

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

N636859542

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| FACILITY: SRGGI Advanced Development Center | | SRN / ID: N6368 |
| LOCATION: 12620 DELTA DRIVE, TAYLOR | | DISTRICT: Detroit |
| CITY: TAYLOR | | COUNTY: WAYNE |
| CONTACT: Jeff Barger , EHS Manager | | ACTIVITY DATE: 08/27/2021 |
| STAFF: Jorge Acevedo | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR |
| SUBJECT: On Site Inspection | | |
| RESOLVED COMPLAINTS: | | |

COMPANY NAME :SRGGI Advanced Development Center

FACILITY ADDRESS :12620 Delta Drive, Taylor, MI 48180

STATE REGISTRAT. NUMBER : N6368

SIC CODE :

EPA SOURCE CLASS : B

EPA POLLUTANT CLASS :

LEVEL OF INSPECTION : PCE

DATE OF INSPECTION : 8/27/21

TIME OF INSPECTION : 10:00 AM

DATE OF REPORT : 9/4/21

REASON FOR INSPECTION : Scheduled

INSPECTED BY : Jorge Acevedo

PERSONNEL PRESENT :Jeff Barger

FACILITY PHONE NUMBER :

FACILITY FAX NUMBER :

FACILITY BACKGROUND

SRG Global (SRG) is an existing automotive bumper and trim plating research and development facility. They operate a chromium plating line for plastic automotive parts.

INSPECTION NARRATIVE:

On August 27, 2021, I conducted a scheduled inspection of SRG Global. I arrived at the facility at 10AM. I met with Jeff Barger, Environmental Health and Safety Manager. The purpose of my visit was to conduct an inspection of the facility to determine the facility's compliance with the Clean Air Act, the Natural Resources and Environmental Protection Act (NREPA), Act 451, Part 55, and Permit to Install 159-97B.

We discussed the most recent permit, 159-97B, which was issued in 2018. Mr. Barger explained that on the day of the inspection, there was no processing occurring. SRG operates Monday through Thursday and uses Friday to perform maintenance on the lines. The lines are put online on Sunday in preparation for the start of the week. Mr. Barger showed me from the top of a platform the operating lines. I observed several open tanks with plating solutions. After observing the lines, Mr. Barger showed me the roof where are all the scrubbers were exhausted. The control equipment appeared to be in good working condition. Mr. Barger explained the processes the facility uses to maintain the equipment. The paint looked fresh and I did not observe any pitting or leaks from the ductwork. I observed several meters on the control equipment and took readings.

Decorative Chrome Scrubber-

Stage 1- 0.5 “ water

Stage 2- 0.5 “water

Stage 3- 1 “ water

HEPA Filter - 0.5” water

Pre Plate Scrubber- 2 “ water

Etch 3 Scrubber- 2 “ water

After observing the roof, Mr. Barger showed me some of the injection molding equipment on site. The facility has four injection molding machines, which are vented inside. The equipment makes certain plastic automobile parts which then are plated according to customer specifications. The next stop, Mr. Barger showed me a boiler which appeared to be permit exempt. I took photos of the name plate and last inspection record from the Michigan Department of Licensing and Regulatory Affairs.

Next we went to another building the company owns which is down the street from the manufacturing facility. The building is labeled as the Innovation Center. They have on display several of finished products. There was one small paint line on site. It coats with a primer and base coat on plaques which are a small piece of material. There is a small

convention oven, uv chamber that instantly cures the paint, and a physical vapor deposition line which provides a protective coating on the material. The facility uses approximately one gallon a month. After observing the small paint line, I left the facility at 11:15AM. On Monday, August 30, I emailed a request for records from Mr. Barger.

COMPLAINT/COMPLIANCE HISTORY:

There has not been any citizen complaints registered nor violations issued against SRG

OUTSTANDING CONSENT ORDERS:

None

OUTSTANDING LOVs

None

OPERATING SCHEDULE/PRODUCTION RATE:

This facility operates two shifts, Monday through Thursday.

PROCESS DESCRIPTION

SRG operates a chromium plating line for plastic automotive parts. Plating line consists of electroless and electrolytic tanks. Prior to electroplating, molded parts must go through a pre-plating process to prepare the part surface so that metal can be plated to the plastic substrate. Pre-plating may consist of stripping etching, dipping, and various other processes prior to copper, nickel, and chromium electroplating. The plating line includes five scrubber systems.

