

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

N186368523

FACILITY: Lapeer Plating & Plastics, Inc.		SRN / ID: N1863
LOCATION: 395 DEMILLE RD., LAPEER		DISTRICT: Lansing
CITY: LAPEER		COUNTY: LAPEER
CONTACT: Steve Sedely , Plating Manager		ACTIVITY DATE: 08/09/2023
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced inspection and review of recordkeeping conducted as Partial Compliance Evaluation (PCE) activities, part of a Full Compliance Evaluation (FCE).		
RESOLVED COMPLAINTS:		

On August 9, 2023, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of Lapeer Plating & Plastics, Inc. (LP&P). The purpose was to determine compliance with its air use permit, and applicable state and federal air pollution requirements.

Facility environmental contact:

Steve Sedely, Plating Manager; 810-728-3741; SedelyS@lpp-inc.com

EGLE, AQD contact:

Dan McGeen, inspector; 517-648-7547; mcgeend@michigan.gov

Facility Description:

Formerly Deco'Plate Manufacturing, Lapeer Plating and Plastics, Inc. (LPP) is a decorative chrome and paint shop. They produce products for the automotive industry such as hood ornaments and trim.

Emission units:

Emission Unit* ID	Emission Unit Description	Control Equipment	PTI No. Or Exemption Rule; Federal regulation, If Applicable	Compliance Status
EU-CHROMEPLATE32	Decorative chromium electroplating tank #32	Composite mesh pad (CMP) scrubber, with HEPA filter, aka System #1, and fume suppressant	25-13, 40 CFR Part 63, Subpart N	Compliance
EU-CHROMEETCH	Pre-etch tank (#1),	2-stage scrubber aka pre-plate	25-13	Compliance

System #5, dual etch scrubber	Etch tank (#2), Third tank (#3)	scrubber and nitric scrubber, together are known as System #5, and fume suppressant		
EU-COPPERTANKS	Copper strike tank (#14), 5 bright acid copper tanks (#15-19)	6-cyclone separation and dry scrubber, aka System #2	25-13	Compliance
EU-ACTIVATORTANKS	Activator tank (#7), accelerator tank (#9), electroless copper tank (#11)	Packed bed scrubber (PBS), aka System #3	25-13	Compliance
EU-NEUTRALIZERTANKS	Neutralizer tank (#5), copper-nickel strip tank (#39)	PBS, aka System #4, which System #3 ties into	25-13	Compliance
EU-PAINTLINE2	Automotive paint process, 6 dry filter pint booths, shared natural gas bake oven	Dry filters (mat/panel filters)	11-13	Compliance
EU-VCRESTLINE	V-Crest Paint Line and mold and paint line	Dry filters	11-13	Compliance
Plastic molding lines	32 plastic injection molding lines	NA	Rule 286(2)(b)	Compliance
Bowtie line	Exempt painting line	Dry filters (mat/panel filters)	Rule 287(2)(c)	Removed

* An *emission unit* is any part of a stationary source that emits or has the potential to emit an air contaminant.

Flexible groups:

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Flexible Group** ID	Flexible Group Description	Associated Emission Unit IDs	Compliance status
FG-NONCHROMEPROCESS	Non-chrome electroplating processes.	EU-COPPERTANKS, EU-ACTIVATORTANKS, EU-NEUTRALIZERTANKS.	Compliance
FG-FACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.		Compliance

****A flexible group is used in a permit to install (PTI) or Renewable Operating Permit (ROP) to combine two or more emission units that have common or identical requirements.**

Regulatory overview:

This facility has an opt-out permit, Permit to Install (PTI) No. 25-13, to limit its potential to emit for volatile organic compounds (VOCs) to keep it from becoming a major source for criteria pollutants. A *major source* has the Potential to Emit (PTE) of 100 tons per year (TPY) or more of any one of the *criteria pollutants*, that is, those for which a National Ambient Air Quality Standard exists. These include carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO₂), VOCs, lead, and particulate matter smaller than 10 microns (PM-10) and particulate matter smaller than 2.5 microns (PM_{2.5}). This facility was once a major source for VOCs, and had a Renewable Operating Permit (ROP) under the Title V program, but they reduced their VOC emissions, and obtained the opt-out PTI..

