



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Partial Compliance Evaluation Inspection Report

East Side Plating, Inc.
Portland, Oregon

Inspection Date: November 9, 2022

ELIZABETH
WALTERS

Digitally signed by ELIZABETH
WALTERS
Date: 2023.01.18 13:52:50 -08'00'

Report Author Signature

Date

Elly Walters
CAA/TRI Enforcement Officer
EPA Region 10

SARA CONLEY

Digitally signed by SARA CONLEY
Date: 2023.01.18 13:55:24 -08'00'

Peer Review Signature

Date

Sara Conley
CAA Enforcement Officer
EPA Region 10

DERRICK TERADA

Digitally signed by DERRICK
TERADA
Date: 2023.01.18 14:09:26 -08'00'

Section Chief Signature

Date

Derrick Terada
ATES Section Chief
EPA Region 10

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Attachments

Attachment 1.....	EPA Region 10 Digital Image Log
Attachment 2.....	East Side Plating E-mail Updates

1. Basic Facility and Inspection Information

Facility: East Side Plating
8400 SE 26th Pl
Portland, OR 97202

AFS/FRS Number: 110000487125

SIC: 3471 (Plating and Polishing)

NAICS: 332813 (Electroplating, plating, polishing, anodizing, and coloring)

Permit Number: AQGP-026a (General Air Contaminant Discharge Permit for Plating and Polishing Operations)
AQGP-002 (General Air Contaminant Discharge Permit for Decorative Chromium Electroplating Tanks)
AQGP-029 (General Air Contaminant Discharge Permit for Small Metal Fabrication and Finishing Operations)

Facility Contacts: Scott Henriksen
Process Engineering/EHS Manager
East Side Plating, Inc.
scotth@eastsideplating.com

U.S. EPA Inspector: Elly Walters
Air and Toxics Enforcement Section (ATES)
Enforcement and Compliance Assurance Division (ECAD)
U.S. EPA Region 10
1200 Sixth Ave.
Seattle, WA 98101-3188
(206) 553-6317
walters.elizabeth@epa.gov

ODEQ Inspectors: Elaine Go
Natural Source Specialist 3
elaine.go@deq.oregon.gov

Chris Moore
Permit Writer and Inspector
chris.moore@deq.oregon.gov

Tula Morales
Natural Resource Specialist I
tula.morales@deq.oregon.gov

East Side Plating, Inc.

Date of Inspection: November 9, 2022

Inspection Start/End Times: 8:45 AM to 10:50 AM

Inspection Notice: This was an unannounced inspection.

This was a Clean Air Act (“CAA”) compliance inspection by the Environmental Protection Agency (EPA). I led the CAA inspection. I also coordinated with the regulatory state air agency, Oregon Department of Environmental Quality (“ODEQ”), and Inspector Go, Moore and Morales participated in the inspection. This was a follow-up inspection to the July 13, 2022 EPA inspection. This inspection’s main objective was to identify and photograph each plating tank subject to the National Emissions Standards for Hazardous Air Pollutants (“NESHAP”) subpart WWWWWW (“6W”) (Area Source Standards for Plating and Polishing Operations) and subpart N (Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks) as well as its CAA permits.

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection and from a subsequent records review. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

1. Facility/Process Description

The following facility description is based on information provided by a facility representative in the opening conference as well as a written response by the facility to the records requests.

East Side Plating (“ESP”) operates a plating and powder-coating facility located at 8400 SE 26th Pl in Portland, Oregon. ESP was originally incorporated in 1946 and purchased the 8400 SE 26th Pl location in the 1990’s. The facility has approximately 108 to 122 employees. The 8400 SE 26th Pl location is comprised of three plants (i.e., each building is considered an individual plant); Plant 1, Plant 2 and Plant 3. Until recently, ESP also operated two additional plants (Plant 4 and Plant 5) at other locations in Portland. Plant 5 was recently sold in December of 2021 and Plant 4 is in the process of sale, according to facility representatives.

The plants at this facility each have dedicated processes: Plant 1 contains the conveyor powder-coating process, Plant 2 contains all plating processes, and Plant 3 contains the wash line, booth powder-coating, blasting, and finishing processes. The facility services metal manufacturers in Northwestern United States and coats/plates a diverse mixture of products, including dental equipment, automotive parts and light fixtures.

2. Compliance History

Based upon a review of the Detailed Facility Report in EPA’s Enforcement and Compliance History Online (“ECHO”) database, there did not appear to be any formal or informal CAA enforcement actions at the facility over the past 5 calendar years.

