

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

B262941753

FACILITY: MARSH PLATING - WILLOW RUN		SRN / ID: B2629
LOCATION: 2800 TYLER RD, YPSILANTI TWP		DISTRICT: Jackson
CITY: YPSILANTI TWP		COUNTY: WASHTENAW
CONTACT: Mitch Marsh		ACTIVITY DATE: 08/08/2017
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Inspection of PTI 40-16 for an electroless nickel plating line.		
RESOLVED COMPLAINTS:		

Contact

Mitch Marsh
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734-904-1971

Don Jones
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248-330-0148

Purpose

This was a scheduled inspection to determine compliance with Permit to Install (PTI) 40-16 for an electroless nickel plating line and associated exhaust equipment. I arrived on site at about 11:00am on 8/8/17 and met with Mitch and Don.

Background

This facility is the former site of Peerless Industries, which to date still has active PTI 483-81 for a degreaser associated with SRN B2629.

Marsh Plating acquired the property and has installed the plating operation described in PTI 40-16. The initial notification required by the National Emission Standard for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 63, Subpart W (6W) for plating and polishing operations was submitted to AQD Jackson and EPA. The Air Quality Division (AQD) does not have delegation of this regulation, however, identified that it is subject during permit review. The facility will demonstrate compliance with Subpart 6W by installation of control devices and management practices.

The facility is currently operating only a portion of the equipment originally included in the application, with plans to continue to expand production capabilities.

Compliance Evaluation

FGZINCPLATE

This is the flexible group (FG) that encompasses the entire operation and includes the emission units EUCLEANACID, EUACIDZINC-NI, and EUALKALINEZINC-NI. Each emission unit area is routed to its own wet scrubber, which are identified as Fume Scrubber #1, #2, and #3 (see image attached). They are maintained in accordance with the facility Malfunction Abatement Plan (MAP), which was submitted on 8/29/2017 (see MAP attached).

I observed magnehelix gauges installed for each fume scrubber while on site as required by Special Condition IV.2.

OTHER

While on site Mitch pointed out a brand new, empty storage tank. Upon expansion of operations, he plans to use

this tank for bulk storage of waste hydrochloric acid (HCl). Initial estimates have shown that the HCl may exceed the allowable concentration identified in PTI exemption Rule 284(2)(h)(iv) for HCl of 11% by weight. Mitch has included a calculation for uncontrolled emission estimates of HCl from the tank, which would appear to meet conditions of Rule 290. Once the tank begins use as an acid storage tank for HCl, associated Rule 290 records will need to be maintained on site.

Summary

After arrival on site, Mitch, Don, and I walked around the facility. There appeared to be plenty of open area for future expansion on the property. I observed the plating line, which Mitch indicated was running about 4 racks per hour. The Magnehelix gauges are installed inside the facility and easily accessible. We then headed to the roof to observe the three (3) scrubber units. They all appeared to be quite new and in good working order.

Compliance Evaluation

Following on site inspection, I have determined that the facility is in compliance with state and federal air rules and regulations and PTI 40-16.

Recommendations

PTI 483-81 has been voided as of 10/11/2017 since the degreaser is no longer physically located at the facility.

I also recommend that the facility begin to keep records in accordance with Rule 290 upon operation of the HCl storage tank.

