



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 24, 2022

Victor Pirrami, Manager
B & L Plating
21353 Edom Avenue
Warren, MI 48089

SRN: N0058, Macomb County

Dear Victor Pirrami:

VIOLATION NOTICE

On August 10, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of B & L Plating located at 21353 Edom, Warren, Michigan. The purpose of this inspection was to determine B & L 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; and to investigate a report which we received from the EPA on August 8, 2022. The report alleges that B & L Plating is discharging untreated chrome plating toxins and metals into the sanitary sewer/groundwater. The report further alleges that no functioning water or air cleaning equipment is in use at B & L Plating.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
1,000-gallon chrome plating tank.	40 CFR 63.346 (b)(13)	B & L Plating did not maintain records of fume suppressant additions to the chrome tank.

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. These standards are found in 40 CFR Part 63, Subpart N.

During this inspection, B & L Plating was unable to produce records showing the date, time, and quantity of each fume suppressant addition to the chrome tank. This is a violation of (the recordkeeping and emission limitations) specified in 40 CFR 63.346 (b)(13).

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 14, 2022 (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 Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If B & L 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 B & L 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 or email listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Bogner", with a stylized flourish at the end.

Adam Bogner
Environmental Engineer
Air Quality Division
586-854-1517; bognara1@michigan.gov

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE