

B5830

MAJMA

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

B583051601

FACILITY: AJAX METAL PROCESSING INC.		SRN / ID: B5830
LOCATION: 4651 BELLEVUE AVE, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Krause Dave , General Manager		ACTIVITY DATE: 12/04/2019
STAFF: Todd Zynda	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: December 4, 2019 Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection

INSPECTED BY: Todd Zynda, AQD

PERSONNEL PRESENT: Dave Krause, General Manager; Alexandria Kline, Process and Environmental Engineer; Constantinos Loukeris, USEPA Region 5; Natalia Vazquez, USEPA Region 5

FACILITY PHONE NUMBER: (313) 267-2100

FACILITY WEBSITE: www.ajaxmetal.com

FACILITY BACKGROUND

Ajax Metal Processing Inc. (AMPI) is located at 4651 Bellevue, Detroit, Wayne County, Michigan. AMPI offers metal finishing services that include heat treating, plating, and application of locking and sealing materials onto metal fasteners, including nuts and bolts. The facility currently has 153 employees and operates three shifts, 24 hours a day, 7 days a week, depending on workload.

AMPI is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70 because the facility has a Potential to Emit (PTE) greater than 10 tons per year of Hazardous Air Pollutants (HAPs) from the coating lines. Pursuant to NESHAP regulations, AMPI is considered a Major Source. The facility does not have a PTE more than 100 tpy of criteria pollutants. AMPI operates equipment under the Renewable Operating Permit (ROP) No. MI-ROP-M5830-2015b.

PROCESS OVERVIEW

AMPI operates various processes including: a dip/spin paint line, an emergency generator (mothballed in place), flow coat process lines, zinc phosphating lines, plating lines, heat treating, boilers and hardening furnaces. Also, there are numerous plating tanks, solution-holding tanks and solid waste holding bins. The ROP for Ajax Metal Processing Inc. comprises 24 emission units (EU).

In ROP No. MI-ROP-B5380-2015b, the EUs are organized into five flexible groups (FG). FGLOCKSEAL and FGMACT contain the following EUs: EUL&OVENS, EULOCTITE1, EULOCKTITE2, EULOCKTITE3, EUWHEEL1, EUWHEEL2, EUWHEEL3, EUWHEEL4, EUDIPSPIN, EUDIPSPIN2. FGPLATINGLINES comprises 6 plating lines that consist of alkaline cleaning baths, hydrochloric acid pickling baths and zinc electroplating tanks (EUPLATING1, EUPLATING3, EUPLATING4, EUPLATING6, EUPLATING11, and EUPLATING12). FGBOILERMACT includes EUBOILER60HP, EUBOILER150HP, EUHARDENING1, EUHARDENING2, and EUENDO. FGRULE290 consists of any emission

unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290 (EUWAX, EUPHOS1, and EUPHOS2).

COMPLAINT/COMPLIANCE HISTORY

On October 11, 2019 an anonymous complaint regarding strong diesel/chemical odors and smoke from AMPI was forwarded to the AQD Detroit District Office from the United States Environmental Protection Agency (USEPA). A complaint investigation was conducted on October 11, 2019 and did not identify any odors or opacity coming from AMPI.

On August 7, 2018 an inspection of AMPI was conducted and the facility was determined to be in compliance with permit conditions and applicable federal and state regulations.

During September 18, 2008, August 27, 2010, July 29, 2013, and January 6, 2015 the facility was inspected and was determined to be in compliance with permit conditions and applicable federal and state regulations. On November 22, 2016 the facility was determined to be in noncompliance for installing rain caps on stacks SVDIPSPIN2-01 and 02 and failure to install flow meters on scrubbers. A violation notice was not issued for these items. On March 30, 2017, permit to install (PTI) No. 47-16A was issued for the installation of SVDIPSPIN2-01 and 02 with rain caps. The installation of flow meters on the scrubbers was not addressed and does not appear to be required.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING VIOLATION NOTICES

None

INSPECTION NARRATIVE

On December 4, 2019 the Michigan Department Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) inspector, Mr. Todd Zynda, conducted an inspection of AMPI at 4651 Bellevue, Detroit, Michigan. This inspection was conducted in conjunction with USEPA inspection of the facility (Constantinos Loukeris, USEPA Region 5 and Natalia Vazquez, USEPA Region 5). During the inspection Dave Krause, General Manager, and Alexandria Kline, Process and Environmental Engineer, provided information and a tour of facility operations relating to air quality permits. The inspection was conducted to determine the facility's compliance with Federal and State air quality regulations and ROP No. MI-ROP-B5830-2015b.

