



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 5, 2022

Mr. Garrett Kanehann, Owner
Beacon Park Finishing, LLC
15765 Sturgeon
Roseville, MI 48066

SRN: B3000, Macomb County

Dear Mr. Kanehann:

VIOLATION NOTICE

On March 8, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Beacon Park Finishing located at 15765 Sturgeon, Roseville, Michigan. The purpose of this inspection was to determine Beacon Park Finishing'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 (Act 451); the Air Pollution Control 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 the conditions of Permit to Install (PTI) number 186-91B.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Nickel-chrome plating line exhausted to composite mesh pad scrubber (Control D)	PTI No. 186-91B Special Condition 21 Rule 910	Beacon Park Finishing staff stated the CMP scrubber system (Control D) is not operated properly during very cold temperatures due to lines freezing. In addition, the company failed to demonstrate, through recordkeeping, that the control was properly operated between February 5, 2021 and October 25, 2021,
Nickel-chrome plating line exhausted to composite mesh pad scrubber (Control D)	PTI No. 186-91B Special Condition 15	Beacon Park Finishing stated they did not operate the control device for the nickel chrome line in the winter and failed to demonstrate the control was properly operated between February 5, 2021 and October 25, 2021. Operating the nickel chrome line without properly operating control would exceed the chromium emission limit according to emissions calculations from PTI 186-91A permit evaluation.

Nickel-chrome plating line exhausted to composite mesh pad scrubber (Control D)/ Chrome tank 4A	40 CFR 63.346(b) Chrome NESHAP PTI No. 186-91B Special Condition 26	Beacon Park Finishing staff did not record surface tension readings between February 5, 2021 and October 25, 2021 and on some other normal operating dates. As a result, the company did not demonstrate that the surface tension was maintained less than 40 dynes/cm ² .
Zinc plating line	Rule 910	Zinc electroplating line was operating while the wet scrubber (Control B) was not installed.
Zinc plating line	PTI No. 186-91B Special Condition 16	Control B was not installed while the Zinc plating line operated. Based on emissions calculations from PTI 186-91A permit evaluation, uncontrolled HCl emissions would exceed the HCl emission limit (0.8 mg/m ³).
Zinc plating line	PTI No. 186-91B Special Condition 22	Beacon Park Finishing staff operated the zinc plating line while Control B was not installed.
Nitric Acid Strip Tank exhausted to wet scrubber	PTI No. 186-91B Special Condition 23	Beacon Park Finishing staff did not record liquid flow rate readings between February 5, 2021 and October 25, 2021 when the line was reportedly operating. As a result, the company did not demonstrate they properly operated Control C while the Nitric Acid Strip tank was being operated.
Scrubber systems – Control A, Control B, Control C, & Control D	PTI No. 186-91B Special Condition 25	Beacon Park Finishing staff did not identify supervisory personnel in the operation and maintenance plan who are responsible for inspection, maintenance, and repair of these air cleaning devices.
Chrome tank 4A	40 CFR 63.343 (c)(5) Chrome NESHAP PTI No. 186-91B Special Condition 27	Surface tension readings were not taken according to the monitoring schedule (once every four hours).
Chrome tank 4A	40 CFR 63.346 (b)(13) Chrome NESHAP PTI No. 186-91B Special Condition 27	Records of the date and time that fume suppressants are added to the chrome tank were not maintained between October 25, 2020 and January 1, 2022.

Nickel-chrome plating line exhausted to composite mesh pad scrubber (Control D)	40 CFR 63.342(f) Chrome NESHAP PTI No. 186-91B Special Condition 28	Records of quarterly inspections of the CMP system were not maintained during the first two quarters of 2021.
Chrome tank 4A	40 CFR 63.347(g)(3) Chrome NESHAP PTI No. 186-91B Special Condition 27	Ongoing Compliance Status Reports provided do not contain all required information.
Grinding/buffing stations	Rule 201	Unpermitted grinding/buffing stations were exhausted outdoors without a fabric filter (cyclone only).
Stationary Source	Rule 210	Beacon Park Finishing removed the wet scrubber used to control HCl emissions from the zinc plating line prior to March 19, 2021. Without this scrubber, the facility's potential to emit (PTE) for a single hazardous air pollutant (HAP) (HCl) exceeds 10 tons/year, making the facility a major source of HAP emissions. The facility currently does not have a renewable operating permit (ROP).

