

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

P080038863

FACILITY: Westlund Plating		SRN / ID: P0800
LOCATION: 1415 South Cooper, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT: Thomas Frankini , Owner		ACTIVITY DATE: 03/07/2017
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Self initiated inspection based on finding a small chrome plater that was listed on the internet.		
RESOLVED COMPLAINTS:		

**Minor Source**

**Facility Contact**

Thomas Frankini (TF) Owner

ph 517-783-2400 westlund@modempool.com

Website: <http://www.westlundmfg.com/>

**Purpose**

On March 7 and March 13, 2017, I conducted an unannounced compliance inspection of Westlund Plating(Company) located in Jackson, Michigan. I was accompanied by Matthew Konieczki (MK), Environmental Quality Analyst with the Water Resources Division with the DEQ-AQD Jackson District Office. (Note: Matt was only present on Day 2.) The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules. This was a self initiated inspection based on locating the facility on the internet.

**Facility Location**

The facility is located in a commercial area in the City of Jackson with 3 different businesses within 200 feet. See attached aerial photo.

**Facility Background**

From the Company's website:

*"We do Custom and Production Polishing and Plating on most metals. We do SHOW QUALITY work on everything from Car Parts (shock absorbers, "A" frames, Springs, Drive Shafts, Nuts and Bolts to Engine Compartment parts), Motorcycle Parts (including aluminum), Boat Parts, Airplane Parts (including stainless steel), Fire Truck Parts to Antique Restoration (including "Gray" Nickel) and repair at a very reasonable price.*

- Small parts a specialty
- Complete Polishing and De-Burring Services
- Decorative Chrome Plating
- Hard Chrome Plating
- Dual Nickel Plating
- Electroless Nickel Plating
- Gray Nickel Plating
- Brushed Nickel Plating



- *Bright Nickel Plating and Pacification*
- *Antique Copper Plating*
- *Copper plating for masking of Heat Treated parts*
- *Chemical Stripping of Plating from most Metals*
- *Chemical De-Smutting and Rust Removal*
- *Custom Polishing and Plating for Display*
- *Complete Referral Service for Non In-House Services*
- *Alkaline Tin Plating*
- *Bright Tin Plating*
- *Gold Plating*
- *Sulfamate Nickel*

*We are also able to do both short and long term production runs, and we can meet MOST Automotive Interior and Exterior Specifications at a lower price than many larger companies. Please contact us for all your Metal Finishing needs! Please take a look at the quality of our work."*

## **Regulatory Applicability**

**Active Permits: None**

### **Permit Exempt Equipment:**

**Various containers/small tanks containing either 15% concentration HCL or detergent with no external vents. Exempt per Rule 285(r)(iii) or (iv)**

**2 small hard chrome plating tanks with no exhaust system. Exempt per Rule 285 (r)(vii)**

**2 small nickel plating tanks with no exhaust system. Exempt per Rule 285 (r)(vii)**

**2 small metal grinding wheels operation with no exhaust system. Exempt per Rule 285 (I)(vi)(B)**

**(Note: There is an exhaust fan located a few feet from the grinding wheels that is rarely used.)**

**Federal Chrome NESHAP regulations apply to the hard chrome plating tanks.**

**EPA administrated program-NESHAP Subpart W (National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations) applies to the nickel tanks.**

### **Arrival & Facility Contact Day 1**

**Visible emissions or odors were not observed upon our approach to the Company's facility. I arrived at approximately 2 pm, proceeded to the facility entrance to request access for an inspection, provided my identification, and met with TF who is the owner and sole employee of the facility. A very brief pre-inspection discussion was held with TF. I informed TF of my intent to conduct a facility inspection and to review the various records as necessary. TF extended his full cooperation during the inspection, accompanied me during the full duration of the inspection, and fully addressed my questions.**

### **Pre-Inspection Meeting Day 1**



TF outlined that the Company is currently operating when they have a plating job to do. TF typically comes in at 2 pm on week days and works there until he is finished. TF indicated that he believes that all his processes are small and don't fall under environmental regulations

### Onsite Inspection Day 1

TF gave me a brief tour of the facility. It basically consists of a main room and smaller adjacent room. The main room contains a 50 gallon in size hard chrome plating tank, 2 nickel plating tanks(160 gallons), several dilute acid containers/tanks and some containers containing detergent. There was also some evaporation tanks that are used to concentrate sludge from the plating tanks. (He indicated that he gives the sludge to a smelter for free.) A 1928 vintage boiler was being used to heat the water in the plating tanks. 2 small rectifiers were being used to provide low voltage current to the plating tanks. In a separate room, a single grinding wheel was being used to grind/polish metal. Overall, both the main room and the adjacent room were very disorderly. (See attached photo.) The walls were all stained brown. The ceiling had no ventilation openings but along the edges of the roof line there was some small openings. The floor of the building was cement.

The nickel tanks were operating with one of them that had a plastic sheet covering it while the other did not. The older tank that wasn't covered has a lot of obvious corrosion material all over the sides of it.

The small hard chrome tank was operating. It had no lid or control. I asked TF if he uses any wetting agent/fume suppressant chemical for the chrome tank. He was able to produce one small bottle from the adjacent room that contained an unknown chemical. He indicated that he used it occasionally. See attached photo of the bottle.

Next I examined the evaporation tanks. They all contained a dry sludge material at the bottom. He indicated that he took a long time for them to evaporate.

There appeared to be various spills on the floor which he claimed to be water.

In the adjacent room, there were a couple of much larger tanks that he had when there was about 5 employees working there at a much higher level of operation.

He claims that the EPA/DNR/Fire Department have all been there before and found it to be fine.

The facility has been there for decades. TF claims it was built on a large landfill and everything around there is heavily contaminated.

### Recordkeeping Review Day 1

TF provided no records.

### Post-Inspection Meeting Day 1

I held a brief post-inspection meeting with TF. I indicated that I had numerous compliance concerns and would need to check the rules to determine which ones applied to his operations. I promised I would make a return visit to let him know. I thanked TF for his time and cooperation, and I departed the facility at approximately 3:00 pm.

### Arrival & Facility Contact Day 2



We arrived at approximately 2 pm on March 13, 2017, proceeded to the facility to request access for an inspection, provided my identification, and met again with TF. I informed TF of our intent to finish conducting a facility inspection as a follow-up to last week's inspection and to let him know what regulations apply to operations. I also indicated that MK would be reviewing his process to see if an industrial storm water permit was required. TF extended his full cooperation during the inspection, accompanied us during the full duration of the inspection, and fully addressed our questions as best as he could.

#### **Pre-Inspection Meeting Day 2**

None.

#### **Onsite Inspection Day 2**

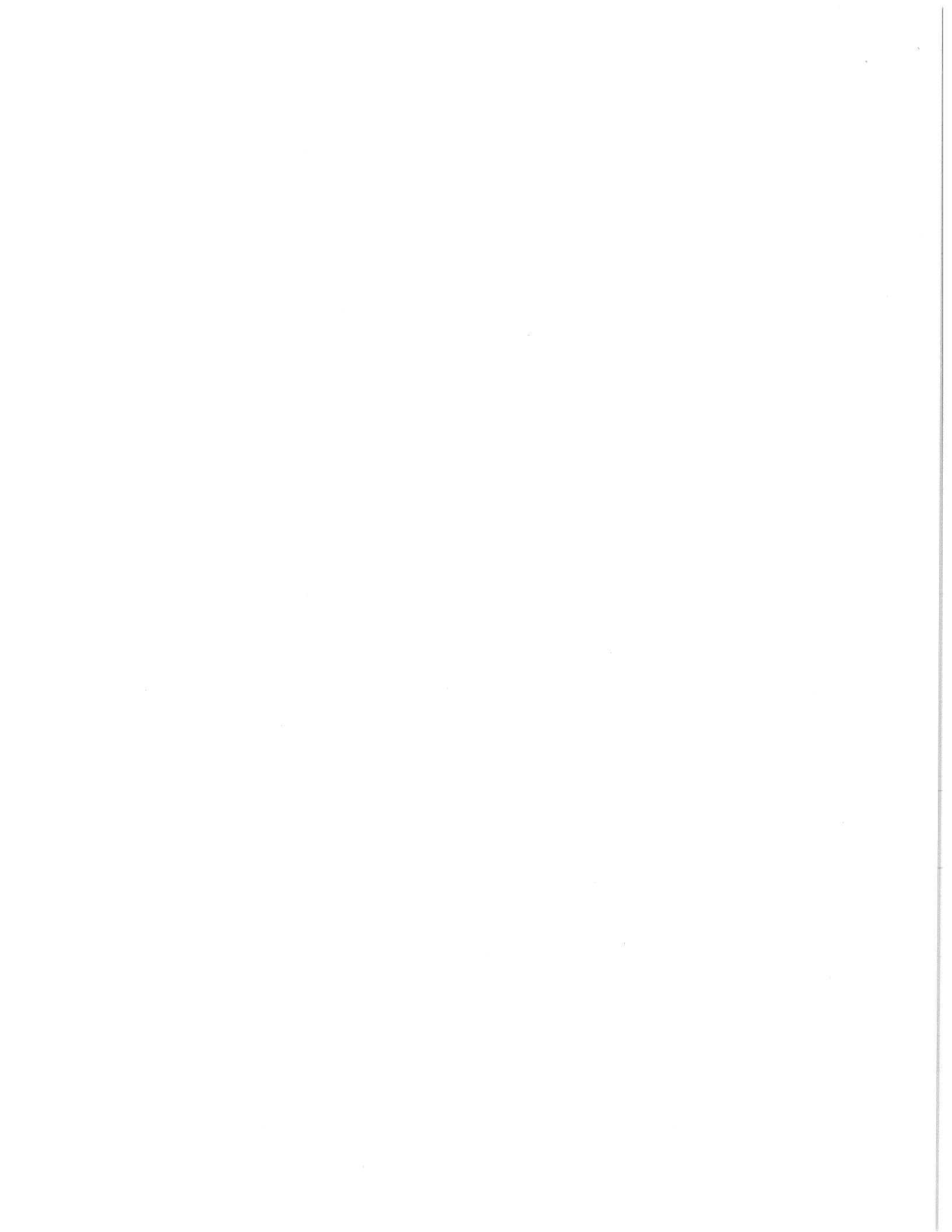
I took a second look at the facility and asked a few follow-up questions. The original chrome tank and 2 nickel tanks were not operating. However, a small 10 gallon chrome tank was in operation. (See attached photo) It was so small that appeared to be portable and was not seen on Day 1. I asked TK about the rectifiers at the facility. He indicated that had several but only 3 are currently in working order. He said they are rated at 100, 200 and 750 amps. I took an additional look at the evaporation tank. He indicated that he occasionally pumps water out of the plating tanks and lets it sit in the evaporation tank for months until dry. He said he hasn't done anything was the residue since the 1980's. (See attached photo.) I then took another look at the adjacent grinding operation. (See attached photos.) There are actually 2 grinding wheels with significant piles of metal shavings on the floor. Nearby there was a small exhaust fan opening that was partially covered up by the metal shavings. It discharged into a small stack that exhausts outside. (No fallout was seen outside the facility but the roof was not safe enough to inspect to confirm there was no issues on top. ) TK said he rarely uses it. In the same room as the grinders are several old plating tanks stacked on top of each in the corner. TK said they haven't been used since the 1980's. He further indicated that he moved his business to this location in 1982. TK said the building was a beer distribution business prior to him moving in.

MK did not have many findings. There is one sewer lid in the middle of the building that appeared to be sealed. MK was going to follow-up with the City of Jackson to confirm this.

#### **Post-Inspection Meeting Day 2**

I told TK my finds and what he needs to do to comply. I told him in order to comply with the Chrome MACT that he was going to have file an initial notification form with the State of Michigan, start using a wetting agent on a regular basis, check surface tension every 33 hours of operation and keep required records. For the nickel tanks, he needs to install proper covers on both tanks, file an initial notification with the EPA, and keep required records. I further indicated that starting next year he will need to fill out MAERS report and pay a \$250 fee for being a Category III facility. I also mentioned to him that he does not have a permit to exhaust the metal grinding operations outdoors and would need to get one if decides to use it again in the future. I gave TK some sample initial notification forms and other guidance documents for the Chrome MACT and NESHAP 6W regulations. We departed the facility at 3:30 pm.

