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December 22, 2015

Ms. April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
Michigan Department of Environmental Quality
Grand Rapids District Office
350 Ottawa Avenue NW; Unit 10
Grand Rapids, Michigan 49503-2341

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AIR QUALITY DIVISION
GRAND RAPIDS DISTRICT

Dear Ms. Lazzaro,

This letter is in response to your Violation Notice dated December 2, 2015 which resulted from your inspection of our 2610 Remico Street facility (SRN: N2787) on November 23, 2015.

Electro Chemical Finishing Co. (ECF) has taken action to achieve and maintain compliance with the terms and conditions of Clean Air Act: Part 55, Air Pollution Control, and the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended and the administrative rules. Below are our responses to the items outlined in the violation notice letter.

Failure to properly operate and maintain an air-cleaning device for the EUBLINE.

On the morning of Monday November 23, 2015, Electro Chemical Finishing environmental staff performed the daily inspection on our air scrubbing systems as called out in our Operation and Maintenance Plan. During this inspection, it was noted that a small leak had developed along a welded seam at the bottom of the EUBLINE air scrubber. The inspections of Friday November 20, 2015 and preceding did not identify a leak in this area. Due to the sub-freezing temperatures of that morning and the previous days, a small mound of ice had formed beneath the leak as a result of the dripping. Upon identifying the leak, environmental staff notified ECF maintenance personnel who proceeded to the roof to evaluate and repair the leak. The mound of ice was contained and the dripping was collected to prevent it from reaching the surface of the roof. The leak was repaired that day. ECF will continue to monitor the area for re-occurrence of the leak and repair any issues as they arise.

For your reference, I have attached a copy of Rule 912 which addresses abnormal conditions. ECF did not exceed any emission limits during the malfunction and no written report was required. Therefore, ECF does not believe this incident constitutes a violation. The following outlines the steps ECF took during this malfunction:

1. Electro Chemical Finishing was performing daily inspections of the air scrubbing systems as called out in our Operation and Maintenance Plan. The leak was identified the morning of the MDEQ visit and was not noted in the preceding inspection reports. Based on this, it is logical to believe that the leak began after the Friday morning inspection and before it was identified on Monday morning. The Monday morning inspection was the next one that was scheduled. Therefore the leak was identified as soon as practically possible.
2. Electro Chemical Finishing maintenance personnel were notified and began to address the situation immediately. They were on the roof addressing the issue when MDEQ personnel accessed the roof to do the inspection.
3. The plating line associated with the EUBLINE emission unit was not operating at the time of the site inspection on November 23, 2015 due a maintenance shut down. Operation of EUBLINE resumed on November 30, 2015 after the repair was completed. The air scrubber continued to operate because it is our standard operating procedure to leave the fume scrubbers running to control indoor air quality. As the source of process emissions was not in operation, the small leak in the scrubber housing could not result in an emission exceedance of any applicable standard or limitation.
4. The small leak in the bottom of the scrubber housing did not affect the operation or efficiency of the air scrubber. Fluid continued to be recirculated through the scrubber system. Electro Chemical Finishing did not exceed any emission limits during this malfunction. Therefore, an emission exceedance would not have occurred due to this malfunction.

ECF was in compliance with the requirements of our Operation and Maintenance (O&M) Plan and Rule 1910 by performing our scheduled inspections and immediately addressing the issue when it was identified per Rule 912 and the O&M plan. Furthermore, as the leak in the scrubber would not result in the discharge of non-compliant air during operation of the plating line, and as the plating line was not in operation when the leak occurred, no emission standard or limitation was exceeded. EUBLINE uses chemical fume suppressant to control the surface tension of each electroless chromic acid bath. Chemical fume suppressants provide the control of any chromic acid emissions. Therefore, ECF believes no violation occurred and complied with Rule 912 during the malfunction.

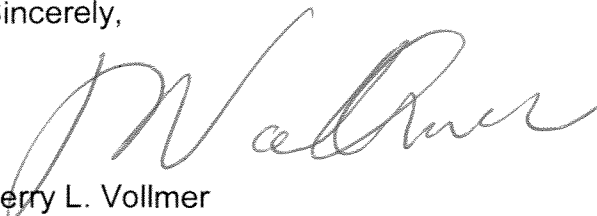
Provide information for an exemption determination for the installation of the replacement nitric acid strip line and scrubber pursuant to Rule 278a and Rule 290.

ECF contracted with Fishbeck, Thompson, Carr and Huber to provide information for this exemption determination prior to operation of this equipment. A report was generated utilizing the exemption provided in Rule 290. This report was provided to MDEQ via email on Friday, December 4, 2015. Receipt was acknowledged that same day via email response.

ECF has been diligent in performing the daily inspections of our air control equipment and addressing any issues noted during these inspections in an expedient manner. We have enlisted the assistance of experts in the air scrubbing industry and are utilizing their expertise to improve our knowledge in the use and maintenance of the air scrubbing equipment. We have also invested heavily in new air control equipment and are investigating additional investment in this area.

If you need any additional information, please let us know. We are committed to being environmentally responsible in our metal finishing operations and complying with or exceeding all regulatory requirements.

Sincerely,

A handwritten signature in dark ink, appearing to read 'T. Vollmer', written in a cursive style.

Terry L. Vollmer
Chief Executive Officer
Electro Chemical Finishing Company

Attachment

cc (via email): Mr. William Horn, Esq, Mika Meyers Beckett and Jones
 Mr. Don Post, President, Electro Chemical Finishing Co.
 Mr. Steve Hulst, Environmental Manager, Electro Chemical Finishing Co.
 Ms. Heidi Hollenbach, MDEQ
 Ms. Lynn Fiedler, MDEQ
 Ms. Mary Ann Dolehanty, MDEQ
 Ms. Teresa Seidel, MDEQ
 Mr. Thomas Hess, MDEQ