



January 11, 2016
Project No. G150107A15

Mr. Rex I. Lane
Air Quality Division
Michigan Department of Environmental Quality
State Office Building
7953 Adobe Road
Kalamazoo, MI 49009-5025

Re: Response to Violation Notice Dated December 15, 2015
Stelmi America, Inc. – SRN: N7166, Calhoun County
Marshall, Michigan 49068

Dear Mr. Lane:

Stelmi America, Inc. (Stelmi) has requested that Fishbeck, Thompson, Carr & Huber, Inc. (FTCH) submit this letter in response to the Violation Notice dated December 15, 2015. The violation notice was in response to your December 10, 2015, inspection of the Stelmi facility located at 1601 Brooks Drive, Marshall, Michigan. Following is a description of each violation noted in your letter, along with an explanation and the corrective action implemented by Stelmi.

FGPlating – PTI No. 178-02A, SC 1.5.

Permittee is required to show continuous compliance. The magnehelic gauge for the in-stack mist eliminator is not permanently installed due to moisture issues in tap lines. Additionally, the magnehelic gauge for the packed bed scrubber was right pegged beyond 1-inch water gauge and should be replaced with a gauge with a wider pressure range. (From Activity Report: Permittee is required to equip and maintain the packed-bed scrubber system with differential pressure monitoring devices. A final stage in-stack mist eliminator was installed in order to comply with the Chrome [National Emissions Standard for Hazardous Air Pollutants] NESHAP total chromium emission limit. The magnehelic gauge for the in-stack mist eliminator is not permanently installed due to moisture buildup in the pressure tap lines. Staff also noted that the packed bed scrubber magnehelic gauge needle was right pegged beyond 1-inch water gauge and a gauge with a wider pressure range needs to be installed. Staff informed Mr. Hall and Mr. Blom that there are several methods (e.g. drip legs, desiccant traps) that can be used to prevent moisture buildup in the pressure gauges. The facility is considered to be in non-compliance with this condition.)

Response: The magnehelic gauges for the in-stack mist eliminator were permanently installed on December 14, 2015. Stelmi has installed drip legs, PVC conduit, and ball valves to eliminate moisture in all magnehelic/pressure gauge lines. After making these improvements, it was discovered that the packed bed scrubber magnehelic gauge needle that was right pegged beyond 1-inch water gauge did not need to be replaced. Verification photos included as Attachment 1.

FGPlating – 40 CFR 63.347(h).

Permittee is not preparing ongoing compliance status reports required under the Chrome NESHAP.

Response: Enclosed please find an *Ongoing Compliance Status Report* for 2014 and 2015. FTCH reviewed pressure drop records from the facility for 2014 and 2015 to determine if excess emissions, as defined in the Chrome NESHAP, occurred during 2014 or 2015 calendar years. Stelmi has indicated that the control system on FG-Plating is a composite mesh pad/packed bed scrubber system (CMP/PBS). Pursuant to the Chrome Plating NESHAP (63.347(h)(2)(A)), an emissions exceedance for a CMP/PBS is indicated when monitoring data is outside the pressure drop range by ± 2 inches of water column. As noted on the ongoing compliance reports (Attachment 2), there were no pressure drop readings outside of ± 2 inches of water column, and therefore no emissions exceedances occurred within the time frames.

As described on the attached reports, the highlighted data indicates apparent clerical errors in data, or if the pressure drop varied by more than ± 1 inch of water column. Stelmi's Operations and Maintenance (O&M) Plan for the line indicates pressure drop will be maintained within ± 1 inch of water column. Following correction of the clerical errors, only one day (April 30, 2014) was outside the pressure drop range of ± 1 inch of water column; however, it was within ± 2 inches of water column and is, therefore,



not an emissions exceedance. Stelmi will update the O&M Plan to reflect NESHAP requirements for a CMP/PBS.

In addition to the above information directly addressing the two items in the Violation Notice (SRN: N7166, December 15, 2015), Stelmi is providing follow-up on several items in the MDEQ Activity Report generated from observations during the December 10, 2015, inspection. These items, along with Stelmi's response, are noted as follows:

A cold cleaner that is exempt under Rule 281 (h). At the time of the inspection, the lid was closed when not in use. Staff provided several MDEQ instruction use labels to Mr. Blom for posting near the unit. At the time of the inspection, the facility did not have an [Material Safety Data Sheet] MSDS sheet for the cold cleaner solvent and indicated that they would provide this information to staff when it is available.

Response: Stelmi labeled the cold cleaner unit with the MDEQ instruction label on December 17, 2015. After investigating, Stelmi identified the trade name of the solvent being used as *Stoddard Solvent Mineral Spirits* manufactured by Haviland Products Company. The MSDS for this product was located in Stelmi's MSDS binder under No. 106. Verification photos and a copy of the MSDS are included in Attachment 1.

EUCHROME6 (facility ID: C5) commenced operation on 9/17/15. EUCHROME6 was in operation at the time of the inspection. The magnehelic gauge for the in-duct mist eliminator is approximately 12 feet above the floor without a permanent walk way to read the gauge. Staff recommended to Mr. Hall that the tap lines be extended down so the magnehelic gauge can be read at eye level which the facility has agreed to do via follow up email. Staff also recommended labeling of process equipment with the air use permit ID along with the magnehelic gauges for the three stage composite mesh pad scrubber system.

Response: On December 14, 2015, the tap lines were extended down and the magnehelic gauge moved to eye level for easy accessibility and viewing. On December 11, 2015, Stelmi labeled the magnehelic gauges for the three stage composite mesh pad scrubber system. On December 21, 2015, Stelmi identified and labeled all process equipment with the air use permit ID along with Stelmi's internal facility ID. Verification photos are included in Attachment 1.

The facility uses a different ID naming system internally for these tanks (C1 through C4; P1) and staff suggested that a permit emission unit label be added to the equipment to avoid confusion when collecting monitoring data. Staff also recommended that labels be added to the pressure gauges for the packed bed scrubber system and final stack mist eliminator in the event Mr. Blom is out of the office and someone else has to record process and control device monitoring data. In a 12/11/15 email from Mr. Hall to staff, labels have been added to the magnehelic gauges.

Response: As of December 21, 2015, Stelmi has identified and labeled all process equipment with the air use permit ID along with Stelmi's internal facility ID. On December 11, 2015, Stelmi had identified and labeled all magnehelic/pressure gauges for the packed bed scrubber system and final stack mist eliminator. Verification photos are included in Attachment 1.

Stelmi is genuinely concerned about staying in full compliance with every condition of their permit as well as the Chrome NESHAP. Stelmi is committed to working with the MDEQ and we hope that the above responses will satisfy the MDEQ request for additional information. If you have any questions or require additional information, please contact me at 248.324.2146 or sajarrett@ftch.com.

Sincerely,

FISHBECK, THOMPSON, CARR & HUBER, INC.


Stephanie A. Jarrett, PE

dmg
Attachments
By email

cc/att: Mr. Michael Hall -Stelmi
Mr. Steve Dodge - Stelmi