

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

N521944165

FACILITY: DMI AUTOMOTIVE INC		SRN / ID: N5219
LOCATION: 1200 DURANT DR, HOWELL		DISTRICT: Lansing
CITY: HOWELL		COUNTY: LIVINGSTON
CONTACT: John Stevens , Quality & Environmental Manager		ACTIVITY DATE: 04/13/2018
STAFF: Kelly Richart	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unannounced inspection		
RESOLVED COMPLAINTS:		

Contact:

John Stevens, Owner of Stevens Quality Consulting, Inc., 734-341-3657, jastev18@gmail.com
Mike Ambrose, Chrome Operations Manager, 517-548-1414, m.ambrose@dmiautomotive.com

Previous Inspections:

8/19/14 Dan McGeen
5/3/13 Dan McGeen
3/9/12 Brad Myott
7/2/09 Dan McGeen
10/4/07 Dan McGeen

Regulations:

PTI 161-94B for two hard chrome electroplating tanks (Tank A and Tank B) controlled by one Composite Mesh Pad Scrubber.

The facility is subject to 40 CFR Part 63, Subpart N, the National Emissions Standards for Hazardous Air Pollutants for Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (Chrome NESHAP).

Arrival:

Time: 9:00am
Conditions: Sunny with a few clouds, Weather Channel App: 40 °F, Winds 11mph from the East
There were no visible emissions from the stacks (DMI Automotive only use one stack) or odors outside of the facility- we quickly learned there was no production occurring that day.
I was accompanied by Dan McGeen, and also two permit engineers Dave Thompson and Nick Carlson in order to discuss a permit needed to convert their Chrome Tank B into a Rinse Tank.

Emission Units:

Emission Unit	Description	PTI #	Federal Reg.	Stack	Compliance?
EUCHROME1	Hard chromium electroplating tank A with Composite Mesh Pad scrubber system	161-94B	40 CFR Part 63, Subpart N	SVCHROME1	Yes
EUCHROME2	Hard chromium electroplating tank B with Composite Mesh Pad scrubber system	161-94B	40 CFR Part 63, Subpart N	SVCHROME1	Yes

Inspection Notes:

There was no production during the time of inspection as DMI Automotive gets most of its work during off-hours of the automotive industry such as during weekends and holidays. At the time of inspection there were only 3 gentlemen cutting metal flat rods to use for the anodes.

DMI Automotive is a small hard chrome plating facility where they plate multiple large dies with a chrome finish that are used in the automotive industry. This process is done through a complex process of creating a metal anode in the shape of the die and placing the anode over the die in the chrome and sulfuric acid wash (there are no other additives in the wash), and then adding electricity. The electricity is dispersed throughout the anode and pulls the chromium to the die. The anodes are created specifically for each die, and the striking time is adjusted per die so that the time and amps applied to the dies are the same. The process requires about 2 amps per square inch of material of the die, which is approximately 30,000 amps per large die. An average-sized die takes roughly 3 hours, and DMI Automotive can do roughly 5 in a day. For smaller dies they can do multiple at a time, but the surface area stays approximately the same per run, approximately 120" in length and 72" in width of

material. Throughout the day as multiple runs have occurred, the current gets weaker, so they may have to increase voltage. It should also be noted that DMI Automotive does not use any chemicals with PFAS or any fume suppressions.

John Stevens showed us their safety equipment and procedures to show their compliance with safety standards in case of an acid spill. They have a spill kit and contingency plan and a large cabinet with extra safety gear and cleaning solutions. There was a poster on Chrome Tank A that had listings of various safety signal words. Additionally, DMI Automotive requires numerous employee safety trainings and keeps records of all webinars and workshops (see Attachments E & F for examples).

Equipment:

Strip Tanks A & B

There were 2 strip tanks (A & B), that contained sodium hydroxide and water. These are used to clean the dies when they arrive and remove oils and old chrome possibly left on the product.

Rinse Tank

There was one rinse tank that contained chrome and sodium hydroxide. This is currently used to rinse off the dies after they are plated. A standard water hose is used for this process. The surrounding floor is grated which allows any extra rinse liquid to be caught below in the secondary confinement area.

Chrome Tank A:

Chrome Tank A is the original tank and the only tank DMI Automotive currently uses to plate their dies. This tank is heated to 140 °F (during the time of inspection the tank was at 131 °F) and dissipates 3-6 inches of solution a day. This tank is controlled by a mesh composite scrubber. Any rinsed-off liquids drain through the grates on the floor around the tank and collect in the secondary confinement pit below. As a safety precaution, the size of the secondary confinement pit is sufficient enough so that if all 5 tanks ruptured, the pit would still only be filled up halfway. It is then pumped out and disposed as hazardous waste. They currently have a waste removal service come about once a year to remove about 8,000 gallons of this waste. Every time this waste is removed, it is analyzed and tested and DMI Automotive keeps these records (see Attachment D for the latest results). At the time of inspection there was no visible waste water in the secondary confinement pit. See Attachment A for records on Chrome Tank A including: process, date, strike amps, strike time, plate amps, plate time, volts, initials of worker, and customer name and description.

