



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING DISTRICT OFFICE

**EGLE**  
LIESL EICHLER CLARK  
DIRECTOR

September 3, 2019

Mr. Scott Wright, Environmental Manager  
Diamond Chrome Plating Incorporated  
604 South Michigan Avenue, P.O. Box 557  
Howell, Michigan 48844

SRN: A2931, Livingston County

Dear Mr. Wright:

**VIOLATION NOTICE**

On August 1, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), reviewed a Halogenated Solvent Cleaner NESHAP Exceedance Report which was submitted on July 31, 2019, by Diamond Chrome Plating Incorporated (DCP) located at 604 South Michigan Avenue, Howell, Michigan. The purpose of this review was to determine DCPs 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; and 40 CFR Part 63, Subpart T, National Emissions Standards for Halogenated Solvent Cleaning.

During the review of the exceedance report, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
BACT-72A batch vapor degreaser	40 CFR Part 63, Subpart T, Section 63.463(e)(2)(i).	Freeboard refrigeration device temperature exceedances reported in semi-annual exceedance report for April 1, 2019 to June 30, 2019

DCP's Bact-72A batch vapor degreaser, which uses the halogenated solvent trichloroethylene, is subject to the federal National Emissions Standards for Halogenated Solvent Cleaning.

Section 63.463(e)(2)(i) states:

(i) If a freeboard refrigeration device is used to comply with these standards, the owner or operator shall ensure that the chilled air blanket temperature (in °F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.

In the 2<sup>nd</sup> Quarter 2019 Halogenated Solvent Cleaner NESHAP Exceedance Report submitted by DCP on July 31, 2019, DCP identified 7 temperature exceedances of the water jacket or freeboard refrigeration device (FRD), for the BACT-72A, between May 1, 2019 and June 30, 2019.

Mr. Scott Wright  
Diamond Chrome Plating, Incorporated  
Page 2  
September 3, 2019

AQD understands that DCP is using as a regulatory limit 30 percent of the boiling point of TCE. With a boiling point of 188.06 °F, the regulatory limit of 30% equates to 56.4 °F.

The above exceedances of the FRD temperature limit constitute a violation of Subpart T, Section 63.463(e)(2)(i).

The 2<sup>nd</sup> Quarter 2019 Halogenated Solvent Cleaner NESHAP Exceedance Report, indicates that several actions were taken to address the temperature exceedances. Please provide an update as to the results of these actions, including if purchase was made of a new temperature probe, based on any investigation of the existing temperature probe. Please also provide a listing of the 7 dates on which exceedances took place, and what the temperatures of those exceedances were.

Please submit the written response to EGLE, AQD, Lansing District, at Constitution Hall, 525 West Allegan, First Floor South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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 violation cited above and for the cooperation that was extended to me during my inspection of DCP, Inc.. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Brian Negele, DAG  
Mr. Brad Myott, EGLE  
Mr. Dennis Eagle, EGLE  
Ms. Rebecca Taylor, EGLE  
Ms. Carla Davidson, EGLE  
Mr. Bryan Grochowski, EGLE