At 12:45 PM, Mr. Todd Zynda (AQD) and USEPA personnel entered the facility, stated the purpose for the inspection, and were greeted by Mr. Krause.

During the opening meeting the facility operations and MI-ROP-B5830-2015b conditions were discussed. During the opening meeting an inspection checklist outlining ROP requirements was discussed. AMPI stated that the records would be compiled and submitted. Records were provided via email on December 23, 2019 (see attached).

The facility inspection began with observation of some of the plating lines and associated

scrubbers. The facility provided a plant layout map identifying lines. After further correspondence with the facility, the below table cross references the ROP emission unit ID and the plant layout ID/work center.

Plant Layout	ROP EU	Work Center	Description
Line 1	EUPLATINGLINE1	23A	Zinc Nickel
Line 3	EUPLATINGLINE3	23B1	Zinc Alkaline
Line 4	EUPLATINGLINE4	23I	Tin Zinc
Line 6	EUPLATINGLINE6	23D1	Zinc Nickel
Line 7	EUPHOS1	43A	Zinc Phosphate
Line 8	EUPHOS2	23F	Pickle & Oil
Line 11	EUPLATINGLINE11	23A1	Zinc Nickel
Line 12	EUPLATINGLINE12	23E	Zinc Chloride

According to Mr. Krause the hydrochloric acid (HCl) concentration in the pickling tanks is typically 30% to 40% by volume of 20° Baume HCl and is measured once per shift. The HCl tanks are maintained at approximately 110 to 120 °F. Each plating line is equipped with its own individual scrubber. Each scrubber is equipped with a flow meter and was observed during the inspection as outlined below. During the inspection it was unclear what the units of measure were on the scrubber flow meters, but it is believed to be gallons per minute (gpm). This was later confirmed via an email on January 29, 2020 (see attached). There is an alarm (warning light) for water recirculation tank less than 20 gallons per minute per the Malfunction Abatement Plant (MAP). The MAP also indicates that a warning occurs for low feed water flow and low recirculation flow. The below table identifies scrubber flow (gpm) measurements during the inspection.

Plant Layout	ROP EU	Work Center	Description	Scrubber Flow Rate (gpm)
Line 1	EUPLATINGLINE1	23A	Zinc Nickel	33.8
Line 3	EUPLATINGLINE3	23B1	Zinc Alkaline	23.1
Line 4	EUPLATINGLINE4	23I	Tin Zinc	46.53
Line 6	EUPLATINGLINE6	23D1	Zinc Nickel	111.88
Line 7	EUPHOS1	43A	Zinc Phosphate	32.79
Line 8	EUPHOS2	23F	Pickle & Oil	35.03
Line 11	EUPLATINGLINE11	23A1	Zinc Nickel	71.22
Line 12	EUPLATINGLINE12	23E	Zinc Chloride	33.08

The facility inspection continued with observation of the heat treat furnaces. The facility operates two lines that have two furnaces per line. The furnaces for each line operate at approximately 1650 °F and 700 to 900 °F. Both heat treatment lines include an oil quench. The safety data sheet for the oil quench was provided as part of the previous inspection via email on August 29, 2018.

Following observation of the heat treatment lines, the lock and seal operations were observed. The facility operates four station wheels (EUWHEEL1 through EUWHEEL4) and 3 cable coaters (EULOCTITE1 through3). During the inspection the waste materials appeared to be stored properly.

Following observation of the lock and seal operations, the remaining plating lines and dip spin operations were observed.