Chrome Tank B:

Chrome Tank B is not currently used for any chrome plating procedures and DMI Automotive is working with the AQD permit staff to convert this tank into a rinse tank. Their plans are to heat this tank only up to 140 °F and use this tank only for rinsing the dies. There would possibly be some dissipation of chrome through evaporation at the low temperature, however there is a push-pull system for ventilation already installed and this tank is connected to their mesh composite scrubber. The concentration of chrome in this tank would be significantly less as a rinse tank compared to a chrome plating tank. Any chrome contaminated rinse water that would spill on the floor would be collected through the grates into the secondary confinement area and pumped back into the tank. DMI Automotive is also planning on putting a new Koroseal PVC liner in Tank B. If this tank is permitted to no longer to be used as a chrome plating tank and only as a rinse water tank, it will likely not be subjected to 40 CFR Part 63 Subpart N.

Mesh Composite Scrubber (Spectra U-IV 32,000):

The mesh composite scrubber is the control factor for both Chrome Tank A and Chrome Tank B. It has 4 mesh pads and a 99% destruction efficiency. When checking each brush pad and its pressure drop, maintenance typically changes or cleans the filters once the pressure drop reaches around 3.2"-3.3". This notifies staff that the scrubber pads are dirty and need to be cleaned. The scrubber is always running even when production is not occurring which minimizes any unwanted evaporation into the facility. The ductwork around the scrubber looked in fact and lacked holes in the PVC piping. There was evidence of welding marks where previous holes had been fixed.

Monitoring/Recordkeeping:

Regarding Chrome Tank A & B, see Attachment A for Tank A records of the total daily amp hours, including: process, date, strike amps, strike time, plate amps, plate time, volts, initials of worker, and customer name and description. We were able to see the DC-Volts and DC-Amps controls for Chrome Tank A and B that are equipped with numerous alarms (see Attachment C). These controls had sticker labels that noted the last calibration for both tanks (10/10/17) and when the next calibrations were due (10/10/18).

The Mesh Composite Scrubber is tested quarterly by internal candidates. We were able to see the gages for the scrubber which had stickers that noted when the last time it was serviced (2/1/18) and when it was due for the next service (5/1/18). See below for the pressure drop readings on the 5 gages for the scrubber:

Pressure drop readings:

#1 = 0.2" water column (w.c.)

#2 = 0.7" (w.c.)

#3 = 0.6" (w.c.)

#4 = 1.4" (w.c.)

#5 (total) = 2.6" (w.c.)

Permit 161-94B requires DMI Automotive to monitor their scrubber and not have more than a \pm 2-inch pressure drop variation from the pressure drop determined from compliance testing- during their latest stack test in 2005 they tested at 2.5". DMI Automotive actually follows stricter federal standards of $2.5" \pm 1$ -inch pressure drop variation. Their total reading of 2.6" complies with both the permit and federal limits.

When checking each brush pad and its pressure drop, maintenance typically changes or cleans the filters once the pressure drop reaches around 3.2"-3.3". This notifies staff that the scrubber pads are dirty and need to be cleaned. See Attachments **B(1-4)** that show records of the date, pressure drop, and tank temperature. On the sides of the record sheets there are notes that document when and which pad was cleaned or replaced.

Summary:

Even though DMI Automotive was not operating at the time of inspection, there were no violations found. The recordkeeping and facility maintenance is in compliance and examples of the various records are attached. DMI Automotive will have to continuously work with the permit section in order to convert their un-used chrome plating tank into a rinse tank via a new permit.

Attachments:

Attachment **A**: Example of Total Daily Amps Hours of Chrome Tank A, including: process, date, strike amps, strike amps minutes, plate amps, plate amps minutes, volts, initials, and customer name and description.

Attachment **B(1-4)**: Multiple months of record examples for the Scrubber Daily Log, including: date, total DP, and tank temperature.

Attachment **C**: Example of Daily Alarm Inspections.

Attachment **D**: Example of lab test results of wastewater in Chrome Tank A from March 19, 2018, concentration of chrome solution was 0.37 oz/gal.

Attachment **E**: Example of MDEQ Hazardous Waste Management & Regulations Webinar Series certification.

Attachment **F**: Example of DMI Automotive Training Records Log.

Departure:

Time: 12:03pm

Conditions: 52 °F, sunny and partly cloudy, winds ENE 11 mph, no visible emissions or odors.

