

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

N547138732

FACILITY: Dynamic Finishing II LLC.		SRN / ID: N5471
LOCATION: 823B W WESTERN, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: John McManus , VP of Engineering		ACTIVITY DATE: 02/17/2017
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of this inspection was to determine the facility's compliance status with PTI No. 556-94 and other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

AQD staff Chris Robinson (CR) and April Lazzaro (AL) were on-site to conduct a scheduled unannounced inspection on Friday February 17, 2017. AQD staff arrived at Dynamic Finishing II (Dynamic), formerly known as Dynamic Finishing, located at 823B W. Western Street, Muskegon, MI, at approximately 10:30 am and met with Mat Hayes, operations manager. No odors or visible emissions were detected. AQD staff presented Mr. Hayes with business cards and informed him that AQD was there to perform an inspection of the facility to determine compliance status with respect to the chrome NESHAP, PTI No. 556-94 and other applicable air rules and regulations. Mr. Hayes informed AQD that the facility has been recently sold, which AQD received a "Transfer of Ownership Notification" for on July 11, 2016. Mr. Hayes also informed AQD that, with the exception of necessary maintenance, there has not been any significant changes since they took ownership.

The only operations at the facility are hard chrome plating and quality control. The anodizing line was removed by the previous owner. The facility maintains a permit for the hard chrome plating line and is also subject to the National Emission Standards for Chromium Emissions from Hard Chromium and Decorative Chromium Electroplating Tanks (Chrome NESHAP). Dynamic currently operates five (5) days per week and employs two (2) staff.

Compliance Evaluation

PTI No. 556-94

All of the tanks except for the Chrome tank are vented to the in-plant environment. The chrome plating line consists of the following tanks:

Tank #1 (Alkaline Cleaner, 150°F) >> Tank #2 (Rinse) >> Tank #3 (Chrome Plating, 133.4°F) >> Tank #4 (Rinse) >> Tank #5 (Rinse #2) >> Tank #6 (Rinse #3)

Based on discussions with Mr. Hayes and observations made during this inspection, the chrome line is only operated when the control system, is operated. The control system consists of a composite mesh pad (CMP) scrubber attached to the chrome tank that has four separate stages with individual filters. All of these stages are individually equipped with a pressure drop gauge. A separate hepa filter, with a pressure drop gauge, is also maintained and operated between the scrubber and the stack, which is vented vertically through the roof. AQD did not verify dimension of the stack but visual observations were consistent with PTI No. 556-94. The pressure drops identified during this inspection are as follows:

Magnehelic Gauge No.	Avg. 1999 Stack Test Pressure Reading ("H2O)	Maximum Allowable NESHAP Pressure Range ("H2O)	Observed Pressure ("H2O)	Compliance Status
1	1.0	3.0	0.2	Yes
2	0.6	2.6	0.5	Yes
3	1.0	3.0	1.8	Yes
4	0.2	2.2	0.2	Yes
Hepa	--	--	0.5	Yes

Compliance with the chrome NESHAP (0.015 milligram per dry standard cubic meter, corrected to 70°F and 29.92 inches Hg) and PTI (2.81 x 10⁻⁵ lbs./hr nor 6.74 x 10⁻⁵) emission rates are determined based on compliance with pressure drop readings. The 1999 stack test was used to determine the base operating range for the scrubber, which is the averages of the pressure drops observed during the stack test. According to the NESHAP, the range can vary from the determined value by 2 inches. AQD provided Mr. Hayes with stack test

operating data (**Attachment A**) to correctly calculate their maximum operating range. AQD reviewed pressure drop records on-site. Although the facility initially incorrectly calculated their maximum operating range, they never exceeded the correct range. Dynamic will update their files to reflect this correction.

The facility has and maintains an Operation and Maintenance plan as required. Dynamic provided an updated version, which is included as (**Attachment B**). Daily and monthly records are maintained as required (**Attachment C**). Based on these records and discussions with Mr. Hayes, the facility is currently performing the following on a daily basis as required by PTI No. 556-94:

- Visually inspect the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
- Turn off the fan and the plating tank and wash down the mesh pads for at least 10 minutes.
- Determine the gas velocity prior to the control device. Based on a review of the final rule, this has been changed and the facility is no longer required to calculate daily gas velocities as long as pressure drops are monitored & recorded daily, which they are. However, this is still a permit requirement and the facility maintains the necessary components to calculate it if necessary. CR did not require them to do so at this time.
- Determine the pressure drop across the controls.
- Visually inspect the controls to ensure proper drainage, no chromic acid build-up on the mesh pads, and that structural integrity is sound. This is a monthly requirement. However, the facility has chosen to conduct this inspection on a daily basis.

According to Mr. Hayes, only fresh water is used during wash-downs.

Chrome NESHAP

The facility maintains necessary records and submits annual "Ongoing Status Reports" to the AQD documenting compliance with the NESHAP for the previous year. As noted above, the facility utilizes a four (4) stage CMP with hepa filter control system. The NESHAP requirements for this control system are as follows:

Description	Frequency	Compliance Status
1. Visually inspect device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.	1/quarter	Yes
2. Visually inspect back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.	1/quarter	Yes
3. Visually inspect ductwork from tank to the control device to ensure there are no leaks.	1/quarter	Yes
4. Perform wash-down of the composite mesh-pads in accordance with manufacturer's recommendations.	Per manufacturer	Yes

The facility keeps thorough records of any and all activities for the chrome tank and its control devices. As required by the permit and by the final rule, the facility does all of the above as required and with greater frequency than is required.

Compliance Determination

Based on the observations made at the time of this inspection, the facility appears to be in compliance with the requirements of the Chrome NESHAP, PTI No. 556-94 and all other applicable Air Quality Rules and Regulations.

List of Attachments

- Attachment A - 1999 Stack Test Operating Data
- Attachment B - Updated O&M Plan
- Attachment C - Scrubber Logs

NAME Chris Robinson

DATE 3/6/2017

SUPERVISOR [Signature]