

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

N72227996

FACILITY: ABC Custom Chrome, Inc.		SRN / ID: N7222
LOCATION: 3370 Warren Dr., WATERFORD		DISTRICT: Southeast Michigan
CITY: WATERFORD		COUNTY: OAKLAND
CONTACT: Bob Freiburger, Owner		ACTIVITY DATE: 11/12/2014
STAFF: Joyce Zhu	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Annual Inspection		
RESOLVED COMPLAINTS:		

On 11/12, I conducted an annual inspection at ABC Custom Chrome, Inc., which is located on 3370 Warren Dr., Waterford, Michigan. When I arrived at the site around 1:05 PM, I met with Mr. Sean Olerey from the facility. I explained the purpose of inspection. Mr. Olerey called Mr. Bob Freiburger, the owner, immediately. I talked to Mr. Freiburger over the phone. Mr. Freiburger indicated that he wished he'd known when I came for inspections. I told him that AQD normally didn't announce the inspection ahead of time. I asked to have Mr. Olerey to show me the plant & I would get back with Mr. Freiburger for records. Mr. Freiburger asked what kind of records. I said surface tension monitoring, the amount of fume suppressant added to the tank, & chrome tank operation hours. He said that he didn't measure the surface tension since 2009 (last time I was there) because he rarely operated the tank. It's cheaper for him to contract out the jobs than operating the tank because he only get a fewer jobs & it would cost more for him to keep the tank heated.

Inspection:

The facility involves in decorative chrome electroplating business. The operation includes the following steps: First, metal parts undergo degreasing process with hot water and soap to remove the oil & grease. Then, parts are sent to a hot water rinse, followed by an acid treatment (5% sulfuric acid solution) to remove rust. Afterwards, the parts are rinsed again before the application of nickel & copper plating. Apparently, the nickel plating improves the corrosion resistance as well as the strength of the metal substrate, & activates the surface of the metal for chromium plating. According to the phone call of 11/25, Mr. Freiburger said they normally prepared the metal parts by the two plates (Nickel and copper), then, they'll outsource the last step. They only chrome plate with big car bumpers. In the winter time, they'll shut down the whole process till April because it's very expensive to keep the tank temperature up. During the inspection, none of the tanks was operating; however, all the tanks were heated. Because "tank operation" according to the chrome NESHAP, means the time in which current and/or voltage is being applied to a chromium electroplating tank, or a chromium anodizing tank, the chromium tank was not operating during the inspection time since no current or voltage was applied. On 11/15/2014, the company sent a letter explaining the time length of the operation. According to the letter, the maximum operation hours are as follow:

Time	Maximum Operation time (minutes)
Week of 10/20	30
Week of 10/27	30
Week of 11/3	7
Week of 11/10	6

On 11/25, I called Mr. Freiburger & total him that he needed to track his operation hours of the chromium tank. According to the guidance document from the Office of Environmental Assistance, even though that they operate with little amount of time, they need sum the time together. When they reach 40 hours of operation time, they should measure the surface tension of the tank. Mr. Freiburger said he didn't measure the surface tension because his operation was intermittent. However, he believed that the surface tension of the chrome tank would meet the corresponding NESHAP requirement standard because periodically he added wetting agent to the tank. He did this in order to protect his son from exposing the chrome fume when operating the tank. Mr. Freiburger will keep a record of the operation time of the chromium plating.

In conclusion, there are some deficiencies in record keeping; however, the chrome electroplating operation is only intermittent; wetting agent was periodically added to the tank. I have told the company to keep record according to the NESHAP requirements. If next inspection shows that the company still lacks of record keeping, I will issue a violation notice.

NAME



DATE

12/10/14

SUPERVISOR

CJE