

## Additional Information

### Violation:

***PTI No. 186-91D-special condition 1.1, iv.1 and iv.2 ( violation related control "D")***

#### ***Explanation of cause***

1. The scrubber malfunctioned due to an electrical and motor problem. This issue occurred from January 2023 to June 2023.
2. BPF has contacted Vanaire to schedule a visit to assess the condition of the composite mesh pad scrubber system. Vanaire representative stated that they will contact us back when they have an available date for the evaluation.  
BPF will send the schedule date to EGLE-AQD once Vanaire provides BPF with a date and time.
3. BPF will send the copy to AQD after Vanaire recommendation is established (if any).
4. The violation was ongoing due to the scrubber system not functioning properly.
5. The scrubber was not working due to an electrical and motor problem, which caused stage 2 filter to collapse. BPF scrubber does not have stage 3. The stages our scrubber has are as follows: Pre-Control, Stage 1 and Stage 2. Stage 2 filter was dirty due to the fact that the scrubber was not functioning, and no water was going through the system. This caused the filter to dry up. At this time BPF does not know why there was no stage 1 filter in the system due to prior Maintenance management/team no longer being at BPF.

6. BPF received a quarterly check list form from EGLE that we have now or implemented into our Operation and Maintenance plan. We have placed a quarterly inspection for the scrubber filters that our maintenance team will be doing. Every 6 months the filters will be removed and clean per BPF Operation and Maintenance plan.
  
7. According to the violation letter, BPF does not have stage 3 filter; however, Stage 2 filter is installed and cleaned. BPF has been in contact with Vanaire and we are waiting for them to give us an actual date for them to come on property to inspect the scrubber system with EGLE and AQD on site. We are trying to get a date in July 2023 for the inspection so that the scrubber could be operational by the end July 2023.

***PTI NO.186-91D-Special condition III.1 ( violation related control “D”)***

1. BPF fail to follow the malfunctioning plan since Jan. 3<sup>rd</sup> 2023.
2. BPF failed to follow the operation and maintenance plan due to the failure of our previous management person by not notifying EGLE of the malfunctioning when it occurred. It was discovered that we had an electrical, motor and filter problem which to fix the scrubber was going to take a lot of time and money for parts and labor to outsource. Our maintenance team worked on the scrubber system as much as they were qualified for.
3. Beacon Park Finishing has implemented our operation and maintenance plan to our maintenance team. Mr. Patel will be verifying daily that the readings are being monitored and recorded.
4. The violation was ongoing because there were multiple issues with the scrubber from the electrical wiring, replacement of motor, air tubing, water pipes and pressure drop gage dials which all took longer than expected due to material and cost.

***PTI NO. 186-91D-special condition III.2,VI.2 and VI.7***

1. The violation was never ongoing nor were we in violation of not taking surface tension readings. During EGLE visit our server were down and we could not provide EGLE with the records; however, once our server was back up and running the records were sent to EGLE.
2. As stated prior, BPF was not in violation and all surface tension were taken and recorded. BPF steps for the Chrome surface tension is as follows: Step 1- The beginning of our production run surface tension readings is taken and recorded. Step 2- After 4 hours, the Chrome surface tension reading is taken and recorded. Step 3- Plater and Mr. Patel (or Management) will get together at the end of the shift to go over all the testing and readings. Step 4- Mr. Patel/Management will save the data electronically and place the hard copy in it's own binder in the lab.
3. During EGLE visit (Adam) he was escorted by BPF new General Manager which he had minimal knowledge of the lab activities and testing records. At that time, BPF did have server issues which we can provide proof from our I.T. department/company. Mr. Bush was not aware at the time due to us keep having intermittent access to the server. As soon as we gained access to the server all the records were sent to EGLE.
4. As stated on comment #2- We have 4 steps which our plater and Mr. Patel will be following along with trained backup personnel (Ramon and Justin). Mr. Patel created a binder for the surface tension readings labeled Daily Chrome Surface Tension Record and will be placed in his office where is accessible to anyone. Once the plater finishes with the daily sheet, at the end of the day he will get with Mr. Patel and place the sheet in the binder.

***PTI NO. 186-91D-special condition IV.3, Special Condition VI.4***

1. Beacon Park Finishing will establish a service date in July 2023 once the Vanaire technician comes on property.

2. The causes of the violations were due to the chrome scrubber system malfunctioning as explained on section PTI NO.186-91D-Special condition III.1.
3. Beacon Park Finishing will have the pressure drop gages calibrated once a year. In cases of any off readings from the pressure drop gage BPF Maintenance team will service the chrome scrubber system. BPF has trained a few employees as a backup person to check the chrome surface tension as well as how to keep record all the time.
4. The Plater is assigned to take the differential pressure readings daily with Mr. Patel as the backup.
5. The reading will be taken from the pressure drop gage dials. The records will be kept in a binder labeled Scrubber Daily readings in Mr. Patel office where it is accessible to everyone. As stated prior the Plater will log the readings and place the log in the log due to the damp environment by the scrubber system.

***No. 186-1D-special condition VI.3 & VI.6***

1. BPF has partial records to perform quarterly inspections and maintenance from January to June 2022; however, the last 2 quarterly inspections BPF cannot locate any of the records due to prior Maintenance Management team disposing/misplacing them.
2. The violation was ongoing due to prior Maintenance team; however, as BPF has all the proper forms to perform all the quarterly check once we have the scrubber is functional.
3. Maintenance team have inspected composite mesh pad, and filter as per manual. Mesh Pads have been cleaned per manual as well as multiple items on the scrubber have been replaced (motor, wiring, tubing...). Maintenance team has been keeping EGLE up to date on all the progress that we have done to the scrubber. BPF will be using the inspection sheet that was provided by EGLE for the quarterly inspection and it will be filled out properly with all the required information stated on the form. Maintenance team will be conducting all the quarterly inspections.
4. BPF prior General Manager Josh Bush conducted the quarterly inspection and submitted the report. We are not sure why he did not mention

anything of the scrubber operation condition on the document before it was sent out to EGLE.

5. The maintenance team will be conducting scheduled quarterly inspection and will be removing the composite mesh pads out of the unit to inspect the condition of them.

**40 FR 63.347(h)**

1. Violation date of July to December 2022; in January 2023 when the Ongoing Compliance Status Report was written for the last 6-months a section of report was not completed. The violation was due to not having the entire Ongoing Compliance Status Report complete. There was a question number 6 stating if the work practices for the operational and maintenance plan were followed, which was not answered.
2. BPF has implemented/ retrained our staff on the operational and maintenance plan. We have discussed with the team how imperative this is for not to deviate from the operational and maintenance plan; however, if for some reason we deviate from the plan it must be documented and signed by the responsible official from BPF.