

September 26th, 2018

To whom it may concern:



Violation Response

On August 9, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Allied Finishing. Two violations were found. A violation of National Emission Standards for Hazardous Air Pollutants, Subpart N 40 CFR 63.347(b) and (e) occurred, a failure to submit notification of compliance status, and a violation of PTI No. 162-17, Special Condition VI.3, failure to maintain the control device.

The replacement of a chrome plating tank occurred on May 5th, 2014 but Allied Finishing never informed the DEQ. After reviewing our records, it is believed our predecessor did not notify the DEQ of the replacement of a chrome tank from EUGREEN1 because they believed the replacement did not qualify as construction or reconstruction of an affected source. The interpretation was that Subpart N defines the affected source as a chromium electroplating tank. A chromium electroplating tank is the receptacle or container along with the following internal and external components needed for chromium electroplating: Rectifiers, anodes, heat exchanger equipment, circulation pumps, and air agitation systems. As only the receptacle housing the chrome electroplating solution was replaced, it was interpreted that this was not a new source, but could potentially be considered a reconstructed source. The fixed capital cost of a new receptacle did not exceed 50% of the cost of a comparable new source so it was not considered a reconstruction either. It was felt that this was a justifiable reason for the lack of notification to the DEQ. In the future, tank repairs and replacements will not occur without notification of the DEQ, unless we learn otherwise in our meeting with April Lazzaro.

The AQD staff observed operation of the nitric strip line while the scrubber and air handling system were not properly operating. An exterior door to the room was open during operation of the scrubber; it was recommended by the manufacturer that this remain closed during operation of the scrubber to ensure proper air flow. The scrubber stack was improperly installed and started up on May 1st, 2018, resulting in a leak of nitric acid to the roof. This was repaired by the manufacturer on September 15th, 2018. The scrubber will be monitored for leaks to ensure repair was successful and the exterior door will remain closed.

Members of Allied Finishing are meeting with April Lazzaro, Senior Environmental Quality Analyst with the AQD, to discuss how to best prevent any future violations on 9/27/18.

Thank you,

A handwritten signature in black ink, appearing to read 'B. Hirdes', with a large, sweeping flourish at the end.

Brad Hirdes

Technological Manager

Allied Finishing, Inc.

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