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SEP 27 2021

Air Quality Division
Warren Office

Mr. Joseph Forth
Environmental Quality Analyst
Air Quality Division

RE: AQD Inspection
Location: 48668 Alpha Dr, Wixom MI

On July 16, 2021 AQD performed a routine Plating Air Quality inspection. The result of that inspection yielded two violations.

First violation was that EUSYSTEM2 PC/ABS (Tanks 5&6) surface tensions were out of the set parameter of maximum 35 dynes. This was recorded on multiple occasions to be above the set 35 dynes therefore instead of addressing each specific date the cause of said exceedances can be explained as a whole.

Surface tensions are monitored daily and are adjust based on tank performance. Racked parts being lifted in and out of the etches causing chemistry to be drug out of these baths and depleted chemistry in this case Surface Tension Reducer will need to be added back to the tank. This is the cause every time resulting in an exceedance of the set 35 dynes.

Following the AQD inspection plant managers at both 4 and 5 were contacted and asked to immediately lower the 35 dynes set for the etches to 33 dynes. This was to establish that surface tensions would be in a more controlled level and gives us the ability to keep this in a manageable area.

Also techs are instructed to do 10 minute rechecks to make for certain that the 33 dynes has not been exceeded. It has been determined that surface tension dynes are affected within 5 to 10 minutes of adding surface tension reducer to the tank. We are confident that this will make the 33 dynes maintainable.

Again this is now implemented at both plating facilities.

Second violation is the FGSYSTEMS Scrubber systems +2/-2 pressures drops that are to be recorded routinely by the maintenance department were on several occasions out of parameters. Again our investigation of the dates in question were the same answer so I will again answer them as a collective whole.

Scrubber pads are monitored by Magnehelic gauges at all scrubber locations in the FGSYSTEM. Pressure increases indicate when filters are becoming dirty. When filters are considered dirty based on the increase of pressure then they are schedule to be soak cleaned in our neutralization tank. This can only

be done during shutdown or no production leaving the neutralization tank accessible. Pressure readings have been added to the maintenance recording sheets to show at what pressure would indicate that time for cleaning is approaching. This shows the need for cleaning and gives foresight to schedule the filter for the following shutdown soak clean. Shut downs are Friday or Saturdays typically. The maintenance department are fully aware and know what is now expected.

An email response is being sent to you and hardcopies will go to
EGLE, AQD, Warren District, @ 27700 Donald Court, Warren, MI 48092

And

Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD P.O. Box 30260, Lansing, Michigan
48909-7760

Mr. Forth as always all of the insight resulting from your visits are shared with all the plants regardless of what plant you happen to visit at the time.

Deepest Regards

A handwritten signature in black ink that reads "Ed Barriager". The signature is written in a cursive style with a prominent flourish at the end.

Ed Barriager
Environmental
29883 Beck Rd
Wixom, MI