



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 30, 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 October 17, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Diamond Chrome Plating, Incorporated (DCP) located at 604 South Michigan Avenue, Howell, Michigan. 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; 40 CFR Part 63, Subpart T, National Emissions Standards for Halogenated Solvent Cleaning, and the First Amended Consent Decree (FACD), Case No. 03-1862 CE.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
BACT-72A vapor degreaser	Michigan Air Pollution Control Rule 201	Rule 285(2)(r)(iv) exemption has not been met, because emissions are not remaining within in-plant environment.
BACT-72A vapor degreaser	Michigan Air Pollution Control Rule 910	Air cleaning device was not properly installed, maintained, or operated.
BACT-72A vapor degreaser	40 CFR Part 63, Subpart T, Section 63.463(e)(iii)(A)	A gap of over one inch was identified between the working mode cover and the degreaser.
BACT-72A vapor degreaser	40 CFR Part 63, Subpart T, Section 63.463(e)(iii)(B)	The gap between the working mode cover and the degreaser constitutes a defect.
Chrome plating ductwork atop west plant roof	First Amended Consent Decree, Paragraph 5.3(b)	Date of repair to ductwork was not clearly identified for Roof Area Inspection Forms for leak discovered on 4/29/2019

Michigan Air Pollution Control Rule 201 requires that an air use permit to install (PTI) be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

The BACT-72A vapor degreaser was installed and operated in late November 2018, under the Rule 285(2)(r)(iv) exemption from the requirements of Rule 201. This exemption reads as follows:

- (r) Equipment used for any of the following metal treatment processes if the process emissions are only released into the general in-plant environment:
- (iv) Cleaning.

Since March of 2019, DCP and DCP's consulting firm, BB&E, have conducted numerous sampling activities to check for the presence of TCE vapors both onsite and offsite. Data from the analysis of air samples has been submitted to EGLE's Remediation and Redevelopment Division (RRD), as well as the AQD, for review. Following review of the most recently received data, which was submitted to EGLE on September 27, 2019, it has been determined by the AQD and the RRD, that TCE emissions are escaping the in-plant environment.

Because TCE emissions from the vapor degreaser are not remaining within the general in-plant environment, the degreaser cannot meet the exemption criteria of Rule 285(2)(r)(iv). Therefore, the degreaser cannot be considered exempt, and this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the vapor degreaser. An application form is available by request, or at the following website: [www.michigan.gov/air](http://www.michigan.gov/air) (in the shaded box on the upper right-hand side of the page).

During the inspection conducted by the AQD on October 17, 2019, staff observed operation of the BACT-72A vapor degreaser, while examples of parts were being cleaned. The built-in roof of the parts basket, which had been lowered into the degreaser, was functioning as the working mode cover of the degreaser. However, there was a gap of more than an inch between the working mode cover and the degreaser itself. It is my understanding that DCP intends to cover or seal this opening with a TCE-resistant material.

The cover is intended to function as one of the air pollution controls for the degreaser, but the gap between cover and degreaser appeared to be a source of fugitive TCE emissions. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner, and in accordance with the administrative rules and existing law.

Additionally, 40 CFR Part 63, Subpart T, Section 63.463(e)(iii)(A) requires the following:

- (iii) If a working-mode cover is used to comply with these standards, the owner or operator shall comply with the requirements specified in paragraphs (e)(2)(iii)(A) and (e)(2)(iii)(B) of this section.

(A) Ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.

The gap between the working mode cover and the vapor degreaser indicates that it does not completely cover all cleaning machine openings when closed. This is a violation of Section 63.463(e)(iii)(A).

Furthermore, 40 CFR Part 63, Subpart T, Section 63.463 (e)(iii)(B) requires the following:

(iii) If a working-mode cover is used to comply with these standards, the owner or operator shall comply with the requirements specified in paragraphs (e)(2)(iii)(A) and (e)(2)(iii)(B) of this section.

(B) Ensure that the working-mode cover is maintained free of cracks, holes, and other defects.

The gap between the working mode cover and the vapor degreaser is considered by the AQD to be a defect with the cover. This is a violation of Section 63.463(e)(iii)(B).

Lastly, the AQD has reviewed the Second Quarter 2019 Roof Area Inspection Forms (RAIF) for the west plant roof. The entry for April 29, 2019 states, "roof duct was cracked and rain water got in and caused chrome leak. It was repaired." The form field for the completed action was left blank and did not specify the date of repair. This is a violation of the FACD, Paragraph 5.3(b), 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, and release(s) identified during the inspection, the ductwork segment for each release identified, and the date any release is repaired."

Due to these multi-media concerns, a meeting between DCP, BB&E, RRD, WRD, and AQD is recommended, to facilitate discussion. A tentative meeting date has been selected at Constitution Hall on November 18, 2019, at 1:00 PM. Please contact the AQD, at your earliest convenience, to confirm whether or not DCP and BB&E representatives will be able to attend.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 11, 2019. 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.

Mr. Scott Wright  
Diamond Chrome Plating, Incorporated  
Page 4  
October 30, 2019

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 violations cited above and for the cooperation that was extended to me during my inspection of DCP. If you have any questions regarding the violations 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: Mr. Matt Bolang, Livingston County Health Department  
Ms. Lisa Quiggle, MDHHS  
Mr. Aaron Cooch, MDHHS  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE Mr.  
Christopher Ethridge, EGLE Mr.  
Brad Myott, EGLE  
Mr. Dennis Eagle, RRD  
Mr. David LaBrecque, RRD Ms.  
Rebecca Taylor, RRD  
Ms. Vicki Katko, RRD  
Ms. Carla Davidson, WRD  
Mr. Bryan Grochowski, MMD  
Mr. Brian Negele, DAG