The inspection concluded with observation of the facility boilers. The following information was recorded: HP150 – 8,277,000 Btu/hr, installation date 03/29/1989, HP60 – 251,100 Btu/hr, installation date 7/14/1986. The facility generator is also located in the same area as the boilers. The generator is no longer used and is mothballed in place. During the inspection, the generator did not appear to have recent use as several items were stored near or on the generator.

During the inspection, the stacks visible from ground level were observed. Stacks were not observed at roof level during the inspection. During the previous inspection, stacks were observed at roof level.

The inspection concluded with observation of the dip spin operations.

APPLICABLE RULES/PERMIT CONDITIONS

ROP No. MI-ROP-B5830-2015b

MI-ROP-B5830-2015b special conditions (SC) are listed as appropriate. For brevity, permit conditions and the language of federal and state rules have been paraphrased.

SOURCE-WIDE CONDITIONS

SC I.1, VI.1 and 2. **COMPLIANCE.** The 12-month rolling VOC emissions shall not exceed 30.0 tons per year. Shall keep all required calculations in an acceptable format. Shall keep the following for all metal parts coating lines operating per R 336.1621(10)(b): Gallons or pounds of each VOC containing coating used and reclaimed; VOC content in pounds per gallon or pounds per pound of each VOC containing coating used; monthly VOC emission calculations; and 12-month rolling VOC emission calculations.

The facility provided monthly, and 12-monthly rolling VOC emissions for December 2016 through November 2019. The highest 12-month rolling VOC emissions occurred at the end of May 2017 at 27.9 tons per year. The facility states that solvents are not reclaimed. On December 23, 2019 the spreadsheet for VOC emission calculations was provided via email. Emission calculations were spot checked for accuracy. The facility maintains the required records.

SC V.1. **COMPLIANCE.** Shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior

written approval by the AQD District Supervisor, the permittee may determine VOC content from manufacturer’s formulation data.

For the majority of coatings, the facility is using VOC content from manufacturer’s formulation data. On September 7, 2018, the AQD requested Method 24 analysis (see previous inspection) on four coatings: Precote 80, Precote 85, Scotch-Grip Brand Fastener Adhesive 2353 (Blue), Scotch-Grip Brand Fastener Adhesive EC2510 (Orange). The coatings were selected based on highest usage at EUWHEEL1, EUWHEEL2, and EUWHEEL3 (the three emission units with the highest VOC emissions) and the highest VOC content. The results the Method 24 testing was provided via email on December 23, 2019 and January 23, 2020.

Coating	Manufacturer		Method 24	
	Density (lb/gal)	VOC Content (lb/gal)	Density (lb/gal)	VOC Content (lb/gal)
Precote 80	9.77	2.69	9.77	2.69
Precote 85	9.698	2.72	9.698	2.72
Scotch-Grip Brand Fastener Adhesive 2353 (Blue)	8.34	3.09	8.566	3.8
Scotch-Grip Brand Fastener Adhesive EC2510 (Orange)	8.34	4.01	8.426	4.1

In a letter dated December 23, 2019, the facility requests that VOC content be determined using manufacturer’s formulation data instead of using federal Reference Test Method 24. As shown above the Method 24 values are greater than the manufacturer formulation data for the “blue” and “orange” coatings. For these instances, the facility shall use the Method 24 results to demonstrate compliance. The facility appears to be using the correct VOC content, density, and water content, as verified in the excel spreadsheets provided on December 23, 2019. For Precote 80 and Precote 85, the facility provided Method 24 results that were provided by the manufacturer from 2013. As noted above VOC and density are identical for both scenarios. The AQD will request that the facility conduct its own Method 24 analysis to verify VOC content, density, and water content of Precote 80 and Precote 85.

FGLOCKSEAL

SC I.1 and 2, VI.1 and 3. **COMPLIANCE.** Monthly VOC emissions shall not exceed 2,000 lb per month per coating line. The 12-month rolling VOC emissions shall not exceed the 10.0 tpy per coating line. Shall keep records in an acceptable format. Shall keep the following: Gallons (with water) coating used and reclaimed; VOC content (with water); monthly VOC emission calculations; and 12-month rolling VOC emission calculations. The facility provided both monthly and 12-month rolling VOC emissions on a per coating line basis for December 2017 through November 2019. The emissions reported for all coating lines are reported as less than 2,000 lb per month and 10.0 tpy (12-month rolling).