#### **Recordkeeping Review Day 2**





TK does not keep any records so there was nothing to review.

### Compliance Summary

Based upon the facility inspection, the lack of records, and review of applicable requirements, the Company is out of compliance with the following:

- 1) Not in compliance with the Chrome MACT for the 2 chrome plating tanks.
- 2) Not in compliance with the NESHAP Subpart WWWW for the 2 nickel plating tanks.

A VN that outlines the above compliance summary bullet items will be sent to the Company. The Company will be given 21 days to make a written response to the compliance allegations.

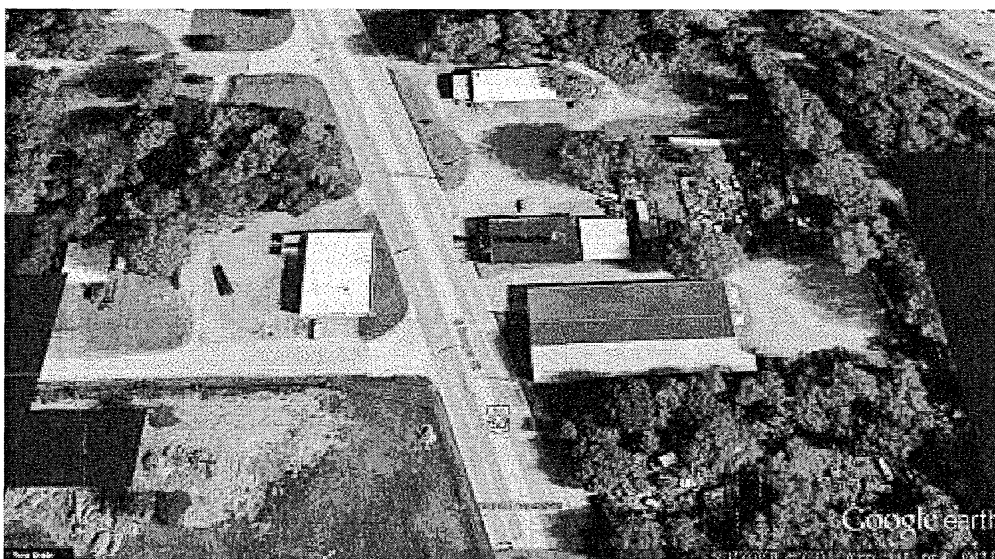
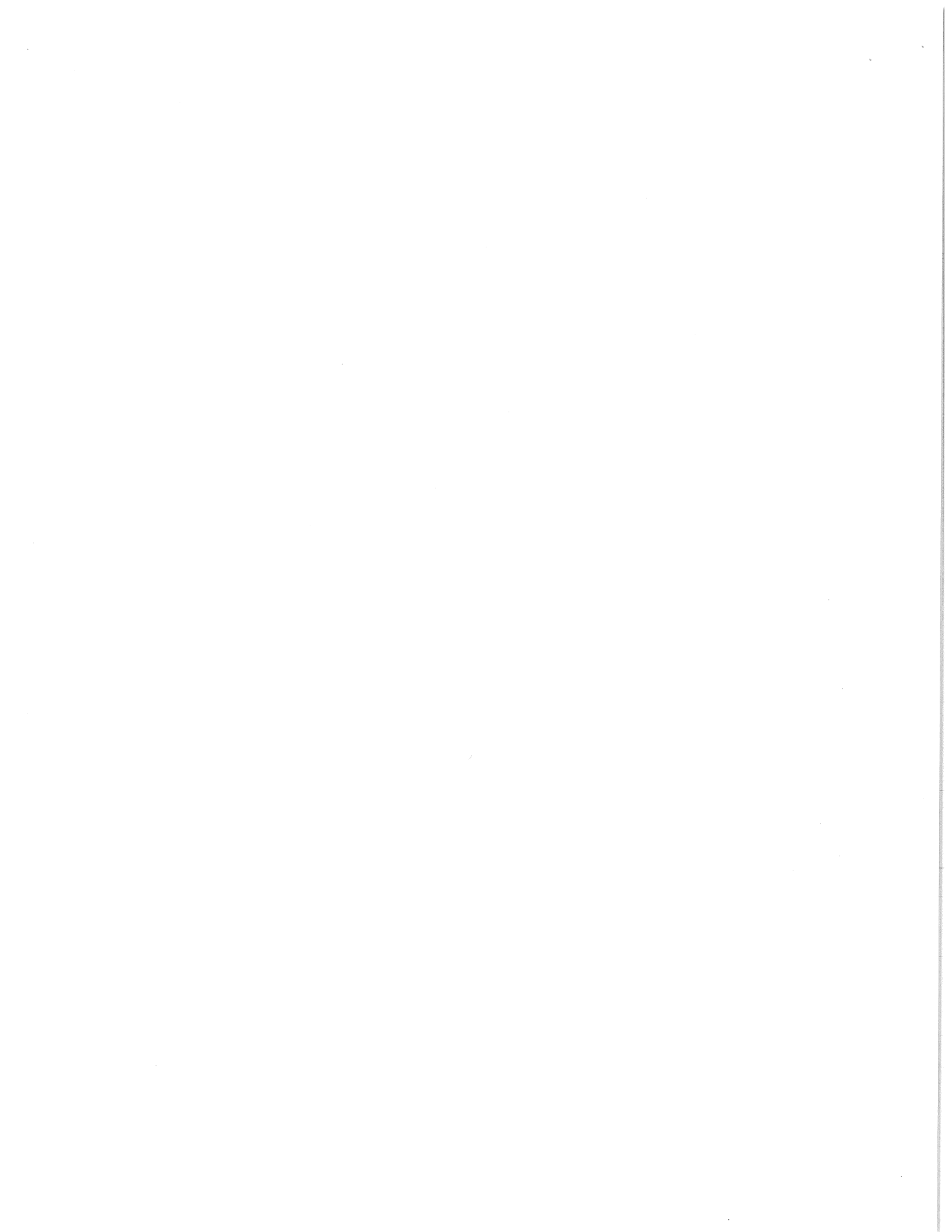
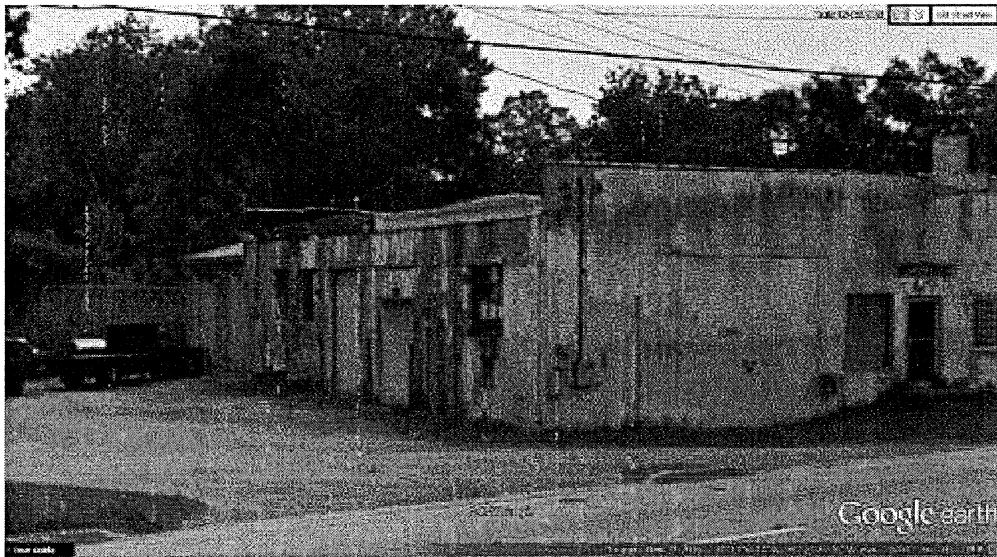
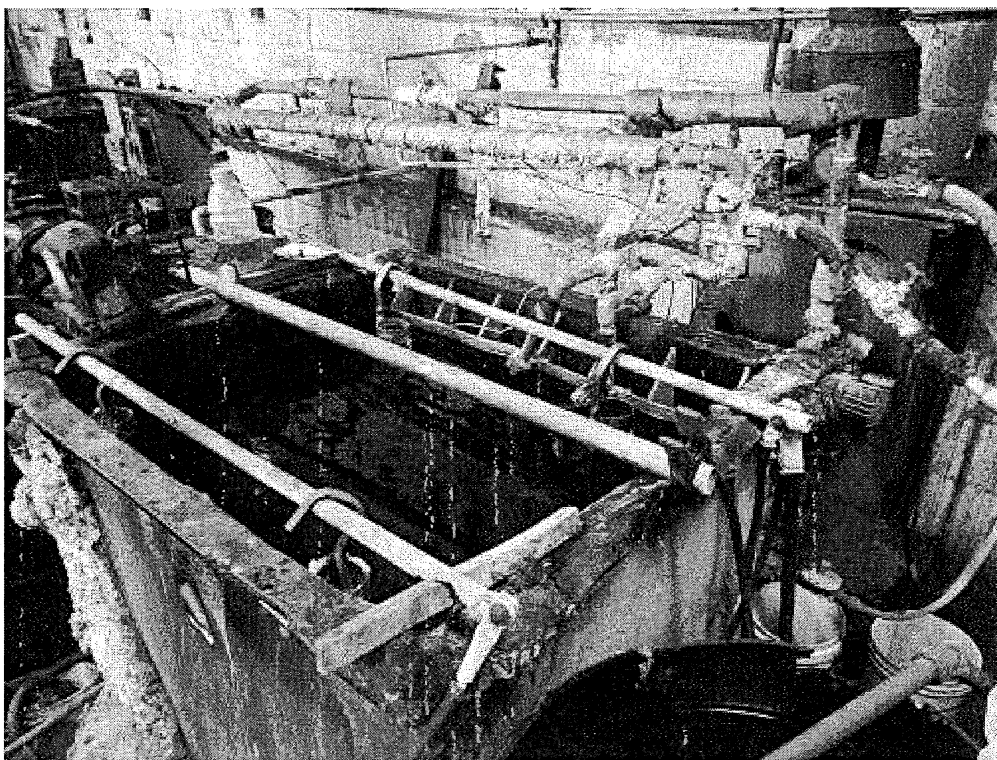