3. Inspection Elements/Order

a. Pre-Inspection Observations

I went directly to the facility. I observed visible emissions from an open door on the north side of Plant 2 as we arrived.

b. Entry and Opening Conference

I arrived in the parking lot of Plant 1 of the facility at approximately 8:45 AM on Wednesday, November 9, 2022. I met Inspector Go, Moore and Morales (ODEQ) in the parking area and entered Plant 1 together. We were met by receptionists in the front office. We presented our inspector credentials, and I explained we were inspectors from U.S. EPA Region 10 and ODEQ and were conducting an unannounced CAA inspection. I asked if Mr. Scott Henriksen, Environmental Health and Safety Manager, was available and the receptionist contacted Mr. Henriksen. Mr. Henriksen met us in the front office and we then walked upstairs to a conference room. I began the opening conference at approximately 9:09 AM. I presented my inspector credentials to Mr. Henriksen. I explained that I was there at the facility to conduct a follow-up CAA inspection. I had previously inspected this facility on July 13, 2022 and was unable to fully inspect the plating lines at that time. I explained that this inspection would focus on identifying and photographing each plating tank that use or emit cadmium, chromium, lead, manganese, and nickel. I further explained that ODEQ was participating in this inspection as well and gave an overview of the inspection process.

We then had a discussion regarding several items or potential compliance concerns from the previous inspection. I asked Mr. Henriksen if the facility kept records of wetting agents and/or fume suppressants additions for the electrolytic nickel-plating tanks. Mr. Henriksen replied that the facility does not and that operators will add as needed throughout the day (referenced this as “blind adds”). We also had a discussion regarding ampere-hour meters for the electrolytic nickel-plating tanks. Mr. Henriksen explained that the facility had purchased and received the meters, but they were not installed yet. We also discussed tank covers and Mr. Henriksen stated that the facility was currently testing propylene balls for surface coverage. I told Mr. Henriksen that the propylene balls would likely not be considered a “tank cover” as defined in NESHAP subpart 6W and cautioned that those tanks may still have other control requirements (such as a tank cover, wetting agents/fume suppressants, and air pollution control equipment). Mr. Henriksen also stated that the facility does not do any flashing electroplating and does not use cyanide in its subparts 6W and N plating tanks. He added that the facility did have a cadmium cyanide plating tank in Plant 4 (located at a different facility owned and operated by East Side Plating), but that was discontinued in 2020.

The opening conference concluded at approximately 9:30 AM.

4. Facility Walk-Through

The walkthrough began at 9:40 AM. The digital photo log is Attachment 1 to this report. All tanks identified below were photographed, please refer to Attachment 1.

Inspector Go, Moore, Morales and I were escorted by Mr. Henriksen during the facility walkthrough. We walked over to Plant 2, which contains the plating lines. I observed a consistent haze in the room. Inspector Go and I did not experience nasal irritation as we had previously during the July 13, 2022 inspection. I first inspected the following tanks in Lines 24 and 26 (which are located in same area): TS-2621 Bright Chrome, TS-2631 TriChrome, TS-2619 Bright Nickel, TS-2633 Semi-Bright Nickel, TS-2630 Semi-Bright Nickel, TS-2634 Bright Nickel, TS-2416 Sulfamate Nickel, TS-2620 Nickel Strike, TS-2402 Passivate 400, TS-2417 Yellow Chromate, and TS-2404 Trivalent Chromate. I asked if the hoods above several plating tanks were operational and Mr. Henriksen replied that the exhaust was not currently operational. He explained that the hoods ventilate to outside of the building and were not connected to any air pollution control equipment. Mr. Henriksen added that the facility does own air pollution control equipment, but the equipment was not installed or in use. I also noted that the sump underneath Lines 24 and 26 was filled with significant amount of colored liquid (photos PB100395, PB100402 and PB100403). Mr. Henriksen explained that this due to hoses that were left running, submerged pipes that disconnected, and drag out from the plating tanks. In one area, the liquid was splashing onto the catwalk caused by an air leak according to Mr. Henriksen.

We then walked through Line 28. I inspected the following tanks in Line 28: TS-2816 EN Bath #1, TS-2818 EN Bath #2, TS-2817 EN Bath #3, TS-2819 EN Bath #4, TS-2831 EN Bath #5, TS-2821 Watts Nickel Strike, TS-2820 Teflon EN, and TS-2801 Bright Chrome Dip. I observed the propylene balls in TS-2816. We walked through Line 25 and I inspected the following tanks in Line 25: TS-2506 East #3 Satin Nickel, TS-2504 North #1 Satin Nickel, TS-2505 South #2 Satin Nickel, TS-2507 Bright Chrome, TS-2509 Clear Chromate and TS-2510 Trivalent Yellow Chromate. I observed a significant amount of colored liquid in the sump under Line 25. Mr. Henriksen was unsure of the exact cause but explained that they have to pump out this specific sump manually. Mr. Henriksen and I then had a discussion of the NESHAP subpart 6W standards and management practices, specifically minimizing spills and overflow of tanks as practicable (40 CFR 53.11507(g)(10)). I asked Mr. Henriksen when the facility had last pumped out the sumps and Mr. Henriksen was unsure.