SC III.1 through 3. **COMPLIANCE.** Shall recover, reclaim, or dispose of coatings, paints,

purge, and cleanup solvents, etc. in accordance with applicable regulations. Shall capture all waste materials and store them in closed containers. Shall dispose of waste in an acceptable manner. Shall handle all VOC/and or HAP containing materials in a manner to minimize fugitive emissions. Shall keep containers covered at all times except when operator access is necessary. During the inspection, the facility appeared to meet the above requirements.

SC IV. 1. **COMPLIANCE.** Shall equip and maintain each application portion of FGLOCKSEAL with HVLP applicator or comparable technology with equivalent transfer efficiency. The facility appears to be meeting this requirement.

SC V.1. **COMPLIANCE.** Shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine VOC content from manufacturer's formulation data.

Please see the discussion under SOURCE-WIDE CONDITIONS, SC V.1.

SC VIII. 1 through 16. **COMPLIANCE.** Stack were not observed at roof level during the inspection. During the previous inspection on August 7, 2018, the facility appeared to meet the stack dimensions for the stack IDs listed in SC VIII. Measurements were not collected at that time.

SC IX.1. **COMPLIANCE.** Shall comply with 40 CFR Part 63, Subpart A and Subpart MMMM. Evaluation with the Subpart MMMM is evaluated below in FGMACT.

SC IX.2. **COMPLIANCE.** May change or replace any coating used without applying for a new general permit. The facility is compliance with this condition.

FGMACT

The facility utilizes the emission rate without add-on controls option – general use coating. Therefore, the conditions pertaining to emission rate with add-on control or compliant material option were not evaluated.

SC I. 1 through 3. **COMPLIANCE.** Organic HAP not to exceed 2.6 lb per gallon of coating solid on a 12-month rolling time period. The facility utilizes the emission rate without add-on controls option – general use coating. The facility provided records for December 2016 through November 2019 demonstrating compliance with the above list emission limit. The highest organic HAP reported occurred December 2016 through April 2017 at 2.4 lb HAP per gallon coating solid.

SC II. **NOT APPLICABLE.** Thinner and/or additive, and cleaning material restrictions apply to the compliant material option.

SC VI. 1 through 5. **COMPLIANCE.** Initial compliance demonstration and record keeping requirements under MACT MMMM. The facility appears to be meeting the record keeping requirements as demonstrated with emission records under SC I. through 3 and semiannual MACT MMMM reports received on September 10, 2019, March 18, 2019, and September 14, 2018. According to the previous inspection, the initial compliance demonstration was submitted February 27, 2008. The facility utilizes the emission rate without add-on controls option, therefore the compliant materials option and emission rate with add-on controls options conditions are not applicable.

SC VII.4. **NOT APPLICABLE.** The facility does not utilize the compliant material option.

SC VII. 5, 6, 7 and IX. 1. **COMPLIANCE.** The facility appears to be in compliance with deviation reporting requirements under SC VII. 5. There have not been any deviations reported in regard to MACT MMMM since the last inspection. The facility submits the applicable notifications and submits semiannual reports. The facility appears to be in compliance with MACT MMMM.

FGPLATINGLINES

The pickling tanks are not subject to 40 CFR Part 63, Subpart CCC, per §63.1155(1) and §63.1156.

§63.1155(a)(1) - All new and existing steel pickling facilities that pickle carbon steel using hydrochloric acid solution that contains 6 percent or more by weight HCl and is at a temperature of 100 °F or higher.

§63.1156 - *Steel pickling* means the chemical removal of iron oxide mill scale that is formed on steel surfaces during hot rolling or hot forming of semi-finished steel products through contact with an aqueous solution of acid where such contact occurs prior to shaping or coating of the finished steel product. This definition does not include removal of light rust or scale from finished steel products or activation of the metal surface prior to plating or coating.

