

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

N711136236

FACILITY: Circuit Controls Corporation		SRN / ID: N7111
LOCATION: 2277 M-119 Hwy, PETOSKEY		DISTRICT: Gaylord
CITY: PETOSKEY		COUNTY: EMMET
CONTACT: JOHN GEORGE		ACTIVITY DATE: 08/25/2016
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: scheduled inspection and records review		
RESOLVED COMPLAINTS:		

Traveled to N7111 Circuit Controls Corporation (CCC) on August 25, 2016 to conduct a FY16 scheduled inspection to determine compliance with PTI 225-06B. Present for the inspection were Jack George (Manager, Quality & Environmental Systems; Health & Safety) and Sally White, also of the same department. Shawn, Plating Department Manager, was also present for the portion of the inspection in the plating department.

**FACILITY INFORMATION AND INSPECTION NOTES:**

The facility just recently went through a building expansion. The sign at the road now reads:

Yazacki  
Circuit Controls Corporation  
2277 M-119

The facility is located on the west side of M-119 just south of the Petoskey State Park entrance.

CCC, owned by Yazaki Corporation, manufactures automotive electrical terminals. Metal stamping takes place by about 60 stamping machines. The stamping section operates 3 shifts per day. The stamped metal is taken upstairs to the plating department to be plated as required. The plating department operates 2 shifts per day.

The two stacks SVCY and SVAC were viewed before and after the inspection. No opacity or odors were detected.

The facility is also inspected by DEQ's Office of Waste Management & Radiological Protection.

**REGULATORY DISCUSSION:**

The facility is subject to PTI 225-06B, permitting 3 plating lines, which is a minor permit.

The facility is not major for criteria pollutants or HAPs.

PTI 225-06B was issued January 10, 2012. PTI 225-06A was voided. The permit revision was made to add silver plating (silver strike, silver plating and silver stripping) to one of the three existing micro plating lines (EUMICROPLATE2). The applicant also requested to remove gold strike for all three lines.

EUMICROPLATE1, EUMICROPLATE2 and EUMICROPLATE3 each have a scrubber associated with their plating lines. Proper operation of the scrubbers is used as the demonstration of compliance with the hydrogen cyanide (HCN) limit. HCN is passed through the scrubbers and vented through SVCY.

FGMICROPLATING is subject to 40 CFR, Part 63, Subpart WWWW – Area source for Plating and Polishing Operations. The AQD is not delegated the regulatory authority for this area source MACT. 6W was discussed during the inspection. The facility provided their records, including their initial notification. A copy of their annual certificate of compliance is attached.

**RECORDS REVIEW:**

EUMICROPLATE1, EUMICROPLATE2 and EUMICROPLATE3 are microplating lines covered under FGMICROPLATING. Each microplating line consists of nickel, gold, silver (line 2 only) tin electroplating tanks. Each line has a wet scrubber for exhaust to SVCY.

**FGMICROPLATING**

SC I.1 emission limits HCN to 0.15 lb/hr (verify with GC 12 and SC VI.2 (proper operation of scrubber)). Testing was done in September of 2011 – HCN was measured at 0.02 lb/hr. The stack test was not at the request of AQD, nor was AQD notified of the testing; the testing was done by the company prior to requesting the 2012 permit revision to better understand their emissions. Since this was not a compliance test the measured amount of HCN is useful however the value cannot be used for demonstration of compliance. Proper operation of the scrubber is the daily demonstration of compliance, and is discussed in SC VI.2.

SC III.1 indicates facility must comply with 40 CFR, Part 63, Subpart WWWW – Area source for Plating and Polishing Operations. The State of Michigan is not delegated this MACT, however during the inspection 6W was discussed. The facility submitted an initial compliance determination, and maintains a record of annual certification of compliance, of which a copy was provided and is attached. The facility utilizes such practices as closing lids, general good housekeeping, minimizing dragout of bath solution. These are just a few examples, more can be viewed on the attachment.

SC IV.1 and IV.2 require proper operation of the scrubbers and a means to observe the distribution of scrubber liquid over the scrubber packing. The units were all operating during the inspection, and operate during use of the plating lines. Each scrubber column is equipped with a window to view the packing material and liquid inside the column. A flashlight is needed to view the material through the window.

SC VI.1 and SC VI.2 The facility is required to maintain records of the observations of the scrubber liquid distribution over the scrubber packing once daily. The records were viewed onsite. The sheets verifying the daily readings were available on a clipboard for each plating line. The observations are taken once per shift when other items are checked on the line.

SC VIII. The facility has two exhaust systems serve the micro plating lines. Emissions associated with cyanogens emissions emit to SVCY; emissions associated with pretreatment and posttreatment emit to SVAC. The stacks are required to be:

SVAC max diameter 11.5 inches, min height 45 feet

SVCY max diameter 8 inches, min height 45 feet).

The facility indicated those are the heights submitted to the AQD as part of permitting, and was not changed with modeling. Based on visual observations, the stacks appear to meet the height and diameter requirements.

Based on the inspection and records review, N7111 appears to meet the conditions of PTI 225-06B.

NAME Becky Radulski

DATE 8/30/16

SUPERVISOR

