



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

November 16, 2016

Mr. Mark Borawski
Arted Chrome Plating, Inc.
38 Piquette Street
Detroit, MI 48202

SRN: A8087, Wayne County

Dear Mr. Borawski:

VIOLATION NOTICE

On February 8, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Arted Chrome Plating, Inc. (hereafter also Arted Chrome or facility) located at 38 Piquette Street, Detroit, Michigan. The purpose of this inspection was to determine Arted Chrome'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; the general conditions and special conditions (SC) of Permit to Install (PTI) number 74-02A; and the requirements of the federal National Emission Standard for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks at 40 CFR 63, Subpart N.

During the inspection and during the subsequent review of the records received from Arted Chrome following the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCHROMETANK1, a decorative chrome electroplating tank utilizing hexavalent chrome and with a fume suppressant containing a wetting agent for emissions control	40 CFR 63.342(d)(3); R 336.1941(1)	Based on the surface tension records, the surface tension on September 17, 2014 was measured at 42.15 dynes/cm and has not been measured below 40 dynes/cm at any time after September 19, 2014 through the last record of February 8, 2016. Therefore, Arted Chrome is not in compliance with the emissions standard of 40 CFR 63.342(d)(3) or R 336.1941(1).
	40 CFR 63.343(c)(5)(ii); R 336.1941(1); PTI 74-02A, EUCHROMETANK1, SC VI.1	After September 19, 2014 through the last record of February 8, 2016, Arted Chrome failed to monitor the surface tension once every four hours.

	40 CFR 63.346(b)(1) and (5); R 336.1941(1); PTI 74-02A, EUCHROMETANK1, SC VI.3	Arted Chrome failed to maintain records necessary to document compliance with the work practice standards at 40 CFR 63.342(f) and Table 1, and to demonstrate consistency with the provisions of the operation and maintenance plan required by 40 CFR 63.342(f)(3).
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EUCHROMETANK1 is an existing decorative chrome electroplating tank utilizing hexavalent chrome and with a fume suppressant containing a wetting agent for emissions control. Therefore, EUCHROMETANK1 is subject to the NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks at 40 CFR 63, Subpart N (also known as MACT N). MACT N was initially promulgated on January 25, 1995 and was last amended on September 19, 2012. MACT N has been incorporated into the Air Pollution Control Rules at R 336.1941(1), also known as Rule 941(1). EUCHROMETANK1 is also permitted under PTI 74-02A, issued on March 31, 2010.

MACT N previously allowed an owner or operator of a decorative electroplating tank with a chromic acid bath to comply with 45 dynes/cm, as measured by a stalagmometer, or 33 dynes/cm, as measured by a tensiometer, as the maximum surface tension value for a tank utilizing a chemical fume suppressant containing a wetting agent. However, in the most recent revision to MACT N the allowed surface tension was lowered to not more than 40 dynes/cm at 40 CFR 63.342(d)(3) for all existing, new, or reconstructed sources. This new standard became effective for existing sources on September 19, 2014 (40 CFR 63.343(a)(1)). This standard is also incorporated into AQD Rule 941(1). Based on the surface tension records received for EUCHROMETANK1, the surface tension on September 17, 2014 was measured at 42.15 dynes/cm and has not been measured below 40 dynes/cm at any time after September 19, 2014 through the last record of February 8, 2016. Therefore, EUCHROMETANK1 is not in compliance with the emissions standard of 40 CFR 63.342(d)(3) or Rule 941(1).

Due to the change in the surface tension standard, Arted Chrome also failed to monitor, in a satisfactory manner, the surface tension of EUCHROMETANK1 every four hours except as allowed in 40 CFR 63.343(c)(5)(ii). Pursuant to 40 CFR 63.343(c)(5)(ii)(A), surface tension readings are to begin at a frequency of once every 4 hours. Pursuant to 40 CFR 63.343(c)(5)(ii)(B) and (C), a source is allowed to decrease the frequency of the surface tension monitoring to once every 40 hours, provided compliance with the surface tension standard is continuously achieved; once an exceedance of the surface tension is recorded, the source is required to revert back to the once per 4 hour monitoring schedule. Arted Chrome operated EUCHROMETANK1 under a monitoring schedule of once every 40 hours, based upon a surface tension limit of 45 dynes/cm. When the surface tension standard was lowered from 45 dynes/cm to 40 dynes/cm on September 19, 2014, the surface tension was required to be monitored once every 4 hours; however, the surface tension schedule remained at once every 40 hours from September 19, 2014 through the

Mr. Mark Borawski
Page 3
November 16, 2016

last record of February 8, 2016. Therefore, the facility is not in compliance with 40 CFR 63.343(c)(5)(ii), Rule 941(1), and SC VI.1 of PTI 74-02A.

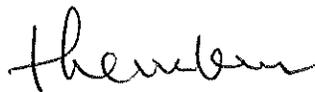
Finally, 40 CFR 63.346(b)(1) and (5) require records necessary to document compliance with the work practice standards at 40 CFR 63.342(f) and Table 1, and to demonstrate consistency with the provisions of the operation and maintenance plan required by 40 CFR 63.342(f)(3). Arted Chrome indicated the work practice standards and the operation and maintenance plan were followed, but written documentation has not been maintained. Therefore, the facility is not in compliance with 40 CFR 63.346(b)(1) and (5), Rule 941(1), and SC VI.3 of PTI 74-02A.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 14, 2016 (which coincides with 28 calendar days from the date of this letter). 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 Arted Chrome 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 and for the cooperation that was extended to me during my inspection of February 8, 2016. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Terseer Hemben
Environmental Engineer
Air Quality Division
313-456-4677

cc: Ms. LaReina Wheeler, City of Detroit BSEED
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