



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

November 1, 2017

CERTIFIED MAIL 7010 0290 0000 3734 2538
RETURN RECEIPT REQUESTED

Mr. Allen Kinsler
Elm Plating Company
1319 South Elm Street
Jackson, Michigan 49203

SRN: N3209, Jackson County

Dear Mr. Allen Kinsler:

VIOLATION NOTICE

On October 19, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a complaint investigation of Elm Plating (Company) located at 1319 South Elm Street in Jackson, Michigan. The purpose of this investigation was to determine the Company'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) and the associated Air Pollution Control Rules and to investigate an odor/smoke complaint attributed to this facility.

During the complaint investigation, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Chrome Conversion Tanks.	National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations-40 CFR 63 Subpart W (6W).	On October 20, 2008, the Company submitted an Initial Notification to EPA for compliance with 6W. In this initial notification, the Company indicated that they have 11 chrome conversion tanks that have a control device to control potential chromium air emissions. However, none of these tanks have the required controls as verified during the inspection.
New Zinc Plating line B5 with chrome conversion tanks controlled by a wet scrubber installed in December 2016.	40 CFR 63 Subpart 6W	The Company failed to submit an Initial Notification form to EPA regarding this new line.

Chrome Conversion Tanks	40 CFR 63 Subpart 6W	No annual compliance reports are being prepared and maintained at the facility nor other 6W required records being kept.
Heat Treat Line #2 Hardening Furnace Stack #7	PTI 238-04, Special Condition 1.2. (10% Opacity limitation)	Black smoke with an estimated opacity of 25% was videotaped on the roof coming from Stack # 7. The opacity noted was continuous over at least a 15-minute interval.
Heat Treat Line #2 Post Wash Stack #3	PTI 238-04, Special Condition 1.2. (10% Opacity limitation)	White smoke with an estimated opacity of 35% was photographed on the roof coming from Stack #3. The opacity noted was continuous over at least a 15-minute interval. The high opacity smoke was observed after the trail off point of a steam plume and appeared to be condensing oil mist.
Three (3) oil quench tanks located underneath 3 hardening furnaces associated with the heat treat lines associated with PTI 238-04.	Rule 201-No Permit to Install. Emission unit not properly described in original permit application.	Three (3) oil quenching tanks located underneath 3 separate hardening furnaces are generating particulate emissions that are not being properly captured by a ventilation system associated with either the hardening furnaces or the post wash ventilation systems. Instead, smoke from these oil quench tanks is being emitted from openings in the floor into the in-plant environment and then escaping through open bay doors located at ground level.
Viron International Viro-Chrome 9000 chrome 3 stage scrubber controlling	Rule 910-An air-cleaning device shall be installed,	Pressure drop readings strongly suggested that Stage II of the scrubber was

emissions from 5 tanks containing chromium compounds.	maintained, and operated in a satisfactory manner.	plugged. Also, the 3 separate water flow meters for each Stage of the scrubber indicated no water flow into the scrubber.
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 22, 2017. 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 violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If the Company 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 this Company. 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,



Mike Kovalchick
Senior Environmental Engineer
Air Quality Division
517-780-5496

cc: Mr. Scott Miller, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