



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREYHER
DIRECTOR

May 14, 2018

Mr. John Wagner, PE, REM, CSP
Director Health, Safety & Environmental Affairs
Diamond Chrome Plating, Incorporated
604 South Michigan Avenue
P.O. Box 557
Howell, Michigan 48844

SRN: A2931, Livingston County
FACD Case No. 03-1862-CE

Dear Mr. Wagner:

VIOLATION NOTICE

On April 5, 2018 and May 7, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) reviewed recordkeeping submitted by Diamond Chrome Plating, Incorporated (DCP) located at 604 South Michigan Avenue, Howell, Michigan. The purpose of this review was to determine DCP'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 First Amended Consent Decree (FACD) Case No. 03-1862-CE, and 40 CFR Part 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning.

Based on review of records, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Batch vapor degreaser	40 CFR Part 63, Subpart T, Section 63.468(f).	Annual halogenated solvent consumption report submitted after the annual due date of February 1 specified in Subpart T.
East rooftop chrome plating ductwork serving scrubber #4 (north scrubber)	FACD, Paragraphs 5.3(b)	The First Quarter 2018 RAIF noted three leaks on January 8, 2018 which were reported to be cleaned on January 9. No mention was made of repair, however.
East rooftop chrome plating ductwork serving scrubber #3 (south scrubber)	FACD, Paragraphs 5.3(b)	The Third Quarter 2017 RAIF noted that for a leak identified on ductwork section VP1, on August 18, 2017, the leak was fixed, but did not identify the date the repair was made.

This batch vapor degreaser process is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning. These standards are found in 40 CFR Part 63, Subpart T.

On March 28, 2018, AQD received the annual halogenated solvent consumption report required by Subpart T, and reviewed it on April 5, 2018. Section 63.468(f) of this regulation requires that the report be submitted by February 1 of each year. Submittal of the report for the 2017 operating year after February 1, 2018 constitutes a violation of Section 63.468(f).

On May 7, 2018, AQD reviewed the First Quarter 2018 Roof Area Inspection Forms (RAIF). The report indicated that on January 8, 2018, there were three instances of leaks discovered, which were reported to have been cleaned on January 9, 2018. No reference was made to the leaks being repaired, however. This constitutes a violation of Paragraph 5.3(b) of the FACD, which states, in part:

“On and after the Effective Date, Defendant shall inspect all ductwork and control equipment at the Property each day the Facility is in production to identify any release of an air contaminant to the environment that fails to be appropriately conveyed to the control equipment for control and removal. All releases must be repaired within forty-eight (48) hours of being identified. Defendant shall conduct and maintain at the Property a written record that identifies the person(s) conducting the required inspection, and release(s) identified during the inspection, the ductwork segment for each release identified, and the date any release is repaired.”

Additionally, the Third Quarter 2017 RAIF indicates that for a leak identified on ductwork section VP1, on August 18, 2017, the leak was fixed, but it did not identify the date the repair was made. This also constitutes a violation of the recordkeeping and reporting requirement of Paragraph 5.3(b) of the FACD.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 4, 2018. 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.

If DCP 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. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-284-6638

DAM:TG

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Chris Ethridge, DEQ
Mr. Brad Myott, DEQ
Mr. Malcolm Mead-O'Brien, DEQ
Ms. Carla Davidson, DEQ
Ms. Stephanie Kammer, DEQ
Mr. Bryan Grochowski, DEQ
Ms. Rebecca Taylor, DEQ
Mr. Brian Negele, DAG