

B5830
MAWLT

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B583028332

FACILITY: AJAX METAL PROCESSING INC.		SRN / ID: B5830
LOCATION: 4651 BELLEVUE AVE, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: FRANK BORNO, PRESIDENT		ACTIVITY DATE: 01/06/2015
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection of metal coating lines		
RESOLVED COMPLAINTS:		

COMPLIANCE INSPECTION OF AJAX METAL PROCESSING INC., DETROIT

Inspector: Terseer Hemben (AQD)

Personnel Present: Mr. Dave Krause (General Manager), Rodney Burgess, (Plant Manager) and Tina Sakalas (Executive Administrator)

Company: Ajax metal processing Inc. (AMP)

4651 Bellevue Avenue, Detroit, MI 48207

SRN: B5830; ROP # MI-ROP-B5830-2009a (Under Operating Shield); FCE; Title V, Major Source

Date of Inspection: January 6, 2015

Facility Phone Number: 313-267-2100; ext 5012.; 313-267-2104 (Tina Sakalas)

INSPECTION NARRATIVE

I arrived at the Ajax facility on January 6, 2015, at 1330 hours. The purpose of visit was to conduct an annual compliance inspection of the metal processing and coating operation. Temperature at the hour was 18 F with wind speed 18 mph coming from the W. I was admitted into the conference hall by Mr. Dave Krause. Ms. Tina Sakalas joined us for a pre-inspection conference. We went over itemized agenda I organized for the inspection. We discussed the type of records that MDEQ-AQD needed to see and requested copies from AMP Inc. The Company indicated all records were electronically filed. I gave time extension for the Company to provide those records. Records were emailed on January 14, 2015.

Mr. Krause introduced me to the Plant Manager (Mr. Rodney Burgess) who walked with me through the plant for inspection of emission units. We inspected all the Emission Units listed in Renewable Operating Permit. Some of the units were not in operation at the time of the inspection. We observed that Ajax Metal processing maintained the use of permitted processes in running the metal finishing plant. The layout within the facility had been up kept with reference to previous inspections, and was maintained in a satisfactory manner. There was a wet spill on the floor in the Phosphating area. The manager explained the operators I saw working around the equipment in the unit were performing cleaning duties including washing the floor at the time of my visit. We held a post-inspection interview in the plant. The records requested by the AQD were sent to the AQD office on January 14, 2015.

COMPLAINT/COMPLIANCE HISTORY:

Ajax Metal processing Company was cited for odor and particulate matter (PM) violation in 2002 and was resolved through consent order. AMP has been operating in good standing.

OUTSTANDING LOV'S:

None

PROCESS DESCRIPTION:

The Ajax Metal Processing Company operates the following coating lines at the Bellevue Street-Detroit facility: Dip/Spin Paint line, Waste Water Treatment, Zinc Plating, Phosphate line, Chromate Plating, Heat Treatment furnace, Locking and Sealing, and Laboratory analysis. There are numerous plating tanks and solution-holding tanks, solid waste holding bins, and scrubbers associated with each process line. Ajax Metal processing facility offers clean and coat services on metal parts for Companies, such as Ford Motor Company, Fiat Chrysler, and General Motors. The rendered services include applications of both 3M, and Loctite adhesives and sealants. Ajax Metal Processing operates under the ROP# MI-ROP-B5830-2009a shield while the ROP renewal is in progress.

EQUIPMENT AND PROCESS CONTROLS:

Ajax Metal Processing Company provided updated process control equipment in the Scrubber system. The Company's information is filed in the records.

OPERATING SCHEDULE/PRODUCTION RATE:

Ajax Metal processing Inc. operates full three shifts covering 24 hours, through 7 days per week, and 365 days of the year. The Company has 40 employees working at this facility.

APPLICABLE RULES ROP permit# MI-ROP-B5830-2009a CONDITIONS:

The AMP operations were evaluated consistent with the ROP conditions. The following conditions were provided the basis:

Regulatory Rules

NESHAP/MACT: 40 CFR 63.3920(a)- Subpart M (Annual and Semiannual reporting)

State Rules: 205, 201, 213, 225, 2003, 2004, 901, 910...

ROP covering Process and Equipment

1. In compliance- AMP stated in writing there have been no changes at the facility in the last 12 months.
2. In compliance -AMP demonstrated the Malfunction Abatement Plan for the process was updated or maintained. AMP indicated the previously submitted MAP was still accurate. No changes had been made to the facility emission units.

