



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 11, 2021

Certified Mail

Mr. Don Jones, Safety Coordinator
Marsh Plating Corporation
103 North Grove Street
Ypsilanti, Michigan 48198

SRN: N2576, Washtenaw County

Dear Mr. Jones:

VIOLATION NOTICE

On April 27, 2021, the Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Marsh Plating Corporation (Company) located at 103 North Grove Street, Ypsilanti Michigan. The purpose of this inspection was to determine the Company'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) and the associated Air Pollution Control Rules and the conditions of Permit to Install (PTI) 119-18.

During the inspection and subsequent records review, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
8000-gallon HCL Tank containing 50% HCL solution on roof venting at ground level.	Rule 201-No PTI.	Acid tank is subject to PTI requirements unless Rule 290 or 291 requirements are met. The Company has not demonstrated that this process is exempt.
Zinc Plating Processes (EULINE2, EULINE3, EULINE4, EULINE6, EULINE7, & EULINE8)	PTI 119-18 Condition III.1	No approved MAP. MAP provided to AQD after inspection inadequate. No indication that acceptable pressure drop operating ranges have been established for each scrubber.
Zinc Plating Processes (EULINE2, EULINE3, EULINE4, EULINE6, EULINE7, & EULINE8)	PTI 119-18 Condition IV.1, 2 & 3.	None of the 13 scrubbers have required pressure-drop indicators on them and could not determine if scrubbers were working properly.
Zinc Plating Processes (EULINE2, EULINE3, EULINE4, EULINE6, EULINE7, & EULINE8)	PTI 119-18 Condition V1.1a & 2.	Weekly pressure drop readings are not being taken nor are any records of the readings being maintained.

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Zinc Plating Process EULINE3	PTI 119-18 Condition IV.1	A Line 3 scrubber was turned off while plating operations were active.
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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 1, 2021. 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 violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit written response to the EGLE, AQD Jackson District, at 301 East Louis B Glick Highway, Jackson, Michigan 49201, and submit copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Company 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 violation cited above and for the cooperation that was extended to me during my recent inspections of the landfill. 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,



Mike Kovalchick
Senior Environmental Engineer
Air Quality Division
517-416-5025

cc: Mr. Scott Miller, EGLE
Mr. Chris Ethridge, EGLE
Ms. Jenine Camillari, EGLE
Mr. Jeff Rathbun, EGLE