SC III. 1 and 2. **COMPLIANCE.** Shall not operate any plating line unless associated scrubber is installed, maintained and operating properly. Shall submit a Malfunction Abatement Plan (MAP) for review and approval. Shall not operate any plating line unless MAP is implemented and maintained. During the inspection the scrubbers for the plating lines appeared to be installed and operating properly. The MAP dated March 2013 appears to satisfy the requirements listed in SC III. 2. Flow rates at the time of inspection appeared to be greater than 20 gpm.

SC III. 3. **COMPLIANCE.** HCl concentration shall not exceed 17% by weight hydrochloric acid (this is equivalent to 50% by volume of 20° Baume HCl). Maximum temperature of 120° F. Maximum surface area of 39.1 square feet. The facility provided HCl concentration and solution temperature records for January 3, 2017 through December 9, 2019. Measured values of HCl are 50% by volume of 20° Baume HCl or less. Solution temperatures indicate values below 120 °F. Surface areas provided during the previous inspection indicate compliance with the 39 square feet requirement.

SC VI. 1 and 2. **COMPLIANCE.** Shall complete all calculations in an acceptable format. Shall keep the following monthly records: Monthly concentration, area of tank in square feet, temperature of acid solution, log of hours of operation, corrective action taken upon failure of the following: fans drawing vacuum and pumps circulating the scrubber water. The facility provided the required records. During the previous inspection the facility also provided the area of tanks. The facility reports no failure of fans or pumps serving the scrubbers.

SC VIII. 1 through 11. **COMPLIANCE.** During the previous inspection the facility appeared to meet the stack dimensions for the stack IDs listed in SC VIII. Stacks were observed at roof level during August 7, 2019 inspection. Measurements were not collected at that time.

During this inspection the stacks were not observed at roof level.

FGBOILERMACT

SC II.1. **COMPLIANCE.** Shall only combust gas 1 fuels. The furnaces and boilers are natural gas fired.

SC III. 1 through 6, SC VI 2 and 3. **COMPLIANCE.** Shall perform one-time energy assessment, initial tune up, and tunes ups as required. The November 22, 2016 inspection indicates that a one-time energy assessment was conducted January 2016 and initial tune up of each affected boiler performed on January 31, 2016 and March 2016. As part of the December 4, 2019 inspection, the facility provided the tune up schedule (Exhibit 23) and supporting documentation. The most recent tune ups were conducted February 5 and 7, 2019. The facility provided tune up records demonstrating compliance with SC VI. 2 and 3.

SC VI. 1 and SC VII. 4. **COMPLIANCE.** Shall keep records of each notification and report submitted and all supporting documentation to comply with 40 CFR Part 63, Subpart A and DDDDD. Shall submit a signed certification in the Notification of Compliance Status that the energy assessment was completed. The facility appears to be meeting the requirement of SC VI. 1 as confirmed during the inspection. As discussed in the November 22, 2016 inspection report, the signed Notification of Compliance was submitted March 2016.

SC IX. 1 through 3. **COMPLIANCE.** The facility appears to be in compliance with Subpart DDDDD.

FGRULE290

The facility claims Rule 290 for three emission units (EUPHOS1, EUPHOS2, and EUWAX).

R 336.1290 exempts from R 336.1201 those sources with limited emissions. The rule is divided into three general sections and further divided into subsections, depending on the type of emission (VOC, particulate, etc.), the carcinogenicity of the emissions, and the health-based screening level(s) of the emissions. Only those rules applicable to the Rule 290 emission units at the stationary source will be addressed. Rule 290 was recently revised on December 20, 2016. The citations listed below coincide with the existing ROP conditions and the former Rule 290 (prior to Rule revision). Each of emission units where installed prior to the rule revision and have not been modified.