Per FGLOCKSEAL

3. In compliance - AMP demonstrated the amount of VOC emissions from FGLOCKSEAL to the ambient air did not exceed 2000 lbs. per month based on calendar month from each individual coating line and the purge and clean-up operations associated with the line. [SC I.1]. Records of process covering the last 12 months indicated the highest emissions occurred in January and February, 2014 in the amount 1000 lbs. month [Exhibit#3, Pg. 1].
4. In compliance -AMP demonstrated the amount of VOC emissions from FGLOCKSEAL to the ambient air did not exceed 10 tpy based on 12 month rolling period as determined at the end of each calendar month from each individual coating line and the purge and clean-up operations associated with the line [SC I.2]. Records of process covering the last 12 months indicated the highest emission per 12 -month rolling time period was 5.2 tpy [Exhibit# 3, pg. 1].
5. In compliance - AMP demonstrated the amount of VOC emissions from FGLOCKSEAL to the ambient air did not exceed 30 tpy based on 12 month rolling period as determined at the end of each calendar month from all coating lines and all associated purge and clean-up operations at the stationary source-including combined emissions from any coating line covered by this permit, any permit issued pursuant to Rule 201, and any coating line exempt from requirement to obtain a permit pursuant to Rule 287 and/or Rule 290 [SC II.1]. The highest emission record per 12 month rolling time period was 18.5 tpy [Exhibit# 3].
6. In compliance - AMP demonstrated all waste coatings and reducers were captured, stored in closed containers, and disposed of in an acceptable manner in compliance with all applicable rules and

regulations [SC III.1]. Response stated all clean-up and production solvents were reused as process product additives [Cover Page 1 item# 5].

7. In compliance - AMP did not need to demonstrate permittee did not operate any spray coating process unless dry filters or a water curtain for particulate control was installed and operated properly [SC IV.1]. The AMP does not operate spray coating equipment.

8. In compliance - AMP demonstrated the coating application method used in the EU was a high volume-low pressure (HLVP) spray or equivalent technology with equal or better transfer efficiency. [SC IV.2]. The technology used for coating is the Flowcoat and dipspin.

9. In compliance - AMP demonstrated permittee determined the VOC emissions and VOC content in pounds per gallon of any coating, reducer or purge/clean-up solvent as applied or as received in accordance with 40 CFR Part 60 EPA method 25A or other EPA approved [SC V.1]. (Note you may determine the content of coating from manufacturer's formulation data). AMP's response indicated the facility used Manufacturer's formulation data (MSDS) to determine VOC content. Coating formulatory summary is listed in Exhibit 9 attached [Exhibit 9].

10. In compliance- AMP did not need to demonstrate permittee tested for VOC or emissions content within 60 days of any applicable request [SC V.2]. The condition was not applicable to AMP.

11. In compliance – AMP did not need to demonstrate that test results were submitted to the AQD Supervisor within 60 days following the last date of test results [SC V.3]. The condition was not applicable to AMP.

12. In compliance – AMP demonstrated the permittee maintained records in appropriate and acceptable format to DEQ-AQD:

(a) monthly record of purchase orders and invoices for all coatings, reducers, and purge/clean-up solvents [SC VI.1a]. Purchase order records of process materials covering the last 12 months are listed under Exhibit 12a.

(b) monthly record of the VOC content in pounds per gallon of all reducers and purge clean-up solvents, the usage rate in gallons and disposal records [SC VI.1b]. Records of VOC content per gallon for the last 12 months are listed under Exhibit 12b.

(c) monthly record of the VOC content in pounds per gallon of each coating and the usage rate in gallons [SC VI.1c]. Records of VOC in coatings used for the last 12 months are listed under Exhibit 12b.

(d) monthly and annual VOC emission rate calculations for each coating line in tons per month and tons per 12 month-rolling time period, using the method specified in Appendix 7 or other AQD approved method [SC VI.1d]. Records for the last 12 months are listed under the Exhibit 3b as in Question # 3.

(e) annual records based upon a 12-month rolling time period of the actual VOC emission rate in tons per year for all coating lines and associated purge/clean-up operations at the stationary source [SC VI.1e]. Records for the last 12 months are listed under Exhibit 3 as in Question# 3.

(f) Date and description of any modification or new installation of process or control equipment for the coating line [SC VI.1f]. Response from AMP indicated there were no changes to coating line equipment or process.

(g) Date and description of any coating change or replacement on the coating line [SC VI.1g]. Response submitted by AMP indicated no new coatings were added in the last 12 months [Cover Pg. item# 12g].

