



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

June 25, 2019

Mr. Scott Wright, Environmental Manager
Diamond Chrome Plating, Incorporated
604 South Michigan Avenue, P.O. Box 557
Howell, Michigan 48844

SRN: A2931, Livingston County

Dear Mr. Wright:

VIOLATION NOTICE

On April 30, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Diamond Chrome Plating, Incorporated (DCP) located at 604 South Michigan Avenue, Howell, Michigan. The purpose of this inspection 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 conditions of DCP's air use permits, and the First Amended Consent Decree (FACD), Case No. 03-1862 CE.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Chrome plating tanks Cr-5, Cr-7, Cr-15, and Cr-17	40 CFR Part 63, Subpart N, Section 63.342(c)(1)(iii)	Recordkeeping shows exceedances, during January-March, 2019 of Subpart N surface tension limit of 33 dynes/cm, as measured with a tensiometer.

DCP's chrome plating tanks Cr-5, Cr-7, Cr-15, and Cr-17 are subject to the federal National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. These standards are found in 40 CFR Part 63, Subpart N. Section 63.342(c)(1)(iii) requires that for open surface hard chromium electroplating tanks, each owner or operator of an existing, new, or reconstructed affected source shall control chromium emissions discharged to the atmosphere from the affected source as follows:

"(iii) If a chemical fume suppressant containing a wetting agent is used, not allowing the surface tension of the electroplating or anodizing bath contained within the affected tank to exceed 40 dynes/centimeter (dynes/cm) (2.8×10^{-3} pound-force per foot (lb/ft), as measured by a stalagmometer, or 33 dynes/cm (2.3×10^{-3} lb/ft), as measured by a tensiometer at any time during tank operation...."

Subsequent to my May 23, 2019 request, DCP provided a requested copy of surface tension records for 2019, year to date (YTD), for hard chrome plating tanks Cr-5, Cr-7, Cr-15, and Cr-17.

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The Chrome Tank Surface Tension form for 2019 YTD shows that each tank exceeded the NESHAP limit of 33 dynes/cm, as measured by a tensiometer, on multiple occasions. The highest individual reading noted had a value of 64 dynes/cm. The above exceedances constitute a violation of 40 CFR Part 63, Subpart N, Section 63.342(c)(1)(iii).

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 19, 2019. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Lansing District, at Constitution Hall, 525 West Allegan, First Floor South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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 violation cited above and for the cooperation that was extended to me during my inspection of DCP. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Brad Myott, EGLE
Mr. Brian Negele, DAG
Ms. Carla Davidson, EGLE
Ms. Rebecca Taylor, EGLE
Mr. Bryan Grochowski, EGLE