

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

ACTIVITY REPORT: Scheduled Inspection

N757445199

FACILITY: COLOR COAT PLATING CO		SRN / ID: N7574
LOCATION: 355 W GIRARD, MADISON HTS		DISTRICT: Southeast Michigan
CITY: MADISON HTS		COUNTY: OAKLAND
CONTACT: Jeffery Swanson , Owner		ACTIVITY DATE: 05/29/2018
STAFF: Joe Forth	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site inspection		
RESOLVED COMPLAINTS:		

On May 29, 2018, I, Joe Forth, from the Department of Environmental Quality's (DEQ), Air Quality Division (AQD), conducted an inspection of Color Coat Plating, State Registration Number (SRN): N7574, located at 355 W. Girard, in Madison Heights, Michigan. The purpose of this inspection was to determine the facility's compliance with 40 CFR Part 63, Subpart N, the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (Chrome NESHAP), the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules.

Facility Description

Color Coat Plating Company offers a variety of coloring and coating types such as: black oxide, anodized aluminum, chrome plating, and zinc oxide. Color Coat Plating coats products for the auto industry, small machinery, and home/business hardware. Currently, Color Coat Plating employs 16 people and is open six days a week; 7:00 am to 7:00 pm Monday through Friday, and 7:00 am to 1:00 pm on Saturday.

All plating operations are vented to the general in-plant environment and appear to be exempt from permitting pursuant Rule 285(2)(r). Despite the chrome tank being exempt from permitting, it is not exempt from the regulations within 40 CFR 63 Subpart N Chrome NESHAP.

Facility Inspection

I arrived at the facility at 2:00 pm. I was met by Mr. Jeff Swanson, Owner (Phone: 248-744-0445 Email: chromejeff@yahoo.com). I sat down with Mr. Swanson to discuss the purpose of the inspection and provided my credentials. Because the facility is exempt from permitting, Color Coat Plating needs only to comply with the chrome NESHAP. To comply with the NESHAP the facility must submit ongoing compliance reports, maintenance records, and records of their chosen compliance method. The chosen compliance method of Color Coat Plating's chrome tank is a fume suppressant. Mr. Swanson was able to provide all the required records at the time of inspection. He only provided the Compliance Reports for 2017 as he only submits them twice a year, once in June/July and one at the end of the calendar year.

Mr. Swanson then gave me a tour of the facility. The facility contains coating operations such as: black oxide, anodized aluminum, chrome plating, and zinc oxide. All operations besides the black oxide are vented to the general in plant environment. The facility has a waste water treatment system on site that treats their nickel waste water. The system does not treat water from the chrome tank as that tank is never purged, water is only added to the tank to make up for evaporation. The wastewater treatment system cleans the water from the rinse tanks and discharges it to the sanitary sewer. The impurities removed by the filter are taken away by an environmental waste facility, EQ Industrial Services (See Attachment A).

Compliance:

All required records received (Ongoing Compliance Status Reports (Attachment B), Maintenance Logs (Attachment C), and Surface Tension measurements (Attachment D)).


Upon reviewing the facility's records of their surface tension measurements for the chrome tank, I noticed some violations. There are several records where the surface tension was recorded to be greater than 40 dynes/cm. The facility has been operating for several years with the belief that the surface tension limit for chrome baths using fume suppressants was 45 dynes/cm. Since the last time the facility has been inspected the NESHAP has been revised to decrease this limit to 40 dynes/cm (40 CFR 63.343 (c)(5)(ii)). Mr. Swanson explained that he was unaware of this change and would increase their additions

of fume suppressant to meet the new limit moving forward. As the facility appears willing to cooperate, a violation notice is not being issued at this time. However, should the facility fail to meet the 40 dynes/cm limit moving forward a violation notice will be issued. It has been asked of the facility to send their monthly surface tension readings to the AQD for the next 6 months to confirm the facility's compliance.

I inquired whether the facility's fume suppressants contained PFOS. Mr. Swanson claimed that he contacted all his suppliers when he heard about the chemical and was told his products do not contain the chemical. I received the SDS for the fume suppressant used in the chrome bath several days later via email. The surfactants appear to not contain PFOS as an ingredient (See Attachments E, F, and G).

Conclusion

Currently, the facility is not operating in compliance with the 40 CFR Part 63, Subpart N, the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (Chrome NESHAP). However, the facility has been told that they shall submit monthly records of their chrome tank surface tension to demonstrate compliance moving forward. It has been decided not to issue a violation notice at this time.

NAME  DATE 7-17-18 SUPERVISOR SK