DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

FACILITY: ELECTRO CHEMICAL FINISHING		SRN / ID: N2787
LOCATION: 2610 REMICO S W, WYOMING		DISTRICT: Grand Rapids
CITY: WYOMING		COUNTY: KENT
CONTACT: Eric Vaughn ,		ACTIVITY DATE: 07/24/2018
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, sch	eduled inspection.	
RESOLVED COMPLAINTS:	,	

Staff, April Lazzaro conducted an site evaluation and met with Eric Vaughn. Mr. Vaughn is the new environmental contact at the facility.

FACILITY DESCRIPTION

Electro Chemical Finishing (ECF) is a Decorative Chromium electroplating facility that provides plating services to the automotive, housewares and plumbing industries. The facility has replaced three large scrubbers and one small scrubber with brand new units. The facility is subject to PTI 584-91D, 40 CFR Part 63 Subpart N- National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (NESHAP), Halogenated Solvent Degreaser NESHAP, Consent Order No. 4-2016 and permit exemptions.

It was determined that no changes to the fume suppressant have been made and they are still using the Macuplex STR NPFX made by MacDermid. This has been confirmed to be free of perfluorooctane sulfonic acid (PFOS) and is NESHAP compliant.

FACILITY OBSERVATIONS

EUALINE

The EUALINE is a decorative chrome electroplating line containing one hexavalent chrome and two trivalent chrome electroplating tanks. It has its own dedicated scrubber which is a composite mesh pad (CMP) system. Scrubber pressure drop readings recorded during the inspection were as follows: Stage 1-0.5" H_2O , Stage 2-1.0" H_2O , Stage 3-1.8" H_2O and overall pressure drop was 2.8" H_2O . Pressure drop readings are higher than last year's readings, and within the ranges established in the O&M Plan.

EUBLINE

The EUBLINE is an electroless nickel preplating process. The two chromic acid etch tanks are connected to the EUCLINE packed bed scrubber. The remaining tanks of EUBLINE for the electroless nickel process are vented to the EUBLINE CMP scrubber. Scrubber pressure drop readings recorded during the inspection were as follows: Stage 1- 0.5" H_2O , Stage 2- 0.5" H_2O , Stage 3- 0.9" H_2O , Hepa Filter- 0.5" H_2O and overall pressure drop was 2.2" H_2O . Pressure drop readings are only slightly higher than last year's readings, and within the ranges established in the O&M Plan.

EUCLINE

The EUCLINE is a decorative chrome electroplating line containing one decorative chrome plating tank that is ducted to the EUCLINE packed bed scrubber. The remaining tanks of EUCLINE are ducted to the EUBLINE CMP scrubber. The EUCLINE scrubber pressure drop reading recorded during the inspection was 2.1" H₂O. This is over the pressure drop identified in the O&M Plan. We learned that this magnehelic is not properly operating and staff have been bringing up the hand-held device to get proper readings. The status of this will be observed during the next inspection.

EUSLDGDRYER

The EUSLDGDRYER is a packed bed scrubber to control emissions from the electric sludge dryer. The media in the scrubber were discolored and showing growth of an unknown origin. Mr. Vaughn checked with the manufacturer who said that the growth wasn't bad enough to affect the particulate control and

told them how to clean the media. Mr. Vaughn had the media cleaned right away and will monitor it more closely.

The EUNITRIC line is not in the permit, but the scrubber has been replaced. However, during the inspection I noted that the fan was vibrating and unbalanced. I had a long discussion with Mr. Vaughn and Don Post about how they need to be identifying and correcting those issues themselves, not AQD staff. They committed to increased employee training.

Surface tension records were observed and there were no reported exceedances.

The halogenated solvent degreaser was empty and the company plans to render it inoperable so that they can discontinue reporting for the Degreaser NESHAP.

CONCLUSION

Additional AQD inspections are necessary to ensure facility staff have implemented the increased training and awareness discussed. The facility will be considered in compliance at this time.