

N0305
MANILADEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N030553658

FACILITY: PERFECTION INDUSTRIES INC		SRN / ID: N0305
LOCATION: 18571 WEAVER, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Kerry Ryan , Vice President		ACTIVITY DATE: 09/20/2024
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Chrome plating		
RESOLVED COMPLAINTS:		

INSPECTED BY : Terseer Hemben, MDEQ
PERSONNEL PRESENT : Kerry A. Ryan, (VP/Operations Mgr.)
FACILITY PHONE NUMBER : (313)-212-4040
FACILITY FAX : (313)-212-6535
DATES OF INSPECTION : 09/20/2024

Perfection Industries, Inc.

18571 Weaver Street, Detroit, MI 48228

SRN: N0305

FACILITY BACKGROUND:

The Perfection Industry, Inc. (PII) is a hard chrome plating operation. The facility has been in operation since 1952. The facility had problems with regulatory rules leading to violations and consent order in 2003-2004. The operation is a minor source that consumes 16.3 million ampere-hour per year. The process uses 5 open surface hexavalent chrome plating tanks as electroplating baths. Chromic acid concentration is timely sampled, tested and topped up when necessary by a contractor. PII is an EPA regulated source. SIP regulations enforce Rule 201, Rule 301, Rule 901 and Rule 910. The facility is regulated under 40 CFR 63, Subpart N. Emissions from the electroplating tanks are released within the general in-plant environment, while gaseous emissions captured across compact mesh pad (CMP) are routed through ductworks and routed to the scrubber for cleaning. The scrubber operating conditions such as pressure drops and water flowrates are monitored and logged as emission control compliance records. PII was cited in 2004 for reinstalling and operating a chrome plating tank without an approved permit to install consistent with Rule 201(1). The violation was resolved through a consent order that required compliance with rule conditions covering Cr emission limits, fume suppressant/wetting agent, composite mesh pad (CMP) maintenance and recordkeeping. The consent order was terminated at the request of the facility management. PII opted to monitor chromium testing. The process stack - vent exhaust flow profile was tested in 2003 and found emission to be 0.003 mg/dscm less than the 0.006 mg/dscm limit. [Records are on file] The facility was last inspected in 2017 and determined to be in compliance with air pollution control rules.

INSPECTION NARRATIVE

I arrived at the premises of the PII on September 20, 2024 at 1050 hours. The purpose of visit was to conduct a scheduled regulatory compliance inspection of the electroplating facility based on PTI No. 213-01B. I was admitted onto the facility by Larry, the process manager. I observed the plating Tanks 1 through 5 were idling. One plating bath was under cleaning service. There was no plating activity going on at the time of my visit. I requested records for the process, but Cindy and Kerry Ryan were

not available. I left the area at 1140 the facility Cindy and Ryan contacted me requesting more time for them to send records. I honored the request. The records were sent via email.

COMPLAINT/COMPLIANCE HISTORY:

PII has not been a source of recent citizen air quality complaints or violations.

OUTSTANDING CONSENT ORDERS:

None

OUTSTANDING VN'S:

None

OPERATING SCHEDULE/PRODUCTION RATE:

The facility runs a regular 8-hour shift from 8:00 AM to 4:00 PM during normal operations.

PROCESS DESCRIPTION PROCESS EQUIPMENT:

The process description and equipment for PII are located in report posted following the previous 2017 compliance inspection.

APPLICABLE RULES AND CONDITIONS:

The PII facility is a hard chromium electroplating source that is subject to the provisions of Rule 941 and NESHAP, of 40 CFR Part 63, Subpart N for Hard & Decorative Chromium Electroplating and Chromium Anodizing tanks when an in-person inspection is conducted. These rules support the SIP issued PTI. Compliance with the NESHAP requirements for the facility will include:

- a) Emission limits [On AQD file]
- b) Work practice standards [on the AQD file]
- c) Performance testing [past records are on the AQD file]
- d) Monitoring [past records are on the AQD file]
- e) Recordkeeping [past records are Attached for the AQD file]
- f) Reporting [past records are on the AQD file]

Staff observed there was no activity from the stacks. Required pressure gauge readings were taken and provided [Records attached]. There were no exceedances.

CONCLUSION

The on-site inspection of the Perfection Industries, Inc was conduted. The records indicated there were no exceedances in equipment performance. The records indicated compliance status with respect to equipment performance and stack activity. Further evaluation of the facility will be made in next visits.

NAME

the

DATE

10/21/24

SUPERVISOR

JK