



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

March 20, 2024

VIA EMAIL

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

SRN: A2931, Livingston County

Dear Scott Wright:

**VIOLATION NOTICE**

On February 7, 2024, and February 29, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Diamond Chrome Plating, Inc. (DCP) located at 604 S. 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 Permit to Install (PTI) numbers 367-83B, 386-85A, 672-88, 673-88, 675-88A, and 677-88; and the First Amended Consent Decree, Case No. 03-1862 CE.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Nickel plating process	PTI 673-88, Special Condition (SC) 18, and Rules 370 and 910	Pale green stains on the outside of the nickel scrubber were indicative of nickel oxide, and indicated past release(s) of collected air contaminants.

On February 29, 2024, the AQD examined the scrubber for the nickel plating process and its ductwork, just outside the south exterior wall of the plant. The AQD staff observed pale, green stains on the side of the scrubber which appeared to have been from two access panels. The color of the dried material was consistent with that of nickel oxide.

The nickel oxide stains on the outside of the scrubber indicate a violation of PTI 673-88, SC 18 and of Rule 370 of the administrative rules promulgated under Act 451,

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which both require that the disposal of collected air contaminants shall be performed in a manner which minimizes the introduction of air contaminants to the outer air. This also constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, 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.

Additionally, the AQD was informed on February 7, 2024, that the chrome redox process has undergone changes in the way it is operated since PTI 672-88 was issued. Specifically, bisulfite and acid were said to be added to the process, in place of one of the original raw materials, sulfur dioxide. PTI 672-88, SC 18 states:

“Applicant shall not substitute any raw materials or process for those described in this permit application which would result in an appreciable change in the quality or any appreciable increase in the quantity of the emission of an air contaminant without prior notification to and approval by the Air Quality Division.”

Please note that this has not been determined to be a violation at this time. Within 30 days, please provide a demonstration that the substitution of bisulfite and acid for sulfur dioxide in the redox process has not resulted in an appreciable change in the quality or any appreciable increase in the quantity of the emission of an air contaminant. For DCP’s response, DCP may elect to do a demonstration of no meaningful change pursuant to Rule 285(2)(c). Language on doing a “no meaningful change” demonstration from Rule 285(3) of the administrative rules promulgated under Act 451 has recently been emailed to you, on March 14, 2024.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 10, 2024, (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 Daniel McGeen at EGLE, AQD, Lansing District, at Constitution Hall, P.O. Box 30242, 1<sup>st</sup> Floor South, Lansing, Michigan 48909 or McGeenD@michigan.gov and submit a copy to 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.

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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 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  
517-648-7547

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Robert Byrnes, EGLE  
Carla Davidson, EGLE  
Bryan Grochowski, EGLE  
Emily Peabody, EGLE