The facility's opt-out permit also limits its PTE for Hazardous Air Pollutants (HAPs), to keep it below the major source threshold of 10 TPY for any single HAP and 25 TPY for aggregate HAPs. The permit limits emissions to <9.0 TPY for any single HAP and <22.5 TPY for aggregate HAPs. It is therefore considered a minor or *area source* for HAPs.

This facility also has General PTI No. 11-13 for coating operations, for their Paint Line 2 and their V-Crest paint Line.

The facility has 32 plastic injection molding lines, which are considered exempt from needing a PTI under Michigan Air Pollution Control (MAPC) Rule 286(2)(b), and a Bowtie painting line, which is exempt from needing a permit under MAPC Rule 287(2)(c).

Additionally, there is a recent Administrative Consent Order (ACO), AQD No. 2019-12, signed 6/6/2019. It was for violations of 40 CFR, Part 63, Subpart N, and PTI 25-13:

- LPP had exceeded the maximum surface tension limit on chromium electroplating tank #32 (EU-CHROMEPLATE32).
- LPP had failed to increase the surface tension monitoring frequency after exceeding the surface tension limit as required on EUCHROMEPLATE32.
- LPP had operated without a functional pressure drop gauge on the packed bed scrubber associated with pre-etch tank #1 and etch tank #2.

- LPP had operated without a functional dry scrubber fan on the dry scrubber system associated with the copper strike tank and five bright acid copper tanks.

The above ACO replaced an earlier ACO, No. 27-2015, which was signed on 9/30/2015, for past violations.

Fee status:

Because this facility has a synthetic minor/opt-out permit to opt out of Title V, it is considered a Category E fee-subject source.

The facility is required to submit an annual emissions report to the Michigan Air Emission Reporting System (MAERS), and its successor, MiEnviro.

Location:

- Address: 395 DeMille Road, Lapeer, Lapeer County.
- Description: This facility is located on the south side of a triangular-shaped industrial park within the City of Lapeer. To the north are industrial and commercial facilities. There is a residential subdivision to the immediate west of LPP. The nearest residences to LPP are about 90 feet west of the plant. A creek runs behind the plant.

Recent inspections:

An unannounced inspection on 9/12/2018 identified compliance concerns which resulted in a VN (see below).

Recent Violation Notices (VNs):

A Violation Notice dated November 15, 2018 identified violations which were subsequently incorporated into ACO AQD No.2019-12.

Required safety apparel:

Safety glasses with side shields, hearing protection, steel-toed work boots.

Operating schedule:

They have done 3 shifts/day, 5 days/week, but also 2 ten hour shifts/day, 4 days/week, depending on production.

Current and past fume suppressant or surfactant use:

As of 2018, the only surfactant or fume suppressant currently in use in LPP's etch tanks and chrome plating tank was said to be ANKOR® LF19, which is PFOS-free, and is manufactured by MacDermid Enthone. As of March 2018, they ceased using LF19, and replaced it with the fume suppressant Fumetrol 21, but currently they are using LF19 again.

In 2008, as indicated in the 1/5/2008 Operations, Maintenance & Malfunction Abatement Plan of what was then known as Deco' Plate Manufacturing; the surfactants or fume suppressants used at that time were:

- ANKOR WETTING AGENT F, manufactured by Enthone, and
- Clepo Chrome Mist Control, manufactured by MacDermid Incorporated.

It is unknown to AQD at present if ANKOR WETTING AGENT TYPE F or Clepo Chrome Mist Control contained PFOS, as the Material Safety Data Sheets at that time did not say.

Safety attire required:

Safety glasses with side shields, and steel-toed boots.

Odor evaluation:

- Start time: 9:58 AM.
- Odors detected: No odors from LP&P detected.
- Weather conditions: Sunny, humid, nd 75 degrees F, with winds out of the W at 0-5 mph.
- Route taken: DeMille to WHitney, back to DeMille, past LP&P, and through residential subdivision wst of LP&P.

Arrival:

This was an unannounced inspection. AQD was represented by inspector Dan McGeen.

- Arrival time: 10:11 AM.
- Odors detected in parking lot: None.
- Visible emissions detected: None.

D. McGeen contacted Plating Manager Steve Sedley, and provided his credentials, per AQD procedure. In a pre-inspection meeting, which was attended by Human Resources Manager Joe Dubreuil, the objectives of the inspection were discussed.

