

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

P080044324

FACILITY: Westlund Plating		SRN / ID: P0800
LOCATION: 1415 South Cooper, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT: Thomas Frankini, Owner		ACTIVITY DATE: 05/08/2018
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection of a very small decorative plating operation with no exhaust system.		
RESOLVED COMPLAINTS:		

Minor Source**Facility Contact**

Thomas Frankini (TF) Owner

ph 517-783-2400 westlund@modempool.com

Website: <http://www.westlundmfg.com/>**Purpose**

On May 7, 2018, I conducted an unannounced compliance inspection of Westlund Plating(Company) located in Jackson, Michigan. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules.

Facility Location

The facility is located in a commercial area in the City of Jackson with 3 different businesses within 200 feet. See attached aerial photo.

Facility Background

From the Company's website:

"We do Custom and Production Polishing and Plating on most metals. We do SHOW QUALITY work on everything from Car Parts (shock absorbers, "A" frames, Springs, Drive Shafts, Nuts and Bolts to Engine Compartment parts), Motorcycle Parts (including aluminum), Boat Parts, Airplane Parts (including stainless steel), Fire Truck Parts to Antique Restoration (including "Gray" Nickel) and repair at a very reasonable price.

- *Small parts a specialty*
- *Complete Polishing and De-Burring Services*
- *Decorative Chrome Plating*
- *Hard Chrome Plating*
- *Dual Nickel Plating*
- *Electroless Nickel Plating*
- *Gray Nickel Plating*
- *Brushed Nickel Plating*
- *Bright Nickel Plating and Pacification*
- *Antique Copper Plating*

- *Copper plating for masking of Heat Treated parts*
- *Chemical Stripping of Plating from most Metals*
- *Chemical De-Smutting and Rust Removal*
- *Custom Polishing and Plating for Display*
- *Complete Referral Service for Non In-House Services*
- *Alkaline Tin Plating*
- *Bright Tin Plating*
- *Gold Plating*
- *Sulfamate Nickel*

We are also able to do both short and long term production runs, and we can meet MOST Automotive Interior and Exterior Specifications at a lower price than many larger companies. Please contact us for all your Metal Finishing needs! Please take a look at the quality of our work."

Regulatory Applicability

Active Permits: None

Category III Fee Subject Facility but MAERS annual submittal is not required.

Permit Exempt Equipment:

Various containers/small tanks containing either 15% concentration HCL, dilute sulfuric acid or detergent with no external vents. Exempt per Rule 285(2)(r)(iii) or (iv).

2 small decorative chrome plating tanks with no exhaust system. Exempt per Rule 285(2)(r)(vii).

2 small nickel plating tanks with no exhaust system. Exempt per Rule 285(2)(r)(vii).

Small metal grinding wheel operation with no exhaust system. Exempt per Rule 285(2)(l)(vi)(B).

(Note: There is an exhaust fan located a few feet from the grinding wheel that has been disabled in the last year.)

Federal Chrome NESHAP regulations apply to the decorative chrome plating tanks.

EPA administrated program-NESHAP Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations) applies to the nickel tanks.

Arrival & Facility Contact

Visible emissions or odors were not observed upon our approach to the Company's facility. I arrived at approximately 2:30 pm, proceeded to the facility entrance to request access for an inspection, provided my identification, and met with TF who is the owner and sole employee of the facility. A very brief pre-inspection discussion was held with TF. I informed TF of my intent to conduct a facility inspection and to review the various records as necessary. TF extended his full cooperation during the inspection, accompanied me during the full duration of the inspection, and fully addressed my questions.

Pre-Inspection Meeting

TF outlined that the Company is currently operating occasionally when they have a plating job to do and he is the only employee. The operation is more hobby size than a commercial size operation. TF typically comes in at 2 pm on week days and works there until he is finished. TF indicated that he was closed for over 2 ½ months over the winter as it was too cold in the shop to get the tanks to operate. None of the processes were operating during the inspection.

