



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Milwaukee Plating Company, Milwaukee, WI

FROM: Laura Steel, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Supervisor
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Milwaukee Plating Company

Facility Location: 1434 N. Vel R. Phillips Ave, Milwaukee, WI 53212

Date of Inspection: March 17, 2022

EPA Inspector(s):

1. Laura Steel, Environmental Engineer
2. Brittany Cobb, Environmental Engineer

Other Attendees:

1. Alfred Mattacotti, President
2. Brooke Smith, Office Manager
3. Christopher Lee, Plant Manager
4. Joe Ilielo, Environmental Consultant

Contact Email Address: nickel@milwaukeeplating.com

Purpose of Inspection: To determine compliance with the Clean Air Act

Facility Type: Nickel and hexavalent chrome electroplating and polishing facility

Regulations Central to Inspection: 40 CFR Part 63 Subpart N: National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (NESHAP Subpart N), 40 CFR Part 63 Subpart WWWW: National

Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, and any other applicable permits and regulations

Arrival Time: 9:20 AM CST

Departure Time: 10:45 AM CST

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet
- ☐ Small Business Resource Information Sheet not provided.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Alfred Mattacotti, Brooke Smith, Christopher Lee, and Joe Ilielo, unless otherwise noted.

Process Description:

Milwaukee Plating Company (Milwaukee Plating Co. or facility) conducts decorative chrome electroplating, nickel electroplating, and polishing. The facility plates diecast, copper, and leaded steel and polishes aluminum and diecast parts, as well as chrome and nickel-plated parts, with 360 grit pads. The facility performs both “flash” (short-term) electroplating and normal electroplating for a longer duration. Chrome plating takes approximately 1 to 3 minutes, and nickel plating takes approximately 15 to 45 minutes. Their process is comprised of four lines: 1) Tin and silver, 2) Zinc, 3) Nickel and chrome (automatic line), and 4) Copper, nickel, and tin (hand line). There are two hexavalent chrome and three nickel electroplating tanks, with an approximate capacity of 4,000 amp-hours/year total. Approximately 10 gallons per month of Trichloroethylene solution is used as a degreaser.

Wetting agents are used as the primary source of emission control for the chrome and nickel tanks, and a tensiometer is used to periodically check the surface tension in the chrome tanks. A custom-built packed bed scrubber is connected to the chrome tanks as an additional layer of emission control. The facility does not cover the nickel tanks when not in use.

Staff Interview:

Milwaukee Plating Co. operates from 6 AM to 11 PM, Monday through Friday and has 32 total employees. There have been no changes in ownership in the last 10 years. Surface tension is checked both by an analyst in an outside lab and in-house. There have been no changes in wetting agents in the past 4 years. An operator checks to ensure water is flowing within the scrubber as verification that it is working properly, but the facility does not record any

measurements. Visual inspections are completed 3 to 4 times per week, but no records are kept of these inspections. The scrubber filter is checked approximately once per month for metals, and these inspections have not been recorded for the past 2 years. The mist eliminator inside the scrubber is not inspected, and no performance tests have been completed on the scrubber. Annual compliance reports are completed biannually.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

The facility has containment systems around tanks that feed into on-site waste treatment. Nickel tanks were not covered or connected to the scrubber, and a strong odor near the nickel and chrome lines was noted. A distinct sweet smell was also noted in the plating area (not a typical acid/base smell). The trichloroethylene tank has its own containment, and it was stored in an unsealed, covered tank at an elevated temperature, as the solution was bubbling when observed. A pressure gauge on the side of the scrubber was read to be 0.8 inH₂O during the inspection.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during the inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Wisconsin DNR air permit
- Ongoing compliance status reports for chrome tanks for the past 4 years in accordance with NESHAP Subpart N, Section 63.347(g)(3)
- Performance tests for scrubbers/wetting agents completed in the past 4 years
- Safety data sheets for wetting agents, chrome and nickel baths, trichloroethylene solvent, and sandpaper
- Current O&M plan(s)
- Wetting agent log sheets for auto and manual additions for the past 4 years
- Surface tension measurements for the past 4 years
- Original records of tensiometer calibrations with the name of the person who took each reading for the past 4 years
- Initial notification for chrome tanks in accordance with NESHAP Subpart N, Section 63.347(c)
- Initial notification for nickel tanks in accordance with NESHAP Subpart 6W, Section 63.11509
- Annual certification of compliance reports for nickel tanks for the past 4 years in accordance with NESHAP Subpart 6W, Section 63.11509(c)

- Records of inspection/routine maintenance of the overall emission capture system and scrubber for the past 4 years
- Details on control system(s) for nickel baths

Concerns: It was noted to the company that trichloroethylene is a neurotoxin and that there are other options for degreasers.

DIGITAL SIGNATURES

Report Author: Steel, Laura Digitally signed by Steel,
Laura
Date: 2022.05.12
15:25:25 -05'00'

Section Supervisor: SARAH MARSHALL Digitally signed by
SARAH MARSHALL
Date: 2022.05.12
15:10:18 -05'00'

Facility Name: Milwaukee Plating Company

Facility Location: 1434 N. Vel R. Phillips Ave, Milwaukee, WI 53212

Date of Inspection: March 17, 2022

APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log

Contains Items Claimed as CBI – Non-Releasable

Facility Name: Milwaukee Plating Company

Facility Location: 1434 N. Vel R. Phillips Ave, Milwaukee, WI 53212

Date of Inspection: March 17, 2022

CONFIDENTIAL BUSINESS INFORMATION ATTACHMENT

Facility Name: Milwaukee Plating Company

Facility Location: 1434 N. Vel R. Phillips Ave, Milwaukee, WI 53212

Date of Inspection: March 17, 2022

All photos taken during the inspection.

Contains Items Claimed as CBI – Non-Releasable**Facility Name:** Milwaukee Plating Company**Facility Location:** 1434 N. Vel R. Phillips Ave, Milwaukee, WI 53212**Date of Inspection:** March 17, 2022**APPENDIX A: DIGITAL IMAGE LOG**

1. Inspector Name: Brittany Cobb	2. Archival Record Location: https://usepa-my.sharepoint.com/:f:/r/personal/cobb_brittany_epa_gov/Documents/Electroplating%20Milwaukee/Milwaukee%20Plating%20Co/Milwaukee%20Plating%20Company%20Photos?csf=1&web=1&e=fssfjm
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_1433.JPG	3/17/22 9:16 AM CST	Facility exterior
2	IMG_1434.JPG	3/17/22 10:02 AM CST	Electroplating tanks
3	IMG_1435.JPG	3/17/22 10:03 AM CST	Nickel wetting agent label
4	IMG_1436.JPG	3/17/22 10:04 AM CST	Chrome plating fume suppressant label
5	IMG_1437.JPG	3/17/22 10:05 AM CST	Electroplating tanks
6	IMG_1438.JPG	3/17/22 10:07 AM CST	Trichloroethylene tank
7	IMG_1439.JPG	3/17/22 10:08 AM CST	Trichloroethylene tank label
8	IMG_1440.JPG	3/17/22 10:09 AM CST	Trichloroethylene tank interior, 1
9	IMG_1441.JPG	3/17/22 10:09 AM CST	Trichloroethylene tank interior, 2
10	IMG_1442.JPG	3/17/22 10:18 AM CST	Scrubber monitoring window
11	IMG_1443.JPG	3/17/22 10:22 AM CST	Scrubber pressure drop gauge
12	IMG_1444.JPG	3/17/22 10:25 AM CST	Electroplating tanks