NAME

Kelly Diebart

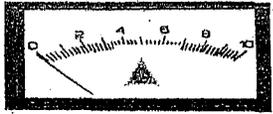
DATE

4/20/18

SUPERVISOR

B. M.

34
198
192
960
1152



A TOTAL DAILY AMPS HOURS TANK A A

ATTACHMENT A

PROCESS (circle)	Redo (check)	DATE / with year:	DMI #:	STRIKE AMPS:	MIN:	PLATE AMPS:	MIN:	VOLTS:	INCHES:	INT:	CUSTOMER Name & Description
(D) R, S		3-30-18		10,000	6	4,000	40	6.5		2191	GM Pad 3 of 4
(D) R, S		3/31/18		7500		4000	40	6		CM	GM PFC 4 of 4
(D) R, S		3/31/18		8500	10	4500	60	6-7		MFA	Drive inner cavity
(D) R, S		3/31/18		13000	10	7,000	60	6-7		MFA	Dr Drive inner punch
(D) R, S		3/31/18		9,000	6	4,500	70	6	2nd	DG	Drive outer cavity
(D) R, S		4/1/18		14000	4.5	6500	60	6		CM	GM Seamozon
(D) R, S		4/2/18		14000	4.5	6500	50	6		CM	Drive U Segments
(D) R, S		4-2-18		5,000	4.5	2,000	50	6		JE	" "
D, R, S		4-2-18		7500	5	3000	60	6-7		JE	Sum Steel 10 details
D, R, S		4-4-18		8500	5	4100	60	6-7		JE	car
(D) R, S		4/5/18		25,500	7.5	11,000	85	7		CM	Ford Mustang Bodyside Punch
(D) R, S		4/7/18		16,500	5	11,000		7		CM	Drive Roof Cal Ctr
D, R, S		4-7-18		27000	5	10000	60	6-7		JE	Drive 2 door punch
D, R, S		4-7-18		21000	5	7500	60	6-7		JE	Drive door car
(D) R, S		4/9/18		21500	7	12500	50	7		CM	Drive 2 Door Punch Inner
(D) R, S		4-9-18		18,000	7	7,500	60	6-7		DG	Drive door car
D, R, S		4-9-18		7500	5	4000	60	6-7		JE	Drive Flange steels
D, R, S		4-9-18		9500	5	5000	60	6-7		JE	Drive
D, R, S											
D, R, S											
D, R, S											
D, R, S											
D, R, S											

Rev. F 3/28/2014
 *D-DMI, U-UCD, R-Reverse, S-Spot
 Removed work bar UCD

DMI Automotive, Inc Total Daily Log

Specification set by DEQ is 2.5 + - 1.0

Whenever the DP reading reaches 3.3 the filters must be cleaned per the Controlling Chromium Emissions Manual. (Found in the ISO14001 File). If the DP is greater than 3.5 or lower than 1.5 you must contact the General Manager or Delegate and they will contact DEQ and notify them of the reading.
 Tank Temp Spec: 117f - 139f if outside the spec. limits see Plant Supervisor for directions.

Date: 2-26-18	Total DP: 3.4	Tank Temp: 127	Date: 3-29-18	Total DP: 3.3	Tank Temp: 130
Date: 2-27-18	Total DP: 3.3	Tank Temp: 130	Date: 3-30-18	Total DP: 3.3	Tank Temp: 129
Date: 2-28-18	Total DP: 3.4	Tank Temp: 130	Date: 3-31-18	Total DP: 3.3	Tank Temp: 130
Date: 3-1-18	Total DP: 3.0	Tank Temp: 179	Date: 4-2-18	Total DP: 3.3	Tank Temp: 127
Date: 3-1-18	Total DP: 2.9	Tank Temp: 130	Date: 4-3-18	Total DP: 3.3	Tank Temp: 130
Date: 3-2-18	Total DP: 3.0	Tank Temp: 130	Date: 4-4-18	Total DP: 3.2	Tank Temp: 129
Date: 3-3-18	Total DP: 3.0	Tank Temp: 130	Date: 4-5-18	Total DP: 3.2	Tank Temp: 130
Date: 3-4-18	Total DP: 2.9	Tank Temp: 129	Date: 4-6-18	Total DP: 3.2	Tank Temp: 130
Date: 3-5-18	Total DP: 3.0	Tank Temp: 129	Date: 4-7-18	Total DP: 3.3	Tank Temp: 130
Date: 3-10-18	Total DP: 3.0	Tank Temp: 130	Date: 4-8-18	Total DP: 3.2	Tank Temp: 130
Date: 3-7-18	Total DP: 3.0	Tank Temp: 130	Date: 4-9-18	Total DP: 3.2	Tank Temp: 129
Date: 3-8-18	Total DP: 3.1	Tank Temp: 130	Date: 4-10-18	Total DP: 3.2	Tank Temp: 130
Date: 3-9-18	Total DP: 3.1	Tank Temp: 130	Date: 4-11-18	Total DP: 3.2	Tank Temp: 127
Date: 3-10-18	Total DP: 3.1	Tank Temp: 130	Date: 4-12-18	Total DP: 3.2	Tank Temp: 129
Date: 3-11-18	Total DP: 3.1	Tank Temp: 130	Date: 4-13-18	Total DP: 3.2	Tank Temp: 128
Date: 3-12-18	Total DP: 3.0	Tank Temp: 129	Date:	Total DP:	Tank Temp:
Date: 3-13-18	Total DP: 3.0	Tank Temp: 129	Date:	Total DP:	Tank Temp:
Date: 3-14-18	Total DP: 3.1	Tank Temp: 128	Date:	Total DP:	Tank Temp:
Date: 3-15-18	Total DP: 3.15	Tank Temp: 129	Date:	Total DP:	Tank Temp:
Date: 3-16-18	Total DP: 3.15	Tank Temp: 130	Date:	Total DP:	Tank Temp:
Date: 3-17-18	Total DP: 3.2	Tank Temp: 129	Date:	Total DP:	Tank Temp:
Date: 3-18-18	Total DP: 3.2	Tank Temp: 129	Date:	Total DP:	Tank Temp:
Date: 3-19-18	Total DP: 3.2	Tank Temp: 130	Date:	Total DP:	Tank Temp:
Date: 3-20-18	Total DP: 3.1	Tank Temp: 130	Date:	Total DP:	Tank Temp:
Date: 3-21-18	Total DP: 3.2	Tank Temp: 130	Date:	Total DP:	Tank Temp:
Date: 3-22-18	Total DP: 3.2	Tank Temp: 130	Date:	Total DP:	Tank Temp:
Date: 3-23-18	Total DP: 3.2	Tank Temp: 130	Date:	Total DP:	Tank Temp:
Date: 3-24-18	Total DP: 3.2	Tank Temp: 130	Date:	Total DP:	Tank Temp:
Date: 3-25-18	Total DP: 3.2	Tank Temp: 130	Date:	Total DP:	Tank Temp:
Date: 3-26-18	Total DP: 3.2	Tank Temp: 130	Date:	Total DP:	Tank Temp:
Date: 3-27-18	Total DP: 3.2	Tank Temp: 130	Date:	Total DP:	Tank Temp:
Date: 3-28-18	Total DP: 3.3	Tank Temp: 130	Date:	Total DP:	Tank Temp:

DMI Automotive, Inc Total Daily Log

Specification set by DEQ is 2.5 + - 1.0

Whenever the DP reading reaches 3.3 the filters must be cleaned per the Controlling Chromium Emissions Manual. (Found in the ISO14001 File). If the DP is greater than 3.5 or lower than 1.5 you must contact the General Manager or Delegate and they will contact DEQ and notify them of the reading.
 Tank Temp Spec: 117f - 139f if outside the spec. limits see Plant Supervisor for directions.

Date: 12-14-17	Total DP: 2.9	Tank Temp: 130	Date: 12-1-18	Total DP: 3.3	Tank Temp: 130
Date: 12-15-17	Total DP: 3.0	Tank Temp: 131	Date: 1-22-18	Total DP: 3.2	Tank Temp: 128
Date: 12-18-17	Total DP: 3.0	Tank Temp: 129	Date: 1-23-18	Total DP: 3.3	Tank Temp: 136
Date: 12-19-17	Total DP: 2.9	Tank Temp: 130	Date: 1-24-18	Total DP: 3.3	Tank Temp: 131
Date: 12-20-17	Total DP: 2.9	Tank Temp: 130	Date: 1-25-18	Total DP: 3.3	Tank Temp: 130
Date: 12-21-17	Total DP: 3.0	Tank Temp: 131	Date: 1-26-18	Total DP: 3.3	Tank Temp: 130
Date: 12-22-17	Total DP: 2.9	Tank Temp: 130	Date: 1-28-18	Total DP: 3.4	Tank Temp: 129
Date: 12-23-17	Total DP: 3.1	Tank Temp: 130	Date: 1-29-18	Total DP: 3.3	Tank Temp: 130
Date: 12-24-17	Total DP: 3.1	Tank Temp: 131	Date: 1-30-18	Total DP: 3.4	Tank Temp: 130
Date: 12-26-17	Total DP: 3.2	Tank Temp: 130	Date: 1-31-18	Total DP: 3.3	Tank Temp: 129
Date: 12-27-17	Total DP: 3.2	Tank Temp: 129	Date: 2-1-18	Total DP: 3.4	Tank Temp: 130
Date: 12-28-17	Total DP: 3.2	Tank Temp: 131	Date: 2-2-18	Total DP: 3.4	Tank Temp: 130
Date: 12-29-17	Total DP: 3.1	Tank Temp: 130	Date: 2-3-18	Total DP: 3.3	Tank Temp: 128
Date: 12-30-17	Total DP: 3.2	Tank Temp: 130	Date: 2-4-18	Total DP: 3.3	Tank Temp: 129
Date: 12-31-17	Total DP: 3.2	Tank Temp: 130	Date: 2-5-18	Total DP: 3.4	Tank Temp: 129
Date: 1-1-18	Total DP: 3.3	Tank Temp: 130	Date: 2-6-18	Total DP: 3.4	Tank Temp: 131
Date: 1-2-18	Total DP: 3.3	Tank Temp: 130	Date: 2-7-18	Total DP: 3.05	Tank Temp: 130
Date: 1-3-18	Total DP: 3.2	Tank Temp: 131	Date: 2-8-18	Total DP: 3.1	Tank Temp: 130
Date: 1-4-18	Total DP: 3.2	Tank Temp: 130	Date: 2-9-18	Total DP: 3.08	Tank Temp: 130
Date: 1-5-18	Total DP: 3.1	Tank Temp: 130	Date: 2-10-18	Total DP: 3.1	Tank Temp: 129
Date: 1-6-18	Total DP: 3.2	Tank Temp: 131	Date: 2-11-18	Total DP: 3.1	Tank Temp: 129
Date: 1-8-18	Total DP: 3.2	Tank Temp: 131	Date: 2-12-18	Total DP: 3.1	Tank Temp: 130
Date: 1-9-18	Total DP: 3.3	Tank Temp: 131	Date: 2-13-18	Total DP: 3.2	Tank Temp: 130
Date: 1-10-18	Total DP: 3.2	Tank Temp: 130	Date: 2-14-18	Total DP: 3.1	Tank Temp: 130
Date: 1-11-18	Total DP: 3.2	Tank Temp: 130	Date: 2-15-18	Total DP: 3.2	Tank Temp: 130
Date: 1-12-18	Total DP: 3.2	Tank Temp: 131	Date: 2-16-18	Total DP: 3.2	Tank Temp: 130
Date: 1-15-18	Total DP: 3.3	Tank Temp: 130	Date: 2-17-18	Total DP: 3.19	Tank Temp: 129
Date: 1-16-18	Total DP: 3.3	Tank Temp: 130	Date: 2-18-18	Total DP: 3.2	Tank Temp: 129
Date: 1-17-18	Total DP: 3.2	Tank Temp: 129	Date: 2-21-18	Total DP: 3.2	Tank Temp: 126
Date: 1-18-18	Total DP: 3.2	Tank Temp: 130	Date: 2-22-18	Total DP: 3.15	Tank Temp: 130
Date: 1-19-18	Total DP: 3.2	Tank Temp: 131	Date: 2-23-18	Total DP: 3.2	Tank Temp: 130
Date: 1-20-18	Total DP: 3.3	Tank Temp: 130	Date: 2-24-18	Total DP: 3.18	Tank Temp: 130