Image 1(aerial photo) : Aerial photo



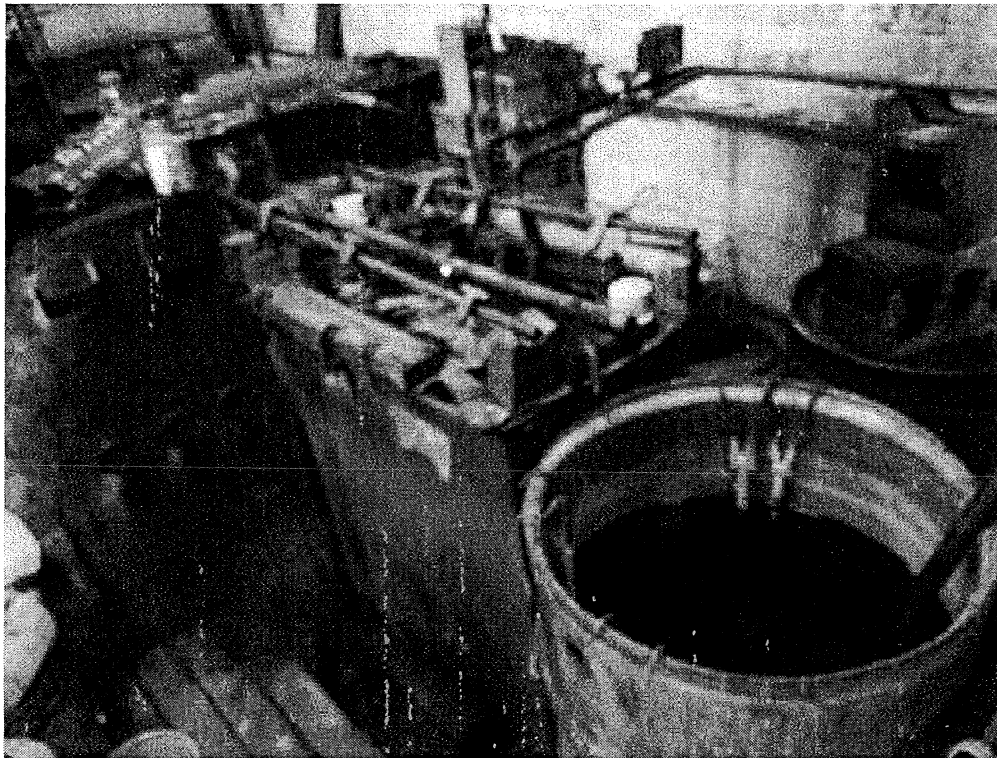


**Image 2(Street View)** : Street view



**Image 3(Old nickel tank)** : Old nickel plating tank

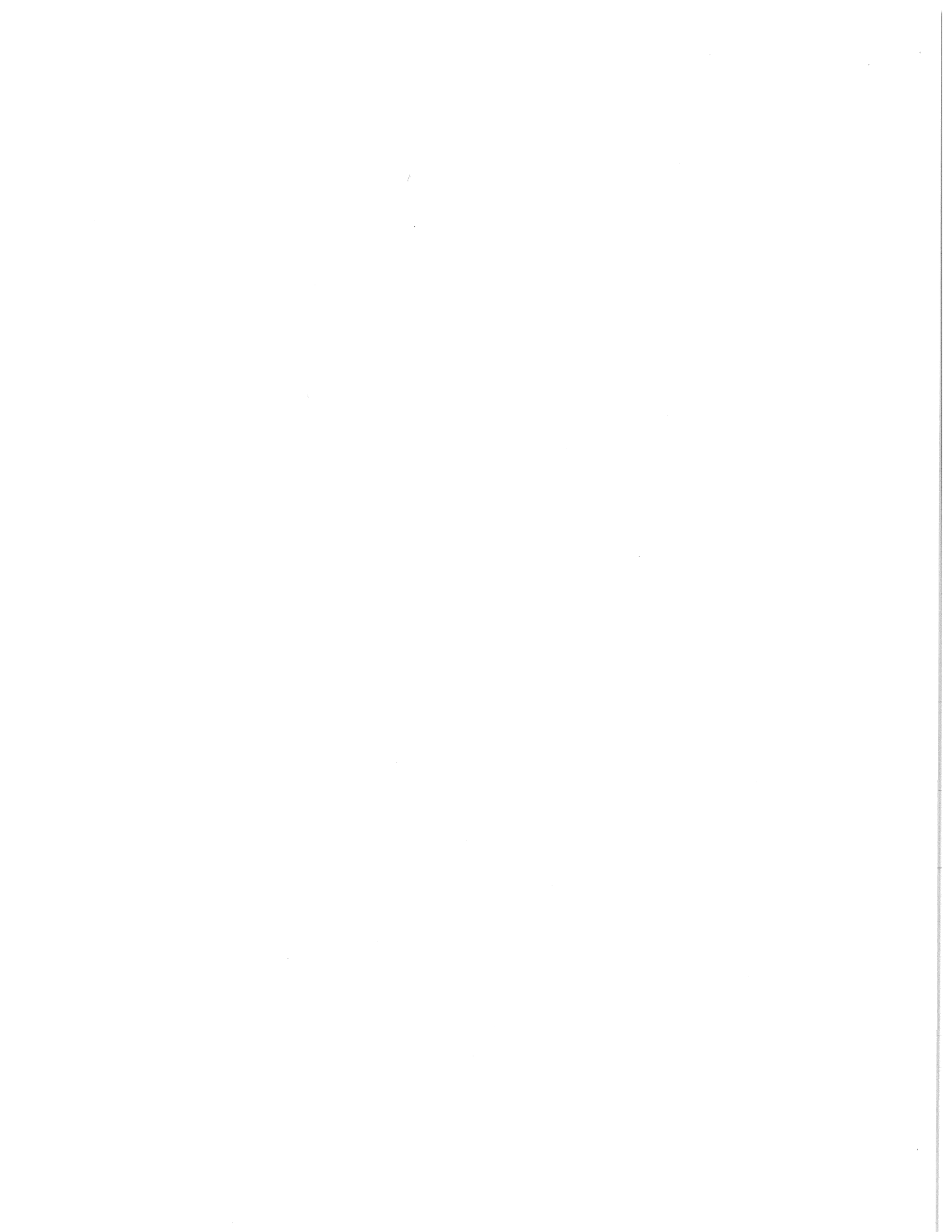