Inspection:

EU-CHROMEPLATE32, PTI 25-13, and Subpart N:

EU-CHROMEPLATE32 was operating. S. Sedely explained the operations of the process as they walked alongside it.

The control sysytem, called System #1, is a 2-stage composite mesh pad (CMP) scrubber followed by a HEPA filter, which is considered a 3rd stage. At 11:07 AM, pressure drop data was collected as follows:

- Stage 1: 0.4-0.45 inches, water column (w.c.)
- Stage 2: 0.8 inches, w.c.
- Stage 3 (HEPA filter): 0.0 inches, w.c.
- Stage 1 and 2 combined 1.36 inches, w.c.
- Overall reading: 2.6 inches, w.c.

Note: It is not clear why the reading for the entire system, 2.6 inches, was so high, with the HEPA filter pressure drop at 0.0 inches. AQD will check on normal pressure drop for the HEPA filter.

The CMP scrubber had been replaced with a CMP and HEPA filter in late 2018, under MAPC Rule 285 (2)(d), for replacement of air pollution control equipment with equivalent or more efficient equipment. The company's consultant, Scientific Control Laboratories, Inc. (SCT) subsequently made a case that a stack test of the new control was not needed for a decorative chrome plating process, whereas it would be a for a hard chrome plating process

EU-CHROMEETCH, PTI 25-13:

EU-CHROMEETCH was operating. It is controlled by a 2-stage scrubber, the two stages being called the pre-plate scrubber and the nitric scrubber which together are called System #5. Control is also provided by fume suppressant.

LP&P has determined the appropriate pressure drop ranges for System #5 is

- For Stage 1 (packed bed scrubber (PBS)): 1.0-3.0 inches, w.c.
- For Stage 2 (CMP scrubber): 0.30-1.5 inches, w.c.
- Overall range for System #5: 1.7-3.3 inches, w.c.

Actual operating parameters:

- Stage No. 1 (PBS): 1.4-1.8 inches, fluctuating, but mostly 1.5-1.6 inches, w.c.
- Stage No. 2 (CMP): 0.55 inches, w.c.
- Overall for System #5: 2.0-2.1 inches, w.c.

Upon examination of the ductwork for the EU-CHROMEETCH control system (Systems #3 and 4) there did not appear to be any leaks from the ductwork. For the fluctuation of the pressure drop reading for the gauge for Stage No. 1, S. Sedley indicated they will have the drum for the motor calibrated.

It was explained that the pre-plate process is everything that is done to preprep plastic parts before plating is applied, and etching is part of the pre-plate process. Neutralization and activation, covered elsewhere under the PTI, are also part of that.

PTI 25-13, EU-CHROMEETCH, SC VI.2 requires: The permittee shall keep the following information on a weekly basis for EU-CHROMEETCH:

- a) Determine and record the bath density in each tank
- b) Sulfuric acid emission calculations in milligrams per cubic meter
- c) Hexavalent chromium emission calculations in milligrams per cubic meter

For SC VI.2.a and c, the company was initially unaware that their consultant, SCT, has been keeping these calculations for years, in support of the annual MAERS reporting they do for LP&P. This data was provided to AQD on 10/11/2023, once the company had reached out to SCT. This data meets the above permit requirements.

FG-NONCHROMEPROCESS, PTI 25-13:

This flexible group is for non-chrome electrolyzing processes, and includes:

- EU-COPPERTANKS
- EU-ACTIVATORTANKS
- EU-NEUTRALIZERTANKS

EU-COPPERTANKS is controlled by 6 cyclone separators and a dry scrubber system, aka System #2. The acceptable range for System #2 is 17-20 amps. Their maintenance staff check the amps with a meter and these are logged into their weekly report of readings from Systems #1-5. There is not a

continuous display for the amp reading. In records received for the latest semi-annual Subpart N compliance report, all readings for System #2 were consistently 18 amps for the first 6 months of 2023, indicating compliance.

EU-ACTVATORTANKS is controlled by a PBS, aka System #3, as D. McGeen understood it. The acceptable pressure drop range is 1.0-3.0 inches, w.c. He did not obtain a pressure drop reading during the inspection, but the recordkeeping for the first 6 months of 2023 showed pressure drop was generally from 1.5-1.6 inches, occasionally as low as 1.3 and as high as 1.7 inches, w.c., within the compliant range.