(h) Please demonstrate permittee maintained current listing of chemical composition of each coating, including the weight the weight percent of each component [SC VI.1h]. Records submitted indicated a copy of chemical composition listing provided under Exhibit# 9 as in Question# 3 and supported by MSDS on AQD file.

13. In compliance – AMP demonstrated permittee made prompt reporting of deviations pursuant to General conditions 21 and 22 of Part A [SC VII.1]. AMP stated there no deviations within the reporting period [Cover Pg. # 13].

14. In compliance – AMP demonstrated permittee submitted semiannual reporting of monitoring and deviations pursuant to General Conditions 23 of Part A; and post marked to reflect compliance with March 15 for reporting period schedules upon request from AQD as applicable [SC VII. 2]. Records logged in MACES under Report Received confirmed the affirmative response in [Cover Pg. # 14].

15. In compliance – AMP demonstrated permittee submitted Annual certification of compliance pursuant to General Conditions 19 and 20 Part A delivering by March 15 for the previous calendar [SC VII.3]. Response is same as in Question# 14].

16. In compliance – AMP demonstrated the exhaust gases from coating line were discharged unobstructed vertically upwards to the ambient air at exit points not less than one and one half times the building height from ground level [SC VIII.1]. Visual inspection confirmed the response from AMP [Cover Pg.# 16]

FGMACT

17. In compliance – AMP demonstrated the amount of Organic HAP emissions in FGMACT did not exceed 2.6 lbs. per gallon of coating solids based on 12-month rolling time period. [SC I.]. Records of process covering the last 12 months indicated the highest emission was 2.0 lbs. per gallon [Exhibit# 17].

18. In compliance – AMP demonstrated the permittee determined whether organic HAP emission rate was equal to or less than the applicable emission limits in 40 CFR 63.3891(a) through (c):

(a) compliant material option, (b) emission rate without add-on controls, and (c) emission rate with add-on controls option. Please include all coatings, thinners, and/or other additives, and cleaning materials used when determining the emission rate [SC 1.1]. AMP used emission rate without add-on control option for determining compliance with the Miscellaneous Metals Part Maximum Achievable Control Technology (MACT) [Exhibit 17 as in Question# 17].

19. In compliance – AMP demonstrated the permittee complied with any coating operation(s) using the compliant material option or the emission rate without add-on controls option with applicable emission limits in 40 CFR 63.3890 at all times [SC 1.2]. Compliance was demonstrated as listed in Exhibit 17 layout.

20. In compliance – AMP did not need to demonstrate each thinner and/or additive contains no organic HAP on continuous basis from each coating operation using compliant material option [SC II. 1]. Response submitted by AMP stated Ajax complied with the general use category for existing sources consistent with 40 CFR 63.3890(b)(1). [Exhibit 17].

21. In compliance - AMP demonstrated that each cleaning material contained no organic HAP on continuous basis from each coating operation using compliant material option [SC II.2]. AMP used the emission rate without add-on controls option. [Cover Pg. item# 21].

22. In compliance – AMP demonstrated permittee conducted an initial compliance reporting for initial compliance period according to 40 CFR 63.3941, 40 CFR 63.3951 or 40 CFR 63.3961 as applied [SC VI.1]. The response is same as in Item# 21.

23. In compliance – AMP demonstrated permittee kept all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931 [SC VI.2]. AMP submitted notification of compliance timely. The information is on file [Exhibit# 17].

24. In compliance - AMP demonstrated the permittee maintained at minimum the following records for each compliance period:

(a) a copy of each notification and report that was submitted to comply with subpart M, and documentation supporting each notification and report [SC VI.3a]. Semi-annual and annual reports were filed in MACES.

(b) a current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and /or other additive, and cleaning material, and the volume fraction of coating solids for each coating [SC VI.3b]. Records covering the last 12 months are listed in Exhibit # 9 as in Question# 9.

(c) a list of the coating operations on which each compliance option was used, and the beginning of and ending dates and times for each compliance option as used [SC VI.3c]. AMP stated all coating lines used the emission rate without add-on controls [Cover Pg. item# 25c].

(d) For the compliant materials option, the calculation of organic HAP content for each coating using equation 2 of 40 CFR 63.3941 [SC VI.3d]. Not applicable, AMP stated Ajax used emission rate without add-on control options [Cover Pg. item# 25d].

