UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 2 6 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gary D. Jensen
Vice President, Operations
Ultra Plating Corporation
345 South Pearl Street
Green Bay, Wisconsin 54303

Dear Mr. Jensen:

The U.S. Environmental Protection Agency has determined that Ultra Plating Corporation's facility at 345 South Pearl Street, Green Bay, Wisconsin, (facility) has violated 40 C.F.R. Part 63, Subpart N, the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (Subpart N), and 40 C.F.R. Part 63, Subpart WWWWWW, the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations (Subpart WWWWWW), promulgated pursuant to Section 112 of the Clean Air Act (CAA or Act). A list of the requirements violated is provided below. We are today issuing to you a Finding of Violation (FOV) for these violations.

Section 113 of the CAA gives us several enforcement options to resolve these violations, including: issuing an administrative compliance order, issuing an administrative penalty order, bringing a judicial civil action and bringing a judicial criminal action.

We are offering you the opportunity to request a conference with us about the violations alleged in the FOV. A conference should be requested within 10 days following receipt of this notice and held within 30 days following receipt of this notice. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply and the steps you will take to prevent future violations. Please plan for your facility's technical and management personnel to take part in these discussions. You may have an attorney represent and accompany you at this conference.

The EPA contact in this matter is Virginia Galinsky. You may call her at (312) 353-2089 if you wish to request a conference. EPA hopes that this FOV will encourage Ultra Plating's compliance with the requirements of the CAA.

Sincerely,

George T. Czerniak
Director
Air and Radiation Division

cc: William Baumann, Chief, Compliance and Enforcement Section, WDNR

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	
Ultra Plating Corporation	)	**FINDING OF VIOLATION**
Green Bay, Wisconsin	)	
	)	
	)	**EPA-5-14-WI-01**
Proceedings Pursuant to	)	
the Clean Air Act	)	
42 U.S.C.§ § 7401 *et seq.*	)	

FINDING OF VIOLATION

Ultra Plating Corporation (Ultra Plating) owns and operates a plating facility at 345 South Pearl Street, Green Bay, Wisconsin (facility). The facility includes, among other things, eight hard chrome plating tanks, three nickel plating tanks and one cadmium plating tank.

The U.S. Environmental Protection Agency is sending this Finding of Violation (FOV) to notify you that we have found violations of the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 C.F.R. Part 63, Subpart N), and the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations (40 C.F.R. Part 63, Subpart WWWWWW).

Regulatory Authority

The Clean Air Act

1. Section 112 (a)(1) of the CAA, 42 U.S.C. § 7412(a)(1), defines "major source" as "any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants." *See* also 40 C.F.R. § 63.2.

2. Section 112 (a)(2) of the CAA, 42 U.S.C. § 7412(a)(2), defines "area source" as "any stationary source of hazardous air pollutants that is not a major source." *See* also 40 C.F.R. § 63.2.

3. Section 112(b) of the CAA, 42 U.S.C. § 7412(b), as revised in 61 Fed. Reg. 30816 (June 18, 1996), lists 188 Hazardous Air Pollutants (HAPs) that cause adverse health or environmental effects.

4. Section 112(d)(1) of the CAA, 42 U.S.C. § 7412(d)(1), requires the Administrator to promulgate regulations establishing emissions standards for each category or subcategory of major and area sources of HAPs, listed for regulation pursuant to subsection (c) and (e) of Section 112. These standards are known as National Emissions Standards for the Regulation of Hazardous Air Pollutants (NESHAPs).

5. Section 112(d)(2) of the CAA, 42 U.S.C. § 7412(d)(2), of the Act requires that emission standards promulgated under Section 112(d)(1) require "the maximum degree of reduction in emissions of the HAP . . . that the Administrator, taking into consideration the cost of achieving such emission reduction, and any nonair quality health and environmental impacts and energy requirements, determine is achievable for new or existing sources in the category or subcategory to which such emission standard applies." These are known as Maximum Achievable Control Technology (MACT) standards.

6. Section 112(d)(5) of the CAA, 42 U.S.C. § 7412(d)(5), allows the Administrator to elect to promulgate standards or requirements for area sources which provide for the use of generally available control technologies or management practices by such sources to reduce emissions of hazardous air pollutants.