EU-NEUTRALIZERTANKS is controlled by a PBS scrubber, aka System #4, as D. McGeen understood it. The acceptable pressure drop range is 1.0-3.0 inches, w.c. He did not obtain a pressure drop reading during the inspection, but the recordkeeping for the first 6 months of 2023 showed pressure drop was generally from 1.5-1.6 inches, occasionally as low as 1.3 and as high as 2.2 inches, w.c., within the compliant range.

Plastic injection molding, MAPC Rule 286(2)(b):

Plastic injection molding at the plant is unchanged, D. McGeen was informed. This area of the plant was observed, during the inspection.

EU-VCRESTLINE, PTI 25-13:

Paint booth are now on a weekly or more frequent schedule for filter changes, D. McGeen was informed.

Particulate filters were of the mat/panel type, and appeared to be in good shape.

Per request by AQD inspector Nathan Hude around 2015 or 2016, LP&P began submitting coating VOC recordkeeping from FG-COATING aka the permitted EU-VCRESTLINE and from the permit exempt Bowtie Line on a quarterly basis. In 2022, the reporting stopped, and appeared as if it may have coincided with turnover of staff at the plant. VOC emissions were very low in 2022, well below the permitted limit. However, because LP&P is under a new Administrative Consent Order, 2019-12, AQD will email a request to the company to resume quarterly VOC reporting.

Bowtie line, MAPC Rule 287(2)(c):

The Bowtie line has been removed, D. McGeen was informed. The exhaust stacks for those booths may now be capped.

Departure:

- Departure time: 12:03 PM.
- Odors detected: None.
- Visible emissions detected: None.

COMPLIANCE CHECK WITH SELECTED CONDITIONS OF PTI NOS. 25-13 and 11-13:

EU-CHROMEPLATE32

DESCRIPTION: Decorative chromium electroplating tank #32.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Use of a wetting agent for fume suppression and one mesh pad mist eliminator.

Compliance check with selected special conditions (SC) for PTI 25-13, EU-CHROMEPLATE32:

PTI 25-13 SC	Requirement	Comments	Complies?
EU- CHROME- PLATE32, SC I.1	Total chromium emissions limit of 0.007 to mg/dscm.	Emission calculations by the company's consultant, SCT indicate that the 2022 annual emission concentration was 0.0001 mg/dscm.	Yes
EU- CHROME- PLATE32 SC III.1	<p>Within 30 calendar days of the date of permit approval, the permittee shall submit to the AQD District Supervisor, an approvable operation and maintenance plan. The plan shall contain all information required by 40 CFR 63.342(f)(3)(i), which includes the following:</p> <p>a) Operation and maintenance criteria for EU-CHROMEPLATE32 add-on control device(s), and for the process and control device(s) monitoring equipment as well as a standardized checklist to document the operation and maintenance of the equipment;</p> <p>b) The work practice standards for the add-on control device(s) and monitoring equipment;</p> <p>c) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and</p> <p>d) A systematic procedure for identifying process equipment, add-on</p>	On 3/26/2019, AQD received an updated MAP from the company, dated 2/27/2019.	Yes

	control device(s) and monitoring equipment malfunctions and for implementing corrective actions to address such malfunctions.		
EU-CHROME-PLATE32 SC III.2	The permittee shall not operate EU-CHROMEPLATE32 unless the chemical fume suppressant containing a wetting agent is applied in quantities and at a frequency to ensure the surface tension of the tank does not exceed, at any time during operation, 40 dynes/cm (2.8×10^{-3} pound-force per foot)) as measured by a stalagmometer or does not exceed 33 dynes/cm (2.3×10^{-3} pound-force per foot) as measured by a tensiometer.	Review of records in the most recent semi-annual Subpart N compliance reports showed that surface tension limit was met each day, with zero exceedances.	Yes
EU-CHROME-PLATE32 SC IV.1	The permittee shall not operate EU-CHROMEPLATE32 unless the composite mesh pad system with mist eliminator is installed, maintained, and operated in a satisfactory manner.	The CMP scrubber and HEPA filter, aka System #1, appeared to be installed, maintained, and operated in a satisfactory manner. The appropriate pressure drop range is 1.0-3.0 inches, water column (w.c.).	Yes
EU-CHROME-PLATE32 SC IV.2	The permittee shall equip and maintain the composite mesh pad system with mist eliminator with a differential pressure monitoring device.	System #1, is a 2-stage composite mesh pad (CMP) scrubber followed by a HEPA filter, which is considered a 3rd stage. Each stage has its own pressure drop gauge.	Yes
EU-CHROME-PLATE32 SC V.	NA	NA	NA

