

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

N639442297

FACILITY: A W CUSTOM CHROME INC		SRN / ID: N6394
LOCATION: 17726 E 9 MILE RD, EASTPOINTE		DISTRICT: Southeast Michigan
CITY: EASTPOINTE		COUNTY: MACOMB
CONTACT: Steve Box , Vice President		ACTIVITY DATE: 11/07/2017
STAFF: Joe Forth	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Onsite inspection		
RESOLVED COMPLAINTS:		

On November 7, 2017, I, Joseph Forth, conducted a scheduled inspection at A W Custom Chrome, Inc. The facility is located at 17726 E. 9 Mile Rd., Eastpointe, MI 48021. For the inspection, I was accompanied by AQD inspectors Adam Bognar and Francis Lim. The purpose of the inspection was to determine the facility's compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451, and the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart N- National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

#### FACILITY INSPECTION:

We arrived at the facility at 9:00 am and met with Mr. Steve Box, Vice President, who represented the facility for the inspection. For the inspection, I read through the most recent inspection report for the facility and asked Mr. Fox interrupt me if any of the information had changed. Mr. Fox claims that there has been no significant change in equipment or process at the facility. He provided me with records of tank inspections and the required stalagmometer readings for the chrome NESHAP compliance. Mr. Fox also provided information on the new surfactant that he uses in the plating tanks to show that they do not contain the chemicals PFOS/PFAS. He then gave a tour of the facility, showing the four plating tanks, the metal polishing/buffing area, and the cyclone. With everything necessary provided and shown the inspection was completed and we left the facility at 9:40 am.

#### Process and Equipment Overview:

The facility is a small metal plating facility that has four plating tanks. These four tanks include a chromium tank, a nickel tank, an acid copper tank, and a cyanide copper tank. The metal parts are prepared and cleaned, and then are moved to the necessary tanks according to customer requirement. The emissions of the plating tanks are emitted to the indoor facility air (i.e. no exhaust or emissions to the outside ambient air). The tanks are covered with tarps when not in use.

In addition to the plating tanks, the facility also has a metal polishing/buffing process within the facility which includes four polishing machines. Using a polishing paste the parts are buffed/polished as needed to comply with customer requirements. The buffers have exhaust vents attached to them that are connected to the cyclone which collects the air and separates the air and dust. The air is exhausted through a filter and the dust is collected in a drum.

The facility does not have a vapor degreaser, ovens, stacks, cold cleaner, generators, or any boilers.

The facility only employs two full time employees, Mr. Box and one other. The facility runs 5 days per week, one shift per day (8-9 hours), and occasionally is open for a half

shift on Saturdays.

**Compliance:**

The facility does not require any Permit to Install (PTI) as all emissions from the tanks are released only into the general in plant environment pursuant to R 336.1285 (2)(r). The facility's chrome plating process is required to comply with 40 CFR 63, Subpart N (Chrome NESHAP). The facility meets compliance by showing that the surface tension of their chrome tank does not exceed 40 dynes/cm when measured by stalagmometer pursuant to 40 CFR 63.343 (c)(5)(ii) (Attachment #1). This is accomplished by adding a surfactant/fume suppressant called Macuplex STR NPF to the tank. This surfactant is produced by MacDermid and does not contain, is not produced from, and will not degrade to PFOS/PFOA/PFAS according to the product information (Attachment #2). Readings for the surface tension are performed using a stalagmometer. The readings are monitored and recorded at the least once a month. This monitoring complies with the NESHAP as the chrome tank is not running constantly to warrant weekly checking (less than 40 hours of actual tank operating time per week). The cyclone does not require a PTI as it is exempt according to R 336.1285 (2)(l)(vi)(B).

The facility also has and adheres to an Operation and Maintenance plan, which includes the surface tension readings and regular inspections of the tanks for leaks, malfunctions, etc. which are also recorded (Attachment #3). The facility files an annual "Ongoing Compliance Status Report", pursuant to 40 CFR 63, Subpart N. Nickel and copper plating processes at the facility are subject to 40 CRR 63, subpart W (6W) – NESHAP: Area source standards for Plating and Polishing operations (Area Source MACT). The facility is an area source for HAP emissions. MDEQ-AQD does not have delegated authority to implement 40 CFR 63 Subpart 6W. So, compliance with the area source MACT is not verified. Chrome plating is not subject to Subpart 6W pursuant to 40 CFR 63.11504(1)(i).

**Conclusion:**

The facility appears to be operating in compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451, and the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart N- National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

NAME J. M. Firth

DATE 11-16-17 SUPERVISOR SK