



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREETHER  
DIRECTOR

March 30, 2018

Mr. Jake Krol, President  
Kro-Pro  
1004 East Broadway Avenue  
Norton Shores, Michigan 49444

SRN: P0906, Muskegon County

Dear Mr. Krol:

**VIOLATION NOTICE**

On March 7, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Kro-Pro located at 1004 East Broadway Avenue, Norton Shores, Michigan. The purpose of this inspection was to determine Kro-Pro's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Chromium Electroplating	40 CFR Part 63, Subpart N	Failure to comply with NESHAP Requirements
Metal Treatment	Rule 201	Failure to obtain a permit to install

This process is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chromium emissions from hard and decorative chromium electroplating and chromium anodizing tanks. These standards are found in 40 CFR Part 63, Subpart N. Kro-Pro is not complying with this NESHAP.

During this inspection, it was noted that Kro-Pro had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised Mr. Krol on March 21, 2018, that this is a violation of Act 451, Rule 201. A program for compliance may include a completed PTI application for the Metal Treatment process equipment. An application form is available by request, or at the following website: [www.michigan.gov/deqair](http://www.michigan.gov/deqair) (in the shaded box on the upper right hand side of the page)

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

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The Safety Data Sheet for the Top Shut XO fume suppressant provided during the on-site inspection identified a "Fluorine type surface agent" with a CAS number listed as "Trade Secret." Please provide information and a CAS number for this chemical.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 20, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

If Kro-Pro believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Kro-Pro. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Chris Robinson  
Environmental Quality Analyst  
Air Quality Division  
616-356-0259

cc: Ms. Heidi Hollenbach, DEQ  
cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