7. Section 112(i)(1) of the CAA, 42 U.S.C. § 7412(i)(1), prohibits the operation of an existing source in violation of the standards, limitations or regulations promulgated under Section 112.

40 C.F.R. Part 63, Subpart A

8. On March 16, 1994, EPA promulgated the General Provisions for the Part 63 NESHAP standards at 40 C.F.R. Part 63, Subpart A, §§ 63.1 - 63.15. 59 Fed. Reg. 12408.

9. 40 C.F.R § 63.4(a)(1) prohibits the owner or operator subject to Part 63 from operating any affected source in violation of the requirements of Part 63.

10. 40 C.F.R § 63.4(a)(2) prohibits the owner or operator subject to Part 63 from failing to keep records, notify, report, or revise reports as required under Part 63.

11. 40 C.F.R § 63.6(e) provides that "[a]t all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions....Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in paragraph (e)(3) of this section), review of operation and maintenance records, and inspection of the source."

12. 40 C.F.R § 63.9(b)(1) requires the submission of an Initial Notification when an affected source becomes subject to a relevant standard. For an affected source that has an initial startup before the effective date of a relevant standard under this part, the notification shall be submitted not later than 120 calendar days after the effective date of the relevant standard.

13. 40 C.F.R § 63.9(h) requires the submission of a Notification of Compliance Status. The Notification of Compliance Status must include, among other things, "a description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method)."

14. 40 C.F.R § 63.9(j) provides that "[a]ny change in the information already provided under this section shall be provided to the Administrator in writing within 15 calendar days after the change."

40 C.F.R. Part 63, Subpart N

15. On January 25, 1995, EPA promulgated the NESHAP for Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks at 40 C.F.R. Part 63, Subpart N, §§ 63.340 - 63.347 (Subpart N). 60 Fed. Reg. 4963. The Subpart has been subsequently amended. The amendments relevant to this FOV are 68 Fed. Reg. 37347, 69 Fed. Reg. 42894, and 77 Fed. Reg. 58242.

16. 40 C.F.R § 63.340 identifies owners or operators of chromium electroplating or chromium anodizing tanks at facilities performing hard chromium electroplating, decorative chromium electroplating, or chromium anodizing as being subject to Subpart N.

17. 40 C.F.R. § 63.341 defines "small, hard chromium electroplating facility" to mean a facility that performs hard chromium electroplating and has a maximum cumulative potential rectifier capacity less than 60 million amp-hours per year.

18. 40 C.F.R. § 63.341 defines "open hard chromium electroplating tank" to mean a chromium electroplating tank that is ventilated at a rate consistent with good ventilation practices for open tanks.

19. 40 C.F.R. § 63.342(a)(1) provides that "[a]t all times, each owner or operator must operate and maintain any affected source subject to the requirements of this subpart, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the owner or operator to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and

maintenance procedures, review of operation and maintenance records, and inspection of the source."

20. 40 C.F.R. § 63.342(b)(1) provides that "[e]ach owner or operator of an affected source subject to the provisions of this subpart shall comply with these requirements in this section on and after the compliance dates specified in § 63.343(a). All affected sources are regulated by applying maximum achievable control technology."

21. 40 C.F.R. § 63.342(f) provides that the work practice standards of 40 C.F.R. § 63.342(f) apply to owners and operators subject to the standards of 40 C.F.R. § 63.342(c) and (d).

22. 40 C.F.R. § 63.342(f)(1)(i) provides that "[a]t all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices."

23. 40 C.F.R. § 63.342(f)(1)(ii) provides that "[m]alfunctions shall be corrected as soon as practicable after their occurrence."

24. 40 C.F.R. § 63.342(f)(3)(i) requires owners or operators of affected sources subject to the work practice requirements of 40 C.F.R. § 63.342(f) to prepare an operation and maintenance plan. The plan must:

    a. specify the operation and maintenance criteria for the affected source, the add-on air pollution control device, if one is used, the process and control system monitoring equipment, and include a standardized checklist to document the operation and maintenance of the equipment;
    b. incorporate the work practice standards for each device or monitoring equipment as identified in Table 1 of Subpart N that is listed in Table 1;
    c. specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
    d. include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions; and,
    e. include housekeeping procedures as specified in Table 2 of Subpart N.