(e) For emissions rate without add-on controls option, the calculations of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using equation 1, 1A through 1C and 2 of 40 CFR 63.3951; and where applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(4); the calculation of the total volume of coating solids used each month using equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using equation 3 of 40 CFR 63.3951 [SC VI.3e]. Compliance with calculation method is highlighted in Exhibit# 17.

(f) The name and mass or volume of each coating, thinner and /or additive, and cleaning material used during each compliance period [SC VI.3f]. Compliance achievement was indicated in Exhibit 12b as in Question# 12.

(g) The mass and fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material was tracked by weight [SC VI.3g]. Compliance attainment was listed in Exhibit 9 as in Question# 9.

(h) The volume fraction of coating solids for each coating used during each compliance period [SC VI.3h]. Compliance attainment was indicated in Exhibit# 9 as in Question# 9.

(i) For either emission rate without add-on controls option, the density of each

Coating, thinner and/or other additive, and cleaning material used during each compliance period [SC VI. 3i]. Compliance attainment was indicated in Exhibit# 9 as in Question# 9.

(j) The information specific in 40 CFR 63.3930(h)(1) through (3), if an allowance was used in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951 (e)(4) [SC VI.3j]. AMP stated no allowance was used for waste solvent. All purge clean-up and production solvents were reused as process product additives.

(k) The date, time, and duration of each deviation, according to 40 CFR 63.3951 (a) through (g) [SC VI.3k]. The data was provided accordingly. No deviation were reported for MACT, Semi-Annual and Annual certification reports.

25. In compliance - AMP did not need to demonstrate for each coating used for the complainant coating option, permittee maintained continuous compliance with the emission limit in 40 CFR 63.3890, for each compliance period, using equation 2 of 40 CFR 63.3941 consistent with 40 CFR 63.3941 (a) [SC VI.4]. AMP used emission rate without Add-on controls option [Cover Pg. item# 26]

26. In compliance -AMP demonstrated for any coating operation or group of coating operations using the emission rate without add-on controls option, permittee maintained continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to 40 CFR 63.3951 (a) through (g) restricting MACT emission limit to 2.6 lb HAP per gallon[SC VI.5]. Compliance achievement is indicated in Exhibit# 17. HAP emissions amounted to 2.0 lb HAP per gallon.

27. In compliance- AMP demonstrated the permittee (a) promptly reported deviations pursuant to General Conditions 21 and 22 of Part A [SC VII.1]. AMP stated there were no deviations. The report is logged in MACES [Cover Pg. item# 28].

28. In compliance - AMP demonstrated permittee complied with semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A covering period from July 1 to December 31 by March 10, and period covering January 1 to June 30 by September 15 [SC VII.2]. AMP stated semiannual reports were submitted timely as filed in MACES [Cover Pg. item# 29].

29. In compliance- AMP demonstrated permittee complied with annual certification of compliance reporting to AQD office pursuant to General Conditions 19 and 20 of Part A by March 15 [SC VII.3]. AMP stated annual reports were submitted timely as logged in MACES [Cover Pg. item# 30].

30. In compliance - AMP did not need to demonstrate for the compliant material option if any coating used for any 12-month compliance period exceeded the applicable emission limit specified in 40 CFR 63.3890; or any thinner or cleaning material used contained any organic HAP, and permittee did not have to report the incident as deviation as specified in 40 CFR 63.3910 (c)(6) and 40 CFR 63.3920 (a)(5) [SC VII.4]. AMP stated Ajax does not use the emission rate without add-on control options [Cover Pg. item# 31]

31. In compliance - AMP demonstrated for the emission rate without add-on controls, if the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit specified in 40 CFR 63.3990, and permittee reported this as a deviation as specified in 40 CFR 63.3910 (c)(6) and 40 CFR 63.3920 (a)(6) [SC VII.5]. AMP stated no deviations occurred [Exhibit# 17].

32. In compliance – AMP demonstrated the permittee submitted the applicable notifications specified in 40 CFR 63.7(b), and (c), 63.8 (f)(4) and 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.3910 [SC VII.6]. AMP stated in confirmation with MACES' log that all required notifications were submitted [Cover Pg. item# 33]

33 In compliance – AMP demonstrated the permittee submitted all semiannual compliance reports specified in 40 CFR 63.3920(a) identifying each coating operations used corresponding to compliance option and any associated deviations from emission limitations in 40 CFR 63.3890 with a confirmation statement of compliance [SC VII.7]. AMP confirmed the semiannual reports had been submitted. The report is logged in MACES [Cover Pg. item# 34].