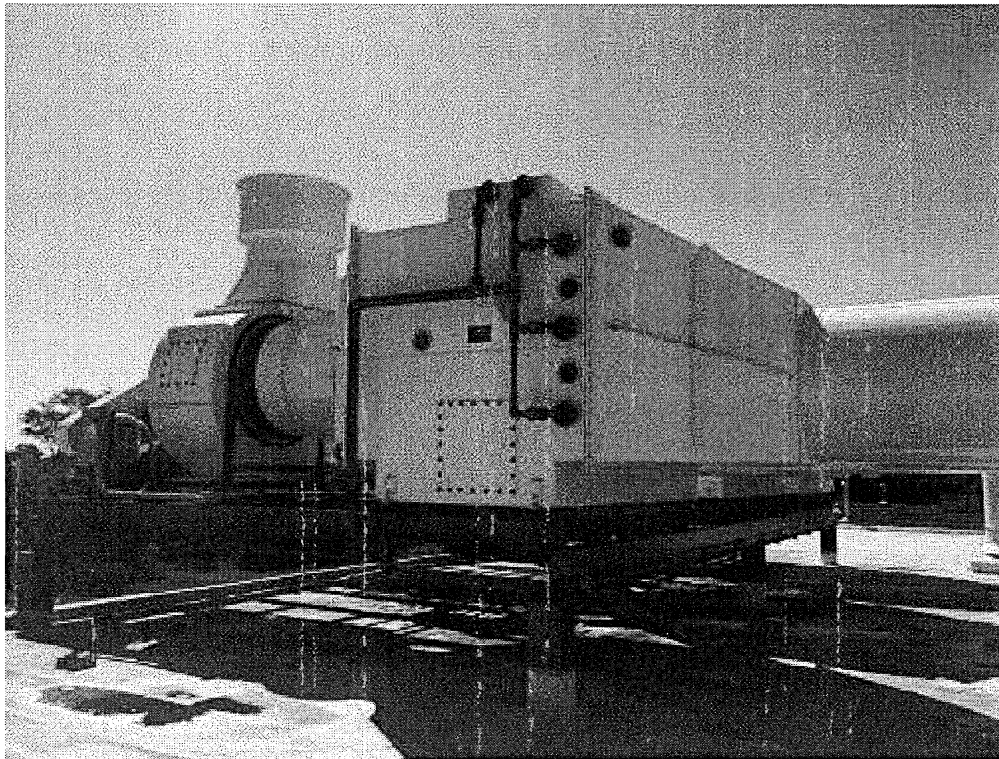


Image 1(Fume Scrubber) : One (1) of three (3) identical rooftop mounted wet scrubber units.

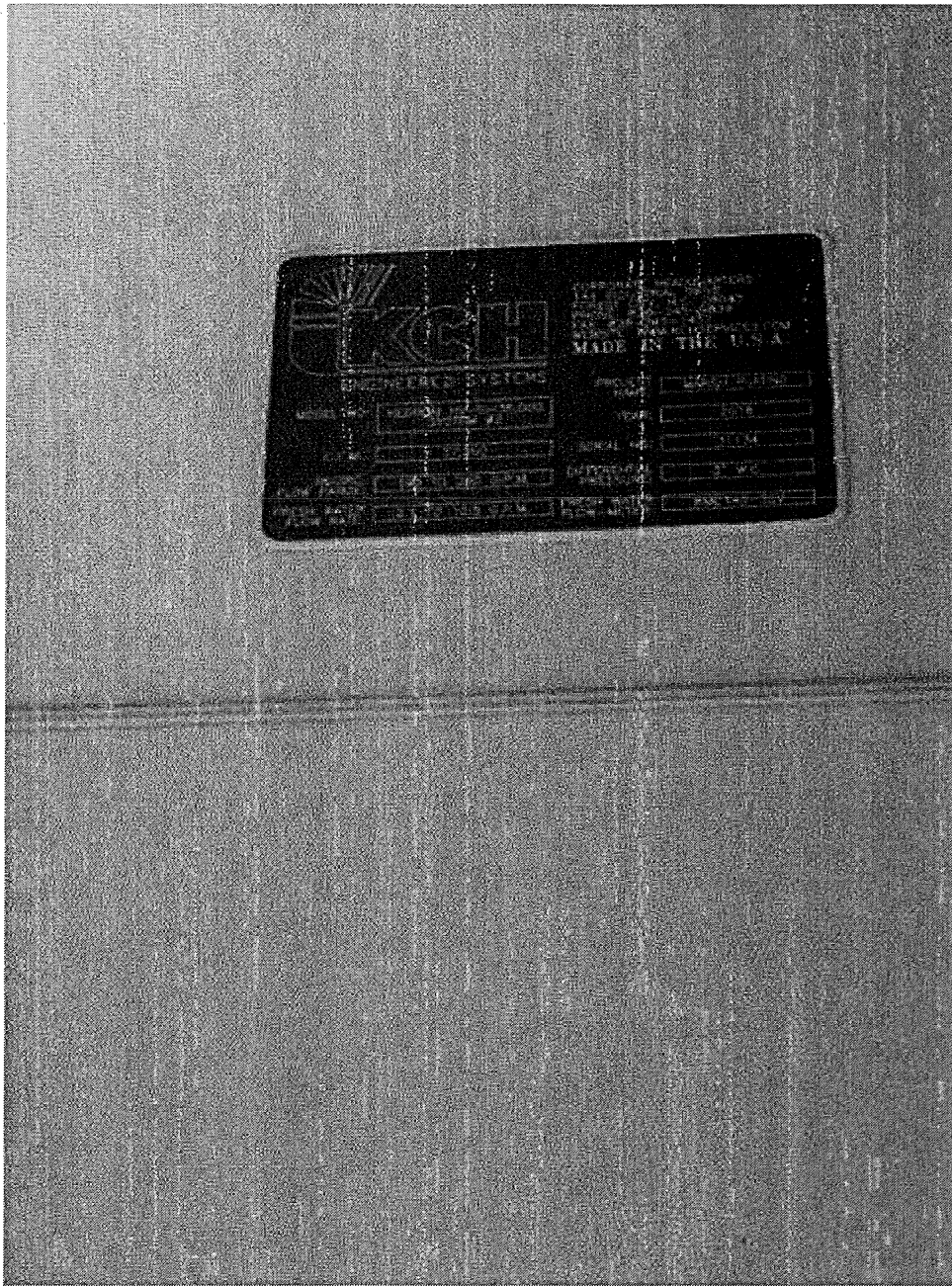


Image 2(Scrubber nameplate) : Lists the operation specifications for the fume scrubber. 37,260 cfm; 3" W.C.

NAME Fack Durban

DATE 10/31/17

SUPERVISOR [Signature]