25. The Housekeeping Practices set forth in Table 2 of 40 C.F.R. § 63.342 include the following:

For	You must:	At this minimum frequency
6. All buffing, grinding, or polishing operations that are located in the same room as chromium	Separate the operation from any affected electroplating or anodizing operation by installing a physical	Prior to beginning the buffing, grinding, or

electroplating or chromium anodizing operations	barrier; the barrier may take the form of plastic strip curtains	polishing operation.

26. 40 C.F.R. § 63.343(a)(8) provides that "[a]fter March 19, 2013, the owner or operator of an affected source that is subject to the standards in paragraphs § 63.342(c) or (d) shall implement the housekeeping procedures specified in Table 2 of § 63.342."

27. 40 C.F.R. § 63.343(b) provides that "[e]xcept as provided in paragraphs (b)(2) and (b)(3) of this section, an owner or operator of an affected source subject to the requirements of this subpart is required to conduct an initial performance test as required under § 63.7, using the procedures and test methods listed in §§ 63.7 and 63.344." Paragraphs (b)(2) and (b)(3) provide that an owner or operator of a hard chromium electroplating tank that uses a wetting agency and complies with the surface tension requirements of 40 C.F.R. § 63.342(c)(1)(iii), (c)(2)(iii), or (d)(2) as demonstrated through the continuous compliance monitoring required by paragraph (c)(5)(ii), is exempt from conducting an initial performance test.

28. 40 C.F.R. § 63.343(c) provides that "[t]he owner or operator of an affected source subject to the emission limitations of this subpart shall conduct monitoring according to the type of air pollution control technique that is used to comply with the emission limitation. The monitoring required to demonstrate continuous compliance with the emission limitations is identified in this section for the air pollution control techniques expected to be used by the owners or operators of affected sources."

29. 40 C.F.R. § 63.343(c)(1)(i) provides that "[d]uring the initial performance test, the owner or operator of an affected source, or a group of affected sources under common control, complying with the emission limitations in § 63.342 through the use of a composite mesh-pad system shall determine the outlet chromium concentration using the test methods and procedures in § 63.344(c), and shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in § 63.344(d)(5). An owner or operator may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliant value the average pressure drop measured over the three test runs of one performance test and accept [plus or minus] 2 inches of water column from this value as the compliant range."

30. 40 C.F.R. § 63.343(c)(1)(ii) provides that "[o]n and after the date on which the initial performance test is required to be completed under § 63.7... the owner or operator of an affected source, or group of affected sources under common control, shall monitor and record the pressure drop across the composite mesh-pad system once each day that any affected source is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within [plus or minus] 2 inches of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests."

31. 40 C.F.R. § 63.343(c)(5)(i) requires owners or operators using a wetting agent-type or combination wetting-agent type/foam blanket fume suppressant to comply with the emission limitations of § 63.342 to determine the outlet chromium concentration during the initial performance test using the procedures specified in § 63.344(c), and establish as the site-specific operating parameter the surface tension of the bath using Method 306B, appendix A, setting the maximum value that corresponds to compliance with the applicable emissions limitation. The owner or operator may also accept 45 dynes/cm measured using a stalagmometer or 35 dynes/cm measured using a tensiometer as the maximum surface tension value that corresponds to compliance with the applicable emission limitation. However, the owner or operator is exempt from conducting a performance test only if the criteria of paragraph (b)(2) of this section are met.

32. 40 C.F.R. § 63.343(c)(5)(ii) requires owners or operators using a wetting agent to comply with the emission limitations in § 63.342 to monitor the surface tension of the electroplating bath once every 4 hours with a stalagmometer or a tensiometer to demonstrate compliance with the site-specific operating parameter set pursuant to 40 C.F.R. § 63.343(c)(5)(i).

33. 40 C.F.R. § 63.343(c)(7) identifies requirements for owners or operators using a fume suppressant and add-on control device to comply with the emission limitations of § 63.342. If both the fume suppressant and add-on control device are necessary to comply with the applicable emission limit, the owner or operator is required to conduct monitoring and comply with the work practice standards for each of the control techniques used. If only one of the techniques is needed to comply with the applicable emission limit, the owner or operator is only required to conduct monitoring and comply with the work practice standards for the control technique that is used to achieve compliance.