Onsite Inspection Day

TF gave me a brief tour of the facility. Little had changed from the previous inspection that was conducted on 3/07/2017. It basically consists of a main room and smaller adjacent room. The main room contains a 50 gallon in size decorative chrome plating tank, a ten gallon decorative chrome plating tank, 2 nickel plating tanks (160 gallons), several dilute acid containers/tanks (hydrochloric and sulfuric acid) and some containers containing detergent. There was also some evaporation tanks that are used to concentrate sludge from the plating tanks. A 1928 vintage boiler was being used to heat the water in the plating tanks. 3 small rectifiers were being used to provide low voltage current to the plating tanks. He indicated that had several but only 3 are currently in working order. He said they are rated at 100, 200 and 750 amps. In a separate room, a grinding wheel was being used to grind/polish metal. Overall, both the main room and the adjacent room were very disorderly. (See attached photo.) The ceiling had no ventilation openings but along the edges of the roof line there was some small openings. The floor of the building was cement.

The nickel tanks were not operating but both had a plastic sheet covering the tank operating surfaces. The older tank had a lot of obvious corrosion material all over the sides of it.

The small decorative chrome tanks were not operating. The tanks have no ventilation equipment associated with them. I asked TF if he uses any wetting agent/fume suppressant chemical for the chrome tank. He says he uses a detergent jet dry like material. He says he tanks operate at too low a temperature to use PFAS. (Chrome tanks operate at 95 degrees F while the nickel tanks operate at 110 degrees F.)

Next, I examined the evaporation tanks. They all contained a dry sludge material at the bottom. Recently, he had pumped water into them from water that had seeped into the building from heavy rains and accumulated in a low spot in the floor where the city sewer lid is located.

Recordkeeping Review

TF provided no records.

The facility is subject to the Chromium NESHAP regulation, but it appears there are no applicable requirements as the facility does not discharge emissions "to the atmosphere". <https://www.law.cornell.edu/cfr/text/40/part-63/subpart-N>

The facility is subject to NESHAP 6W. <https://www.law.cornell.edu/cfr/text/40/part-63/subpart-W>

Compliance with this NESHAP was not reviewed this time since EPA has not delegated authority to the State of Michigan to administer this program.

Post-Inspection Meeting

I held a brief post-inspection meeting with TF. I indicated that I didn't have any additional compliance concerns. I thanked TF for his time and cooperation, and I departed the facility at approximately 3:30 pm.

Compliance Summary

The facility appears to be compliance with Chrome NESHAP since there appears to be no applicable emission standards as no emissions are discharged to the atmosphere.

