from this area of the roofline.

Inside the plant, we did not approach the cadmium plating tanks themselves, as additional personal protective gear (respirators) would be needed.

40 CFR Part 63 Subpart WWWWWW, the NESHAP for Area Source Standards for Plating and Polishing Operations applies to their cadmium plating processes, but AQD does not have delegated authority from the Environmental Protection Agency to regulate this Area Source MACT.

Two alkaline chrome strip tanks; PTI 676-88:

While up on the roof, Mr. Wagner and I observed two exhaust stacks near a windowed dormer, neither of which had any visible emissions. I could not identify the small stack, but the thicker diameter stack appears to me to be the exhaust for the alkaline strip tanks, S-1 and S-2. Their exhaust passes through an in-line mesh pad, before being released to the atmosphere. Mr. Wagner indicated that DCP plans to have the various stacks on the roof labeled, for ease in identification.

Strip tanks which exhaust indoors; Rule 285(r)

I observed one of the two strip tanks at DCP which exhaust into the general, in-plant atmosphere, rather than through the roof. There were no visible emissions.

Cooling tower, PTI No. 677-88:

There were no visible emissions from the cooling tower.

6 electric ovens; Rule 282(a):

These are used to heat parts, to remove helium.

I left the site at 3:14 PM.

Conclusion:

I did not identify any new violations at DCP today. The reason the compliance status of DCP is identified as "noncompliance" for this report is because of past violations of Rule 910 for scrubbers #3 and 4, which have not yet been resolved. However, DCP and AQD are working to address these issues, through an amended Joint Consent Decree.

On 9/19/2014, changes made to the chromium NESHAP in 2012 will be implemented. The chrome emission limit for open chrome plating tanks at small hard chromium electroplaters will change from 0.03 g/dscm to 0.015 g/dscm, and the surface tension limit for chrome platers using a surfactant as their compliance option will change from a maximum of 35 dynes/cm to 33 dynes/cm. DCP will be stack testing scrubbers #3 and 4 on 9/10-11/2014, to determine compliance with the NESHAP emission limit. It does not appear that scrubber #5 is required to undergo stack testing, under the NESHAP, as the compliance option for that scrubber is measuring surface tension. However, in the future, AQD would like to see stack testing conducted on scrubber #5. If scrubber #6 is made operational in the future, AQD would require stack testing, and a permit application.

NAME [signature] DATE 10/16/2014 SUPERVISOR [signature]