



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

February 4, 2015

Mr. Terry Vollmer
Electro Chemical Finishing
2610 Remico Street SW
Wyoming, Michigan 49519

SRN: N2787, Kent County

Dear Mr. Vollmer:

VIOLATION NOTICE (CORRECTION)

On January 16, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Electro Chemical Finishing located at 2610 Remico Street SW, Wyoming, Michigan. The purpose of this inspection was to determine Electro Chemical Finishing'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 administrative rules; and the conditions of Permit to Install (PTI) number 584-91C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
One existing vapor degreaser	40 CFR 63.468(f)	Failure to submit annual report from 2010-2014
EUALINE; two decorative trivalent chrome plating tanks	40 CFR 63.345(b) PTI No. 584-91C, Special Condition (SC) VII.1	Failure to submit notification of construction
EUALINE	40 CFR 63.6(e)(1)(i) Rule 910 PTI No. 584-91C, SC IV.1 and VI.2	Failure to properly operate and maintain air pollution control equipment
EUALINE	PTI No. 584-91C, SC VI.4	Failure to maintain record of control device inspections
EUBLINE	Rule 910	Failure to properly operate and maintain air pollution control equipment

Process Description	Rule/Permit Condition Violated	Comments
EUBLINE	PTI No. 584-91C, SC III.3	Failure to properly implement the Operation and Maintenance Plan (O&M Plan)
EUBLINE	PTI No. 584-91C, SC VI.2	Failure to maintain record of control device inspections
EUCLINE	40 CFR 63.6(e)(1)(i) Rule 910 PTI No. 584-91C, SC IV.1	Failure to properly operate and maintain air pollution control equipment
EUCLINE	PTI No. 584-91C, SC III.3	Failure to properly implement the O&M Plan
EUCLINE	PTI No. 584-91C, SC VI.3	Failure to maintain record of control device inspections
Rack Strip Line Scrubber	Rule 910	Failure to properly operate and maintain air pollution control equipment
Waste Treatment Scrubber	Rule 910	Failure to properly operate and maintain air pollution control equipment

During the inspection, AQD staff observed operation of the scrubbers and found that two had obvious water leakage, one had significant air infiltration and all had the magnehelic gauges removed. This is considered failure to properly operate and maintain air pollution control equipment.

Additionally, in accordance with Rule 1001 (R 336.2001) and General Condition 13 of Permit to Install Number 584-91C, the AQD is requesting that Electro Chemical Finishing submit a test protocol within 60 days of receipt of this letter. The protocol shall include a proposed date for the testing which is to be conducted no later than May 20, 2015. The test should determine the emission rate of total chromium from EUALINE, hexavalent chromium, formaldehyde, methanol and HCl from EUBLINE and hexavalent chromium from EUCLINE. Test requirements should be discussed with the AQD Technical Programs Unit prior to submittal of protocol. All testing must be conducted using United States Environmental Protection Agency approved test methods.

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Not less than 7 days before the performance test is conducted, the AQD must be notified in writing of the time and place of the performance tests and who shall conduct them. Results of the performance test shall be submitted to the department in the format prescribed by the applicable reference test method within 60 days after the last date of the test.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 6, 2015. 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 include in the response an updated facility Potential to Emit evaluation for criteria pollutants and hazardous air pollutants.

If Electro Chemical Finishing 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 Electro Chemical Finishing. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-356-0248

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Mr. Steve Hulst, Electro Chemical Finishing
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