<p>EU-CHROME-PLATE32, SC VI.1</p>	<p>The permittee shall monitor the surface tension of the EU-CHROMEPLATE32 once every four (4) hours of tank operation for the first 40 hours of tank operation. If there are no exceedances during the first 40 hours of tank operation, then surface tension measurements may be conducted once every eight (8) hours of tank operation for the next 40 hours of tank operation. If there are no exceedances during the 40 hours of tank operation when surface tension measurements are being conducted every eight (8) hours, then surface tension measurements may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every four hours must be resumed and the subsequent decrease in frequency shall follow the schedule as laid out above. The minimum frequency of monitoring allowed is once every 40 hours of tank operation. An example of monitoring frequency is available at 40 CFR 63.343(c)(5)(ii)(C). The surface tension shall be monitored with a stalagmometer or tensiometer as specified in Method 306B of 40 CFR Subpart N.</p>	<p>Review of surface tension records throughout the 2023 fiscal year showed that the company was doing this, based on the time periods between monitoring. They do it a minimum of 1 time per shift, even if that is not required under Subpart T.</p> <p>Note: They do not operate between Thursday nights and Sunday nights, so there are no surface tension checks during that time frame.</p>	<p>Yes</p>
<p>EUCHROME-PLATE32, SC VI.2</p>	<p>The permittee shall perform inspections of the composite mesh pad (CMP) system as follows:</p>	<p>Records received in the semi-annual Subpart N compliance report showed that;</p>	<p>Yes</p>

	<p>a) Determine pressure drop across the CMP system on a daily basis. If the pressure drop across the control varies by more than ± 2 inch of water gauge, from the pressure drop determined during compliance testing or as specified by the manufacturer, the permittee shall document the variation, and review the operation and maintenance procedures. The permittee shall document any corrective action.</p> <p>b) Visually inspect the CMP system, on a quarterly basis, to ensure there is proper drainage, no chromic acid build up on the pads, and no evidence of chemical attack on the structural integrity of the control device.</p> <p>c) Visually inspect the back portion of the mesh pad closest to the fan, on a quarterly basis, to ensure there is no breakthrough of chromic acid mist.</p> <p>d) Visually inspect ductwork from tanks to the CMP system, on a quarterly basis, to ensure there are no leaks.</p> <p>e) Perform wash-down of composite mesh pads in accordance with manufacturer's recommendations.</p> <p>.</p>	<p>a.) Pressure drop was being recorded on a daily basis (Mon.-Thurs.). The CMP scrubber with HEPA filter appears as "System #1" in their "Weekly Differential Pressure Reading Log for Scrubbers/Exhaust/Rectifier (Systems #1 Through 5)." This document, submitted as part of the semi-annual Subpart N reporting, is stored electronically by the AQD Lansing District Office (LDO) in Content Manager.</p> <p>b.) Quarterly inspections were being done, and pads cleaned as needed (chrome scrubber pads were cleaned on 1/28/2023, soaked in neutralizer and cleaned on 3/10/2023, and cleaned and replaced on 5/19/2023.)</p> <p>c.) Quarterly inspections were being done (see above.)</p>	
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		<p>d.) They appear to be conducting the required quarterly checks.</p> <p>e.) Pads were reported to be cleaned as needed.</p>	
EUCHROME-PLATE32, SC VII.1	The exhaust gases from the stack SV-CREXHSYS1 shall be discharged unobstructed vertically upwards to the ambient air form a stack with a maximum exhaust diameter of 32 inches and a minimum height above ground of 50 feet.	It would not have been possible to use a laser range finder on the stack from ground level, due to the stack exhausting through the roof, but the stack appeared to be of the required dimensions.	Yes

EU-CHROMEETCH**DESCRIPTION:** One pre-etch tank (#1) and one etch tank (#2)**Flexible Group ID:** NA**POLLUTION CONTROL EQUIPMENT:** Packed bed scrubber and composite mesh pad**Compliance check with selected SC for PTI 25-13, EU-CHROMEETCH:****Compliance check with selected SC for PTI 25-13, EU-CHROMEETCH:**

	Requirement	Comments	Complies?