Process tanks associated with chrome plating but in which neither chromium electroplating nor chromium anodizing is taking place, are not subject to the provision of this subpart- Examples include but not limited to rinse tanks, etching tanks, and cleaning tanks.

APPLICABLE RULES/PERMIT CONDITIONS:

Permit to Install 159-97B was issued in 2018. SRG is subject to 40 CFR 63 Subpart N.

Permit to Install 159-97B - Issued August 9, 2018.

Compliance for EUTANK356 is evaluated below.

SC IV.1- Shall not operate EUTANK356 unless scrubber is installed, maintained, and operated in a satisfactory manner.

COMPLIANCE- Tank 356 was not operating at the time of the inspection. At the time of the inspection, the scrubber appeared to be in good working order with a pressure drop meter. Review of records received indicates that pressure drop readings are being recorded. _

SC VI.1- The permittee shall equip and maintain the scrubber system with a device to monitor pressure drop. Each device shall monitor pressure drop on a continuous basis during operation

COMPLIANCE- Scrubber system was equipped with a device to monitor pressure drop.

SC VIII.1- Stack Height and Diameter of Nitric Scrubber shall have a maximum exhaust diameter and minimum height above ground of 32 inches and 34 feet, respectively.

COMPLIANCE- Height and Diameter were not measured but appeared to be appropriate height and diameter.

Compliance for FGPREFLATE is evaluated below.

SC IV.4 Shall not operate FGPREFLATE unless scrubbers are installed, maintained, and operated in a satisfactory manner.

COMPLIANCE- Tanks were not in operation at the time of the inspection. The scrubbers, at the time of the inspection, appeared to be in good working order with visible pressure drop meters. Review of records received indicates that pressure drop readings are being recorded.

SC VI.1. The permittee shall equip and maintain the scrubber system with a device to monitor pressure drop. Each device shall monitor pressure drop on a continuous basis during operation.

COMPLIANCE- Scrubber system was equipped with a device to monitor pressure drop.

SC VIII.1- Stack Height and Diameter of Pre-Plate Scrubber and Etch Scrubber shall have a maximum exhaust diameter and minimum height above ground of 40 inches and 34 feet, respectively.

COMPLIANCE- Height and Diameter were not measured but appeared to be appropriate height and diameter.

Compliance for FGMIST is evaluated below

SC IV.1 Shall not operate FGMIST unless composite mesh mist eliminators are installed, maintained, and operated in a satisfactory manner.

COMPLIANCE- During the inspection, the composite mesh pad mist eliminators appeared to be installed and operating satisfactorily. Pressure drop monitors were installed and operating during the inspection.

SC IV.2 Facility shall have liquid flow timers to maintain the required intermittently constant water flow.

COMPLIANCE- Facility has liquid flow timers to maintain intermittently constant water flow. At the time of the inspection, facility was down for maintenance.

SC VI.1 Facility shall equip and maintain mist eliminators with a device to monitor pressure drop on a continuous basis.

COMPLIANCE Facility was equipped with pressure drop monitor which was continuously measuring pressure drop at the time of the inspection.

SC VI.2 Facility shall keep daily record of the pressure drop.

COMPLIANCE- Facility submitted records of the daily pressure drop readings.

SC VIII.1- Stack Height and Diameter of Mist Eliminator stack shall have a maximum exhaust diameter and minimum height above ground of 38 inches and 34 feet, respectively.

COMPLIANCE- Height and Diameter were not measured but appeared to be appropriate height and diameter.

Compliance for FGDECCHROME is evaluated below:

SC III.1 Facility shall maintain two decorative chromium tanks so that surface tension of the bath contained within tanks does not exceed 40 dynes/cm or 33 dynes/cm.

COMPLIANCE- Facility maintains records of surface tension and records indicate surface tension were maintained below the permitted surface tension.

SC IV.1 Facility shall install, maintain, and operate scrubber in a satisfactory manner.

COMPLIANCE- Scrubber appeared to be in working order and records of pressure drop indicated that facility is operating the scrubber in a satisfactory manner.

SC VI.1- Facility shall equip and maintain scrubber with a device to monitor pressure drop.

COMPLIANCE- Facility has equipped equipment with a scrubber and is continuously monitoring pressure drop.

SC VI.2. Facility shall keep daily records of the pressure drop across the scrubber system.

COMPLIANCE- Records of daily pressure drop readings are maintained by facility and submitted to AQD for review.

SC VI.3 Facility shall monitor surface tension according a scheduled prescribed by the chrome NESHAP.

