

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: On-site Inspection**

B300067806

<b>FACILITY:</b> Beacon Park Finishing LLC		<b>SRN / ID:</b> B3000
<b>LOCATION:</b> 15765 STURGEON, ROSEVILLE		<b>DISTRICT:</b> Warren
<b>CITY:</b> ROSEVILLE		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Garrett Kanehann , Owner/CEO		<b>ACTIVITY DATE:</b> 06/21/2023
<b>STAFF:</b> Adam Bogнар	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Self-initiated inspection		
<b>RESOLVED COMPLAINTS:</b>		

On Wednesday, June 22, 2023, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I, Adam Bogнар, conducted an unannounced inspection of Beacon Park Finishing LLC (the "Facility") located at 15765 Sturgeon, Roseville, MI.

The purpose of this inspection was to determine the facility's compliance status with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment, Great Lakes, and Energy -Air Quality Division (EGLE-AQD) rules; 40 CFR Part 63, Subpart N, National emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (Chrome NESHAP); and Permit to Install No. 186-91D. Since the facility was not operating on the date of this inspection, and has not operated since the date of my last inspection, I did not evaluate the compliance status of all items stated above. Instead, during this inspection I looked at what maintenance had been performed on the composite mesh pad system since my last inspection, and what maintenance will be performed on this system in the future.

This inspection was conducted with City of Roseville Building Department staff James (Jim) Osterhout. Jim and I met at Beacon Park Finishing at around 11:10 am. We were met outside by Beacon Park Finishing staff Ramon Bosques, Plant Manager, and Justin Moore, Maintenance Technician. Ramon and Justin allowed us into the facility. Ramon explained that Beacon Park Finishing has not operated in the past two months or so. Ramon was not sure of the exact date but stated that they have not operated any of the processes since my last inspection on April 12, 2023.

Jim and Ramon walked around and inspected items that Jim was concerned about from a building regulations standpoint. Jim had issues with how the emergency lighting is set up at the facility. According to Jim, if the power goes out, there is not adequate light for employees to be able to see their way out. Jim also mentioned that the fire drop doors need to be inspected/repared. Justin Moore accompanied me for an inspection of the composite mesh pad scrubber system.

I explained to Beacon Park Finishing staff that since the facility is not operating, my goal for the inspection is to determine what maintenance has been done on the chrome scrubber, Control D. During my last inspection on April 12, 2023, I documented that the pre-control and stage 1 filter in Control D were not installed. Additionally, the stage 2 filter was very dirty which may have been affecting its efficiency.

I did not evaluate compliance with all conditions of PTI No 186-91D, the chrome NESHAP, and other EGLE-AQD rules because I evaluated compliance with all of these items during inspections on March 16, 2023 and again on April 12, 2023. A violation notice was sent to Beacon Park Finishing on April 28, 2023 to address violations identified during these inspections. AQD is still working with Beacon

Park Finishing to resolve the violations identified in these inspections. A second violation notice was sent to Beacon Park Finishing on May 31, 2023 because Beacon Park Finishing did not respond to the first violation notice by May 16, 2023. Beacon Park Finishing responded to the second violation notice on June 7, 2023, which was the date the response to the second VN was due.

The response that Beacon Park Finishing provided for the violations was not adequate because it did not adequately address all the inquiries that were stated in the violation notices. In some instances, violations were not addressed at all. On June 12, 2023, AQD sent Beacon Park Finishing a letter requesting additional information as part of the response to the two violation notices. In this letter, AQD provided Beacon Park Finishing a detailed list of what information needs to be included in a complete response to the violation notices. AQD has not received a complete violation notice response from Beacon Park Finishing at this time. The response to this letter is due on June 26, 2023.

The initial response that Beacon Park Finishing sent to AQD stated that the composite mesh pad in stage 2 of the scrubber was found to be collapsed. Beacon Park also stated that the mesh pad in stage 3 was installed, however it was not clean which affected its performance. Beacon Park stated that they power washed both the stage 2 and stage 3 mesh pads and reinstalled them into the scrubber. Joshua Bush stated in an email on May 19, 2023 that they washed the filters over the Line 1 dike which gets pumped to the waste water treatment system for processing. Line 1 is a currently unpermitted, mothballed, decorative chrome plating line that, according to Popat Patel (Chemist), was last operated on June 13, 2013, and was drained on January 21, 2014.

The naming conventions used by Beacon Park Finishing are inconsistent. When I spoke with Justin during this inspection, he stated that there is a pre-control, stage 1, and stage 2 filters. Either way, there are three composite mesh pad filters, with the filter in the middle (stage 1) being the thickest of the three. Going forward in this report, I will refer to the filters in the way that Justin referred to them.