DMI Automotive, Inc Total Daily Log

Specification set by DEQ is 2.5 + - 1.0

whenever the DP reading reaches 3.3 the filters must be cleaned per the Controlling Chromium Emissions Manual. (Found in the ISO14001 File). If the DP is greater than 3.5 or lower than 1.5 you must contact the General Manager or Delegate and they will contact DEQ and notify them of the reading.

Tank Temp Spec: 117f - 139f if outside the spec. limits see Plant Supervisor for directions.

Date: 9-24-17	Total DP: 2.9	Tank Temp: 129	Date: 11-4-17	Total DP: 3.1	Tank Temp: 129
Date: 9-25-17	Total DP: 3.0	Tank Temp: 130	Date: 11-5-17	Total DP: 3.1	Tank Temp: 130
Date: 9-26-17	Total DP: 2.9	Tank Temp: 131	Date: 11-6-17	Total DP: 3.1	Tank Temp: 130
Date: 9-27-17	Total DP: 2.9	Tank Temp: 130	Date: 11-7-17	Total DP: 3.2	Tank Temp: 129
Date: 9-28-17	Total DP: 3.0	Tank Temp: 129	Date: 11-8-17	Total DP: 3.1	Tank Temp: 130
Date: 9-29-17	Total DP: 3.0	Tank Temp: 129	Date: 11-9-17	Total DP: 3.1	Tank Temp: 129
Date: 9-30-17	Total DP: 2.9	Tank Temp: 129	Date: 11-10-17	Total DP: 3.2	Tank Temp: 131
Date: 10-2-17	Total DP: 3.0	Tank Temp: 130	Date: 11-11-17	Total DP: 3.2	Tank Temp: 130
Date: 10-3-17	Total DP: 3.0	Tank Temp: 130	Date: 11-12-17	Total DP: 3.2	Tank Temp: 129
Date: 10-4-17	Total DP: 3.0	Tank Temp: 131	Date: 11-13-17	Total DP: 3.3	Tank Temp: 130
Date: 10-5-17	Total DP: 2.9	Tank Temp: 129	Date: 11-14-17	Total DP: 3.2	Tank Temp: 129
Date: 10-6-17	Total DP: 3.0	Tank Temp: 130	Date: 11-15-17	Total DP: 3.2	Tank Temp: 129
Date: 10-9-17	Total DP: 3.0	Tank Temp: 129	Date: 11-16-17	Total DP: 3.5	Tank Temp: 130
Date: 10-10-17	Total DP: 3.1	Tank Temp: 129	Date: 11-17-17	Total DP: 3.3	Tank Temp: 130
Date: 10-11-17	Total DP: 3.0	Tank Temp: 130	Date: 11-20-17	Total DP: 3.3	Tank Temp: 129
Date: 10-12-17	Total DP: 3.0	Tank Temp: 130	Date: 11-21-17	Total DP: 3.2	Tank Temp: 130
Date: 10-13-17	Total DP: 3.1	Tank Temp: 130	Date: 11-22-17	Total DP: 3.2	Tank Temp: 129
Date: 10-16-17	Total DP: 3.1	Tank Temp: 129	Date: 11-24-17	Total DP: 3.3	Tank Temp: 130
Date: 10-17-17	Total DP: 3.0	Tank Temp: 129	Date: 11-25-17	Total DP: 3.1	Tank Temp: 129
Date: 10-18-17	Total DP: 3.0	Tank Temp: 129	Date: 11-27-17	Total DP: 3.2	Tank Temp: 129
Date: 10-19-17	Total DP: 3.1	Tank Temp: 130	Date: 11-28-17	Total DP: 3.3	Tank Temp: 130
Date: 10-20-17	Total DP: 3.1	Tank Temp: 131	Date: 11-29-17	Total DP: 3.3	Tank Temp: 131
Date: 10-23-17	Total DP: 3.1	Tank Temp: 130	Date: 11-30-17	Total DP: 3.2	Tank Temp: 130
Date: 10-24-17	Total DP: 3.0	Tank Temp: 130	Date: 12-1-17	Total DP: 3.3	Tank Temp: 130
Date: 10-25-17	Total DP: 3.1	Tank Temp: 129	Date: 12-4-17	Total DP: 3.3	Tank Temp: 131
Date: 10-26-17	Total DP: 3.1	Tank Temp: 130	Date: 12-5-17	Total DP: 3.2	Tank Temp: 131
Date: 10-27-17	Total DP: 3.2	Tank Temp: 129	Date: 12-6-17	Total DP: 3.3	Tank Temp: 131
Date: 10-30-17	Total DP: 3.2	Tank Temp: 130	Date: 12-7-17	Total DP: 3.3	Tank Temp: 130
Date: 10-31-17	Total DP: 3.2	Tank Temp: 130	Date: 12-8-17	Total DP: 3.3	Tank Temp: 129
Date: 11-1-17	Total DP: 3.0	Tank Temp: 129	Date: 12-11-17	Total DP: 3.3	Tank Temp: 130
Date: 11-7-17	Total DP: 3.1	Tank Temp: 130	Date: 12-12-17	Total DP: 3.0	Tank Temp: 129
Date: 11-8-17	Total DP: 3.0	Tank Temp: 131	Date: 12-13-17	Total DP: 3.0	Tank Temp: 130

