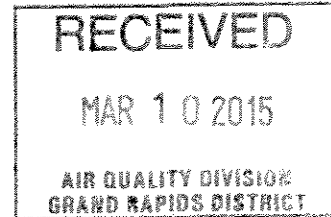




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(616) 531-0670  
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Ms. April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
Michigan Department of Environmental Quality  
Grand Rapids District Office  
350 Ottawa Avenue NW; Unit 10  
Grand Rapids, Michigan 49503-2341



06 March 2015

Dear Ms. Lazzaro,

This letter is in response to your Violation Notice dated 04 February 2015 which resulted from your inspection of our 2610 Remico Street facility on 16 January 2015.

Electro Chemical Finishing Co. (ECF) has taken action to achieve and maintain compliance with the terms and conditions of Permit to Install Number 584-91C, Clean Air Act: Part 55, Air Pollution Control, and the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Below are our responses to items 1 -12 outlined in the violation notice letter.

**1. Failure to submit annual reports for the vapor degreaser from 2010 to 2014.**

Annual reports for the vapor degreaser had been completed and were on file at ECF. They were submitted to MDEQ on 26 January 2015 via email. ECF personnel were mistaken in their belief that the report was to be completed and kept on site. Future reports will be submitted to the Grand Rapids District office as required.

**2. Failure to submit notification of construction for two decorative trivalent chrome plating tanks on the EUALINE.**

The notification of construction form had been completed and was on file at ECF. We believed the form had been submitted prior to the construction activities. It was sent to MDEQ per your request on 27 January 2015.

**3. Failure to properly operate and maintain air pollution control equipment on the EUALINE.**

The following corrective actions have been initiated to address the operational and maintenance issues for the EUALINE fume scrubber:

- a) The water flow meter which was not operational has been replaced with a new unit and the water flow readings are once again being recorded on a daily basis as objective evidence of proper water feed rates.
- b) The cracked magnahelic tubes on the scrubber have been replaced and pressure drop readings are being measured and recorded on a daily basis as objective evidence that the fume scrubber is operating efficiently.
- c) A replacement fume scrubber has been purchased due to the degraded condition of this equipment. It will be shipped to ECF and installed as soon as the weather allows.
- d) Quarterly checks are being performed to validate proper operation of the scrubber and to identify any developing conditions that would require maintenance or repair.

#### **4. Failure to maintain records of control device inspections on the EUALINE.**

ECF had written procedures and record keeping forms in place to facilitate the inspections of our fume scrubber control devices and ECF personnel were assigned to perform these tasks. Upon review of these procedures and forms it is evident that they were inadequate to provide our personnel with the instruction necessary to perform the inspections in a manner that was in compliance with our permit requirements. We have taken the following measures to correct this situation and return to compliance with our permit:

- a) The written procedures have been revised to provide clear instruction to the technicians as to what needs to be checked during their inspections. All applicable personnel have been re-trained using the revised procedures to ensure that they have the necessary knowledge to perform the task.
- b) The Daily Fume Scrubber Inspection form has been revised. Control limits and a Corrective Action section have been added to improve our record keeping.
- c) A Quarterly Fume Scrubber Inspection form has been developed as a record of our on-going control and maintenance of the fume scrubbers. These requirements have also been added to our computerized preventative maintenance system so they can be scheduled appropriately.
- d) Additional technicians have been trained in the task of performing the daily fume scrubber checks. We believe this will improve the inspections and the communication to management if there is an issue.
- e) The Daily Fume Scrubber Inspection form is being submitted daily to the Maintenance Manager for review and sign off. The form is then submitted to an internal 3<sup>rd</sup> party for further review and filing.

#### **5. Failure to properly operate and maintain air pollution control equipment on the EUBLINE.**

The following corrective actions have been initiated to address the operational and maintenance issues for the EUBLINE fume scrubber:

- a) The water flow meter components have been cleaned and the water flow readings are being recorded on a daily basis as objective evidence of proper water feed rates.
- b) The cracked magnahelic tubes on the scrubber have been replaced and pressure drop readings are being measured and recorded on a weekly basis as objective evidence that the fume scrubber is operating efficiently.

- c) Quarterly checks are being performed to validate proper operation of the scrubber and to identify any developing conditions that would require maintenance or repair.
- d) The small leak from this scrubber housing is being collected and returned into the plant. It will be repaired by ECF personnel as soon as the weather permits.

#### **6. Failure to properly implement the Operations and Maintenance Plan (O & M Plan) on the EUBLINE.**

While many portions of the O & M Plan, such as chromium mist suppressant additions and surface tension readings, were being properly implemented, the portion of the plan regarding maintenance of the fume scrubbers was not being fully implemented. That portion of the plan required revision to provide our personnel with the instruction necessary to perform the inspections in a manner that was in compliance with our permit requirements. We have revised that portion of the plan and have re-trained all applicable personnel in the requirements. Revisions are the same as the ones listed in points (a) – (e) of Item #4 above.

