

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

U7009005152397

FACILITY: ASP Plating Company		SRN / ID: P1108
LOCATION: 211 North Griffin Street, GRAND HAVEN		DISTRICT: Grand Rapids
CITY: GRAND HAVEN		COUNTY: OTTAWA
CONTACT: Stephen Rowe , Vice President		ACTIVITY DATE: 02/11/2020
STAFF: Chris Robinson	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: FY '20 on-site inspection to determine the facility's compliance status with respect to applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

AQD Staff Chris Robinson (CR) met with Stephen Rowe, Vice President of ASP Plating company for a scheduled unannounced onsite inspection. ASP Plating is located at 211 North Griffin Street in Grand Haven, Michigan. The perimeter of the building was surveyed for odors and visible emissions. None were observed. The intent of the visit was relayed to Mr. Rowe along with identification.

This facility conducts electrolytic zinc barrel plating, electrolytic phosphate plating and electroless nickel plating of springs and small stampings.

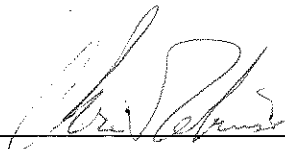
The last inspection was conducted on February 24, 2009, since this inspection the facility has decommissioned the automatic electrolytic zinc barrel plating line that was observed during the previous inspection and added a new automatic electrolytic zinc barrel plating line. Mr. Rowe indicated that this line was installed approximately four (4) months prior to the February 11, 2020 inspection. In the zinc plating line, zinc ball anodes dissolve in the solution to maintain proper concentrations. A "conveyor" moves the barrel baskets from one tank to another, carrying the electrical charge to the part for the metal to adhere.

The previous inspection report noted that the plating lines were vented internally and that there was one general ventilation fan located on the south end of the building. Based on observations made during the February 11, 2020 inspection the facility appears to have added an exhaust hood over the zinc phosphate containers that vents through the roof of the building and added two (2) large powered fans that exhaust through the east exterior wall of the building directly next to the plating lines. The new zinc plating line is entirely vented through a series of hoods and ductwork that exhausts through a blower and stack located on the roof of the building.

CR discussed permitting requirements and the use of Rule 285(2)(r), which the facility had previously been using. Rule 285(2)(r) can only be used if the process emissions are only released into the general in-plant environment. The installation of hoods and ductwork that vent directly to ambient air through a stack is clearly not allowed by Rule 285(2)(r). Building ventilation is allowed, however the location of the large powered exhaust fans does not appear to be for building ventilation alone and seems to be for controlling emissions from the plating lines. The owner/president of the facility, Gary Rowe indicated that the fans were installed for that purpose.

With the current exhaust configurations for the plating lines, these lines are no longer exempt from Rule 201 permitting requirements per Rule 285(2)(r). CR contacted the facility and discussed Rule 290. The facility is not aware of air quality rules and regulations and could not provide a Rule 290 demonstration or any related records. Therefore, ASP is in violation of Rule 201 for not obtaining a Permit to Install (PTI) prior to installation. A Violation Notice will be issued.

NAME



DATE

2/18/2020

SUPERVISOR

