

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N278732269

FACILITY: ELECTRO CHEMICAL FINISHING		SRN / ID: N2787
LOCATION: 2610 REMICO S W, WYOMING		DISTRICT: Grand Rapids
CITY: WYOMING		COUNTY: KENT
CONTACT: Steve Hulst , Quality Manager/EHS Manager		ACTIVITY DATE: 11/23/2015
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced partial compliance evaluation.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced partial compliance evaluation and met with Steve Hulst and Audrey La Roche. I explained that the reason for the inspection was to look at the existing nitric acid strip line before it is removed and replaced this week. The facility had submitted a Supplemental Environmental Project (SEP) to the AQD as part of ongoing Consent Order discussions. SEP #1 was to replace the nitric acid strip line scrubber with a new scrubber. During the last inspection, this scrubber was cited in violation of Rule 910, and during the stack testing in August 2015 it was noted to have had acid emissions in the past which had eaten through the steel housing, and an odor was identified. So, I had questions as to whether or not the company was replacing this scrubber to upgrade, or whether they were replacing the scrubber to come in to compliance.

I brought along the camera as well as some pH paper to determine if there was any acidic liquid on the scrubber to aid in the determination as to how the unit is currently operating. I learned from Mr. Hulst that they facility was in shutdown due to the holiday and that they have already removed the strip tanks and will be installing new ones. (see attached photos) Also, they will be replacing the scrubber on Thursday-Saturday. I recalled the conversation with Mr. Hulst from the week before regarding a permit application for the nitric strip line. I asked what the status of that was and Mr. Hulst stated that he has a draft application, but since they are thinking of installing a new nickel line he is waiting to do both at the same time. I reminded him that the AQD permitting is for installation, and he has effectively replaced the entire nitric strip line with no permit. I suggested he discuss this with their consultant ASAP, and we could talk further about it Monday/next week after he has had a chance to do so. Further information from Mr. Hulst states that they plan to use the Rule 290 exemption for this line.

I stated that I'd like to go on the roof to take a look at the condition of the nitric scrubber. As we arrived on the roof Larry Keeney and Dave Titcomb were there working on the B Line scrubber where a ladder was seen. Larry stated that they were working on fixing a small leak. However, we first went straight to the nitric acid strip line scrubber. While we were there, I observed additional corrosion in the area that had been previously noted during the stack test in August. In fact, it was clear by looking at the unit that there was a specific drip pattern for the water as evidenced by icicles on the equipment. (see attached photos) I took a chunk of ice off of a stabilizing rib on the north east portion of the stack, and brought it down and placed a piece of pH paper on it to see if it is acidic. It was identified to be in the pH of 1-3 range, which is acidic. The range of the scrubber water for this unit has a pH range of 4-8 per the facility Operations and Maintenance Plan. A second area was tested for acidity and was found to be inconclusive. Other photos of this unit were taken, see attached.

I looked up at the B Line scrubber stack to see green staining going down the sides. (all scrubbers were painted before the stack test in early August 2015) I stated to Mr. Hulst, that I wanted to do a walk around of the B Line scrubber. As I approached, I noted dark green staining at the fan casing that was actively in a drip pattern. (see attached photo) As I continued to walk around the unit, it became clear that the scrubber was leaking scrubber water onto the roof, based on the patch of accumulated yellowish ice that had formed. (see attached photos) A closer look to the area of the leak indicated that the seal is very corroded and had failed. (see attached photos of corrosion) This is in the same general area of a pin point leak identified during the August 18, 2015 stack test. The identification of the leak by me, and the repair of it by the company is detailed in the stack test report.

A review of the daily scrubber inspection form for the month of November did not note that the daily inspection had identified the leak prior to November 23rd, 2015. (see attached for November daily inspection forms) The daily inspection sheet also does not note the staining on the stack which is green in color. Attached to this report is a photo montage of dated images of the B Line scrubber.

A violation notice will be sent for the B Line scrubber for failure to maintain and operate an air-cleaning device in a satisfactory manner as required in Rule 336.1910. A Rule 278a request will be made for the replacement of the

nitric acid strip line and scrubber.

The facility was in non-compliance at the time of the inspection. The complete set of photos taken are attached on a CD.

