DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

FACILITY: COLOR COAT PLATING CO		SRN / ID: N7574
LOCATION: 355 W GIRARD, MADISON HTS		DISTRICT: Southeast Michigan
CITY: MADISON HTS		COUNTY: OAKLAND
CONTACT: Jeffery Swanson , Owner		ACTIVITY DATE: 08/11/2016
STAFF: Rebecca Loftus	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

On August 11, 2016, I, Rebecca Loftus, from the Department of Environmental Quality's (DEQ), Air Quality Division (AQD), conducted an inspection of Color Coat Plating, State Registration Number (SRN): N7574, located at 355 W. Girard, in Madison Heights, Michigan. The purpose of this inspection was to determine the facility's compliance with 40 CFR Part 63, Subpart N, the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (Chrome NESHAP), the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules.

Contact Information

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Mr. Jeffery Swanson, Owner, 248-744-0445, chromejeff@yahoo.com

Company Overview

Color Coat Plating offers a variety of coloring and coating types such as: black oxide, anodized aluminum, chrome plating, zinc oxide, and chrome. Color Coat Plating coats products for the auto industry, small machinery, and home/business hardware. Currently, Color Coat Plating is open six days a week; 7:00am to 7:00pm Monday through Friday, and 7:00am to 1:00pm on Saturday.

Inspection Observations

During the inspection, Mr. Swanson escorted me through the building and showed me the different metal coating lines offered by Color Coat Plating. He noted that Color Coat Plating had made some upgrades to better/newer equipment, but no changes to processes have occurred since the AQD's last inspection in 2010.

Each metal coating line is comprised of a series of dip tanks. The zinc plating, nickel plating, aluminum anodizing, and black oxidizing lines release emissions to the general in-plant environment and appear to be exempt from obtaining an air permit to install (PTI) pursuant to Rule 285(r).

At this facility Color Coat Plating also operated a small chrome plating line. The 3ft x 3ft x 3ft chrome tank is subject to 40 CFR Part 63, Subpart N, the Chrome NESHAP. Color Coat Plating does not have an air permit for the chrome process because emissions from the chrome tank are only released to the in-plant environment and Color Coating Plating is operating the tank under an air exemption: Rule 285(r). Because Color Coat Plating is subject to the Chrome NESHAP, they are classified as a category III fee facility and pay an annual air quality fee.

Record Keeping

During the inspection, Mr. Swanson provided me with the Daily Process Operations Records and Ongoing Compliance Status Reports; the Chrome NESHAP requires both to be kept onsite. The Operation and Maintenance Plan for the chrome tank was also available on-site. In addition to these records, Mr. Swanson provided me with the Weekly Tank Inspection Sheet provided by the Lab Technician (see attached example).

Color Coat Plating uses a wetting agent to control emission from the chrome tank and records the surface tension with a stalagmometer at least once a month, (more often if production increases). Upon reviewing the records, Color Coat Plating is recording the surface tension at least once in every 40 hours of operation, maintains a surface tension below 45 dynes, and records the daily operation hours of the chrome tank; as required by the NESHAP. The wetting agent is added as needed and the amount is recorded on the Weekly Tank Inspection Sheets and Daily Process Operations Records.

Note: Typically, Mr. Swanson transposes the Chrome Tank information from the Weekly Tank Inspection Sheets to the Daily Process Operations Records. Although all records were available for review (and appear to demonstrate compliance with the NESHAP), for 2015 and 2016, the daily logs did not have the Chrome Tank information copied to them. Mr. Swanson said he will be updating the 2015 and 2016 Daily Process Operations Record Logs and in the future, will make sure the Chrome Tank information is copied from the weekly sheets to the logs.

For the Ongoing Compliance Status Reports (see attached example), Color Coat Plating completes a report every 6 months and has not reported any excess emissions from the Chrome Process since my last inspection.

Conclusion

Based on the records reviewed during and after the inspection, Color Coat Plating appears to be in compliance with the Chrome NESHAP, the Federal Clean Air Act, and Michigan's Air Pollution Control Rules.

DATE 9/12/16