



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

March 17, 2016

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

SRN: A2931, Livingston County

Dear Mr. Wagner:

VIOLATION NOTICE

On March 10, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) contacted you by telephone to discuss ductwork at Diamond Chrome Plating, Incorporated (DCP), located at 604 South Michigan Avenue, Howell, which AQD observed on March 10. The purpose of this conversation 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 administrative rules and the conditions of Permit to Install (PTI) number 675-88A.

During the telephone conversation, staff discussed the following:

Process Description	Rule/Permit Condition Violated	Comments
Cadmium plating process wet scrubber	Rule 910; PTI number 675-88A, Special Condition number 16	Photographs show exposed seams on ductwork to scrubber, indicating device is not installed, maintained, or operated properly.

On March 10, 2016, AQD staff observed photographs of the cadmium scrubber ductwork on the south exterior wall of the plant, which had been taken by Ms. Rebecca Taylor of the DEQ's Remediation & Redevelopment Division (RRD) on February 17, 2016. These photographs showed tape that had been used on one or more seams of the ductwork in between the scrubber and the cadmium plating process. The AQD does not consider tape to be an acceptable long term method for sealing exposed seams on ductwork.

This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

This also constitutes a violation of Special Condition number 16 of PTI number 675-88A, which states:

"Applicant shall not operate the equipment, unless the wet scrubber is installed and operating properly."

AQD considers it necessary for ductwork to be kept in good repair, in order for an air pollution control device to be installed, maintained, and operated in a satisfactory manner.

It is my understanding that immediately following our telephone conversation, you investigated this issue. Please submit a written response to this Violation Notice by April 7, 2016. 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. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