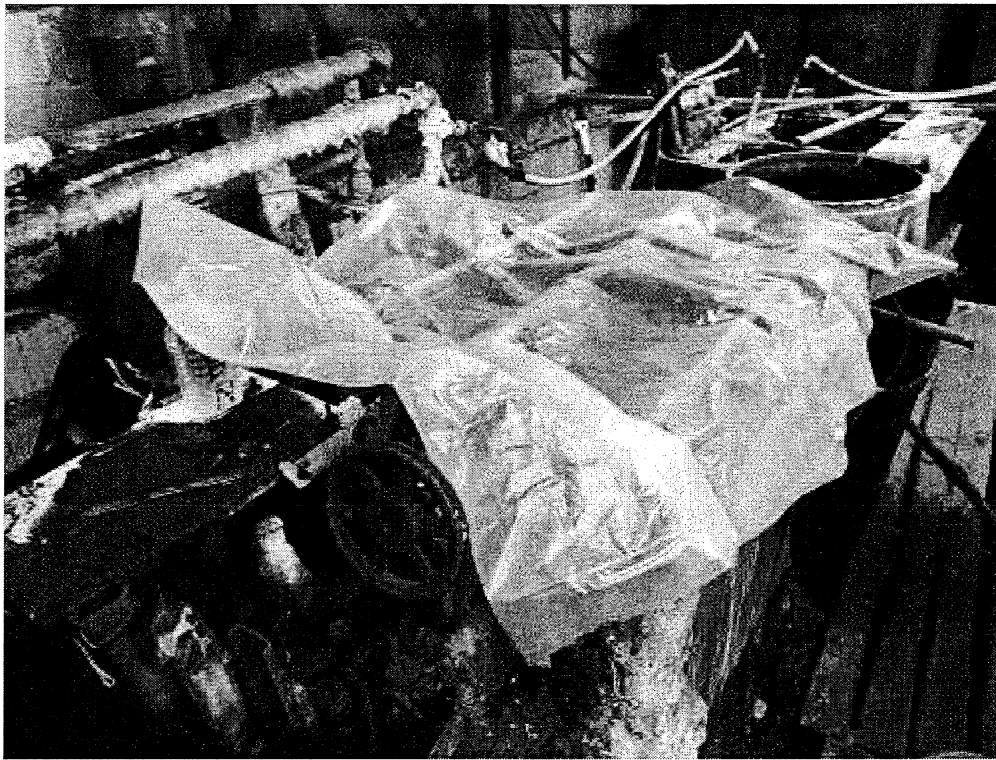


Image 1(Nickel tank) : Nickel tank with corrosion

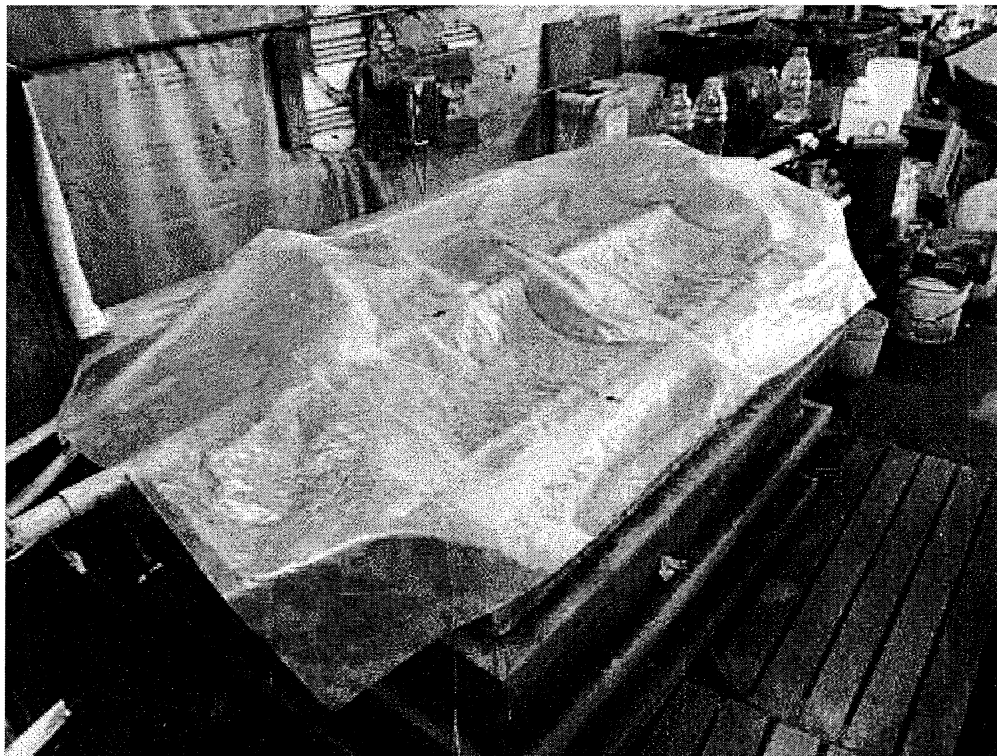


Image 2(Nickel tank) : Nickel tank #2.

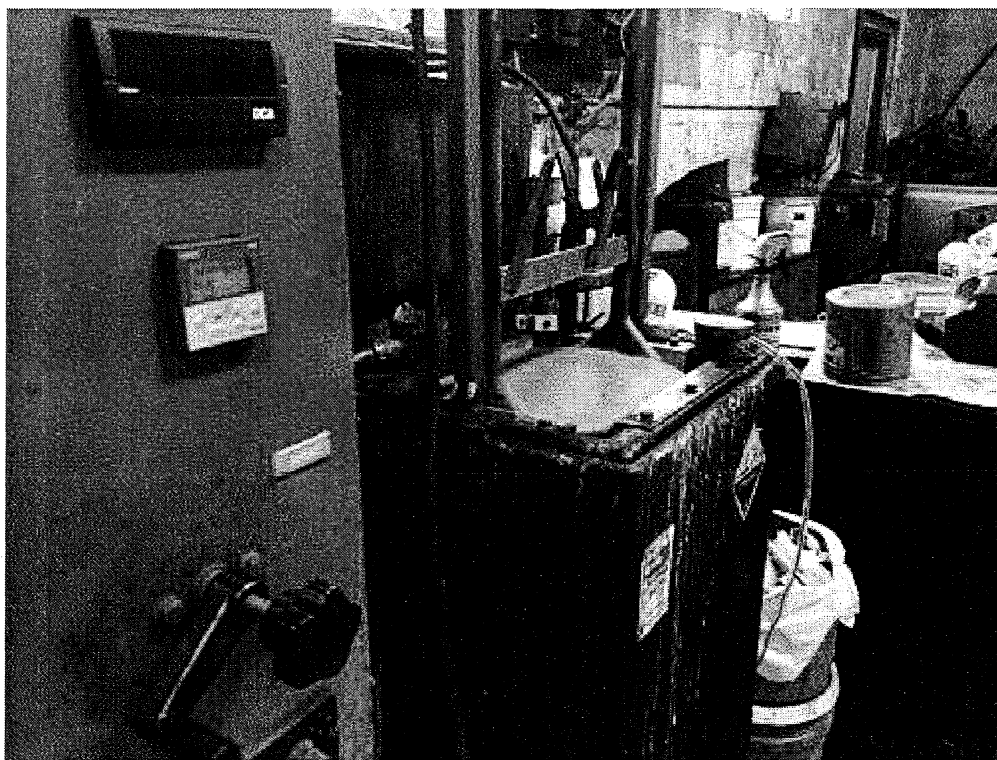


Image 3(Chrome Tank) : Chromium Tank #2.



Image 4(Evaporation Tanks) : Evaporation Tanks

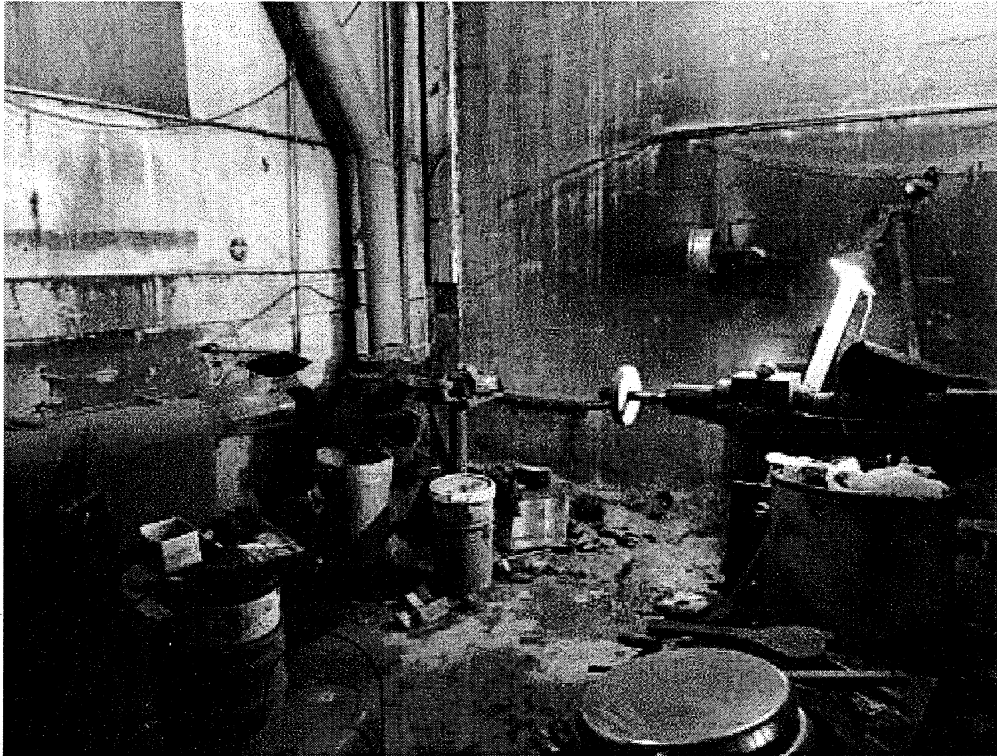


Image 5(Grinding wheel) : Metal grinding wheel.