PTI 25-13 EUCHROMEETCH SC			
EUCHROMEETCH, SC I.1	Emission limit for hexavalent chromium of 11.5 micrograms per cubic meter.	Initially, the company did not believe they had emission calculations, but on 10/11/2023, provided emissions data their consultant has reportedly used for MAERS purposes. The 2022 calendar year emission concentration for hexavalent chrome was 0.0018 milligrams, or 1.8 micrograms, per cubic meter.	Yes
EUCHROMEETCH, SC 1.2	Emission limit for sulfuric acid of 6.05 milligrams per cubic meter.	Initially, the company did not believe they had emission calculations, but on 10/11/2023, provided emissions data their consultant has reportedly used for MAERS purposes. The 2022 calendar year emission concentration for sulfuric acid was 0.0010 milligrams per cubic meter.	Yes
EUCHROMEETCH, SC III.1	<p>Within 30 calendar days of the date of permit approval, the permittee shall submit to the AQD District</p> <p>Supervisor, an approvable operation and maintenance plan. The plan shall contain all the following:</p> <p>(R 336.1910)</p> <p>a) Operation and maintenance criteria for EU-CHROMEETCH, add-on control device(s), and for the</p> <p>process and control device(s) monitoring equipment as well as a</p>	On 3/26/2019, AQD received an updated MAP from the company, dated 2/27/2019.	Yes

	<p>standardized checklist to document the</p> <p>operation and maintenance of the equipment;</p> <p>b) The work practice standards for the add-on control device(s) and monitoring equipment;</p> <p>c) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance</p> <p>or other preventable conditions do not occur; and</p> <p>d) A systematic procedure for identifying process equipment, add-on control device(s) and monitoring equipment malfunctions and for implementing corrective actions to address such malfunctions.</p>		
EUCHROMEETCH, SC III.2	<p>The permittee shall not operate EU-CHROMEETCH unless the packed bed and composite mesh pad are installed, maintained, and operated in a satisfactory manner.</p>	<p>The PBS and CMP scrubber, aka the pre-plate scrubber and nitric scrubber, together are known as System #5. They appeared to be working properly, and the pressure drop readings were within the appropriate ranges.</p>	Yes
EUCHROMEETCH, SC III.3	<p>The permittee shall not operate EU-CHROMEETCH unless the chemical fume suppressant containing a</p> <p>wetting agent is applied in quantities and at a frequency to ensure the surface tension of the tank does not</p> <p>exceed, at any time during operation, 35 dynes/cm (2.8x10⁻³ pound-force per foot)) as measured by a stalagmometer or does not</p>	<p>The company has indicated that they are tracking these readings on a spreadsheet.</p>	Yes

	exceed 32 dynes/cm (2.3×10^{-3} pound-force per foot) as measured by a tensiometer.		
EUCHROMEETCH, SC IV.1	The permittee shall equip and maintain the composite mesh pad and packed bed scrubber systems with a differential pressure monitoring device.	There is a pressure drop gauge for each system (Systems #3 and 4).	Yes
EUCHROMEETCH, SC V.	NA	NA	NA
EUCHROMEETCH, SC VI.1	The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.	Initially, the company did not believe they had emission calculations, but on 10/11/2023, provided emissions data their consultant has reportedly used for MAERS purposes.	Yes
EUCHROMEETCH, SC VI.2	The permittee shall keep the following information on a weekly basis for EU-CHROMEETCH:	Please see below.	See below
EUCHROMEETCH, SC VI.2a	Determine and record the bath density in each tank.	The company has indicated they record bath concentration 2-3 times per day, and this information is stored in a database.	Yes
EUCHROMEETCH, SC VI.2b	Sulfuric acid emission calculations in milligrams per cubic meter.	Initially, the company did not believe they had emission calculations, but on 10/11/2023, provided emissions data their	Yes