stage
padci

DMI Automotive, Inc Total Daily Log

Specification set by DEQ is 2.5 + - 1.0

Whenever the DP reading reaches 3.3 the filters must be cleaned per the Controlling Chromium Emissions Manual. (Found in the ISO14001 File). If the DP is greater than 3.5 or lower than 1.5 you must contact the General Manager or Delegate and they will contact DEQ and notify them of the reading.

Tank Temp Spec: 117f - 139f if outside the spec. limits see Plant Supervisor for directions.

Date: 7-21-17	Total DP: 3.2	Tank Temp: 130	Date: 8-22-17	Total DP: 3.4	Tank Temp: 132
Date: 7-22-17	Total DP: 3.1	Tank Temp: 130	Date: 8-23-17	Total DP: 3.4	Tank Temp: 130
Date: 7-23-17	Total DP: 3.1	Tank Temp: 130	Date: 8-24-17	Total DP: 3.3	Tank Temp: 131
Date: 7-24-17	Total DP: 3.1	Tank Temp: 131	Date: 8-25-17	Total DP: 3.3	Tank Temp: 130
Date: 7-25-17	Total DP: 3.2	Tank Temp: 129	Date: 8-26-17	Total DP: 3.3	Tank Temp: 132
Date: 7-26-17	Total DP: 3.2	Tank Temp: 129	Date: 8-27-17	Total DP: 3.2	Tank Temp: 132
Date: 7-27-17	Total DP: 3.2	Tank Temp: 130	Date: 8-28-17	Total DP: 3.3	Tank Temp: 130
Date: 7-28-17	Total DP: 3.2	Tank Temp: 131	Date: 8-29-17	Total DP: 3.2	Tank Temp: 130
Date: 7-29-17	Total DP: 3.1	Tank Temp: 130	Date: 8-30-17	Total DP: 3.3	Tank Temp: 131
Date: 7-30-17	Total DP: 3.1	Tank Temp: 128	Date: 9-1-17	Total DP: 3.3	Tank Temp: 130
Date: 7-31-17	Total DP: 3.2	Tank Temp: 130	Date: 9-2-17	Total DP: 3.4	Tank Temp: 129
Date: 8-1-17	Total DP: 3.1	Tank Temp: 130	Date: 9/3/17	Total DP: 3.3	Tank Temp: 130
Date: 8-2-17	Total DP: 3.0	Tank Temp: 130	Date: 9/4/17	Total DP: 3.3	Tank Temp: 130
Date: 8-3-17	Total DP: 3.1	Tank Temp: 130	Date: 9/5/17	Total DP: 3.2	Tank Temp: 131
Date: 8-4-17	Total DP: 3.2	Tank Temp: 130	Date: 9/6/17	Total DP: 3.2	Tank Temp: 130
Date: 8-5-17	Total DP: 3.2	Tank Temp: 129	Date: 9/7/17	Total DP: 3.3	Tank Temp: 130
Date: 8-6-17	Total DP: 3.2	Tank Temp: 130	Date: 9/8/17	Total DP: 3.2	Tank Temp: 131
Date: 8-7-17	Total DP: 3.1	Tank Temp: 129	Date: 9/9/17	Total DP: 3.3	Tank Temp: 130
Date: 8-8-17	Total DP: 3.2	Tank Temp: 129	Date: 9/10/17	Total DP: 3.3	Tank Temp: 132
Date: 8-9-17	Total DP: 3.2	Tank Temp: 130	Date: 9/11/17	Total DP: 3.4	Tank Temp: 130
Date: 8-10-17	Total DP: 3.3	Tank Temp: 131	Date: 9/12/17	Total DP: 3.4	Tank Temp: 131
Date: 8-11-17	Total DP: 3.3	Tank Temp: 130	Date: 9/13/17	Total DP: 3.3	Tank Temp: 130
Date: 8/12/17	Total DP: 3.3	Tank Temp: 127	Date: 9/14/17	Total DP: 2.8	Tank Temp: 131
Date: 8/13/17	Total DP: 3.2	Tank Temp: 130	Date: 9/15/17	Total DP: 2.9	Tank Temp: 130
Date: 8/14/17	Total DP: 3.2	Tank Temp: 131	Date: 9/16/17	Total DP: 2.8	Tank Temp: 130
Date: 8/15/17	Total DP: 3.3	Tank Temp: 130	Date: 9/17/17	Total DP: 2.9	Tank Temp: 131
Date: 8/16/17	Total DP: 3.2	Tank Temp: 129	Date: 9/18/17	Total DP: 2.9	Tank Temp: 130