Image 6(Main room) : Main room

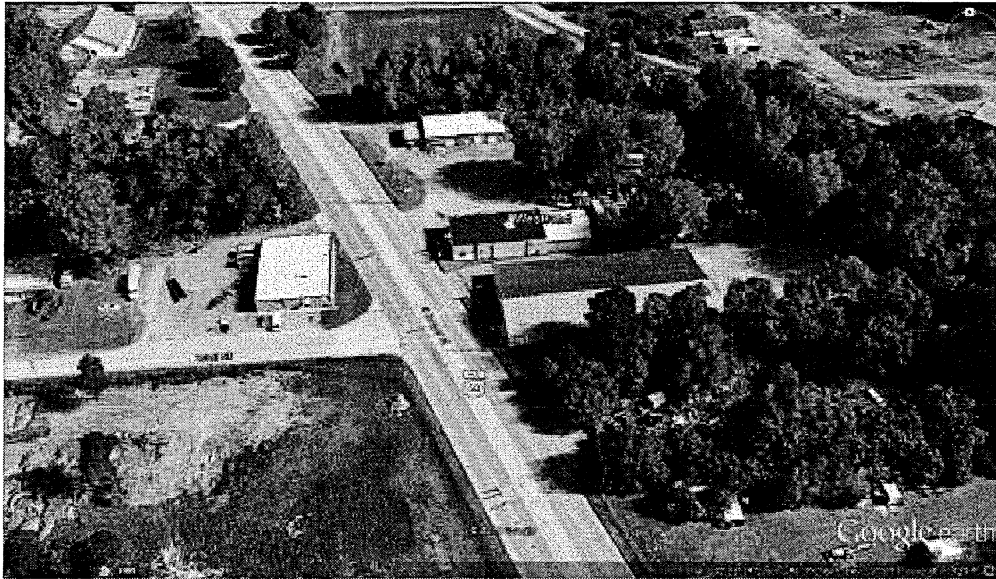


Image 7(Aerial photo) : Aerial photo

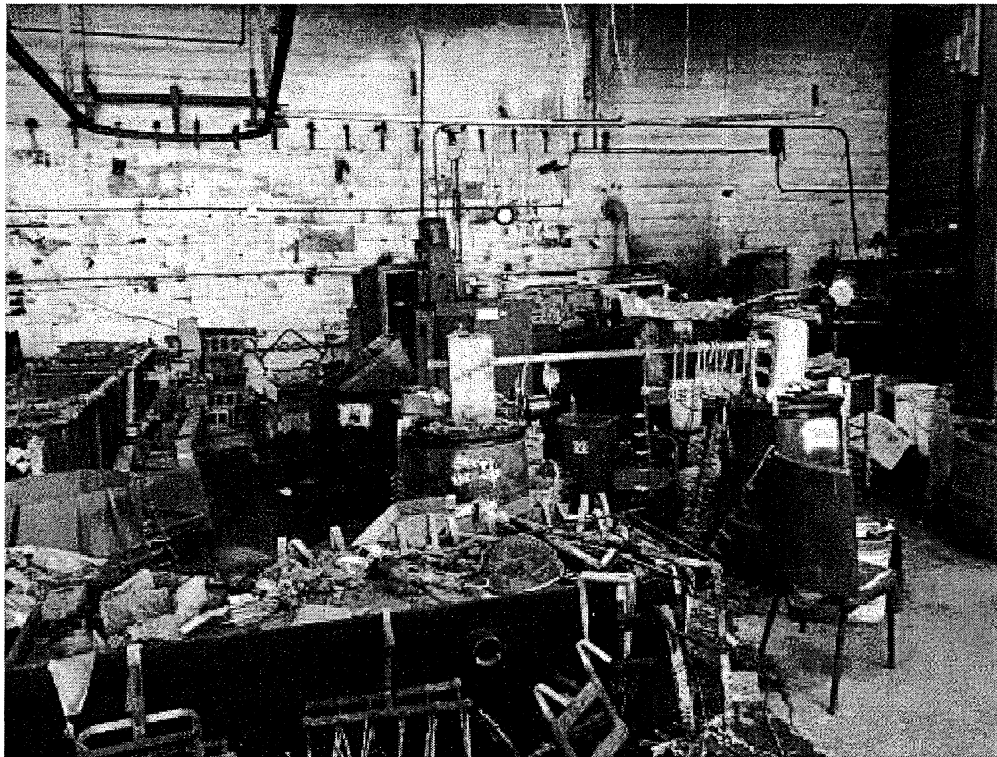
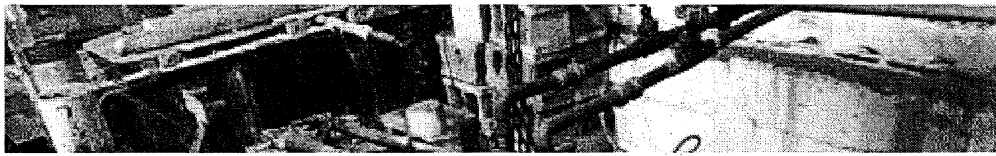


Image 8(Main Room) : Main Room





NAME M. Kovalchik

DATE 5/8/2018

SUPERVISOR [Signature]