



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

October 26, 2016

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Mr. John Wagner, PE, REM, CSP  
Director Health, Safety & Environmental Affairs  
Diamond Chrome Plating, Incorporated  
604 South Michigan Avenue  
P.O. Box 557  
Howell, Michigan 48844

SRN: A2931, Livingston County  
VN-006809  
FACD Case No. 03-1862-CE

Dear Mr. Wagner:

**VIOLATION NOTICE**

On September 19, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Diamond Chrome Plating, Incorporated (DCP) located at 604 South Michigan Avenue, Howell. The purpose of this inspection was to determine DCP'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 (Act 451); the Air Pollution Control Rules; the conditions of your air use permits, and the First Amended Consent Decree (FACD) Case No. 03-1862-CE. This letter also provides notice of violations found during review of the second quarter Roof Area Inspection Form submitted on August 19, 2016, via electronic mail for failure to comply with the requirements of your National Pollutant Discharge Elimination System (NPDES) Permit No. MI0058204, issued under authority of Part 31, Waters Resources Protection, of Act 451, and the FACD.

Violations found during the inspection and review of the Roof Area Inspection Form (RAIF) are summarized as follows:

Date	Description	Rule/Permit Condition Violated	Violation
5/31/16	Weep between SH7 and SH8	FACD Paragraph 5.4(a); NPDES Permit Part I.B.1.	No repair or time and date of completion recorded on RAIF.
5/23/16	Weep at sections SH6 and SH7	FACD, Paragraphs 5.3(b) and 5.4(a); NPDES Permit Part I.B.1.	Duct identification numbers and time and date of cleaning and repair not recorded on RAIF.
5/17/16	Weep at SH19	FACD Paragraph 5.4(a); NPDES Permit Part I.B.1.	No repair or time and date of completion recorded on RAIF.
4/5/16	Weep at V8 drop	FACD Paragraph 5.4(a); NPDES Permit Part I.B.1.	No time of repair noted on RAIF.
3/31/16	Weep, joint between SH15 and SH16	FACD Paragraph 5.4(a); NPDES Permit Part I.B.1.	No time of repair noted on RAIF.

During the inspection, we discussed the Roof Area Inspection Forms for the second quarter of 2016, which were submitted to the AQD on August 19, 2016. The forms referenced a "weep" discovered on May 23, 2016, but did not identify which section or sections of ductwork were involved. Additionally, the follow up actions (cleaning and repair), and the date on which they took place, were not identified. This constitutes a violation of Paragraph 5.3(b) of the FACD, which states, in part:

"On and after the effective date, Defendant shall inspect all ductwork and control equipment at the Property each day the Facility is in production to identify any release of an air contaminant to the environment that fails to be appropriately conveyed to the control equipment for control and removal. All releases must be repaired within forty-eight (48) hours of being identified. Defendant shall conduct and maintain at the Property a written record that identifies the person(s) conducting the required inspection, any release(s) identified during the inspection, the ductwork segment for each release identified, and the date any release is repaired."

During the course of the inspection, the missing data was located, and was entered by DCP on the original copy of the Roof Area Inspection Form for the date May 23, 2016. A copy was provided to AQD prior to the conclusion of the inspection; therefore, no further action on the part of DCP is needed to resolve this violation.

Please be aware that the above violation may be considered to be the first of the three instances specified under Paragraph 5.3(c) of the FACD which could impose a requirement to install demisters or other control technology. Paragraph 5.3(c) reads, in part:

"If the MDEQ identifies on three (3) separate dates within any three (3) year period that releases from the ductwork were not identified, documented, or repaired as required under Paragraph 5.3(b), within ninety (90) days of receiving written notice from MDEQ of the violation, Defendant shall submit evidence to the AQD Project Coordinator that it has (i) installed demisters on all chrome plating processes (tanks) associated with the ductwork where the release was identified; (ii) is using surfactants on all chrome plating processes (tanks) associated with the ductwork where the release was identified; or (iii) replaced all ductwork for the chrome plating processes associated with the releases. Defendant may propose an alternative control technology besides the three (3) listed in this Paragraph pursuant to Section XXIII (Modification). MDEQ shall notify Defendant in writing upon discovery of any release that was not identified, documented or repaired as required under Paragraph 5.3(b)."

Similar violations are noted under Part 31 of Act 451 for failure to comply with NPDES Permit No. MI0058204, which incorporates Diamond Chrome Plating's approved Storm Water Pollution Prevention Plan as part of the permit. The SWPPP includes daily inspections using the Roof Area Inspection Form, which directs the inspector to note the day and time of the completed action. As noted above, a weep was identified on May 23, 2016, but no duct designation was recorded as required. No repair was noted or time and date of completion as required. A small weep needing a weld repair is noted as needed at SH19 on May 17, 2016, but no repair or time and date of completion were noted as required. Further, repairs and their times and dates of completed repairs were not recorded on the Roof Area Inspection form for weeps discovered on March 31, 2016, and April 5, 2016. In the future please ensure that all weeps/leaks are documented, including complete records of repairs conducted (i.e. description of repair including time and date), as required in your NPDES permit.

If DCP 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 AQD's inspection of DCP. If you have any questions regarding the violations, please contact us at the telephone numbers listed below.

Sincerely,



Stephanie Kammer  
District Supervisor  
Water Resources Division  
517-897-1597



Daniel A. McGeen  
Environmental Quality Analyst  
Air Quality Division  
517-284-6638

DAM:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Robert Wagner, DEQ  
Ms. Angela Brown, DEQ  
Mr. Richard Kuhl, DAG  
Mr. Malcolm Mead-O'Brien, DEQ  
Ms. Rebecca Taylor, DEQ  
Mr. Bryan Grochowski, DEQ  
Ms. Carla Davidson, DEQ  
Mr. Brad Myott, DEQ