34. In compliance – AMP did not need to demonstrate permittee complied with all applicable provisions of the NESHAPs as specified in 40 CFR, Part 63, Subpart A and Subpart M for surface coating of Miscellaneous metal Parts and Products by initial compliance date [SC IX.1]. The initial notifications are on file.

FGPLATINGLINES

35. In compliance - AMP demonstrated permittee did not operate any plating line in FGPLATINGLINES unless the associated packed bed scrubber for the plating line was installed, maintained and operating properly consistent with MAP/PM specified in SC III.2 [SC III.1]. AMP stated the MAP for plating lines was followed. Pressure drop gauges and temperature indicators were working during the inspection.

36. In compliance - AMP demonstrated permittee submitted in March 2012 to the AQD office for review and approval a preventive maintenance/malfunction abatement plan (PM/MAP) that had been updated to include the new identification for each emission unit in FGPLATINGLINES; and the permittee did not operate any plating line in FGPLATINGLINES unless the approved PM/MAP or alternate plan was implemented. Response from AMP confirmed compliance.

37. In compliance- AMP kept and maintained daily chemical logs. AMP confirmed the recordkeeping practice. Records were provided at request.

38. In compliance-AMP demonstrated record maintenance using the following MAP procedures:

(a) Identification of the equipment and, if applicable, air cleaning device and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair [SC III.2(a)] The walk through the plant observed AMP's compliance with equipment identification.

(b) Description of the items or conditions to be inspected and frequency of the inspections or repairs [SC III.2(b)]. Walk through with Rodney Burgess facilitated explanation of inspection and frequency of inspections as daily event.

(c) Identification of the equipment and, if applicable, air-cleaning device, operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of these parameters and a description of the method of monitoring or surveillance [SC III.2(c)]. Scrubbers were visually

inspected for efficient operation. Inspection confirmed the correct pressure drops and temperature ranges.

(d) Identification of the major replacement parts should be maintained in inventory for quick replacement [SC III.2(d)].

(e) A description of the corrective procedures or operational changes that should be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits [SC III.2(e)]. AMP satisfied this requirement consistent with Cover Pg. item# 39 a-e.

39. In compliance –AMP demonstrated the parameters of the acid pickling tanks in FGPLATINGLINES did not exceed maximum concentration of Hydrochloric acid 17% by weight per maximum surface area of tank 39.1 sq. ft. at temperature maximum value 120 F [SC III.3.1]. Visual inspection confirmed all stacks were discharged unobstructed vertically upwards. AMP stated no changes were made to stacks.

40. In compliance- AMP demonstrated the permittee kept, in satisfactory manner, the following records for the FGPLATINGLINES:

(a) Written or electronic log of maximum monthly concentration of acid in the tank expressed as percent by volume of degrees baume HCL [SC VI.1(a)].

(b) Area of the acid tank in square feet [SC VI.1(b)].

(c) Temperature of the acid solution in the tank [SC VI.1(c)].

(d) Written or electronic log of the hours of operation [SC VI.1(d)].

(e) Corrective action taken upon failure of the following (i) the fans drawing vacuum on the acid, and (ii) the pumps circulating the scrubber water through the scrubber.[SC VI.1(e)]. Exhibit 42 confirmed the log of record keeping for temperature and associated pressures.

41. In compliance- Staff visually verified there was no change in stacks dimensions in confirmation with the information already on file [SC VII.1-11]:

SV006 has maximum diameter 21 inches and 38 feet in height.

1. SVSCRUB1 has maximum diameter 20 inches and 39 feet in height.
2. SVSCRUB3 has maximum diameter 20 inches and 39 inches in height.
3. SVSCRUB4 has maximum diameter 20 inches and 39 feet in height.
4. SVSCRUB11 has maximum diameter 20 inches and 38 feet in height.
5. SVSCRUB12 has maximum diameter 20 inches and 39 feet in height.
6. SVPLT1 has maximum diameter 38 inches and 31 feet in height.
7. SVPLT3 has maximum diameter 42 inches and 30 feet in height.
8. SVPLT4 has maximum diameter 46 inches and 31 feet in height.
9. SVPLT11 has maximum diameter 42 inches and 29 feet in height.
10. SVPLT12 has maximum diameter 42 inches and 29 feet in height.

FGRULE290

42. In compliance- AMP demonstrated each emission unit that emits only no carcinogenic volatile organic compounds or noncarcinogenic material which were listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1000 or 500 pounds per month respectively [SC I.1]. AMP stated the condition was not applicable.

43. In compliance - AMP demonstrated each emission unit that the total uncontrolled emissions of air contaminants were not more than 1000 or 500 pounds per month, respectively, and all the following criteria listed below were met consistent with Exhibit # 42 as in Question# 42:

(a) For noncacinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per

cubic meter, the uncontrolled or controlled emissions shall not exceed 1000 or 500 pounds per month, respectively [SC I.2a].

(b) For noncancerogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter, and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively [SC I.2b].

(c) For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions should not exceed 20 or 10 pounds per month, respectively [SC I.c].

(d) The emission unit should not emit any air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter [SC I.2d].

44. In compliance - AMP demonstrated the emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that were exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions were met:

(a) The particulate emissions were controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which was designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1000 pounds of exhaust gases and which did not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute [SC I.3a].

(b) The volatile emissions from emission unit were not more than 5 percent opacity in accordance with the methods contained in Rule 303 [SC I.3d]. AMP responded the condition was not applicable.

(c) The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, was more than 2.0 micrograms per cubic meter [SC I.3c]. AMP stated the condition was not applicable.

45. In compliance – AMP demonstrated permittee maintained records of the following information for each emission unit calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or an alternative format that is approved by the AQD District Supervisor-AMP provided illustrative data supporting the requirements in this condition [Exhibit # 42]:

(a) Records identifying each air contaminant that is emitted [SC VI.1a]. Exhibit# 42.

(b) Records identifying if each air contaminant is either controlled or uncontrolled [SC VI.1b]. Exhibit # 42.

(c) Records identifying if each air contaminant is either carcinogenic or non-carcinogenic [SC VI.1c]. Exhibit# 42.

(d) Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii) [SC VI.1d]. Exhibit# 42

(e) Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in the table and Rule 290 [SC VI.1e]. [Exhibit# 42]

46. In compliance- AMP demonstrated permittee maintained an inventory of each emission unit that was exempt pursuant to Rule 290 in which the following information was included:

(a) The permittee maintained a written description of each emission unit as it is maintained and operated throughout the life of the emission unit [SC VI.2a].

(b) For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), permittee maintained a written description of the control device, including the design control

efficiency and the designed exhaust gas flow rate [SC VI.2b]. Compliance was indicated in Exhibit# 42-Rule 290 records.

47. In compliance – AMP did not need to demonstrate for each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), permittee performed a monthly visible emission observation of each stack or vent during routine operating condition and kept a written record of the results of each observation [SC VI.3]. AMP stated the condition was not applicable

48. In compliance – AMP demonstrated permittee performed prompt reporting of deviations pursuant to general Conditions 21 and 22 of Part A [SC VII.1]. AMP stated there were no deviations.

49. In compliance – AMP demonstrated permittee made semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A to the AQD District Office by March 15, based on period July 1 to December 31, and by September 15 covering period January 1 to June 30 [SC VII.2]. AMP stated semiannual reports were timely submitted as confirmed in MACES log.

50. In compliance-AMP demonstrated permittee reported annual certification of compliance pursuant to general Conditions 19 and 20 of Part A by march 15 [SC VII.3]. AMP stated annual reports were timely submitted and logged in MACES.

Areas of Interest:

Inspection of equipment- Plating and coating equipment were inspected. The equipment worked in satisfactory manner. Equipment that was not manned was shut down.

Workshop-workshop arrangement was satisfactory I observed the aisles were straight and equipment were lined and anchored appropriately.

Plant floor practices - were satisfactorily maintained, however I observed wet spills around certain plating units. The Plant manager, Mr. Burgess, explained those areas were undergoing maintenance and cleaning. There were operators working in the areas.

General hygiene- the general hygiene of the plant was satisfactory.

Equipment performance- Equipment maintenance was satisfactory.

POLLUTANT EMISSIONS PER MAERS 2014 REPORT (TPY):

MAERS REPORT REVIEW:

The Ajax Metal Processing facility's 2014 MAERS is yet to be reviewed.

CONCLUSION

The evaluation of Ajax Metal Processing Inc. identified no violation during and after the inspection. The Company demonstrated high level compliance with permit condition requirements by reporting and filing deviation reports timely. The AMP currently operates under compliance conditions defined in the Renewal Operating permit# MI-ROP-B5830-2009 requirements. The information obtained during this inspection will be applied to assisting AMP for maintaining future compliance with environmental pollution control needs.

NAME

th

DATE

7/28/15

SUPERVISOR

JK