



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
WARREN DISTRICT OFFICE



DANIEL EICHINGER  
ACTING DIRECTOR

April 25, 2023

VIA E-MAIL AND U.S. MAIL

Garrett Kanehann, Owner  
Beacon Park Finishing, LLC  
15765 Sturgeon  
Roseville, MI 48066

SRN: B3000, Macomb County

Dear Garrett Kanehann:

**VIOLATION NOTICE**

On March 16, 2023, and again on April 12, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Beacon Park Finishing, LLC (BPF) located at 15765 Sturgeon, Roseville, Michigan. The purpose of this inspection was to determine Beacon Park Finishing, LLC'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); the Air Pollution Control Rules; 40 CFR Part 63, Subpart N, National emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (Chrome NESHAP); and the conditions of Permit to Install (PTI) number 186-91D.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition I.1	BPF did not operate the pollution control device for nickel/chrome plating line. Based on the permit evaluation document, this process will not meet the total chromium emission limit of 0.05 micrograms per dry standard cubic meter without maintaining proper surface tension of the chrome tank and operating the composite mesh pad scrubber properly.

FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition III.1 40 CFR 63.342(f)	BPF did not implement their operation and maintenance plan. The CMP scrubber was down for months, was not fixed, and AQD was not notified. BPF did not maintain records showing that surface tension in the chrome tank was kept below 40 dynes/cm <sup>2</sup> from January 31, 2023 through March 16, 2023.
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition III.2 40 CFR 63.342(d)	BPF did not maintain records showing that surface tension in the chrome tank was kept below 40 dynes/cm <sup>2</sup> from January 31, 2023 through March 16, 2023.
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition IV.1	BPF operated the chrome tank without installing the composite mesh pad filter in the scrubber system.
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition IV. 2	BPF operated the nickel strike tank without installing the composite mesh pad filter in the scrubber system.
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition IV.3	BPF did not maintain the differential pressure monitoring device.
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition VI.2 40 CFR 63.343(c)(5)	BPF did not maintain records showing that surface tension in the chrome tank was kept below 40 dynes/cm <sup>2</sup> from January 31, 2023 through March 16, 2023.
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition VI.3	BPF did not perform inspections on the composite mesh pad scrubber for all of 2022 and the first quarter of 2023.
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition VI.4	BPF did not maintain records of the pressure drop across the composite mesh pad system on a daily basis.

FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition VI.5 40 CFR 63.346	BPF did not monitor emissions and operating and maintenance information in accordance with the chrome NESHAP.
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition VI.6 40 CFR 63.346(b)(1)	BPF did not maintain records of inspections required to comply with the applicable work practice standards of 40 CFR 63.342(f).
FGLINEIV – nickel/chrome plating line.	PTI No. 186-91D Special Condition VI.7 40 CFR 63.346(b)(13)	BPF did not maintain records showing that surface tension in the chrome tank or fume suppressant additions from January 31, 2023 through March 16, 2023.
FGLINEIV – nickel/chrome plating line	40 CFR 63.347(h)	BPF did not maintain an ongoing compliance status report with the required information. There is no certification stating whether or not the work practices identified in 40 CFR 63.342(f) were followed.

This process is also 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.

On March 16, 2023, the AQD staff observed operation of the nickel/chrome line while the composite mesh pad scrubber was offline.

On April 12, 2023 AQD staff observed that the composite mesh pad filter was not installed in the control device for the nickel/chrome plating line. The composite mesh pad filter is the part of the system designed to control hexavalent chromium emissions.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 16, 2023 (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.

Please submit the written response to EGLE, AOD, Warren District, at 27700 Donald Ct, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AOD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Beacon Park Finishing, LLC 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 Beacon Park Finishing. 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,



Adam Bognar  
Senior Environmental Engineer  
Air Quality Division  
586-854-1517

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Joyce Zhu, EGLE