		consultant has reportedly used for MAERS purposes.	
EUCHROMEETCH, SC VI.2c	Hexavalent chromium emission calculations in milligrams per cubic meter.	Initially, the company did not believe they had emission calculations, but on 10/11/2023, provided emissions data their consultant has reportedly used for MAERS purposes.	Yes
EUCHROMEETCH, SC VI.3	<p>The permittee shall monitor the surface tension of the EU-CHROMEETCH once every four (4) hours of tank operation for the first 40 hours of tank operation. If there are no exceedances during the first 40 hours of tank operation, then surface tension measurements may be conducted once every eight (8) hours of tank operation for the next 40 hours of tank operation. If there are no exceedances during the 40 hours of tank operation when surface tension measurements are being conducted every eight (8) hours, then surface tension measurements may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every four hours must be resumed and the subsequent decrease in</p>	The company has indicated they are doing this.	Yes

	frequency shall follow the schedule as laid out above. The minimum frequency of monitoring allowed is once every 40 hours of tank operation		
EUCHROMEETCH, SC VI.4	<p>The permittee shall perform inspections of the composite mesh pad (CMP) and the packed bed scrubber</p> <p>systems as follows: (R 336.1224, R336.1225, R 336.1910)</p> <p>a) Determine pressure drop across the both systems on a daily basis. If the pressure drop across the control varies by more than ± 2 inch of water gauge, from the pressure drop determined during compliance testing or as specified by the manufacturer, the permittee shall document the variation, and review the operation and maintenance procedures. The permittee shall document any corrective action.</p> <p>b) Visually inspect the CMP system, on a quarterly basis, to ensure there is proper drainage, no chromic acid build up on the pads, and no evidence of chemical attack on the structural integrity of the control device.</p> <p>c) Visually inspect the back portion of the mesh pad closest to the fan, on a quarterly basis, to ensure there is no breakthrough of chromic acid mist.</p>	<p>Records indicate that they are:</p> <p>a.) Doing this on a daily basis.</p> <p>b.) Doing this on a quarterly basis.</p>	Yes

	<p>d) Visually inspect ductwork from tanks to the CMP system, on a quarterly basis, to ensure there are no leaks.</p> <p>e) Perform wash-down of composite mesh pads in accordance with manufacturer's recommendations.</p>	<p>c.)Doing this on a quarterly basis.</p> <p>d.) Doing this on a quarterly basis.</p> <p>e.) Doing this as needed. Etch-scrubber pads were said to be cleaned the week of 3/27-30/2023.</p>	
EUCHROMEETCH, SC VI.	The exhaust gases from the stack SVCHREXHSYS5 shall be discharged unobstructed vertically upwards from a stack with a maximum diameter of 26 inches and a minimum height above ground level of 25 feet.	Based on the height of the roof, the stack appeared as if it would be of the appropriate dimensions.	Yes

Compliance check with selected SC for PTI 25-13, FG-NONCHROMEPROCESS:

PTI 25-13, FG-NONCHROMEPROCESS, SC	Requirement	Comments	Complies?
FG-NONCHROMEPROCESS, SC III.1	The permittee shall not operate the emission units covered by FG-NONCHROMEPROCESS unless the corresponding control device is installed, maintained, and operated in a satisfactory manner.	The control devices appeared to be operating properly.	Yes

FG-NONCHROMEPROCESS, SC III.2	<p>The permittee shall not operate FG-NONCHROMEPROCESS unless a malfunction abatement plan (MAP) as described in Rule 911(2), for each control device associated with FG-NONCHROMEPROCESS, has been submitted within 60 days of permit issuance, and is implemented and maintained.</p> <p>NOTE: III.2(a)-(c) are not spelled out here, for brevity.</p>	On 3/26/2019, AQD received an updated MAP from the company, dated 2/27/2019.	Yes
FG-NONCHROMEPROCESS, SC IV.	NA	NA	NA
FG-NONCHROMEPROCESS, SC V.	NA	NA	NA
FG-NONCHROMEPROCESS, SC VI.1	The permittee shall keep the following information on a weekly basis for EU-COPPERTANKS:	Please see below.	See below
FG-NONCHROMEPROCESS, SC VI.1.a	Monitor and record fan electric current for each cyclone.	This is being done, per the records submitted of all the scrubber systems (including non-Subpart N) at the plan,t as part of the semi-annual Subpart N compliance reports.	Yes
FG-NONCHROMEPROCESS, SC VI.1.b	Monitor and record pressure drop across the packed bed scrubber.	This is being done, per the records submitted of all the scrubber systems (including non-Subpart N) at the plan,t as part of the semi-	Yes

		annual Subpart N compliance reports.	
FG-NONCHROMEPROCESS, SC VII.	NA	NA	NA

Compliance check with selected SC of PTI 25-13, FG-FACILITY:

