



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GRETHNER
DIRECTOR

November 15, 2018

Mr. John Kuruda
Waste Treatment Supervisor/Environmental Coordinator
Lapeer Plating & Plastics, Inc.
395 DeMille Road
Lapeer, Michigan 48446

SRN: N1863, Lapeer County

Dear Mr. Kuruda:

VIOLATION NOTICE

On September 12, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Lapeer Plating & Plastics, Inc. (LPP), located at 395 DeMille Road, Lapeer, Michigan. The purpose of this inspection was to determine LPP'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 11-13 and 25-13; and Consent Order AQD number 27-2015.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-CHROMEPLATE32	Permit to Install (PTI) No. 25-13, Special Condition (SC) EU-CHROMEPLATE32 III. 2; 40 CFR Part 63, Subpart N, Section 63.342(d)(3)	Exceedance of dynes/centimeter limit on March 14, 2018
EU-CHROMEPLATE32	PTI No. 25-13, SC EU-CHROMEPLATE32 VI. 1; 40 CFR Part 63, Subpart N, Section 63.343(c)(5)	Failure to increase monitoring frequency after exceedance of dynes/centimeter limit on March 14, 2018
EU-CHROMEETCH	PTI No. 25-13, SC EU-CHROMEETCH III.2 ; Rule 910	Leak identified on ductwork leading to 2-stage scrubber.
EU-CHROMEETCH	PTI No. 25-13, SC EU-CHROMEETCH IV.1 ; Consent Order AQD No. 27-2015, Paragraph 9. B.	Scrubber's stage 2 pressure drop gauge temporarily not working
EU-COPPERTANKS	PTI No. 25-13, SC FG-NONCHROMEPROCESS III. 1	Dry scrubber fan not working

For EU-CHROMEPLATE32, PTI No. 25-13, Special Condition (SC) III. 2 states:

"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."

The Ongoing Compliance Status Report (Report) dated July 17, 2018, indicates that on March 14, 2018, there was a dynes/cm value recorded of 34 dynes/cm. This is over the 33 dynes/cm limit in the PTI, and the current federal regulatory limit of 33 dynes/cm for a decorative chromium electroplating tank using a chromic acid bath, in Title 40 of the Code of Federal Regulations (CFR), Part 63, Subpart N. This is therefore a violation of both PTI No. 25-13, SC EU-CHROMEPLATE32 III. 2, and the chromium NESHAP, Section 63.342(d)(3).

It should be noted that on the first page of LPP's Report, Section 2 references the applicable emissions limit for Tank ID #32 as <35 dynes/cm. In the past, this had been the federal dynes/cm limit, but it was changed to no greater than 33 dynes/cm, on September 19, 2014. That was the implementation date set by the revised chrome NESHAP, as published in the Federal Register on September 19, 2012. Please ensure that LPP staff are familiar with the current limit, to avoid future exceedances.

For EU-CHROMEPLATE 32, SC VI. 1 states:

"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."

The Report shows an exceedance of the dynes/cm limit, on March 14, 2018. However, it does not show an increase to once every four hours in the monitoring frequency for taking surface tension readings. It is my understanding that a sample taken at 3:01 AM on March 14 showed an exceedance, upon being tested, but a new measurement was not made until over twelve hours later, after a 3:54 PM sample was taken. This is a

violation of both PTI No. 25-13, SC EU-CHROMEPLATE32 VI. 1, and the chromium NESHAP, Section 63.343(c)(5).

The cited SC EU-CHROMEPLATE32 VI. 1 of PTI number 25-13 is also enforceable as paragraph 9.C of Consent Order, AQD number 27-2015.

During the inspection, the 2-stage scrubber serving EU-CHROMEETCH was examined. A leak was identified on the ductwork leading from the chrome etch process to the scrubber. The damp, greenish residue found on the underside of the duct appeared indicative of trivalent chromium. This is a violation of PTI No. 25-13, SC EUCHROMEETCH III. 2, which states:

"The permittee shall not operate EU-CHROMEETCH unless the packed bed and composite mesh pad are installed, maintained, and operated in a satisfactory manner."

The cited SC EUCHROMEETCH III. 2 of PTI number 25-13 is also enforceable as paragraph 9. B of Consent Order AQD. No. 27-2015.

The leaking ductwork is furthermore considered 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 operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Additionally, the pressure drop gauge for stage 2 of the EU-CHROMEETCH scrubber was not operating, until after a plant employee had been called to address it. This constitutes a violation of PTI No. 25-13, SC EU-CHROMEETCH IV. 1, which states:

"The permittee shall equip and maintain the composite mesh pad and packed bed scrubber systems with a differential pressure monitoring device."

Lastly, during the course of the inspection, the dry scrubber control device for EUCOPPERTANKS was examined, and found to be not operating. The non-operational dry scrubber constitutes a violation of SC FG-NONCHROMEPROCESS III. 1, which states:

"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."

It is noted that LPP personnel began to immediately make repairs to the unit, while I was on-site. Before the end of the day, I received from you, by e-mail, a copy of a work order demonstrating that repairs were complete. The documentation I received from you also included a copy of the invoice for the new fan motor, which had been installed for the dry scrubber. Thank you for your prompt attention to bringing the control device back into operation.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 10, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 the DEQ, AQD, Lansing District, at Constitution Hall, 525 West Allegan, First Floor South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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

Sincerely,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-284-6638

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Brad Myott, DEQ