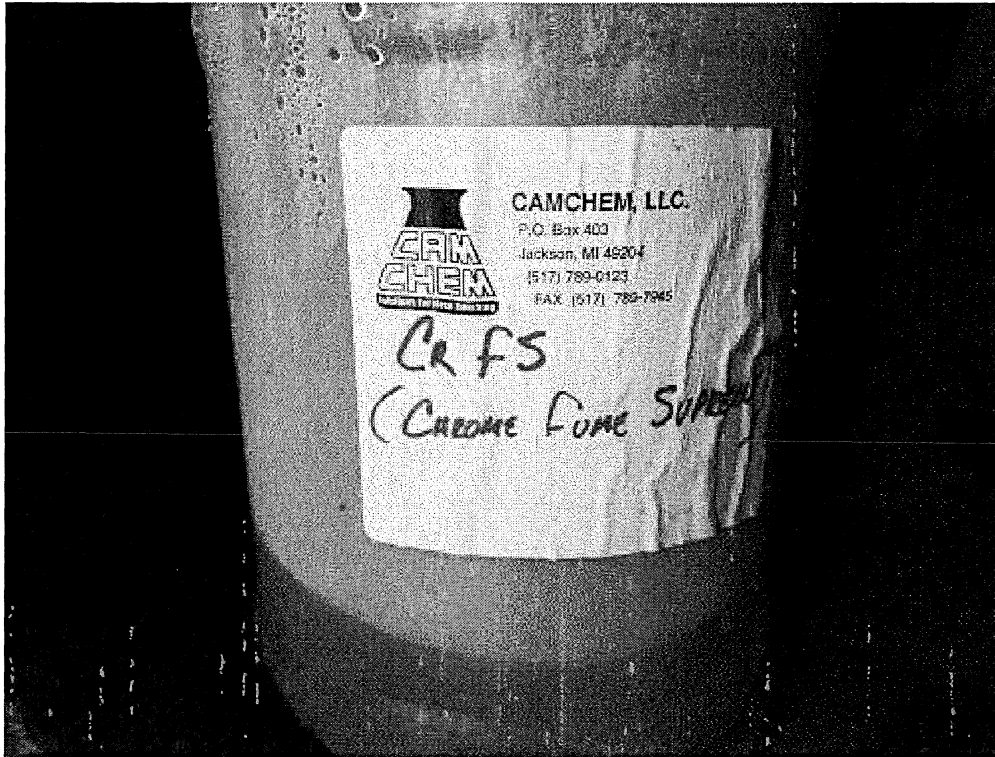


**Image 4(chrome plating tank)** : Chrome plating tank(Tank next to blue barrel.)

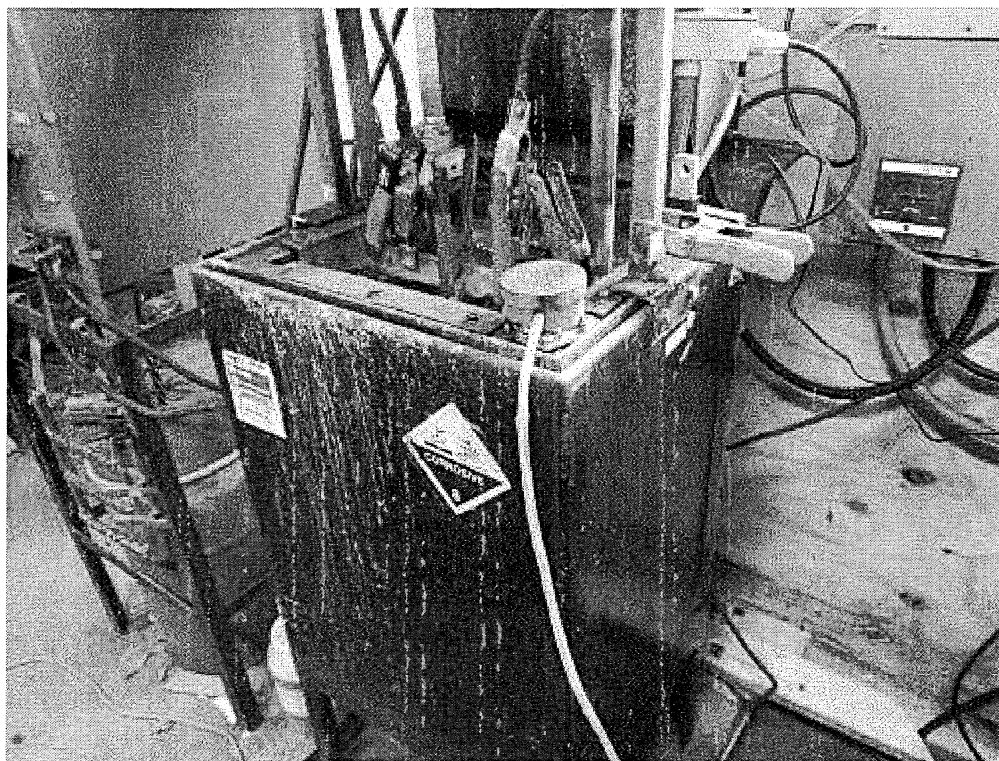


**Image 5(Main room)** : Main room

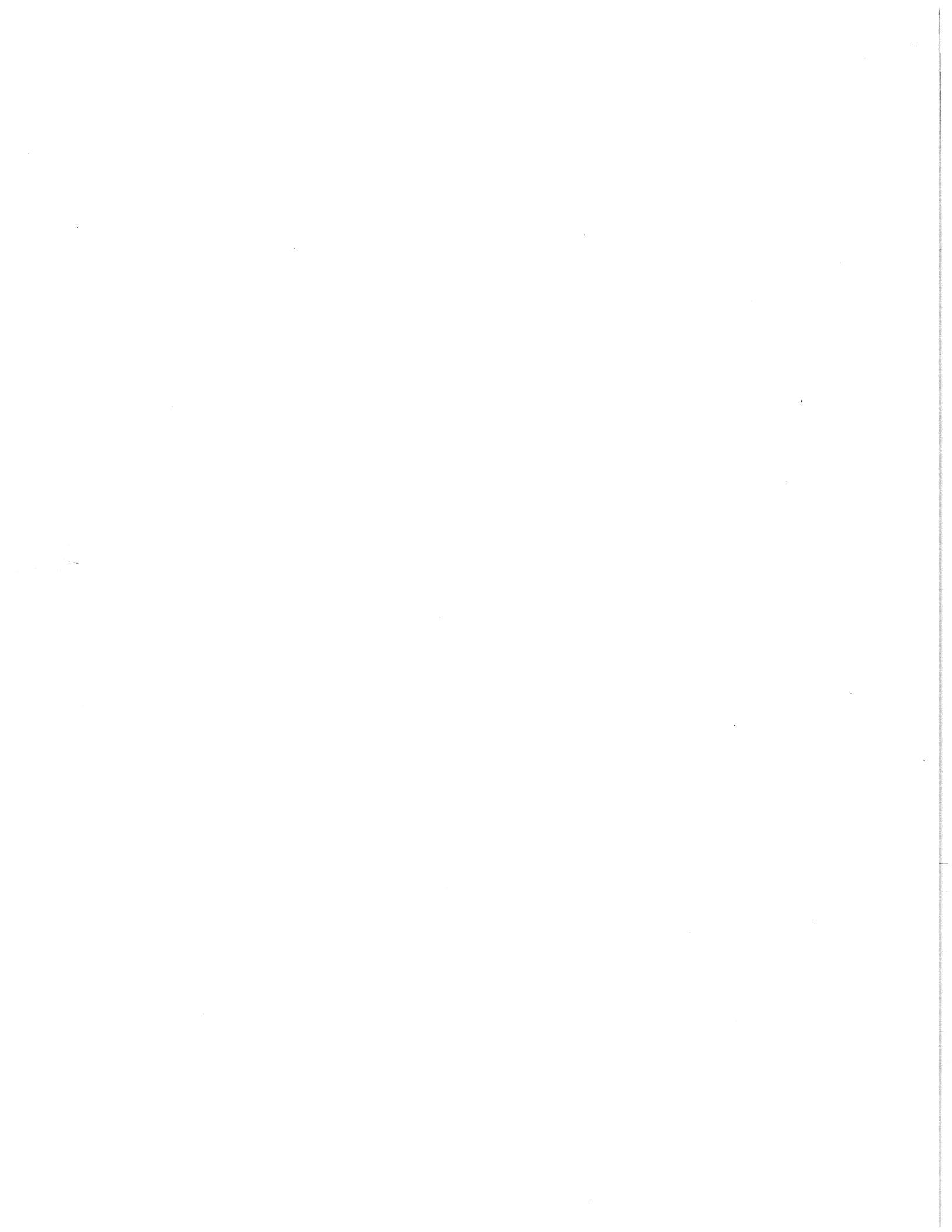




