

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

B236325984

FACILITY: HOWARD FINISHING LLC		SRN / ID: B2363
LOCATION: 32565 Dequindre, MADISON HTS		DISTRICT: Southeast Michigan
CITY: MADISON HTS		COUNTY: OAKLAND
CONTACT: Nino Nuculovic, Tool Design & Engineering Manager		ACTIVITY DATE: 06/06/2014
STAFF: Joyce Zhu	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Annual inspection		
RESOLVED COMPLAINTS:		

On June 6, I conducted an annual air quality inspection at Howard Finishing, LLC, which is located on 32565 Dequindre, Madison Heights. I arrived at the facility around 2:55 PM. Mr. Nino Nuculovic, the tool & engineering manager, met with me. I explained the purpose of the inspection to him. Afterwards, he took me to see the operations.

Inspection:**RO Permit # MI-ROP-B2363-2014**

This permit covers an automated electro-deposition coating line with phosphate pretreatment system, a chrome striping process as well as a nickel stripping process, a decorative chrome electroplating process, & 3 natural gas fired boilers.

EULINE9

This is an automated electro-deposition coating line for metal part coating. The process is subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart M. The company has selected the compliant material option to demonstrate compliance for the standards. The e-coat process includes a phosphate pretreatment & electro-coating. For the phosphate pretreatment process, metal parts are undergone 2 stages of spray cleaning, followed by city water rinsing, & phosphate treatment, rinsing with city water again, sealing, and two-stage rinses, and finally e-coat. In the e-coat process, metal parts undergo permeate spray rinse, and then submerge to an e-coat bath, followed by DI water rinse before going to the oven for cure. According to the MSDS, there's no VOC containing material used in the phosphate pretreatment system. During the inspection, I didn't see any spills near phosphate pretreatment system as well as the dip coating line. Paste and other chemicals were stored in 55-gallon drums, except for resin which is stored in a big tank. All the chemical materials were stored in closed containers near the coating line. I observed some water on the ground near the storage area. The company keeps following records:

1. A current list of the chemical composition of each coating, reducer, resin feed, pigment paste, & cleaners
2. Monthly record of the material used in gallons, the corresponding densities, VOC contents, the volume of coating solids, the hours of operation, & VOC emissions calculations (lb/hr, tons/[12-mon rolling time period], lb/[gallon minus water as applied], & lb/[gallons of coating solid])

The company uses VOC as a surrogate for organic HAP. From the company's records, for the period of January to May of 2014, the VOC emissions are below the VOC permit limits in terms of lb/hr and tons/[12-mon rolling time period]; the VOC content of the coating used in the process was in compliance with the permit requirement; the VOC content in terms of lb/[gallons of coating solids] was well below the HAP content requirement. The company uses manufacturer's Method 24 VOC analysis to satisfy the

testing requirement for coatings. It appeared that the company operated in compliance with the requirements.

EUCHROME, FGSOAKCLEANERSTRIP & FGNICKELNITRICSTRIP

The emission unit & the flexible groups are for the decorative chrome electroplating Line which includes a decorative chrome tank with mesh pad control system (CMP), a soak cleaner tank, a chrome strip tank, an electro-cleaner tank controlled by packed bed wet scrubber, two nitric strip tanks, & two hydrogen chloride dip tanks controlled by packed bed wet scrubber as well as a composite mesh pad system. The company has not installed the line yet. A permit to install (PTI) for the line was issued in Sept 2013. The company has 18 month to install the process from the date of the issuance.

FGBOILERS

This covers 3 natural gas fired boilers. Boiler #2 & #3 have a capacity less than 5 MMBTU/hr each; whereas boiler #5 has a capacity of 8.4 MMBTU/hr. Boiler #3 has been disconnected from the power line. They conducted tune-ups for the boilers on Feb. 18, 14. During the inspection, they only operate Boiler #5.

In conclusion, the company operated the dip coating process in compliance with Air Quality Regulations and the RO Permits requirements.

NAME Joyce ZC

DATE 7/17

SUPERVISOR CTE