



June 7, 2023

Mr. Adam Bognar
Senior Environmental Engineer
Air Quality Division
Department of Environment, Great Lakes and Energy

Adam:

Thank you for your continued interest in our aligned goals of keeping jobs, paying taxes and respecting the environment. I am passionate that my team and I are addressing EGLE's concerns on how Beacon Park Finishing ("BPF") operates in compliance with rules and regulations. The below addresses the issues raised in your May 31, 2023 letter in the order they appear in your letter. Some of the items appeared to be duplicative, so my team and I consolidated certain items.

Violation Notice Response to EGLE

- Item #4: EGLE states that BPF operated the chrome tank without installing the composite mesh pad filter in the scrubber system.
 - BPF Response: The composite mesh pad in stage two was found to have collapsed. The mesh pad in stage 3 was installed, however it was not clean effecting its performance. We have since reinstalled the stage 2 mesh pad as well as power wash it and we have since cleaned and power washed the stage 3 mesh pad.
- Item #5: EGLE states that BPF operated the nickel strike tank without installing the composite mesh pad filter in the scrubber system.
 - BPF Response: The chrome scrubber system ventilation is tied into the chrome tank and the nickel strike tank and both tanks operate off the identical scrubber ventilation system. See above concerning the corrective action for the mesh pads.
- Item #6: EGLE states that BPF did not maintain the differential pressure monitoring device.
 - BPF Response: EGLE is partially correct. Pressure drop readings were recorded throughout 2022. In 2023 pressure drop readings were not recorded as the scrubber malfunctioned and there were large periods of time when operation on the line ceased. We have replaced two magnehelic gauges and are scheduling service to calibrate the readings and make any other adjustments required to ensure accurate readings.
- Item 8 ITEM #8 PTI NO 186-91D Special condition vi.7 40CFR 63.63.346(b)(13)

- Response: At the time of the inspection, the BPF server was down and BPF could not access surface tension data from server. After the server came back online, BPF sent the information to Mr. Bognar (EGLE) all surface tension data from Jan,31 2023 to March 16 ,2023.
- Item Number 9 40CFR 63.347(h)
 - Response: BPF maintains ongoing compliance record; BPF sent all data year 2022 to Mr. Bognar (EGLE) on June 1st 2023.

BPF is taking the following steps to achieve our aligned goals for the scrubber:

- Fine tune the program timer on the water system to improve performance.
- Improve the magnehelic gauges so that they more accurately register the pressure drop overall and across the pre-stage, stage 1, or stage 2.
- Replace the pre-stage filter, pursuant to a quote from Vanaire. The current quote for a new pre-stage filter is \$8,800.
- We are scheduling service to come out to help us set up the water system and pressure drop monitoring system.

EGLE and Beacon Park are aligned in our goals to provide BPF's customers with quality product while complying with EGLE's standards. I look forward to sharing additional progress with you and your colleagues at EGLE. Once you have had a chance to review this letter, let's set up a conference call with you, me and my team to answer any questions.



Garrett P. Kanehann, Owner, Beacon Park Finishing