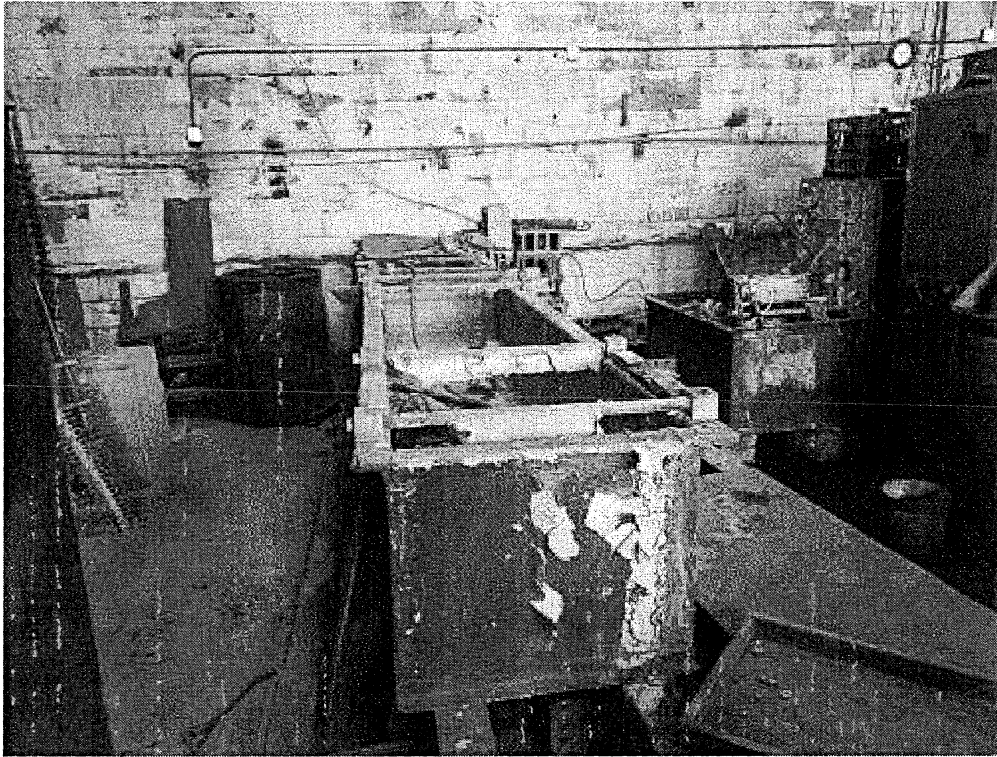
**Image 6(Fume suppress)** : Fume suppressant containing unknown compound.



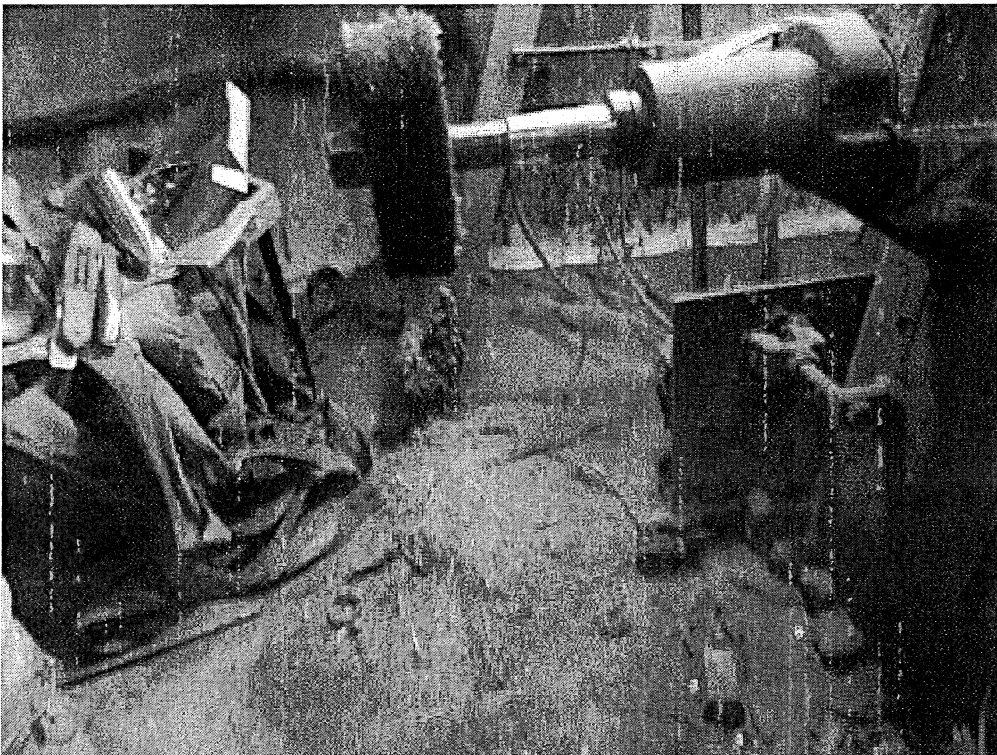
**Image 7(Small chrome tank)** : 10 gallon hard chrome plating tank