34. 40 C.F.R. § 63.346(b)(1) provides that "[t]he owner or operator of an affected source subject to the provisions of this subpart shall maintain the following records for such source…inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of § 63.342(f) and Table 1 of § 63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection."

40 C.F.R. Part 63, Subpart WWWWWW

35. On July 1, 2008, EPA promulgated the NESHAP for Area Source Standards for Plating and Polishing Operations at 40 C.F.R. Part 63, Subpart WWWWWW, §§ 63.11504 - 63.11513 (Subpart WWWWWW). 73 Fed. Reg. 37741. The Subpart has been subsequently amended (76 Fed. Reg. 57919).

36. Subpart WWWWWW applies to owners and operators of plating and polishing facilities that are area sources of hazardous air pollutant (HAP) emissions, that use or have emissions of compounds of one or more plating and polishing metal HAP, and that are engaged in one or more of the following processes: electroplating other than chromium electroplating, electroless or non-eletrolytic plating, other non-electrolytic metal coating processes, dry mechanical polishing of finished metals and formed products after plating or thermal spraying, electroforming and electropolishing. 40 C.F.R. § 63.11504

37. 40 C.F.R. § 63.11507(d) provides that if you own or operate an affected new or existing electroplating tank that uses cyanide in the plating bath, operates at pH greater than or equal to 12, and contains one or more of the plating and polishing metal HAPs, you must measure and record the pH of the bath upon startup of the bath.

38. 40 C.F.R. § 63.11508(a) provides that if you own or operate an affected source under Subpart WWWWWW, you must submit a Notification of Compliance Status in accordance with 40 C.F.R. § 63.11509(b).

39. 40 C.F.R. § 63.11508(c)(7)(i) provides that if you own or operate an affected tank that contains one or more of the plating and polishing metal HAPs, uses cyanide in the bath, and is subject to the management practices specified in § 63.11507(d), you must report in your Notification of Compliance Status the pH of the bath solution that was measured at startup.

40. 40 C.F.R. § 63.11509(a) provides that if you own or operate an affected source under Subpart WWWWWW, you must submit an Initial Notification no later than 120 calendar days after July 1, 2008. The Initial Notification must include general information about the facility and must include a description of the compliance method for each affected source.

41. 40 C.F.R. § 63.11511 defines "startup of the tank bath" as "when the components or relative proportions of the various components in the bath have been altered from the most recent operating period. Startup of the bath does not include events where only the tank's heating or agitation and other mechanical operations are turned back on after being turned off for a period of time."

Factual Background

42. Ultra Plating owns and operates a plating facility located at 345 South Pearl Street, Green Bay, Wisconsin. The facility consists of nine hard chrome electroplating tanks, two sulfamate nickel plating tanks, one bright nickel plating tank, one electroless nickel plating tank, one nickel strike tank, one chromate conversion coating tank and one cadmium plating tank.

43. Ultra Plating has a maximum cumulative potential rectifier capacity for chromium electroplating that is greater than 60 million amp-hours per year, making it a large, hard chromium plating facility as that term is defined at 40 C.F.R. § 63.341.

44. In May and June of 1997, Ultra Plating conducted a performance test pursuant to 40 C.F.R. § 63.343(b). Ultra Plating reported that the 1997 testing is the only performance testing it has ever conducted.

45. On August 25, 1997, Ultra Plating submitted a Notification of Compliance Status pursuant to Subparts A and N. The Notification of Compliance Status reported that all of the chromium electroplating tanks at the facility were controlled by mesh pads and that the relevant operating parameter for each was the pressure drop.