COMPLIANCE- Facility is measuring surface tension and provided records to AQD. Surface tension has been below 33 dynes/cm, so the minimum frequency of monitoring is once every 40 hours of tank operation.

SC VI.4 Facility shall monitor emissions and operating and maintenance information in accordance with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and N. The permittee shall keep records of all source emissions and operating and maintenance information on file at the facility and make them available to the Department upon request.

COMPLIANCE- Facility submitted Operations and Maintenance Plan(September 2018), which prescribes how the facility will comply with 40 CFR 63 Subpart N. Facility submitted inspection and maintenance records for control equipment.

SC VI.5 Facility shall maintain records to comply with applicable work practice standards.

COMPLIANCE- Records were received showing compliance with maintaining work practice standards. Records from January 2020 to August 2021 were received and evaluated.

SC VI.6 Facility shall keep records of surface tension of each tank in FGDECCHROME.

COMPLIANCE- Records were received showing surface tension readings and dates of fume suppressant added.

SC VIII.1 - Stack Height and Diameter of Decorative Chrome Scrubber shall have a maximum exhaust diameter and minimum height above ground of 24 inches and 34 feet, respectively.

COMPLIANCE- Height and Diameter were not measured but appeared to be appropriate height and diameter.

SC IX.1- Facility shall comply with the NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

COMPLIANCE- Based on a review of records received, it appears the facility is in compliance with the applicable requirements. The facility was not operating during the time of the inspection, but it appears the equipment and control equipment is maintained in an appropriate manner.

Compliance for FGTRICHROME is evaluated below:

SC IV.1 Facility shall operate equipment with a scrubber that is installed , maintained, and operating satisfactorily.

COMPLIANCE- Facility operates equipment with a scrubber. During the inspection, the scrubber appeared to be working correctly. AQD observed pressure drop device and records were received indicating pressure drop readings.

SC VI.1 Facility shall equip and maintain the scrubber system with a device to monitor pressure drop.

COMPLIANCE- Scrubber is equipped with pressure drop monitor.

SC VI.2 Facility shall keep records of pressure drop across the scrubber system.

COMPLIANCE- Records were received showing pressure drop readings for the scrubber system.

SC IX.1- Facility shall comply with the NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

COMPLIANCE- Based on a review of records received, it appears the facility is in compliance with the applicable requirements. The facility was not operating during the time of the inspection, but it appears the equipment and control equipment is maintained in an appropriate manner.

The facility uses surface tension to show compliance with 40 CFR 63, Subpart N. It also uses mesh pad scrubber system. With regards to 63.342(f)(3)(i)- SRG has an Operation and Maintenance Plan on site. A copy of the plan was provided after the inspection. SRG has a scrubber system per PTI 159-97B, but complies with the surface tension requirements mandated in 40 CFR 63 Subpart N. Records of surface tension are kept and were provided following the inspection. SRG maintains housekeeping procedures as required by the Operation and Maintenance plan. SRG provided the Safety Data Sheet to show compliance with the wetting agent provisions in 40 CFR 63 Subpart N. Specifically, the provision states that after September 21, 2015, facilities have to use non-PFOS wetting agents.

Compliance for several tanks in regards to the area source MACT regulating area source plating and polishing operations was not evaluated during this inspection. The facility maintains an Operations and Maintenance manual to ensure compliance with 40 CFR 63, Subpart N. This may be evaluated during the next inspection cycle.

Exempt Equipment

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The facility has a hot water boiler which is exempt under Rule 282. It solely fires natural gas and its heat input capacity is less than 50,000,000 BTU/hr.

The facility has four injection molding equipment which is vented inside. The equipment is exempt under Rule 286.

The small paint line for plaques is exempt under Rule 287. It appeared to be minimally used and not pursuing paint records as it did not appear to be commercially used.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

N/A

MAERS REPORT REVIEW:


MAERS in the past several years have not been submitted, however, it appears that the facility, due to the fact that it is subject to 40 CFR 63, Subpart N. Facilities which are subject to a federal Maximum Available Control Technology (MACT) standard but are not "major" under Title I or Title III. Category F facilities are assessed a \$250 facility charge with no emissions charge. I alerted Mr. Barger of this fact and told him the facility would be responsible for paying fees going forward.

FINAL COMPLIANCE DETERMINATION:

The facility, at the time of inspection, appears to be in compliance with their PTI and applicable regulations.

NAME 

DATE 9-27-2021

SUPERVISOR 
10/25/2021