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Ms. April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
Michigan Department of Environmental Quality  
Grand Rapids District Office  
350 Ottawa Avenue NW; Unit 10  
Grand Rapids, Michigan 49503-2341



23 April 2015

Dear Ms. Lazzaro,

This letter is in response to your Violation Notice dated 03 April 2015 which resulted from your inspection of our 379 Forty-fourth Street facility on 13 March 2015.

Electro Chemical Finishing Co. (ECF) has taken action to achieve and maintain compliance with the terms and conditions of Permit to Install Number 288-98, Clean Air Act: Part 55, Air Pollution Control, and the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Below are our responses to items 1 - 3 outlined in the violation notice letter.

**1. Failure to properly operate and maintain air pollution control equipment on the hexavalent chrome plating line (North Scrubber).**

The following corrective actions have been initiated to address the operational and maintenance issues for the North fume scrubber:

- a) The water flow meter which only totaled the water usage has been replaced by a meter which displays actual flow to the scrubber. This will ensure that we know the proper water flow rate is being applied to the spray nozzles. The water flow readings will continue to be recorded on a daily basis as objective evidence of proper water feed rates.
- b) The cracked ductwork has been repaired.
- c) The joint in the ductwork that showed some salt build-up has been cleaned up and re-sealed.
- d) Maintenance has been performed on the scrubber and the magnahelic meter is now operating properly. Pressure drop readings are being measured and recorded on a daily basis as objective evidence that the fume scrubber is operating efficiently.

- e) Quarterly checks are being performed to validate proper operation of the scrubber and to identify any developing conditions that would require maintenance or repair.

## **2. Failure to properly operate and maintain air pollution control equipment on the process acid tanks (South Scrubber).**

The following corrective actions have been initiated to address the operational and maintenance issues for the South fume scrubber:

- a) The water flow meter which only totaled the water usage has been replaced by a meter which displays actual flow to the scrubber. This will ensure that we know the proper water flow rate is being applied to the spray nozzles. The water flow readings will continue to be recorded on a daily basis as objective evidence of proper water feed rates.
- b) Maintenance has been performed on the scrubber and the magnahelic meter is now operating properly. Pressure drop readings are being measured and recorded on a daily basis as objective evidence that the fume scrubber is operating efficiently.
- c) Quarterly checks are being performed to validate proper operation of the scrubber and to identify any developing conditions that would require maintenance or repair.

## **3. Failure to maintain the liquid indicator device for the South Scrubber.**

The probe controlling the solenoid valve governing the addition of fresh water to the South Scrubber water feed tank has been cleaned. This will prevent a re-occurrence of the situation observed during the inspection. The solenoid control probes will be examined during the daily inspection to ensure continued proper operation.

Additionally, the following measures have been implemented in an effort to improve our overall Air Quality program:

- a) The written procedures have been revised to provide clear instruction to the technicians as to what needs to be checked during their inspections. All applicable personnel have been re-trained using the revised procedures to ensure that they have the necessary knowledge to perform the task.
- b) The Daily Fume Scrubber Inspection form has been revised. Control limits and a Corrective Action section have been added to improve our record keeping.
- c) A Quarterly Fume Scrubber Inspection form has been developed as a record of our on-going control and maintenance of the fume scrubbers. These requirements have also been added to our computerized preventative maintenance system so they can be scheduled appropriately.
- d) Additional technicians have been trained in the task of performing the daily fume scrubber checks. We believe this will improve the inspections and the communication to management if there is an issue.
- e) The Daily Fume Scrubber Inspection form is being submitted daily to the Maintenance Manager for review and sign off. The form is then submitted to an internal 3<sup>rd</sup> party for further review and filing.

ECF has added supervisory oversight and review to the procedures controlling the scheduled maintenance and inspections of the air control equipment as a measure to prevent these issues from re-occurring. We will also begin to hold an on-going monthly meeting to review the status of our air quality program. ECF upper management will be included in this monthly review meeting.

Electro Chemical Finishing Co. is committed to being environmentally responsible in its metal finishing operations. We will apply the lessons learned in addressing these issues to improve our internal environmental programs and practices.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Vollmer', written over the printed name.

Terry L. Vollmer  
Chief Executive Officer  
Electro Chemical Finishing Company

Attachments

Cc: Mr. William Horn, Esq, Mika Meyers Beckett and Jones  
Mr. Don Post, President, Electro Chemical Finishing Company  
Mr. Steve Hulst, Environmental Manager, Electro Chemical Finishing Company