#### **7. Failure to maintain records of control device inspections on the EUBLINE.**

ECF had written procedures and record keeping forms in place to facilitate the inspections of our fume scrubber control devices and ECF personnel were assigned to perform these tasks. Upon review of these procedures and forms it is evident that they were inadequate to provide our personnel with the instruction necessary to perform the inspections in a manner that was in compliance with our permit requirements. We have taken the following measures to correct this situation and return to compliance with our permit:

- a) The written procedures have been revised to provide clear instruction to the technicians as to what needs to be checked during their inspections. All applicable personnel have been re-trained using the revised procedures to ensure that they have the necessary knowledge to perform the task.
- b) The Daily Fume Scrubber Inspection form has been revised. Control limits and a Corrective Action section have been added to improve our record keeping.
- c) A Quarterly Fume Scrubber Inspection form has been developed as a record of our on-going control and maintenance of the fume scrubbers. These requirements have also been added to our computerized preventative maintenance system so they can be scheduled appropriately.
- d) Additional technicians have been trained in the task of performing the daily fume scrubber checks. We believe this will improve the inspections and the communication to management if there is an issue.
- e) The Daily Fume Scrubber Inspection form is being submitted daily to the Maintenance Manager for review and sign off. The form is then submitted to an internal 3<sup>rd</sup> party for further review and filing.

#### **8. Failure to properly operate and maintain air pollution control equipment on the EUCLINE.**

The following corrective actions have been initiated to address the operational and maintenance issues for the EUCLINE fume scrubber:

- a) The water flow meter components have been cleaned and the water flow readings are being recorded on a daily basis as objective evidence of proper water feed rates.

- b) The cracked magnahelic tubes on the scrubber have been replaced and pressure drop readings are being measured and recorded on a weekly basis as objective evidence that the fume scrubber is operating efficiently.
- c) Quarterly checks are being performed to validate proper operation of the scrubber and to identify any developing conditions that would require maintenance or repair.

**9. Failure to properly implement the Operations and Maintenance Plan (O & M Plan) on the EUCLINE.**

While many portions of the O & M Plan, such as chromium mist suppressant additions and surface tension readings, were being properly implemented, the portion of the plan regarding maintenance of the fume scrubbers was not being fully implemented. That portion of the plan required revision to provide our personnel with the instruction necessary to perform the inspections in a manner that was in compliance with our permit requirements. We have revised that portion of the plan and have re-trained all applicable personnel in the requirements. Revisions are the same as the ones listed in points (a) – (e) of Item #4 above.

**10. Failure to maintain records of control device inspections on the EUCLINE.**

ECF had written procedures and record keeping forms in place to facilitate the inspections of our fume scrubber control devices and ECF personnel were assigned to perform these tasks. Upon review of these procedures and forms it is evident that they were inadequate to provide our personnel with the instruction necessary to perform the inspections in a manner that was in compliance with our permit requirements. We have taken the following measures to correct this situation and return to compliance with our permit:

- a) The written procedures have been revised to provide clear instruction to the technicians as to what needs to be checked during their inspections. All applicable personnel have been re-trained using the revised procedures to ensure that they have the necessary knowledge to perform the task.
- b) The Daily Fume Scrubber Inspection form has been revised. Control limits and a Corrective Action section have been added to improve our record keeping.
- c) A Quarterly Fume Scrubber Inspection form has been developed as a record of our on-going control and maintenance of the fume scrubbers. These requirements have also been added to our computerized preventative maintenance system so they can be scheduled appropriately.
- d) Additional technicians have been trained in the task of performing the daily fume scrubber checks. We believe this will improve the inspections and the communication to management if there is an issue.
- e) The Daily Fume Scrubber Inspection form is being submitted daily to the Maintenance Manager for review and sign off. The form is then submitted to an internal 3<sup>rd</sup> party for further review and filing.

**11. Failure to properly operate and maintain air pollution control equipment on the Rack Strip Line Scrubber.**

The following corrective actions have been initiated to address the operational and maintenance issues for the Rack Strip fume scrubber:

- a) The water flow meter components have been cleaned and the water flow readings are being recorded on a daily basis as objective evidence of proper water feed rates.

- b) The cracked magnahelic tubes on the scrubber have been replaced and pressure drop readings are being measured and recorded on a weekly basis as objective evidence that the fume scrubber is operating efficiently.
- c) Quarterly checks are being performed to validate proper operation of the scrubber and to identify any developing conditions that would require maintenance or repair.

**12. Failure to properly operate and maintain air pollution control equipment on the Waste Treatment Scrubber.**

The following corrective actions have been initiated to address the operational and maintenance issues for the Waste Treatment fume scrubber:

- a) The water flow meter components have been cleaned and the water flow readings are being recorded on a daily basis as objective evidence of proper water feed rates.
- b) The cracked magnahelic tubes on the scrubber have been replaced and pressure drop readings are being measured and recorded on a weekly basis as objective evidence that the fume scrubber is operating efficiently.
- c) Quarterly checks are being performed to validate proper operation of the scrubber and to identify any developing conditions that would require maintenance or repair.

ECF has added supervisory oversight and review to the procedures controlling the scheduled maintenance and inspections of the air control equipment as a measure to prevent these issues from re-occurring. We will also begin to hold an on-going monthly meeting to review the status of our air quality program. ECF upper management will be included in this monthly review meeting.

Included in this correspondence is the up-dated facility Potential to Emit evaluation for criteria pollutants and hazardous air pollutants that you requested. I will also be contacting air sampling contractors in the next week to procure stack testing services in accordance to the timing called out in the violation notice letter.

Electro Chemical Finishing Co. is committed to being environmentally responsible in its metal finishing operations. We will apply the lessons learned in addressing these issues to improve our internal environmental programs and practices.

Sincerely,



Terry L. Vollmer  
Chief Executive Officer  
Electro Chemical Finishing Company

**Attachments**

Cc: Mr. William Horn, Esq, Mika Meyers Beckett and Jones  
Mr. Don Post, President, Electro Chemical Finishing Company  
Mr. Steve Hulst, Environmental Manager, Electro Chemical Finishing Company