DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B172540332

FACILITY: CONTROLLED PLATING TECHNOLOGIES INC		SRN / ID: B1725
LOCATION: 1100 GODFREY, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Douglas Slot , Plant Manager		ACTIVITY DATE: 06/14/2017
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Douglas Slot, Plant Manager. Upon our introduction, I informed Mr. Slot that the inspection was routine, but that during my preparation, I had questions on the recordkeeping.

FACILITY DESCRIPTION

Controlled Plating Technologies, Inc. (CPT) is a zinc plating facility that currently operates three plating lines. The Manual Rack Line (formerly Hoist) and Automatic Rack Line conduct zinc electro plating and are vented through separate exhaust systems. The Barrel line is also a zinc electro plating line, but it is completely internally vented. The Automatic Rack Line was installed in 2013.

During the inspection preparation, it was identified that the facility had previously received a Violation Notice for failure to obtain a Permit to Install for the Manual Rack Line in 2008. The facility submitted a permit application, and after some discussion, it was determined that the line was exempt per Rule 290. The reason for this is because the company stated that emissions were below the exemption levels. Emissions of constituents from tanks that had direct ventilation out of the roof were included in the calculations. Emissions from tanks across the catwalk were considered "internally vented" and not included in the emissions totals. Due to the fact that in a plating line each tank is considered an emission unit, this is an acceptable way to evaluate for emissions. I went back to the facility on June 21, 2017 for a second look at the way the ventilation is set up on this line. Basically, this was to verify that emissions of nitric acid were not being emitted through the existing ventilation. In addition to this, Mr. Slot and I discussed the pH in the tank, the concentration of nitric acid used and the fact that it is maintained at ambient temperatures and is not electrolytic. Following these observations and discussions, it is confirmed that the nitric acid tank is internally vented, and appears exempt per Rule 285(2)(r).

Mr. Slot stated that the new Automatic Rack Line was also Rule 290 exempt, with calculations being the same and operates on a slightly smaller scale and hours than the Manual Rack Line. This line was evaluated for emissions during the second visit as well, and it was determined that nitric acid dip tank is vented to the ambient air and as such it appears exempt per Rule 285(2)(r). Only one set of vent hood equipment is present above the zinc tank.

In the past, there was confusion on the status of the equipment on the roof and the nomenclature. The equipment consists of old scrubber bodies, and are dry. Essentially, the company only uses them as exhaust fans. In the emissions calculations, they have been using 95% control efficiency for particulate mist. The only roof access is by stand-alone ladder, which I did not feel comfortable using to access the roof. I asked Mr. Slot to safely access the roof and to take phots of the chevron blade mist eliminator and I would allow them to continue to use the 95% control efficiency. Upon further evaluation, the equipment did not appear to have a chevron blade mist eliminator, and as such Mr. Slot removed the control efficiency. This does not have a significant effect on reported emissions as they were low to begin with.

It is noted that the prior AQD inspector in 2013 believed that the scrubbers were operational, when in fact they have not been operational in many years. Mr. Slot explained that prior to CPT operating a zinc electro plating line, the building was home to a chrome electro-plating line. The old scrubbers were installed to control chrome emissions. They have not been used as scrubbers since the 1980's. The building itself is very old, and the existing 90 HP natural gas fired boiler had a date of 1957 on the faceplate.

This facility is subject to the National Emission Standards for Hazardous Air Pollutants for Area Sources: Plating and Polishing which is found at 40 CFR Part 63 Subpart WWWWWW. At the time of the inspection, the Air Quality Division (AQD) does not have delegated authority. This means that the AQD neither implements nor enforces this regulation. The implementation and enforcement of this regulation is conducted by the United States Environmental Protection Agency.

COMPLIANCE SUMMARY

Controlled Plating Technologies was in compliance at the time of the inspection. See attached for emissions information. Actual calculations have been place in the confidential file do to the proprietary nature of the information.

NAME _____ DATE 6-27-17 SUPERVISOR _____