46. In a letter to the Wisconsin Department of Natural Resources on April 29, 2003, Ultra Plating stated that the pressure drops during the June 1997 initial performance test were as follows:

Stack	Tank	Pressure Drop (inches of water)
C01	P01	5.6
C02	P02 + P03	6.5
C03	P04	6.0
C04	P05	5.4
C05	P06 + P07	2.5
C06	P08 + P09	4.0

47. A review of Ultra Plating's pressure drop records from January 1, 2010 through July 31, 2013, shows that Ultra Plating operated its scrubbers outside the required range (the pressure drop during the initial performance test, plus or minus 2 inches of water) on 45 days. Many of these seem to be a single malfunction that lasted for multiple days:

Tank	Date	Pressure Drop (inches of water)	Notes
T1+T2 (C02)	2-Jun-10	9	Possible moisture in line
	3-Jun-10	9	
	4-Jun-10	9	
	7-Jun-10	10.5	
	8-Jun-10	10.5	
	28-Jan-13	0	Ice in airline
	29-Jan-13	0	
	30-Jan-13	0	
	31-Jan-13	0	
	1-Feb-13	0	
Silos (C05)	17-Nov-10	4.6	
	18-Nov-10	4.6	

	19-Nov-10	4.6	
	22-Nov-10	4.6	
	23-Nov-10	4.6	
	24-Nov-10	4.6	
	25-Nov-10	4.6	
	26-Nov-10	4.6	
	29-Nov-10	4.6	
	30-Nov-10	4.6	
	12-Dec-11	6	Air tubes and magnehelic full of water
	13-Dec-11	6	
	11-Jul-12	4.6	
	12-Jul-12	4.6	
	13-Jul-12	4.6	
	16-Jul-12	4.6	
	17-Jul-12	4.6	
	18-Jul-12	4.8	
	19-Jul-12	4.8	
	20-Jul-12	4.8	
	5-Dec-12	4.6	
	7-Dec-12	4.6	
	10-Dec-12	4.6	
	11-Dec-12	4.6	
	12-Dec-12	4.6	
	13-Dec-12	4.6	
	14-Dec-12	4.6	
	17-Dec-12	4.6	
	18-Dec-12	4.6	
	19-Dec-12	4.6	
	20-Dec-12	4.8	
	21-Dec-12	4.8	
	26-Dec-12	4.6	
	27-Dec-12	4.8	
	28-Dec-12	4.8	

48. Ultra Plating reported that on May 27, 2010, the ductwork from the horizontal chromium plating tank (C01) to its fume scrubber was hit by the hoist, causing a hole in the ductwork. Ultra Plating stopped taking pressure drop readings and commenced use of a fume suppressant to control emissions. On June 25, 2013, Ultra Plating stopped using the fume suppressant in the horizontal chromium plating tank because it was working on repairing the ductwork.

49. Ultra Plating reported that it does not take surface tension measurements at any of its plating tanks. It reported that, on two occasions, it had samples of the horizontal chromium plating tank bath analyzed in a lab and received surface tension measurements from those analyses.

50. In response to a request for the operation and maintenance plan required by 40 C.F.R. § 63.342(f)(3), Ultra Plating submitted the Operation and Maintenance Manual for the Enforcer III scrubber. This manual does not include the housekeeping procedures as specified in Table 2 of Subpart N. The Manual includes a maintenance checklist and, in a separate section, it specifies that:

    a. spray headers should be checked weekly for proper spray pattern; and,
    b. mesh pads should be checked monthly for chrome buildup or separation of pad from retainer;

51. Ultra Plating's maintenance records demonstrate that it conducts quarterly maintenance using its maintenance checklist. However, it does not keep a record for each fume scrubber separately. It does not have records demonstrating that it does weekly checks of the spray headers or monthly checks of the mesh pads, as recommended by the manufacturer in the Operation and Maintenance Manual.

52. On March 18, 2013, EPA conducted an on-site inspection of Ultra Plating's facility. During the inspection, EPA observed that there was at least one buffing process in the same room as the horizontal chromium plating tank (C01). There was no physical barrier in place between the buffing process and the chromium plating tank. In August 2013, Ultra Plating indicated that it had ordered a barrier and would install it.

53. On March 21, 2013, Ultra Plating submitted a document titled "Initial Notification...Subpart WWWWWW." The Initial Notification identified the facility address, contact person and phone number, a list of affected sources, the plating and polishing metal HAP used in, or emitted by, those sources, and the description of the compliance method for each affected source.

54. Ultra Plating has not submitted a Notification of Compliance Status that includes methods used to comply with the applicable management practices and equipment standards, a statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements, or the pH of the cadmium plating tank upon initial startup.

55. In response to a request for the pH measurement that was taken upon initial startup of the cadmium tank bath, Ultra Plating provided records demonstrating the pH of tank bath for every quarter from 2009 through 2013. It did not provide a record demonstrating that the pH of the tank bath was measured upon startup of the tank, as required by 40 C.F.R. § 63.11507(d).