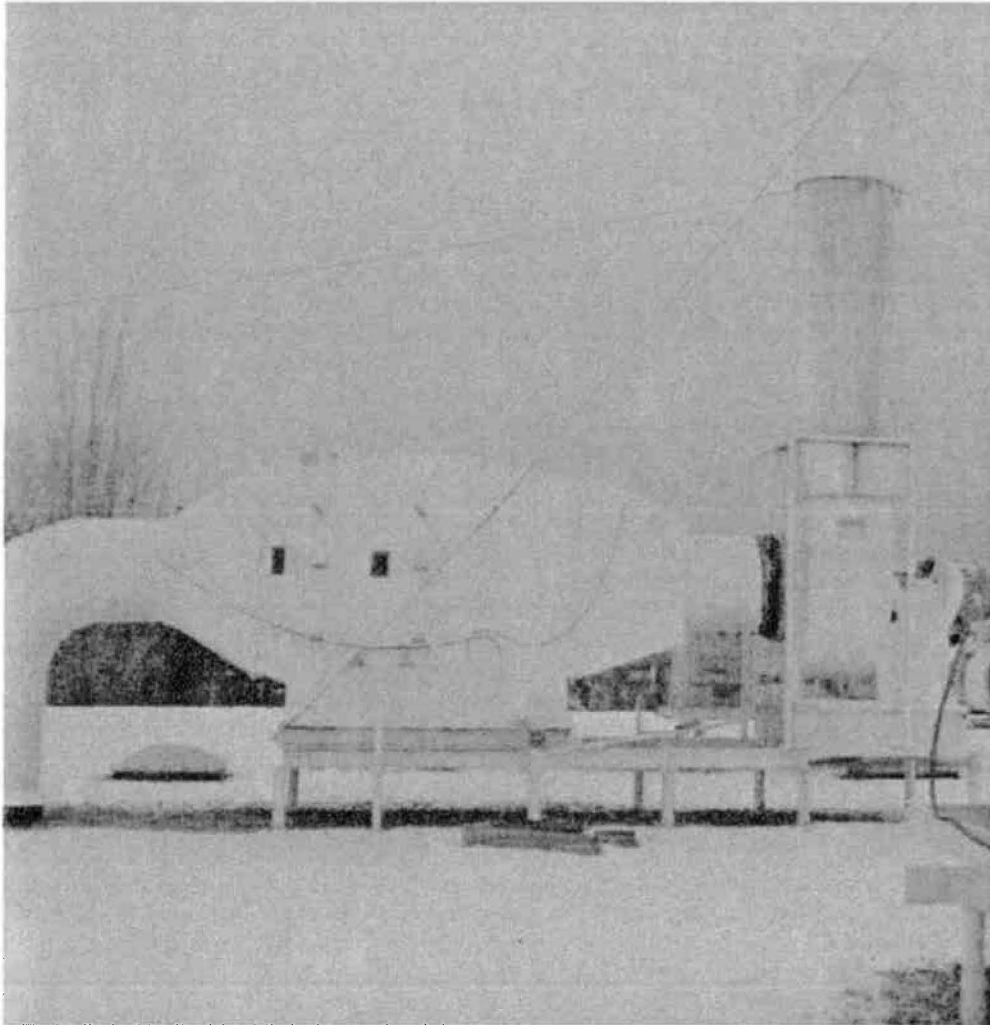


Image 1(B Line scrubber) : Green stack stainage



Image 2(B Line Scrubber) : Green drippage from fan at outlet of scrubber.