The conditions of PTI number(s) 186-91B limit the emissions of chromium from the nickel-chrome plating line to 0.05 micrograms per cubic meter, corrected to 70 °F and 29.92 inches Hg.

The conditions of PTI number(s) 186-91B limit the emissions of hydrochloric acid (HCl) from the zinc plating process to 0.8 milligrams per cubic meter, corrected to 70 °F and 29.92 inches Hg.

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

This process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source Plating and Polishing Operations. These standards are found in 40 CFR Part 63, Subpart WWWW.

During the March 8, 2022 inspection, Beacon Park Finishing was unable to produce records required by the facility's operation and maintenance plan. These records are how the source demonstrates that their air pollution control program/equipment is operating correctly. AQD identified the following recordkeeping deficiencies regarding the operation and maintenance plan and ongoing compliance status reports:

- Daily pressure drop records for Control D were not maintained between February 5, 2021 and October 25, 2021.
- Daily liquid flow records for Control B were not maintained between February 5, 2021 and October 25, 2021.
- Daily liquid flow records for Control C were not maintained after January 15, 2021.
- Records of quarterly inspections of the chrome scrubber (Control D) according to the Chrome NESHAP (40 CFR 63.342(f)) were not maintained for the first two quarters of 2021.
- Surface tension records for chrome tank 4A were not maintained between October 29, 2020 and January 1, 2022. Additionally, the records Beacon Park Finishing provided from January 1, 2022 to March 8, 2022 show that the surface tension readings are not taken every four hours as required in the Chrome NESHAP.
- Supervisory personnel who are responsible for inspection, maintenance, and repair of these air cleaning devices are not identified in the operation and maintenance plan for all scrubber systems.
- The operation and maintenance plan recordkeeping sheet for Control D contains a box stating, "Pressure drop monitors calibrated." An initial next to this box was erased on all of the check sheets.
- The Ongoing Compliance Status Reports submitted by Beacon Park Finishing did not contain all of the information required in 40 CFR 63.347(g)(3), including:
 - A certification by a responsible official indicating whether or not the operation and maintenance plan was followed or was not followed. This section was left blank.
 - An explanation of the reasons for not following the provisions of the operation and maintenance plan, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by 40 CFR 63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed. 40 CFR 63.342(f)(3)(iv) requires that these incidents be recorded and reported to the AQD district supervisor via phone call within two working days after commencing actions inconsistent with the operation and maintenance plan. This report shall be followed by a letter to the AQD district supervisor within seven working days after the end of the event. AQD did not receive any notifications from Beacon Park Finishing.
 - A description of any changes in monitoring, processes, or controls since the last reporting period. Mr. Popat Patel, who was responsible for maintaining daily pressure drop records for days that the nickel-chrome line was operated, left the facility in late 2020/early 2021. The Ongoing Compliance Status Report should detail when key personnel change. These changes in key personnel should also be noted in the operation and maintenance plan.
 - The number, duration, and a brief description for each type of malfunction which occurred during the reporting period, and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.342(a)(1), including actions taken to correct a malfunction. Mr.

Patel stated that this scrubber is not operated during very cold temperatures because of water lines freezing. This type of malfunction must be reported in the Ongoing Compliance Status Report.

