

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

A257568191

FACILITY: Advance Plating & Finishing, Inc.		SRN / ID: A2575
LOCATION: 840 Cottage Grove, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Mark Richmond , Maintance		ACTIVITY DATE: 07/13/2023
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, self-initiated inspection and met with Mark Richmond, Maintenance. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations. No visible emissions or odors were noted upon arrival at the facility. Advance Plating & Finishing Inc. (APF), operates one zinc electroplating and one zinc nickel metal electroplating line providing finishing to metal automotive and furniture products. I confirmed that APF has not conducted any chromium electroplating since 2015. During the inspection, we were assisted by Elliot Eisaman.

The lines consist of the preparation solutions, rinses, acid, zinc electroplating and zinc nickel electroplating followed by rinses and sealing and a final drying stage. The tanks exhaust to the general in-plant environment, except for the zinc and zinc nickel electroplating tanks, where there is a fan assist exhaust directly over them. Additionally, some parts get a black or clear seal coating and are dried at approximately 400°F. There are two stacks to exhaust the drying ovens. The in-plant exhaust is approximately 13.5' above the electroplating tanks, and the exhaust unit extends approximately 5-7' above the roof and vents horizontally. A discussion of the exhaust and whether or not it was installed and intended to vent emissions from the tanks was conducted during both the previous inspection and this inspection. Based on those discussions, it became clear that the unit is exhausting emissions from the zinc and zinc nickel electroplating tanks to the ambient air.

During the previous inspection the AQD Air Toxics Unit was consulted for information on the nickel sulfate used in the zinc nickel electroplating tank. Nickel is considered an air toxic, and a carcinogen and I wanted to check on the specific type of nickel used at APF. I was advised that the nickel used should be regulated as a nickel compound under CAS # 7440-02-0 and that due to the IRSL for nickel of 0.0042 ug/m², the Rule 290 Permit to Install exemption is not an option. Rule 291 is a possible option; however the combined potential emissions cannot exceed 0.006 tons per year. Emissions of air contaminants from this line are currently unknown. In an email, contact information for the Clean Air Assistance Program staff was provided to the company.

Following the previous inspection, the facility received a Violation Notice for failure to obtain a Permit to Install for the zinc nickel electroplating process. To address the violation, the previous facility management informed AQD that they would no longer use the ventilation system, effective June 1, 2017. Due to staff changeover, it is unclear when the facility started using the system again and the current staff were unaware of the prior issue. I informed Mr. Richmond that a Violation Notice would be issued, and I was instructed to send it to Jack Smit, President. The previous Violation Notice was sent to Orlando Stephenson, identified in current corporate filings as Secretary.

Advance Plating & Finishing Inc. is in violation of Rule 201 for failure to obtain a Permit to Install for the zinc nickel electroplating process. A Violation Notice will be issued.

NAME April Lazzaro

DATE 08/29/2023

SUPERVISOR HH