



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

November 30, 2020

Ms. Abby VanGheluwe, General Manager  
Norbrook Plating  
11400 East 9 Mile Road  
Warren, MI 48089

SRN: B6660, Macomb County

Dear Ms. VanGheluwe:

**VIOLATION NOTICE**

On October 14, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Norbrook Plating located at 11400 East 9 Mile Road, Warren, Michigan. The purpose of this inspection was to determine Norbrook Plating’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; the conditions of Permit to Install (PTI) numbers 584-86A, 238-99, 239-99, 240-99, 266-04; and 40 CFR Part 63 Subpart N – National Emissions Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (Chrome NESHAP).;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
185 Gallon Nitric Acid Strip Tank vented to a packed bed scrubber with a recirculating caustic solution.	PTI No. 266-04 – Special Condition 1.2. Rule 910	Tank/scrubber was operated while the scrubber liquor pH was lower than acceptable values.

On October 14, 2020, the AQD staff observed operation of the nitric acid strip tank while the packed bed scrubber with recirculating caustic solution was not operated in a satisfactory manner. Norbrook Plating allowed the caustic soda feed drum to run out causing the scrubber liquor to fall to a pH of 5. Record sheets at Norbrook Plating indicate that the pH should never fall below 6; however, a report from Integrated Environmental, Inc. states that the pH is kept at approximately 9.5.

This 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

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operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 21, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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 Norbrook Plating 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 violation cited above and for the cooperation that was extended to me during my inspection of Norbrook Plating. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Bognar  
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