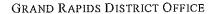


## STATE OF MICHIGAN

## DEPARTMENT OF ENVIRONMENTAL QUALITY





August 24, 2018

Ms. Renee Wilson Morse Hemco Inc. 455 Douglas Avenue Holland, Michigan 49424

SRN: A5948, Ottawa County

Dear Ms. Wilson:

## **VIOLATION NOTICE**

On July 17, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Morse Hemco Inc. located at 455 Douglas Avenue, Holland, Michigan. The purpose of this inspection was to determine Morse Hemco Inc.'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; the Air Pollution Control Rules; and 40 CFR Part 63, Subpart N.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Chromium plating	40 CFR Part 63, Subpart N (40 CFR 63.342(c)(1)(iii))	Chrome tanks exceeded the 33 dyne/cm requirement.
Chromium plating	40 CFR Part 63, Subpart N (40 CFR 63.343(c)(5)(ii))	Failed to increase surface tension monitoring frequency after exceeding dyne limit.
Chromium plating	40 CFR Part 63, Subpart N (40 CFR 63.342, Table 2)	General housekeeping needs to be improved.

This process is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. These standards are found in 40 CFR Part 63, Subpart N.

The NESHAP requires that Morse Hemco Inc.'s tank surface tension be maintained below 33 dynes/cm as measured by a tensiometer. The facility exceeded the limit at a minimum of five (5) times in a two (2) year period. The records also did not indicate an increase in the frequency of testing after the exceedances, as required by the NESHAP.

Under the housekeeping practices section of the NESHAP, it is required that the facility must clean up any spills within one (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. 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.

Ms. Renee Wilson Morse Hemco Inc. Page 2 August 24, 2018

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 14, 2018 (which coincides with 21 calendar days from the date of this letter). 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.

Please submit the written response to the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Morse Hemco Inc. 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 Morse Hemco Inc. 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,

Tyler Salamasick 🔑

**Environmental Quality Analyst** 

Air Quality Division

616 558-1281

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ

Mr. Craig Fitzner, DEQ

Mr. Christopher Ethridge, DEQ Ms. Jenine Camilleri, DEQ Ms. Heidi Hollenbach, DEQ