We walked over to Line 21 (the hoist line). I inspected the following tanks in Line 21: TS-2109 Zinc Phosphate, TS-2111 Trivalent Yellow Chromate, TS-2102 Clear Chromate, and TS-2101 Phosphate Sealer. I also observed a significant amount of colored liquid in the sump under Line 21 from Line 22. We then walked through Line 22 and I inspected the following tanks: TS-2206 Bright Nickel, TS-2210 Heavy Zinc Phosphate, TS-2212 Clear Chromate, TS-2213 Trivalent Yellow Chromate, TS-2214 Trivalent Black Chromate, TS-2215 Black Chromate (hexavalent), and TS-2216 Yellow Chromate (hexavalent).

Plant 3 contains the Phosphate Line 33 and powder-coating processes. Mr. Henriksen escorted Inspector Go, Moore, Morales and I to Plant 3. I inspected the following tanks in Line 33: TS-3302 Clear Chromate and TS-3304 Zinc Phosphate.

The walkthrough ended at approximately 10:35 AM.

5. Closing Conference

At 10:35 AM, our group walked to a staff office in Plant 3 to discuss the inspection and conduct the closing conference. I led the closing conference and summarized the parts of the facility we had visited during the inspection and my observations related to CAA. I went through my inspection notes and described potential compliance concerns from the inspection. The following were identified as potential CAA compliance concerns during the closing conference:

1. At the July 13th inspection, information collected had indicated that TS-2404 did not contain or use chromium (a metal HAP). However, the tank name contained “chromate” which would also indicate that it contained or used a chromium compound. I asked Mr. Henriksen to review the SDS’s for that specific tank and to confirm whether or not it contained or used a metal HAP.
2. The facility’s general ACDP requires recordkeeping of ampere-hours for electrolytic nickel-plating tanks. Mr. Henriksen had explained earlier that the facility had purchased and received the ampere-hour meters but had not yet installed them. I asked Mr. Henriksen to please send an update via e-mail if those were installed.
3. I identified the liquid in the sumps under Lines 24 and 26 (these share the same sump), 25, and 22 as potential compliance concerns. I again explained the NESHAP subpart 6W standards and management practices, specifically minimizing spills and overflow of tanks as practicable (40 CFR 53.11507(g)(10)). I asked Mr. Henriksen to also send updates via e-mail if these areas were cleared.

The closing conference concluded at 10:50 AM.

6. Post Inspection

Mr. Henriksen provided several updates post-inspection:

1. On January 9, 2023, Mr. Henriksen provided an update on the sump under Lines 24 and 26 via e-mail (see Attachment 2). He explained that during the November 9th inspection, there was liquid in the sump and an air leak that caused the splashing. He provided photos of the sump and the method implemented to keep the sump pumped down. I responded asking for additional updates on the sumps under Lines 22 and 25, the ampere-hour meters for the nickel-plating tanks, and to confirm if tank TS-2404 did or did not contain or use a metal HAP.
2. On January 10, 2023, Mr. Henriksen responded to my e-mail and provided several updates (see Attachment 2). Mr. Henriksen explained that the sump for Line 25 was pumped down, but it cannot get as low as the other sumps (due to it being a temporary sump without a low spot to install a sump pump in) and that the facility’s pumps can only lower the liquid level to about 1” before losing their prime. Mr. Henriksen also wrote that the sump under Line 22 has not yet been completely emptied out – the facility was working to first empty the sump under Lines 24 and 26, and then would work on Line 22 next. Mr. Henriksen also provided on an update that three ampere-hour meters were installed in December and that they were installing two more that week. The facility had, at the time of Mr. Henriksen’s e-mail, installed ampere-hour meters on 7 of its 12 electrolytic nickel-plating tanks. Mr. Henriksen also confirmed that even though tank TS-2404 is named “Trivalent Chromate,” it does not actually contain or use any chromium compounds and provided the SDS.

3. On January 17, 2023, Mr. Henriksen provided an update on the sumps under Lines 22 and 25 (see Attachment 2). Mr. Henriksen provided updated photos of the sumps and the method being implemented to keep the sump for Line 22 pumped down.