I asked Justin to demonstrate that the composite mesh pads had been cleaned and reinstalled on Control D. Justin and I donned safety goggles and a cloth mask to check the filters on the Control D. Justin took me up on a scissor lift to observe these filters. The filters were already unbolted. Justin stated that he didn't want to bolt the filters back up yet because they are not operating the plating tanks, and he expected that AQD would want to see the filters. Justin removed the stage 1 and stage 2 filter cartridges, revealing the composite mesh pad filters. I observed that the stage 1 filter had been re-installed, and the stage 2 filter had been cleaned. I could tell the stage 2 filter had been cleaned because it was essentially free from dust.

During my last inspection on April 12, 2023, the stage 2 filter was completely covered in a thick dust cake. I took pictures of the stage 1 filter on the date of this inspection. These photos are included in this report below. The picture on the left is the front of the stage 1 filter and the picture on the right is the backside of the stage 1 filter.



According to Justin, the pre-control filter is not currently installed. I did not ask Justin to unbolt the pre-control filter, so I did not observe this. Justin was not sure if the unit was ever equipped with a filter in the pre-control filter cartridge. I explained to Justin that Vanaire, the scrubber manufacturer, is going to need to come out here to determine if the scrubber is functioning properly.

As part of my inspection on March 16, 2023, Beacon Park Finishing submitted a signed quarterly inspection report for this scrubber indicating that the "packed bed section" of this scrubber was checked despite the fact that this scrubber system does not contain a packed bed section. Furthermore, no issues were noted in this inspection report even though the Stage 1 and pre-control composite mesh pad filters were not installed at the time of the inspection.

I explained to Justin that it appears that nobody at Beacon Park Finishing has any experience with composite mesh pad scrubber maintenance and operation. Justin did not disagree with this statement. Justin stated that he would contact Vanaire to try and set up a time for them to inspect the scrubber. I told Justin that I want to be present for this inspection. I also mentioned in my June 12, 2023 additional information request that a representative from AQD needs to be on-site during the Vanaire inspection.

I explained to Justin that it didn't make sense that Beacon Park Finishing was quoted \$40,000 by Vanaire to replace the composite mesh pad filters, yet simply washing the filters off with a hose was an adequate way of restoring their function. Justin explained that the previous plant manager, Nick Salvati, always wanted to throw money at problems instead of trying to fix them in-house. Justin stated that the filters may not have needed to be replaced, but Nick insisted on replacing them.

I contacted Vanaire to see if washing the pads off with a hose would work to restore filter function. The engineer I spoke with at Vanaire stated that washing the filters off might be an adequate way of cleaning them, but it would depend on the condition of the filter. The Vanaire engineer stated that he would need to see the filter to evaluate if washing the filter off was an adequate way of restoring function. Vanaire will need to provide some guidance to Beacon Park Finishing staff so that the staff can determine if the filters are functioning properly.

The statements by Justin Moore and Nick Salvati raise the question of why the filters were not fixed despite Beacon Park Finishing staff being aware of the non-functional filters at the time Nick Salvati was employed at the facility. Based on a conversation I had with Garrett Kanehann, Owner, Nick Salvati was let go from Beacon Park Finishing in early 2023.

While we were up on the scissor lift, Justin explained that he recently replaced all the pressure lines to the Magnahelic pressure gauges. I observed that the old pressure lines were disconnected, and fresh tubing was installed. Justin stated that he installed the new lines in the same manner as the lines he removed. I examined the way Justin installed the pressure lines and it appeared to be installed correctly. I did not observe the entirety of each line from the Magnahelic gauge to the scrubber system. Vanaire should inspect the pressure lines during their visit to Beacon Park Finishing.

During the inspection I observed that none of the processes at Beacon Park Finishing were operating. Ramon stated that he believes four people were working in the plant on this date (Ramon, Justin, Popat, and one other person). I observed that the dikes underneath the chrome plating tanks were still filled with fluid. I took a photograph of the dikes, which is included in this report below.



I did not identify any additional violations during this inspection. I observed that the composite mesh pad system Stage 1 and Stage 2 filters were both cleaned and reinstalled into the scrubber system. Based on my conversations with Justin, the pre-filter is not installed. I observed that new pressure lines have been run between the scrubber system and the Magnahelic pressure gauges.

I left the facility at around 12 pm.

NAME Adam Bogner

DATE 6/26/2023

SUPERVISOR K. Kelly