Violations

56. Ultra Plating has violated 40 C.F.R. §§ 63.6(e), 63.342(a)(1) and 63.342(f)(1)(i) by:

    a. Failing to inspect the spray headers weekly for proper spray pattern and the mesh pads monthly for chrome buildup or separation of pad from retainer;
    b. Failing to maintain the pressure drop across the composite mesh pad scrubbers within the required range of the pressure drop during the initial performance test, plus or minus 2 inches of water;
    c. Failing to repair the hole in the ductwork going from the horizontal chromium electroplating tank to the scrubber; and
    d. Discontinuing the pressure drop measurements for the scrubber because of use of a fume suppressant but not taking the surface tension measurements required when using a fume suppressant for control.

57. By failing to notify EPA when it commenced use of a fume suppressant at the horizontal chromium electroplating tank, Ultra Plating has violated 40 C.F.R. § 63.9(j).

58. By failing to maintain the pressure drop across the composite mesh pad scrubbers within the required range of the pressure drop during the initial performance test, plus or minus 2 inches of water, Ultra Plating has violated 40 C.F.R. §§ 63.342(a)(1) and 63.343(c)(1)(ii).

59. By failing to conduct a performance test of the horizontal chromium plating tank (C01) after it commenced use of a fume suppressant for emission control, Ultra Plating has violated 40 C.F.R. § 63.343(b) and 63.343(c)(5)(i).

60. By failing to conduct surface tension measurements every 4 hours when the horizontal chromium plating tank was using the fume suppressant in conjunction with the composite mesh pad filter, Ultra Plating has violated 40 C.F.R. § 63.343(c)(5)(ii).

61. By failing to address the pressure drop deviations as soon as possible, Ultra Plating has violated 40 C.F.R. § 63.342(f)(1)(ii).

62. By failing to include in its Operation and Maintenance Manual the housekeeping procedures as specified in Table 2 of Subpart N, Ultra Plating has violated 40 C.F.R. § 63.342(f)(3)(i).

63. By failing to implement the housekeeping procedures as specified in Table 2 of Subpart N, Ultra Plating has violated 40 C.F.R. § 63.343(a)(8).

64. By failing to identify the add-on air pollution control device inspected in its quarterly maintenance records, Ultra Plating has violated 40 C.F.R. § 63.346(b)(1).

65. By failing to measure the pH of the cadmium tank bath upon startup, Ultra Plating has violated 40 C.F.R. § 63.11507(d).

66. By failing to submit the Initial Notification within 120 days after July 1, 2008, Ultra Plating has violated 40 C.F.R. §§ 63.9(b) and 63.11509.

67. By failing to submit a Notification of Compliance Status by July 1, 2010, Ultra Plating has violated 40 C.F.R. §§ 63.11508(c)(7)(i) and 63.11509.

68. By violating the provisions of 40 C.F.R. Part 63, Subpart N and WWWWWW, as described in Paragraphs 58 – 69, above, Ultra Plating has violated 40 C.F.R §§ 63.4(a)(1) and (2) and 63.342(b)(1).

69. By violating the provisions of provisions of 40 C.F.R. Part 63, Ultra Plating has violated Section 112(i)(1) of the CAA, 42 U.S.C. § 7412(i)(1).

7/26/14
Date

George T. Czerniak
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Notice and Finding of Violation, No. EPA-5-14-WI-01, by Certified Mail, Return Receipt Requested, to:

Gary D. Jensen
Vice President Operations
Ultra Plating Corporation
345 South Pearl Street
Green Bay, Wisconsin 54303

I also certify that I sent copies of the Notice of Violation and Finding of Violation by first-class mail to:

William Baumann, Chief, Compliance and Enforcement Section
Wisconsin Department of Natural Resources
Bureau of Air Management
101 South Webster Street
P.O. Box 7921 (AMI7)
Madison, Wisconsin 53707-7921

Richard Wulk, Supervisor – North Team
Northeast Region
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, Wisconsin 54313-6727

On the 28 day of February 2014.

Loretta Shaffer
Administrative Professional Assistant
Planning and Administration Section

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7670 0399