

GRETCHEN WHITMER GOVERNOR

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY





November 17, 2023

Garrett Kanehann Beacon Park Finishing, LLC 15765 Sturgeon Roseville, Michigan 48066

SRN: B3000, Macomb County

Dear Garrett Kanehann:

VIOLATION NOTICE

On October 3, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Beacon Park Finishing, LLC located at 15765 Sturgeon, Roseville, Michigan. The purpose of this inspection was to determine Beacon Park Finishing's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 186-91D.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition I.1	BPF did not operate the pollution control device for nickel/chrome plating line. Based on the permit evaluation document from PTI No. 186-91B, this process will not meet the total chromium emission limit of 0.05 micrograms per dry standard cubic meter without maintaining proper surface tension of the chrome tank and operating the composite mesh pad scrubber properly.
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition III.1	BPF did not implement their operation and maintenance plan. The composite mesh pad scrubber has been down since at least January 1, 2023. AQD was not initially notified, and repairs have not been made in a timely manner.

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FGLINE IV – nickel/chrome plating line.	PTI No. 186-91D Special Condition IV.1	BPF operated the chrome plating tank without operating the composite mesh pad filter system, Control D.
FGLINE IV – nickel/chrome plating line.	PTI No. 186-91D Special Condition IV.2	BPF operated the nickel strike tank without operating the composite mesh pad filter system, Control D.
FGLINE IV – nickel/chrome plating line.	PTI No. 186-91D Special Condition VI.3	BPF did not perform quarterly inspections on the composite mesh pad scrubber for the 2 nd , and 3 rd quarters of 2023.
FGLINE IV – nickel/chrome plating line.	PTI No. 186-91D Special Condition VI.4	BPF did not maintain records of the pressure drop across the composite mesh pad system on a daily basis.
FGLINE IV – nickel/chrome plating line.	PTI No. 186-91D Special Condition VI.6	BPF did not maintain records of inspections required to comply with the applicable work practice standards of 40 CFR 63.342(f).

This process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. These standards are found in 40 CFR Part 63, Subpart N.

On October 3, 2023, the AQD staff reviewed surface tension records which indicate that the nickel/chrome line was operated for approximately 2-3 days per week from January 1, 2023 through September 30, 2023 while the composite mesh pad scrubber was offline.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 8, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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Please submit the written response to Joyce Zhu at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or <u>bognara1@michigan.gov</u> and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Beacon Park Finishing believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Beacon Park Finishing. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

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Adam Bognar Senior Environmental Engineer Air Quality Division 586-854-1517

cc: Annette Switzer, EGLE Christopher Ethridge, EGLE Brad Myott, EGLE Jenine Camilleri, EGLE Joyce Zhu, EGLE