In your response to this violation notice, please include the following information:

- An explanation of how Beacon Park Finishing will maintain appropriate records for daily pressure drop of Control D, daily liquid flow rate Control B and Control C, quarterly inspections of the chrome scrubber, and surface tension measurements for chrome tank 4A every four hours of tank operation. Be sure to identify the appropriate personnel who will be responsible for taking these readings at the appropriate time intervals.
- A procedure for updating these procedures when key personnel change.
- An updated operation and maintenance plan which identifies supervisory personnel. Included in this operation and maintenance plan, please include a procedure to modify the plan when these key supervisory personnel change.
- An explanation of how often the pressure drop monitors for the CMP scrubber should be calibrated.
- A method for identifying the operating status of a process each calendar day in the pressure drop, liquid flow rate, and surface tension records. This may include writing "DID NOT OPERATE", "zero", or an equivalent statement in the operating hours column on the recordkeeping sheets for days that a process is not operated.
- An updated ongoing compliance status report including all information required in 40 CFR 63.347(g)(3).

During the March 8, 2022 inspection, AQD spoke with facility staff regarding the composite mesh pad (CMP) scrubber associated with the nickel-chrome plating line. Beacon Park Finishing staff stated that this CMP scrubber is sometimes not operated properly (no washdowns) on very cold days due to lines freezing.

Additionally, daily records of pressure drop were not maintained between February 5, 2021 and October 25, 2021.

Also, during the March 8, 2022 inspection, AQD spoke with facility staff regarding the wet scrubber (Control B) associated with the zinc plating line. Beacon Park Finishing staff stated that this scrubber was removed sometime in 2021 due to roof damage. The facility has had trouble scheduling a contractor to re-install the scrubber system after repairing the roof. The zinc electroplating line was operating during this inspection without a scrubber installed. Google Earth Pro aerial photos indicate the scrubber was not on the roof in March 2021. Google Earth Pro aerial photos shows that the scrubber was there in March 2020.

Failing to properly operate the CMP system and Control B during operation of the associated plating tank constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

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In the response to this violation notice, include a plan that will address how to properly operate Control D at all times, including during very cold temperatures. In addition, please include a schedule and plan for the installation of Control B.

During the March 8, 2022 inspection, it was noted that Beacon Park Finishing had installed and commenced operation of unpermitted equipment at this facility. Specifically, Beacon Park Finishing installed several grinding/buffing stations which are ducted outdoors without a fabric filter (cyclone filter only). The AQD staff advised Beacon Park Finishing on March 8, 2022, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the grinding/buffing process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Alternatively, Beacon Park Finishing may install and operate the grinding/buffing process in accordance with R336.1285 (2)(l)(vi) by either; ensuring emissions from the process are released only into the general in-plant environment or by having external emissions vented to an appropriately designed and operated fabric filter.

Beacon Park Finishing staff statements and Google Earth Pro Aerial photo evidence indicates Beacon Park Finishing removed the wet scrubber used to control HCl emissions from the zinc plating line prior to March 19, 2021. Without this scrubber, the facility's PTE for a single HAP (HCl) exceeds 10 tons/year, making the facility a major source of HAP emissions. The facility currently does not have an ROP. In addition, on February 22, 2022, Beacon Park Finishing submitted emissions records with the 2021 Michigan Air Emissions Reporting System (MAERS) report indicating actual uncontrolled HCl emissions from the zinc plating line were 14.82 tons.

R 336.1211(a)(i)(A) of the Michigan Administrative Code (MAC) requires sources that directly emit, or has the potential to emit, 10 tons per year or more of an individual hazardous air pollutant (HAP) obtain a Renewable Operating Permit (ROP).

R 336.1210 prohibits the operation of a source required to have an ROP except in compliance with all applicable terms and conditions of an ROP, unless a timely and administratively complete ROP application has been received. Per R 336.1210(4), for a stationary source that is or becomes a major source, as defined by R 336.1211(1)(a)(i) to (iii), an administratively complete application shall be considered timely if it is received by the department not more than 12 months after the stationary source commences operation as a major source or otherwise becomes subject to the requirements to obtain a renewable operating permit as a major source.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 26, 2022 (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; what steps are being taken to prevent a reoccurrence; and all other information specified in this notice of violation.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Beacon Park Finishing 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 Beacon Park Finishing. 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,



Adam Bogner
Environmental Engineer
Air Quality Division
586-854-1517

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE