

N3209LRM
2018 0130



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Jackson, Michigan 49203
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January 30, 2018

Mr. Mike Kovalchick
Senior Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
Jackson District Office
301 East Louis Glick Highway
Jackson, Michigan 49201-1556

**Subject: Violation Notice, Elm Plating Co. 1319 South Elm Street, Jackson, MI 49203, SRN: N3209
Supplemental Information**

Dear Mr. Kovalchick,

Per our letter to you dated November 22, 2017, we are writing to provide you with supplemental information pertaining to a recent compliance audit conducted at all Elm Plating Company (EPC) Facilities in Jackson, Michigan. On Tuesday, January 23, 2018, a qualified representative from Derenzo Environmental Services conducted a thorough inspection at each of the four EPC Plants along with Elm Plating representatives. A copy of the audit summary is provided herein within Attachment A for your records. Each facility was determined to be in regulatory compliance based upon the actions taken by EPC; as previously summarized for you in our November 22, 2017 correspondence.

Please contact me at (517) 416-9561 if you have any questions or concerns.

Sincerely,
Elm Plating Company

Brian Boyer, P.E.
Director of Environmental Engineering

Copies: Mr. Scott Miller, MDEQ (via email) MILLERS@michigan.gov
Ms. Lynn Fiedler, MDEQ (via email) FIEDLERL@michigan.gov
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Mr. Jonas M. McCluskey, EPC

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AIR QUALITY DIVISION

Attachment A



January 26, 2018

Mr. Brian Boyer, P.E.
Director of Environmental Engineering
ELM PLATING COMPANY
1319 South Elm St.
Jackson MI, 49203

Subject: Plant Nos. 1 – 4 Facility Air Compliance Audit Results

Dear Mr. Boyer:

Derenzo Environmental Services (DES) performed a facility air compliance audits on January 23, 2018 for the Elm Plating Company (Elm Plating) Plant No. 1 – 4 facilities to evaluate compliance with existing air permits and other promulgated rules pertaining to emissions of air contaminants. Mr. Brian Boyer coordinated the onsite meeting.

The following four (4) facilities were audited:

- Plant No. 1 located at 1319 Elm St., Jackson, MI. This facility provides plating and heat treating services.
- Plant No. 2 located at 2395 East High St., Jackson, MI. This facility provides aluminum anodizing services.
- Plant No. 3 located at 533 Hupp St., Jackson, MI. This facility provides dip spin coating services.
- Plant No. 4 located at 1307 Page St., Jackson, MI. This facility provides sorting, packaging and assembly services.

The emission units installed at the facilities were audited to determine their compliance status relative to MDEQ Permit to Install (PTI) and permit exemption requirements. Where applicable the facility operating parameters and records were compared to the requirements specified in the federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) that apply to the facility.

The following sections summarize each facility inspection and document the compliance status of emission units installed at each facility.

PLANT NO. 1 AUDIT RESULTS

Plant No. 1 is located at 1319 Elm St., Jackson, MI. The facility provides zinc and chromate plating services as well as heat treating services. Specifically, the facility consists of the following emission units:

1. Zinc Barrel Plating Line No. B2 which exhausts to the in plant environment. This line was operated as a permit exempt unit; R336.1290 for the hydrochloric acid tank, R336.1285(l)(iii) for the potassium hydroxide cleaner tank and R336.1285(r)(vii) for the zinc plating tanks.
2. Zinc Barrel Plating Line No. B3 which exhausts to the in plant environment. This line is operated as a permit exempt unit; R336.1290 for the hydrochloric acid tank, R336.1285(l)(iii) for the potassium hydroxide cleaner tank and R336.1285(r)(vii) for the zinc plating tanks.
3. Zinc Barrel Plating Line No. B4 which exhausts to the atmosphere via a single stack. This line is operated under PTI No. 136-00.
4. Chromate Conversion Line No. C1 which exhausts to the in plant environment. This line is operated as a permit exempt unit; R336.1285(r)(i).
5. Chromate Conversion Line No. C3 which exhausts to the in plant environment. This line is operated as a permit exempt unit; R336.1285(r)(i).
6. Chromate Conversion Line No. B5 which exhaust to the atmosphere via multiple stacks. This line is operated as a permit exempt unit; R336.1290 tank emissions, R336.1282(a)(i) curing ovens and R336.1282(b)(i) boiler.
7. Three (3) heat treatment lines which exhaust to the atmosphere via multiple stacks. The lines are operated under PTI No. 238-04.
8. An alkaline cleaning station which exhausts to the atmosphere via a single stack. The station is operated as a permit exempt unit; R336.1285(l)(iii) for the alkaline cleaner, R336.1282(a)(i) drying ovens and R336.1282(b)(i) hot water heater.

The facility is also subject to the Plating and Polishing NESHAP, Subpart WWWW (6W).

Permit Exempt Zinc Barrel Plating Line Nos. B2 and B3

Zinc Barrel Plating Line No. B2 is currently not in operation. Facility representatives noted that there are no plans to put the line back in service and it may be removed from the facility.

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During the audit Zinc Barrel Line No. B3 was in operation and no adverse conditions were observed.

The Rule 290 records for the lines were current through December 2017 and records for previous years were present. The records contain a description of the emission units.

These emission units were determined to be in compliance with all air related regulatory requirements. Derenzo recommends that a more thorough emission unit description be added to the beginning of the recordkeeping spreadsheet. This description should include a listing of each tank and the contents in the tank.

Zinc Barrel Plating Line No. B4

During the audit Zinc Barrel Line No. B4 was in operation and no adverse conditions were observed.

Permit to Install No. 136-00 requires the facility to maintain records of HCl purchases and concentration of solution used in the tank (must be below 20%). The permit also requires records of the amount of KOH used and concentration be maintained. The records for the lines were up to date.

These emission units were determined to be in compliance with all air related regulatory requirements.

Permit Exempt Chromate Conversion Line Nos. C1 and C3

During the audit Chromate Conversion Line No. C1 was not in operation. It was observed that the tanks were covered with lids. No adverse conditions were observed.

During the audit Chromate Conversion Line No. C3 was in operation and no adverse conditions were observed.

The MDEQ recently performed an inspection of the facility and issued the facility a violation notice. The notice specifically noted that Chromate Conversion Line Nos. C1 and C3 were in violation of the NESHAP (Subpart 6W) for indicating on the 2008 initial notification that the lines had pollution control equipment installed when no pollution control equipment was installed. Elm Plating provided the MDEQ an adequate response to this violation. Derenzo Environmental does not agree with the violation as described in the notice. The NESHAP (Subpart 6W) does not require chromate conversion tanks to install pollution control equipment. The MDEQ also noted that the facility is not preparing annual compliance certification reports relative to the NESHAP (Subpart 6W). Elm Plating provided the MDEQ an adequate response to this violation and is now up to date on annual compliance certification reports.

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These emission units were determined to be in compliance with all air related regulatory requirements.

Permit Exempt Chromate Conversion Line Nos. B5

During the audit Chromate Conversion Line No. B5 was in operation and no adverse conditions were observed. Facility representatives noted that the scrubber associated with the line was operating normally.

The Rule 290 records for the lines were current through December 2017 and records for previous years were present. The records contain a description of the emission units.

The MDEQ recently performed an inspection of the facility and issued the facility a violation notice. The notice specifically noted that Chromate Conversion Line No. B5 was in violation of Rule 910 because the pollution control equipment was not operating properly. Elm Plating provided the MDEQ an adequate response to this violation. Derenzo Environmental does not agree with the violation as described in the notice because no rules or laws require the emission unit to install and operate the pollution control equipment. The NESHAP (Subpart 6W) does not require chromate conversion tanks to install pollution control equipment, Rule 336.1290 does not require the emission unit to install pollution control equipment and the exemption analysis for the line did not incorporate the use of pollution control equipment (i.e., the line was exempt without the use of pollution control). The MDEQ also noted that the facility failed to submit an initial notification and is not preparing annual compliance certification reports relative to the NESHAP (Subpart 6W). Elm Plating provided the MDEQ an adequate response to this violation and has since submitted the required initial notification and is now up to date on annual compliance certification reports.

These emission units were determined to be in compliance with all air related regulatory requirements. Derenzo prepared the permit exemption analysis for Line B5. The exemption analysis contains a detailed description of the process and contents of each tank along with maximum emissions calculations. A copy of this document has been provided to the facility. It is recommended that this document be maintained and updated if any process changes are made.

Heat Treatment Lines

During the audit the three (3) heat treatment lines were in operation. The room that houses the equipment had a noticeable smoke in the in plant environment. All bay doors were in the closed position and no visible emissions were observed from the exhaust stacks. Facility representatives detailed that the facility plans to install pollution control equipment to capture smoke emissions from the quench portion of the emission unit and then route the controlled gas stream back into the plant.

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PTI No. 238-04 limits monthly particulate matter emissions to 2,460 pounds, opacity emissions to 10% (six-minute average) and quench oil use to 335 gallons per month. The records for the lines were current and up to date and no violations were observed.

The MDEQ recently performed an inspection of the facility and issued the facility a violation notice. The notice specifically noted that heat treatment lines were in violation of the 10% opacity limitation. Elm Plating provided the MDEQ an adequate response to this violation. The MDEQ also stated that the quench oil tanks associated with the heat treatment lines were in violation of Rule 336.1201 for not properly describing the emission unit and for not properly capturing particulate matter emissions with a ventilation system. Elm Plating provided the MDEQ a response to this violation. Derenzo Environmental does not feel that this constitutes a violation because the equipment description in the existing air permit clearly states the oil quench is part of the emission unit (quench oil is the basis for the particulate matter emissions calculations) and the permit does not require emissions to be captured by a ventilation system and the permit does not associate exhaust stacks with the emission units.

These emission units were determined to be in compliance with all air related regulatory requirements.

Permit Exempt Alkaline Cleaning Station

During the audit the alkaline cleaning station was in operation and no adverse conditions were observed.

These emission units were determined to be in compliance with all air related regulatory requirements.

PLANT NO. 2 AUDIT RESULTS

Plant No. 2 is located at 2395 East High St., Jackson, MI. The facility provides aluminum anodizing services. Specifically, the facility consists of the following emission units:

1. Eleven (11) tank aluminum anodizing process which exhausts to the in plant environment and to the atmosphere via a single exhaust stack. This line is operated as a permit exempt unit; R336.1290 for the parts cleaner and anodizing tanks and R336.1282 for the tank water heater.

Permit Exempt Aluminum Anodizing Process

During the audit the aluminum anodizing process was in operation and no adverse conditions or odors were observed. Each tank was numbered and labeled with the contents of the tank.

The facility is required to keep records of emissions from the parts cleaner tank and anodizing tanks under Rule 290. The Rule 290 records for the lines were current through December 2017 and records for previous years were present. The records contain a description of the emission unit.

These emission units were determined to be in compliance with all air related regulatory requirements. Derenzo recommends that a more thorough emission unit description be added to the beginning of the recordkeeping spreadsheet. This description should include a listing of each tank and the contents in the tank.

PLANT NO. 3 AUDIT RESULTS

Plant No. 3 is located at 533 Hupp St., Jackson, MI. The facility provides dip spin coating services. Specifically, the facility consists of the following emission units:

1. Dip Spin Coating Line No. 1 (EU-DIPSPIN1) which consists of two (2) coating reservoirs, and a two (2) zone curing oven. The line and oven are exhausted to a regenerative thermal oxidizer (RTO) for VOC control. The line is operated under PTI No. 113-16.
2. Dip Spin Coating Line No. 2 (EU-DIPSPIN2) which consists of one (1) coating reservoir, and a single zone curing oven. The line and oven are exhausted to a RTO oxidizer for VOC control. The line is operated under PTI No. 113-16.
3. Shot blaster that exhausts to a dust collector which vents to the in plant environment. This emission unit is operated as a permit exempt unit under R336.1285(l)(vi)(B).
4. Table blaster that exhausts to a dust collector which vents to the atmosphere. This emission unit is operated as a permit exempt unit under R336.1285(l)(vi)(C).
5. Paint mixing area that exhausts to a hood which ties into the RTO. This emission unit is operated as a permit exempt unit under R336.1287(k).

The facility has submitted a PTI application for installation of a new dip spin coating line that will be exhausted to the RTO. The facility also operates under Consent Decree No. 27-2016 for operating the coating lines without a PTI. The company has met all of the conditions of the consent decree and can apply to terminate the order on July 15, 2018.

Dip Spin Coating Lines (FG-DIPSPINS)

During the audit the two (2) dip spin coating lines were in operation and no adverse conditions or odors were observed. The paint mix area was not in operation.

Permit to Install No. 113-16 limits annual volatile organic compound (VOC) emissions to less than 14.9 tons, annual hazardous air pollutant (HAP) emissions to less than 8.9 tons for individual HAPs and 22.49 tons for aggregate HAPs. The PTI also limits annual coating and reducer usage to 20,000 gallons, each, requires VOC containing material to be stored in closed containers, specifies operating parameters for the RTO, requires a malfunction abatement plan (MAP) for the RTO, requires emissions testing and specifies what records must be kept. The PTI requires the chemical compositions of the coatings and reducers be maintained.

All coating reservoirs were properly stored and lids were in the closed position. RTO temperature records were reviewed and were determined to be up to date and in compliance with permit requirements. The facility has prepared a MAP and conducted the required emissions

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testing and the facility maintains these reports. The material use records were up to date and no violations were observed. The VOC and HAP emission records for the lines were up to date and no violations were observed. The facility maintains copies of the safety data sheets (SDS) for all coatings and reducers.

These emission units were determined to be in compliance with all air related regulatory requirements.

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PLANT NO. 4 AUDIT RESULTS

Plant No. 4 is located at 1307 Page Ave., Jackson, MI. The facility provides sorting, packaging and assembly services. Specifically, the facility consists of the following emission units:

1. Two (2) small shop heating units that are fired with natural gas. The emission units are operated as a permit exempt units under R336.1282(b)(i).

This facility does not have any air related regulatory requirements and, therefore, does not have any air related compliance issues.