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

A594845410

FACILITY: MORSE HEMCO INC		**SRN / ID:** A5948
LOCATION: 455 DOUGLAS AVE, HOLLAND		**DISTRICT:** Grand Rapids
CITY: HOLLAND		**COUNTY:** OTTAWA
CONTACT: Renee Wilson , Human Resources		**ACTIVITY DATE:** 07/17/2018
STAFF: Tyler Salamasick	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** MINOR
SUBJECT: FY 2018 Chrome plating inspection. Unannounced.		
RESOLVED COMPLAINTS:		

Clean Air Act Inspection report for Morse Hemco Inc., Holland, Michigan

Background information

Morse Hemco Inc. is a manufacturer of inspection gauges. The facility is a high precision, low tolerance parts shop. The primary activity carried out at the facility is machining with chrome coating of parts.

Introduction and purpose

On July 17 2018 Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division conducted an unannounced, scheduled inspection of Morse Hemco Inc. The MDEQ inspected the facility located at 455 Douglas Ave, Holland, Michigan. The purpose of the 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 (Act 451); and the Air Pollution Control Rules.

Facility Location

The facility is located in a small industrial park with surrounding residential structures. The nearest residential structure is located approximately 500 feet west of the facility. Morse Hemco is approximately 1400 feet north west of Lake Macatawa.

Compliance History

The MDEQ AQD has not received any recent complaints pertaining to Morse and has not issued any recent violation notices. The facility was previously inspected in 2012 and 2008 and was found to be in compliance at that time. The facility was recommended for enforcement in 1998 for violating 40 CFR Part 63 Subpart N. The facility had also been issued a violation for surface tension exceedances in 2006 for exceeding the 35 dyne limit (this limit has since been lowered to 33 dynes).

Observations and facility processes

AQD staff met with Renee Wilson, Human Resources, and Steve Bush, Plant Manager. Upon meeting AQD staff presented their identification and informed the representative of the intent of the inspection. The facility representative agreed to show the MDEQ the facility and its processes. Steve explained how and what products are made at Morse Hemco Inc.

The facility produces inspection gauges starting with blanks or rod. The large majority of the facility is designated to various different metal processing stations. The facility has multiple CNC machines, cutting areas and grinding wheels.

The parts are machined into various different shapes and diameters at different stations. The CNC machines, which includes milling and CNC EDM (electrical discharge machining) are internally exhausted through a filtration system. The lathes, mills, annealing and hand cutting are also internally exhausted. The facility has a sand blaster which is internally vented.

The parts are chrome coated at the chrome coating area, located at the north west most corner of the building. While in the chrome coating area, I observed the chrome tanks and the exterior of the building at the exhaust point. While in the coating area I observed a significant amount of staining on the ground as well as staining of the side of the dip tanks. I could not determine if the staining was from recent spills or if it was historic.

After observing the chrome coating, Steve showed me the inspecting area. The inspection area is used to check tolerance of parts, inspect threads and certify parts. This area did not appear to have any processes that generated a significant amount of air contaminants.

Regulatory analysis and compliance evaluation

Facility emission category

Morse Hemco Inc. is a minor source of particulate matter (PM) and hazardous air pollutants (HAPs). The HAP of interest is hexavalent chrome (chrome). The facility's chrome coating line is grand father from AQD permitting requirements and as a result did not require a permit to install per the requirements of Rule 201. The other equipment at the facility that emits air contaminants are minor and are exempt from permitting.

Source Wide Conditions

Morse Hemco does not have permits with source wide conditions that restrict the facility's potential to emit.

Federal Regulations

The chrome coating line is subject to 40 CFR Part 63 subpart N the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

NESHAP 40 CFR Part 60 Subpart N

The NESHAP requires that Morse Hemco's tank surface tension be maintained below 33 dynes/cm as measured by a tensiometer. Renee provided me with a copy of the records for the seven tanks at the facility. The records indicated that the tanks are maintained at approximately 30 dynes, fairly consistently. The normal range fluctuate by approximately 1 dyne. The records did indicate a total of 5 exceedances in a 2 year period. The records did not however indicate an increase in the frequency of testing after the exceedances, as required by the NESHAP.

The NESHAP requires that after September 21, 2015 the owner or operator shall not add PFOS-based fume suppressants to any affected tanks. Renee provided me with an SDS that indicated the material was PF free, but the product information only stated that the material consists of 1%-5% halogenated aliphatic acid.

Under the housekeeping practices section of the NESHAP it is required that the facility must clean up any spills within 1 hour of the occurrence. It is also required that the facility clean the surfaces within storage areas, open floor areas and walkaways around the tank that are contaminated with hexavalent chromium and the tanks. At the time of my inspection, as discussed above, there was a significant amount of staining on the ground and on the tanks in the plating areas. The facility should implement better housekeeping practices as required by table 2 in the NESHAP.

Exempt processes

The sandblasting equipment appears to be exempt from Rule 201 requirements to obtain a permit pursuant to Rule 285(2)(l)(vi)(B).

The different machining processes appear to be exempt from Rule 201 requirements to obtain a permit pursuant to Rule 285(2)(l)(i), Rule 285(2)(l)(vi)(C) and Rule 285(2)(l)(vi)(B).

Discussion

Concerns: The facility did appear to have some housekeeping issues and should implement a more intensive cleaning program especially as it pertains to spills, historic or recent. The facility also exceeded the dyne requirements as set by the NESHAP. As presented in the facility's records, they also failed to increase the dyne monitoring frequency as describe in the NESHAP. The facility violated the dyne limits in the past and had been recommended for enforcement for the previous excursions.

Compliance statement: It appears that Morse Hemco Inc. is not in 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. Morse Hemco is in violation of the 40 CFR Part 63 Subpart N- National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. The facility has been in violation of the chrome NESHAP in the past and will be issued a violation notice seeking to resolve the non-compliance with the NESHAP.

NAME  DATE 8/22/18 SUPERVISOR