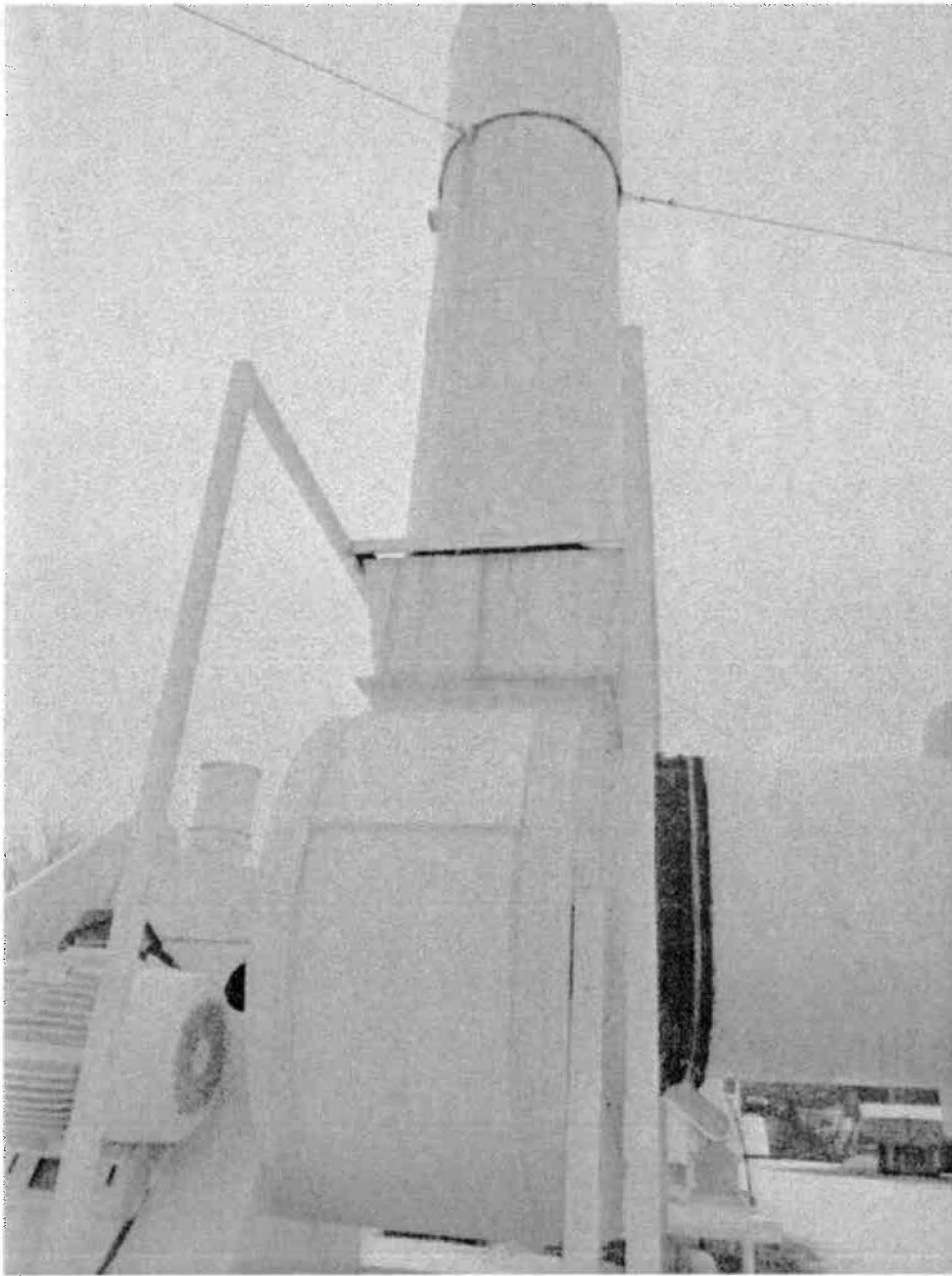


Image 3(B Line Scrubber) : Other side of stack.



Image 4(B Line Scrubber) : Leak at base, corrosion at seam.

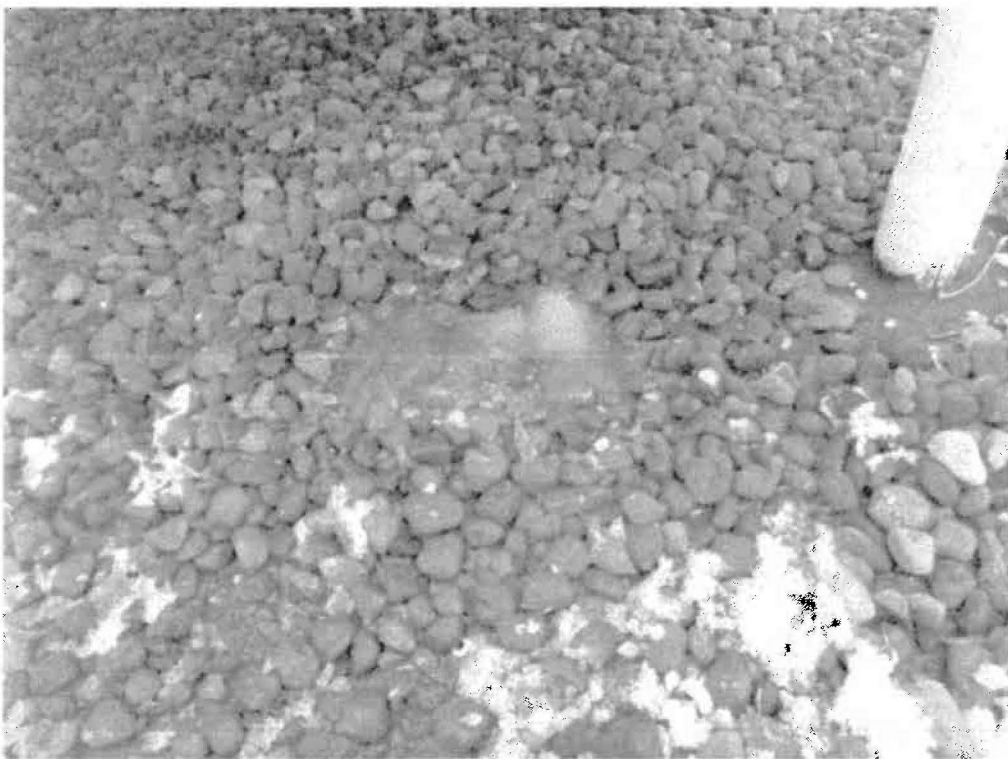


Image 5(B Line Scrubber) : Leak in the form of ice below unit. Broken icicles are present.

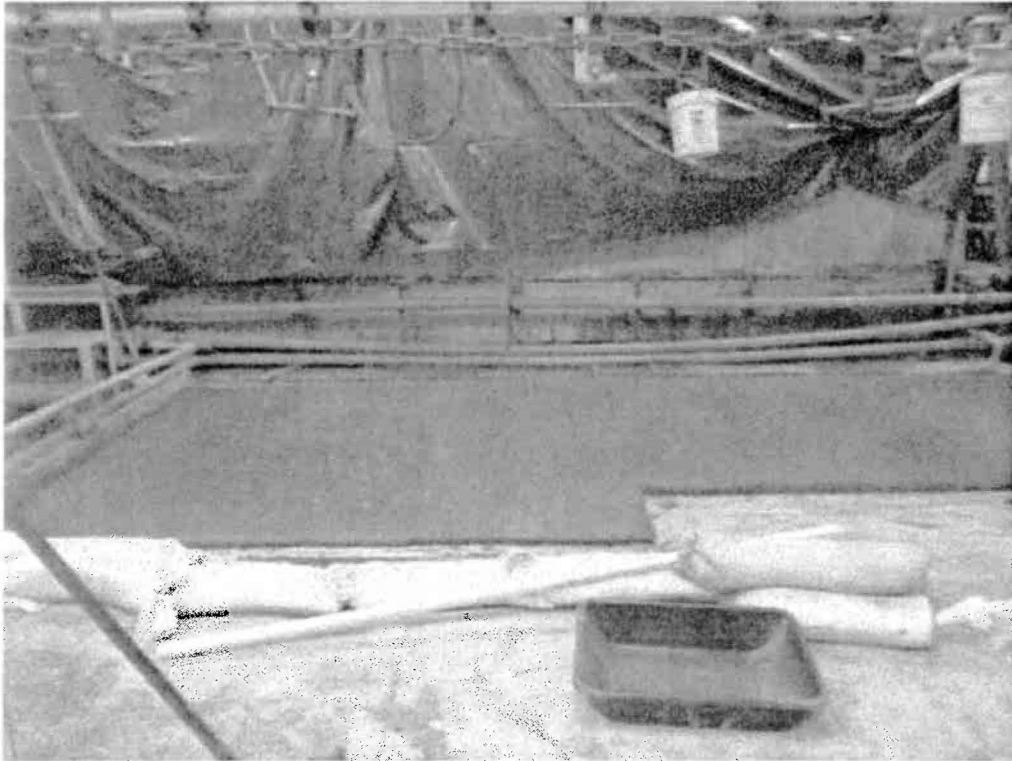


Image 6(Nitric Acid Strip) : Location in plant of former nitric acid strip line tanks (2) that are being replaced.



Image 7(Nitric Acid Strip) : Evidence that nitric acid strip line scrubber has been emitting acid. pH paper shows acid level.



Image 8(Nitric Acid Strip) : Evidence of ongoing non-compliance of scrubber. AQD has not approved the SEP for replacement of this unit.



Image 9(Nitric Acid Strip) : Location of acidic liquid (ice) on the scrubber.

NAME Paul Amador

DATE 12-1-15

SUPERVISOR PAB