Date: 8/17/17	Total DP: 3.3	Tank Temp: 131	Date: 9/19/17	Total DP: 2.8	Tank Temp: 130
Date: 8/18/17	Total DP: 3.3	Tank Temp: 130	Date: 9/20/17	Total DP: 2.9	Tank Temp: 130
Date: 8/19/17	Total DP: 3.4	Tank Temp: 130	Date: 9/21/17	Total DP: 2.9	Tank Temp: 131
Date: 8/20/17	Total DP: 3.4	Tank Temp: 129	Date: 9/22/17	Total DP: 2.9	Tank Temp: 130
Date: 8-21-17	Total DP: 3.3	Tank Temp: 130	Date: 9/23/17	Total DP: 2.9	Tank Temp: 130

new stage 1p

cleaned stage 1p

Attachment C

DMI Automotive, Inc Daily Alarm Inspections

Specification set by EPA 265.195

States that owner or operator must inspect, where present, at least once each operating day, data gathered from monitoring and leak detection equipment. Note: 265.15c requires the owner or operator to remedy any deterioration or malfunction he finds. Sect. 265.196 requires the owner or operator to notify the Regional Administrator within 24 hours of confirming a release.

Date: 3-3-18 / Int.: N/A	Pass / Fail	Date: 3-31-18 / Int.: N/A	Pass / Fail
Date: 3-4-18 / Int.: N/A	Pass / Fail	Date: 4-2-18 / Int.: N/A	Pass / Fail
Date: 3-5-18 / Int.: N/A	Pass / Fail	Date: 4-3-18 / Int.: N/A	Pass / Fail
Date: 3-6-18 / Int.: N/A	Pass / Fail	Date: 4-4-18 / Int.: N/A	Pass / Fail
Date: 3-7-18 / Int.: N/A	Pass / Fail	Date: 4-5-18 / Int.: N/A	Pass / Fail
Date: 3-8-18 / Int.: N/A	Pass / Fail	Date: 4-6-18 / Int.: N/A	Pass / Fail
Date: 3-9-18 / Int.: N/A	Pass / Fail	Date: 4-7-18 / Int.: N/A	Pass / Fail
Date: 3-10-18 / Int.: N/A	Pass / Fail	Date: 4-8-18 / Int.: N/A	Pass / Fail
Date: 3-11-18 / Int.: N/A	Pass / Fail	Date: 4-9-18 / Int.: N/A	Pass / Fail
Date: 3-12-18 / Int.: N/A	Pass / Fail	Date: 4-10-18 / Int.: N/A	Pass / Fail
Date: 3-13-18 / Int.: N/A	Pass / Fail	Date: 4-11-18 / Int.: N/A	Pass / Fail
Date: 3-14-18 / Int.: N/A	Pass / Fail	Date: 4-12-18 / Int.: N/A	Pass / Fail
Date: 3-15-18 / Int.: N/A	Pass / Fail	Date: 4-13-18 / Int.: N/A	Pass / Fail
Date: 3-16-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-17-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-18-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-19-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-20-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-21-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-22-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-23-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-24-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-25-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-26-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-27-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-28-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-29-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail
Date: 3-30-18 / Int.: N/A	Pass / Fail	Date: / Int.:	Pass / Fail

