



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

January 7, 2021

Mr. James Smith
Beacon Park Finishing, LLC
15765 Sturgeon Street
Roseville, MI 48066

SRN: B3000, Macomb County

Dear Mr. Smith:

VIOLATION NOTICE

On October 28, 2020 and November 12, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Beacon Park Finishing located at 15765 Sturgeon Street, Roseville, Michigan. The purpose of this inspection was to determine Beacon Park Finishing'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 Permit to Install (PTI) number 186-91B.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|-------------------------------|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Nickel-chrome plating line IV | PTI No. 186-91B, General Condition 9 | The permittee did not notify the AQD Warren District Supervisor of the malfunction of Control D which resulted in emissions in exceedance of the limit in SC 15. |
| Nickel-chrome plating line IV | PTI No. 186-91B, Special Condition 15 | Chrome emissions from chrome line IV, exhausted through a packed-bed scrubber, shall not exceed 0.05 mg/cubic meter. Records and inspection observations indicate chrome line IV was operated at least 13 days between October 9, 2020 and October 28, 2020 while the scrubber (Control D) was not being operated. |
| Chrome plating line IV | PTI No. 186-91B, Special Condition 21 | Records and inspection observations indicate the permittee operated chrome plating line IV at least 13 days between October 9, 2020 and October 28, 2020 without the scrubber control being in operation. |

| | | |
|------------------------|------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Chrome plating line IV | PTI No. 186-91B, Special Condition 25 | The operation and maintenance plan provided by Beacon Park on December 3, 2020 for Control D does not include a standardized checklist to document the operation and maintenance of the controls which addresses a systematic procedure for identifying malfunctions, reporting process parameters to the operation supervisors and other actions to be followed to ensure that control equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur. The facility provided an inspection record, not specified in the operation and maintenance plan for Control D, dated October 24, 2020, which stated various operating parameter were checked and did not identify any malfunction or repairs of the scrubber, however, the scrubber was not operational on October 24, 2020. |
|------------------------|------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice January 28, 2021 (which coincides with 21 calendar days from the date of this letter). 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, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Beacon Park Finishing 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.

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Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Beacon Park Finishing. 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,

A handwritten signature in black ink, appearing to read "Joseph M. Forth". The signature is written in a cursive style with a large initial "J" and a distinct "F".

Joseph Forth
Environmental Quality Analyst
Air Quality Division
586-217-1435

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE