UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	
Detroit Chrome Electro Forming Company Detroit, Michigan	)	FINDING OF VIOLATION
	)	EPA-5-99-MI-6
	)	
	)	
Proceedings Pursuant to Section 113 (a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3)	)	

FINDING OF VIOLATION

The United States Environmental Protection Agency (U.S. EPA), by authority duly delegated to the undersigned, hereby notifies the State of Michigan and Detroit Chrome Electro Forming Company (Detroit Chrome) that U.S. EPA finds, pursuant to Section 113(a)(3) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(3), that Detroit Chrome, located at 7515 Lyndon Street, Detroit, Michigan, is in violation of Section 112 of the Act, 42 U.S.C. § 7412, and regulations promulgated thereunder setting forth National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 C.F.R. Section 63, Subpart N (Chrome Plating NESHAP).

Detroit Chrome owns and operates a metal finishing job shop at its facility. Specifically, Detroit Chrome uses 7 chromium electroplating tanks to perform hard chrome plating for various metal parts.

Detroit Chrome was inspected on February 13, 1998, by a U.S. EPA inspector. Based on evidence from the inspection and other sources, Detroit Chrome violated the Chrome Plating NESHAP in the following ways:

(1) 40 C.F.R. §63.10(b)(1) requires the owner or operator of an affected source to maintain on-site compliance records representing the most recent two years of the source's operation, at a minimum. As of March 16, 1998, Detroit Chrome failed to maintain on-site compliance records. This is a violation of 40 C.F.R. §63.10(b)(1).

(2) 40 C.F.R. §63.342(f)(3) requires the owner or operator of an affected source to write an operation and maintenance plan, containing certain information, for its chrome plating facility. As of February 13, 1998, Detroit Chrome failed to write a complete operation and maintenance plan for its chrome plating facility. Specifically, the plan had no procedure for identifying malfunctions, or for implementing actions to correct malfunctions. This is a violation of 40 C.F.R. §63.342(f)(3).

(3) 40 C.F.R. §63.344(a) requires the owner or operator of an affected source to produce a performance test report, containing certain information. Detroit Chrome's chromium emissions performance test reports for performance tests conducted on April 4 and 20, 1997, and March 18, 1998, are incomplete. Specifically, each report did not include a brief process description, or quality assurance procedures and results. This is a violation of 40 C.F.R. §63.344(a).

(4) 40 C.F.R. §63.344(c) requires the owner or operator of an affected source to conduct a performance test in accordance with one of a number of listed methods, one of which is Method 306A, 40 C.F.R. Part 63, Appendix A (Method 306A). Detroit Chrome's chromium emissions performance test reports dated April 7 and 29, 1997, and March 28, 1998, state that the performance tests were conducted in accordance with Method 306A. However, the actual test method used was inconsistent with procedures required by Method 306A in the following ways: (a) no procedure used to determine the location of traverse points within the stack, (b) no velocity pressure traverse was performed to determine the time the probe should spend at each traverse point, (c) no cyclonic flow check was performed, (d) the first impinger bottle in the sampling train was filled with an incorrect amount of sodium hydroxide, (e) an incorrect number of mason jars was used in the sampling train, and (f) there was no train leak check procedure performed. These discrepancies are violations of 40 C.F.R. §63.344(c).

(5) 40 C.F.R. §63.347(d)(1) requires the owner or operator of an affected source to submit a notice of intent to perform a performance test at least 60 calendar days before the test begins. Detroit Chrome submitted a March 4, 1997, notice to the Michigan Department of Environmental Quality for a test conducted on April 4, 1997. This notice was not sent at least 60 days in advance for the April 4, 1997 test. Also, the notice notified of a surface tension test rather than a performance test. These are violations of 40 C.F.R.

§63.347(d)(1).

(6) 40 C.F.R. §63.347(f)(2) requires the owner or operator of an affected source to submit the results of a performance test no later than 90 days following the completion of the test. Detroit Chrome failed to submit results of performance tests conducted on April 4 and 20, 1997, within 90 days following the completion of each test. This is a violation of 40 C.F.R. §63.347(f)(2).

11/23/98
Date

FOR
Stephen Rothblatt, Acting Director
Air and Radiation Division