Comments if Failed:

**DIAMOND CHROME PLATING, INC.
604 S. MICHIGAN AVENUE
P.O. BOX 557
(517)546-0150, FAX (517)546-3666**

March 19, 2018

DMI Automotive, Inc.
1200 Durant Drive
Howell, MI 48843

Attn: Mike Ambrose
Fax No: 548-1711

Chrome Solution
-A-

25.5	oz/gal Chrome
0.22	oz/gal Sulfate
116:1	Ratio
1.90	g/l Trivalent
1.34	g/l Iron
0.35	g/l Copper
0.37	oz/gal Rinse Tank Chrome

If you have any further questions feel free to call.

Sincerely,
Maryn Revoir
Lab Manager

MDEQ Hazardous Waste Management & Regulations Webinar Series Hazardous Waste Generator Trainer - Self Certification

I, RICK WELLS, certify that I have viewed the entirety of the Michigan Department of

Print signatory's name here

Environmental Quality (MDEQ), Hazardous Waste Webinars listed below related to the waste training program(s) for which I am responsible to gain a general understanding of the hazardous waste and liquid industrial by-product generator requirements under Part 111, Hazardous Waste Management, and Part 121, Liquid Industrial By-product of the Michigan Natural Resources and Environmental Protection Act, Act 451 of 1994, as amended, and the rules promulgated thereunder. I recognize that this information is essential for me to evaluate the need for additional site specific compliance measures and training as part of a site-specific hazardous waste training program. I recognize that additional site-specific staff training is necessary for on-site personnel to properly perform their daily duties related to the generation and management of hazardous waste. I further recognize that the MDEQ training does not adequately cover hazardous waste tank or Subpart CC requirements, and that additional independent training is necessary for those topics.

Waste 101, September 27, 2016

Rich Wells
Signature

3-18-18
Date Viewed

Universal Waste, November 16, 2016

Signature

Date Viewed

Waste Characterization and Generator Status, January 18, 2017

Signature

Date Viewed

Used Oil, February 23, 2017

Signature

Date Viewed

Waste Accumulation and Labeling, March 22, 2017

Signature

Date Viewed

Waste Recordkeeping & Inspection, April 18, 2017

Signature

Date Viewed

Conditionally Exempt Small Quantity Status, May 18, 2017

Signature

Date Viewed

2017 Part 111 Rule Changes, June 20, 2017

Signature

Date Viewed

Diligent attention was given to assure that the information presented in the webinar series is accurate as of the date of delivery; however, there is no guarantee, expressed or implied, that use of this webinar series will satisfy all regulatory requirements mandated by the regulations and their respective enforcement agencies. Reliance on information from this webinar series is not usable as a defense in any enforcement action or litigation. Viewers are encouraged to also review the relevant statutes and administrative rules which can be accessed through the webinar notes provided for the webinar series or at www.michigan.gov/deq/waste.

ATTACHMENT E

Attachment F

DMI Automotive, Inc Training Records Log

Employee Name: *Rich Will*

List Title of Training	Trained By:	Employee Signature:	Date:
ANODE BUILDING	OJT		
BASIC JOB PROCEDURES	John R.Stevens		
CHROME THICKNESS TEST			
COMPUTER TRAINING FOR JOB BOOKS			
CRANE SAFETY	<i>John R.Stevens</i>		
DMI POLICY	<i>John R.Stevens</i>	<i>Rich Will</i>	<i>3-15-18</i>
ENV. PROCEDURES	<i>John R.Stevens</i>		
ENVIRONMENTAL POLICY	<i>John R.Stevens</i>		
FINAL INSPECTIONS	OJT		
HAZARDOUS COMMUNICATION	<i>John R.Stevens</i>		
INPROCESS INSPECTION	John R.Stevens		
INTERNAL AUDITS			
ISO9000 REQUIREMENTS	John R.Stevens		
14001 REQUIREMENTS	John R.Stevens		
JOB DESCRIPTIONS	John R.Stevens		
SDS TRAINING	<i>John R.Stevens</i>		
ORIENTATION	John R.Stevens		
POLISHING			
PPE	<i>John R.Stevens</i>		
PROCEDURES	<i>John R.Stevens</i>		
PROCESS FLOW / MAPS	<i>John R.Stevens</i>		
QUALITY POLICY	<i>John R.Stevens</i>		
RECEIVING INSPECTION	<i>John R.Stevens</i>		
RESPIRATOR TRAINING	<i>John R.Stevens</i>		
SAFETY	<i>John R.Stevens</i>		
SPILL CONTAINMENT	<i>John R.Stevens</i>		
WORK INSTRUCTIONS	<i>John R.Stevens</i>		
FORKLIFT	<i>John R.Stevens</i>		
MANIFEST TRAINING	<i>John R.Stevens</i>		
DEQ Webinars	<i>John R.Stevens</i>		