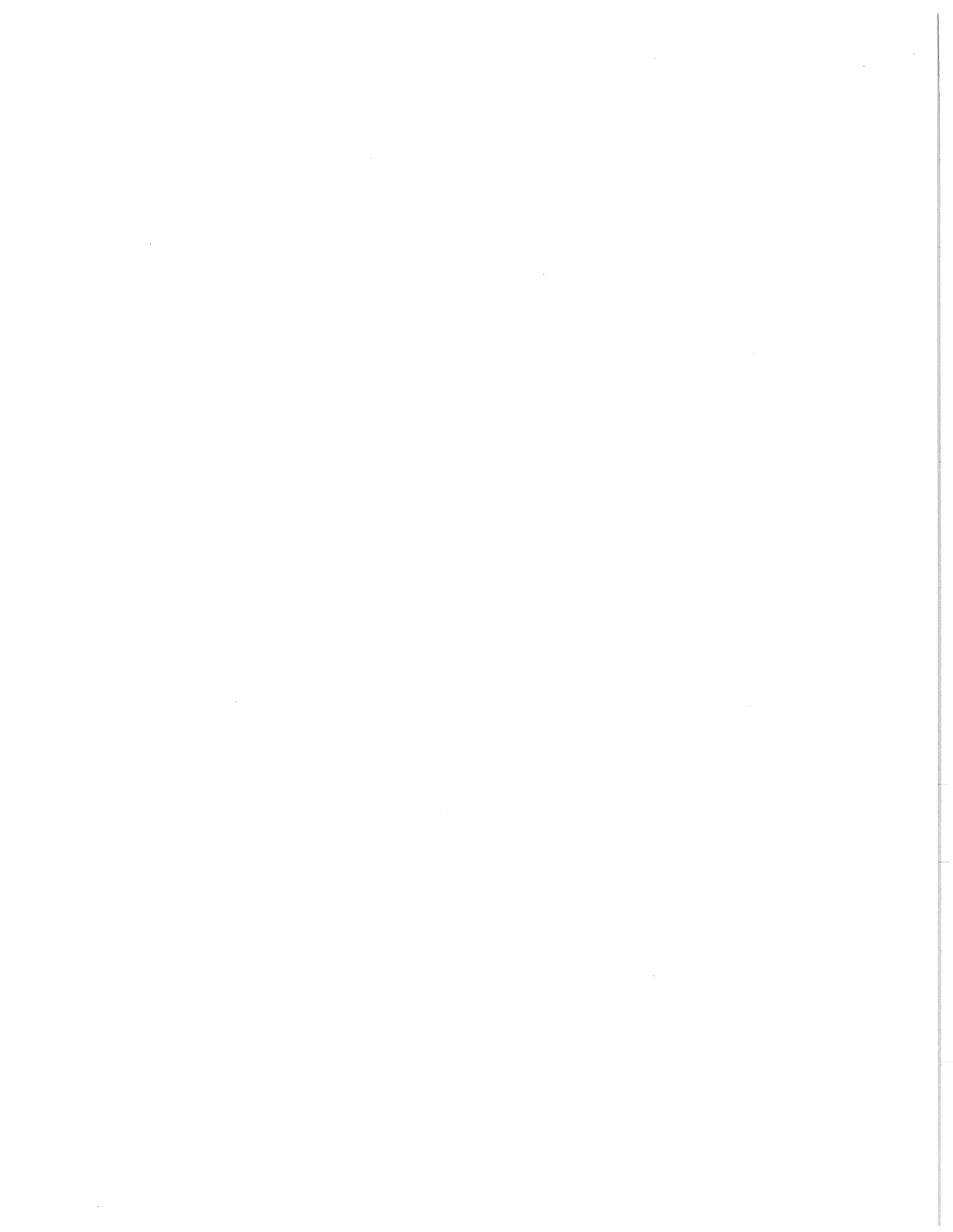


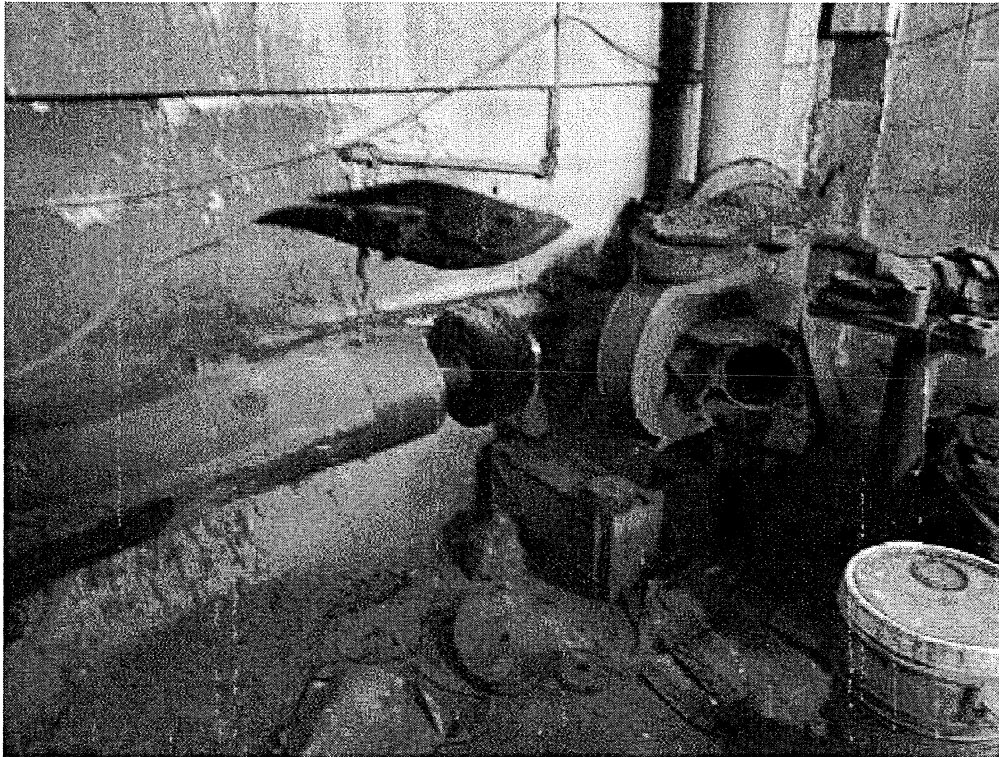


**Image 8(evaporation tank)** : Evaporation tank



**Image 9(Grinding wheel)** : 1 of 2 grinding wheels





**Image 10(Exhaust fan) :** 2nd grinding wheel and exhaust fan opening in the background

NAME M. Kovalchuk

DATE 3/14/2017

SUPERVISOR [Signature]