



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

September 7, 2018

Mr. Brad Hirdes  
Allied Finishing  
4100 Broadmoor SE  
Kentwood, Michigan 49512

SRN: B6196, Kent County

Dear Mr. Hirdes:

**VIOLATION NOTICE**

On August 9, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Allied Finishing located at 4100 Broadmoor SE, Kentwood, Michigan. The purpose of this inspection was to determine Allied Finishing'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 162-17, 34-06A and 349-01C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUGREEN1 One Decorative Chrome Electroplating Tank	National Emission Standards for Hazardous Air Pollutants, Subpart N  40 CFR 63.347(b) and (e)	Failure to submit notification of compliance status.
Nitric Line	PTI No. 162-17, Special Condition VI.3;  Rule 910	Failure to maintain the control device.

The replacement of a chrome electroplating tank on the EUGREEN1 line is considered a new affected source as defined in the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart N. Subpart N requires that a notification of compliance status be submitted each time that an affected source becomes subject to the requirements of this subpart.

Also during the inspection, AQD staff observed operation of the nitric strip line while the scrubber and air handling system were not properly operating.

This constitutes a violation of PTI No. 162-17 and 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.

The AQD also requests that Allied Finishing provide a demonstration as to whether or not reconstruction has occurred on either EUGREEN1 or EUBLUE1. This shall be conducted by evaluating the emissions units as defined in Permit to Install No. 349-01C.

In addition, the AQD requests that Allied Finishing demonstrate that changes to the following are exempt from the requirements of Rule 201 of the administrative rules promulgated under Act 451 or submit a PTI application for the subject processes at the facility.

1. Addition of stack/scrubber for the woods nickel tank.
2. Changes to EUGREEN1 and EUBLUE1.
3. Material changes to EUALUMPREPLATE.

Be advised, Rule 201 requires that an air use permit to install (PTI) be obtained prior to installation, construction, operation, reconstruction, relocation, or alternation of any process or process equipment which may be a source of an air contaminant.

However, certain processes and process equipment may be exempt from obtaining a PTI. Rule 278 establishes requirements of eligibility for exemptions listed in Rules 280 through 291. To be eligible for a listed exemption, the owner or operator of an exempt process or exempt process equipment must be able to provide information demonstrating the applicability of the exemption. Pursuant to Rule 278(a), this demonstration should be provided with 30 days of a written request by the AQD and should include the following information:

- A description of the exempt process or process equipment, including the date of installation.
- The specific exemption being used by the process or process equipment.
- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

Finally, as part of a complete compliance program, the AQD is requesting that Allied Finishing conduct performance testing on EUGREEN1 and EUBLUE1 in accordance with Rule 1001 (R 336.2001) within 90 days of receipt of this notification.

The testing should determine the chromium emission rate from all plating tanks and associated control systems using United States Environmental Protection Agency approved test methods.

A test protocol must be submitted to the AQD at least 60 days prior to the actual test date. Not less than 7 days before the performance test is conducted, the AQD must be notified in writing of the time and place of the performance tests and who shall conduct them. Results of the performance test shall be submitted to the department in the format prescribed by the applicable reference test method within 60 days after the last date of the test.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 28, 2018 (which coincides with 21 calendar days from the date of this letter). 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.

Please submit the written response to the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Allied Finishing 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 and for the cooperation that was extended to me during my inspection of Allied Finishing. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-1092

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Heidi Hollenbach, DEQ