PTI 25-13, FG-FACILITY, SC	Requirement	Comments	Complies?
FG-FACILITY, SC I.1	Emission limit for each individual HAP of < 9.0 TPY.	HAPs emissions are tracked in their database. These are reported to MAERS, S. Sedely advised, and are below permitted limits.	Yes
FG-FACILITY, SC I.2	Emission limit for aggregate HAPs of , 22.5 TPY.	HAPs emissions are tracked in their database. These are reported to MAERS, S. Sedely advised, and are below permitted limits.	Yes
FG-FACILITY, SC II.	NA	NA	NA
FG-FACILITY, SC III.	NA	NA	NA
FG-FACILITY, SC IV.	NA	NA	NA
			Yes

FG-FACILITY, SC V.1	<p>The permittee shall determine the HAP content of any material as received and as applied, using</p> <p>manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the</p> <p>manufacturer's HAP formulation data using EPA Test Method 311.</p>	AQD was informed that they are keeping a database of safety data sheets (SDS) and they keep environmental data sheets (EDS) in their lab.	
FG-FACILITY, SC VI.1	The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition	Initially, the company did not believe they had emission calculations, but on 10/11/2023, provided emissions data their consultant has reportedly used for MAERS purposes.	Yes
FG-FACILITY, SC VI.2	<p>The permittee shall keep the following information on a calendar month basis for FGFACILITY:</p> <p>a) Gallons or pounds of each HAP containing material used.</p> <p>b) Where applicable, gallons or pounds of each HAP containing material reclaimed.</p> <p>c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.</p> <p>d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in</p> <p>tons per calendar month.</p> <p>Lapeer Plating and Plastics (N1863) April 25, 2013</p> <p>Permit No. 25-13 Page 15 of 15</p> <p>e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in</p>	They are tracking HAPs usage and emissions in their database and reporting to MAERS, S. Sedely indicated.	Yes

	<p>tons per 12-month rolling time period as determined at the end of each calendar month. For the first</p> <p>month following permit issuance, the calculations shall include the summation of emissions from the</p> <p>11-month period immediately preceding the issuance date. For each month thereafter, calculations</p> <p>shall include the summation of emissions for the appropriate number of months prior to permit issuance</p> <p>plus the months following permit issuance for a total of 12 consecutive months.</p> <p>The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee</p> <p>shall keep all records on file and make them available to the Department upon request.</p>		
FG-FACILITY, SC VII.	NA	NA	NA
FG-FACILITY, SC VIII.	NA	NA	NA
FG-FACILITY, SC IX.	NA	NA	NA

ACO AQD No. 2019-12 requirements are below.

COMPLIANCE PROGRAM AND IMPLEMENTATION SCHEDULE

9.A. On and after the effective date of this Consent Order, the Company shall comply with the Malfunction Abatement Plan (MAP) for EU-CHROMEPLATE32 and EU-CHROMEETCH dated

February 27, 2019. The MAP shall be an enforceable part of this Consent Order and attached as Exhibit A to this Consent Order. Any future revisions to the MAP shall replace Exhibit A on the date of written approval from the AQD Lansing District Supervisor.

9.B. On and after the effective date of this Consent Order, the Company shall comply with Special Conditions 111.2, IV.1, VI.3, and VI.1 for EU-CHROMEPLATE32 of PTI 25-13, as amended.

9.C. On and after the effective date of this Consent Order, the Company shall comply with and Special Conditions 111.2, IV.1, and VI.3 for EU-CHROMEETCH of PTI 25-13, as amended.

9.D. On and after the effective date of this Consent Order, the Company shall comply with Special Condition IV.1 and IV.2 for FG-COATING of General Permit 11-13, as amended.

9.E. On and after the effective date of this Consent Order, the Company shall comply with Special Condition 111.1 for FG-NONCHROMEPROCESS of PTI 25-13, as amended.

9.F. On and after the effective date of this Consent Order, the Company shall comply with PTI 25-13, as amended.

LP&P appears to be in compliance with the above requirements of ACO AQD No. 2019-12.

Conclusion:

No instances of noncompliance were identified.

NAME 

DATE 11/7/2023

SUPERVISOR 