DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

U61161213037650

FACILITY: Metal Finishing Technology		SRN / ID: U611612130
LOCATION: 2652 Hoyt Street, Muskegon		DISTRICT: Grand Rapids
CITY: Muskegon		COUNTY: MUSKEGON
CONTACT: Joe Wingett,	3	ACTIVITY DATE: 11/17/2016
STAFF: Chris Robinson	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: The purpose of this in	rspection was to determine the facilities compliance st	atus with all air quality rules and regulations.
RESOLVED COMPLAINTS:		

AQD staff Chris Robinson (CR) and Steve Lachance (SL) were on-site to conduct a self-initiated scheduled unannounced inspection on Thursday November 17, 2016. CR and SL arrived at the Metal Finishing Technology (MFT) facility at approximately 10:00 am and met with Mr. Joe Wingett, manager. No odors or visible emissions were detected. AQD staff presented Mr. Wingett with business cards and informed them that AQD was there to perform an inspection of the facility to determine compliance status with all applicable air rules and regulations.

FACILITY DESCRIPTION

MFT is a metal surface cleaning and finishing facility that operates a passivation line, black oxide line, and an anodizing line. This facility is considered to be a minor source and no permits have been issued. During the last inspection, 1/17/07, the facility utilized Rule 290 for both the anodizing and Black Oxide Lines which were, at that time, vented to the outside environment.

According to Mr. Wingett, there have not been any major changes since the last inspection. However, MFT has added a small acrylic surface treatment tank to the black oxide line and a passivation line. MFT employs approximately 11 employees and operates one (1) shift, five (5) days per week.

COMPLIANCE EVALUATION

Passivation Line

The passivation line is used to clean stainless steel components. The entire line is vented to the in plant environment and therefore appears to be exempt under Rule 285(r). Process tanks for this line are configured as follows:

Alkaline Cleaner — Water Rinse — Nitric Acid (20-25%) — Water Rinse (Dipped for 15-20 min) — Water Rinse (Heated 100 gallon tank).

Anodizing Line

The anodizing line is used to treat and finish aluminum office and automotive parts. Not all parts go through every tank on this line. Process tanks for this line are configured as follows:

Alkaline Cleaner --- Alkaline Cleaner --- Etch (Sodium Hydroxide) --- Rinse1 --- DSMUT --- Rinse2 --- Anodize3 or Hard Coat (Sulfuric Acid) --- Rinse3 --- Anodize2 (Sulfuric Acid) --- Anodize1 (Sulfuric Acid) --- Rinse4 --- Green Dye --- Black Dye --- Double Rinse --- Gold Dye --- Turquoise Dye --- Blue Dye --- Red Dye --- Rinse 7 --- Seal --- Hot Rinse.

All of the tanks except for the Etch, Rinse1, Anodize1 and Anodize2 tanks are considered to be metal treatment process tanks and are vented to the general in-plant environment. Therefore, they appear to be exempt under Rule 285(r). The Anodize3 tank is currently vented to the in plant environment. Mr. Wingett indicated that the Anodize3 tank should be vented outside. However they have not made the necessary changes to the ventilation system since the last process tank configuration change. Compliance with occupational health regulations often require anodizing tanks to be vented outside. Therefore, AQD will not accept exemption 285r for this tank and has recommended to Mr. Winget that the venting system be reconfigured to vent Anodize3 outside. The Rinse1 and Etch tanks are used for surface prep which appears to be exempt under Rule 285(I)(iii). The Anodize1, Anodize2 and Anodize3 tanks may be exempt from Rule 201 permitting, but would require records to utilize rule 290. Since no records were available, this is a violation of Rule 201.

Black Oxide Line

The black oxide line is used to treat and finish steel office and automotive parts. Process tanks for this line are

configured as follows:

Alkaline Cleaner (140°F) --- Rinse --- Muriatic Acid (~20%) --- Rinse --- Black Oxide --- Double Rinse --- Oil (Water Soluble, 160°F, 5-6%) --- or --- Acrylic (portable 1 gallon tank, 1/3 acrylic, 2/3 water).

All tanks except for the Alkaline Cleaner and the Black Oxide tanks are considered to be metal treatment process tanks and are vented to the general in-plant environment. Therefore, they appear to be exempt under Rule 285(r). The Alkaline Cleaner is used for surface prep which appears to be exempt under Rule 285(l)(iii). The Black Oxide tank is vented to the outside environment and may be exempt from Rule 201 permitting, but would require records to utilize rule 290. Since no records were available, this is a violation of Rule 201.

COMPLIANCE DETERMINATION

Based on observations made during the November 17, 2016 inspection, MFT is not in compliance with all air quality rules and regulations. A Rule 201 violation notice will be issued for failure to maintain records for the Anodize1, Anodize2 and Anodize3 tanks on the anodizing line and the Black Oxide tank on the black oxide line.

List of Attachments

- MSDS for Sulfuric Acid (Anodizing Tanks)
- MSDS for Sodium Hydroxide (Anodizing Line Etch Tank)
- MSDS for Cleaner SSP-140 (Anodizing Line Alkaline Cleaner Tank)
- MSDS for HAVABLACK S2G (Black Oxide Tank)
- SDS for Lab Oil 100 (Black Oxide Line Oil Tank)
- MSDS for HP HAVALAC Yellow (Black Oxide Line Acrylic Tank)

E Vris Letris DATE 12/12/2016 SUPERVISOR TO