R 336.1290(a) through (d) – **COMPLIANCE** – Emissions less than 1000 lbs. uncontrolled and 500 lbs. controlled with more restrictive limits for certain initial threshold screening levels (ITSL) and initial risk screening levels (IRSL); particulates limited to emissions of 0.01 lbs. particulate per 1000 lbs. gas, controlled by dust collector or equivalent installed and maintained, 5% opacity limit and monthly visible emission observation; description on file and records maintained. Required records are as follows for each emission unit: written description of the emission unit and control device, including the design control efficiency and exhaust gas flowrate; identify air contaminants emitted, carcinogenicity, screening level, and level of control; monthly emissions calculations; record of monthly visible emission readings. HCL has an initial threshold screening level (ITSL) of 20 ug/m3.

The following emission units are listed as Rule 290 subject in the 2018 MAERS with their reported annual emissions in pounds:

2018 MAERS emissions reported (in pounds)

Emission Unit	HCl	VOC

EUPHOS1	97.07	-----
EUPHOS2	140.7	-----
EUWAX	-----	405

Accordinging the MAERS submittal, the above reported emission units operate 12 months of the year. EUWAX emissions are equal to the material usage. Scrubbers control HCl emissions from EUPHOS1 and EUPHOS2. EUPHOS1 and EUPHOS2 reported HCl emissions for 2018 are less than 500 pounds per year. EUWAX reported VOC emissions for 2018 are less than 500 pounds per year.

In the December 23, 2019 submittal, the facility also submitted monthly emission calculations for EUPHOS1, EUPHOS2, and EUWAX. The reported emissions are significantly less than 500 pounds per month.

The facility also claims that the outside HCl storage tank is exempt per Rule 290. On January 22, 2019, the facility provided emission calculations for the HCl storage tank. At this time the AQD accepts the Rule 290 records as provided. The facility also provided information that the equipment would be exempt under Rule 291 (see attached email dated January 22, 2020).

Permit to Install Exempt Equipment

Hardening Furnaces

EUHARDENING1 and EUHARDENING2 (installed in 1976) appear to be exempt from PTI requirements per R336.1282(a) from the 1980 Air Quality Rules effective January 18, 1980. At that time the Rule read as follow.

R336.1282(a) – The permit system does not apply to any of the following: (a) Natural gas-fired, liquefied petroleum gas-fired, or electrically heated furnaces for heat treating glass or metals, the use of which does involve molten materials.

As confirmed during the inspection, the facility does use quench oil on both EUHARDENING1 and EUHARDENING2, but the exclusion of quench oil from the exemption did not occur until after the installation of the furnaces. The subsequent Rule from 1992 (effective April 17, 1992) reads as follows.

R336.1282(a)(i) – The permit system does not apply to any of the following: (a) Any of the following processes or process equipment which are electrically heated or which fire sweet gas fuel or no. 1 or no. 2 fuel oil at maximum total heat input rate of not more than 10,000,000 Btu per hour: (i) Furnaces for heat treating glass or metals, the use of which does not involve molten materials, oil-coated parts, or oil quenching.

Boilers

The two boilers at the facility appear to be exempt from PTI requirements under R336.1282(2)(b)(i). The boilers ratings are as follows: HP150 – 8,277,000 Btu/hr and HP60 – 251,100 Btu/hr.

Emergency Generator (mothballed)

The emergency generator (which is currently mothballed) appears to be exempt from PTI

requirements under R336.1282(2)(b)(i) and R336.1285(2)(g).

FEDERAL REGULATIONS

40 CFR Part 63, Subpart ZZZZ

Subpart ZZZZ applies to the EUCOGEN as it is located at a major source of HAPs. The emission unit was installed in 1987 and dated before December 19, 2002. The engine is considered existing RICE pursuant to 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [RICE MACT]). However, EUCOGEN is not subject to the RICE MACT pursuant to 63.6590(b)(3)(iii) which states in parts: -

(3) The following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements: iii) Existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that does not operate or is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 63.6640(f)(2)(ii) and (iii).

40 CFR Part 63, Subpart WWWW

CHROMATELINES 1 & 2 located in the FGPLATINGLINES & CHROMATELINES were at a major source of HAPs, therefore the groups are not subject to 40 CFR 63.11504(a).

40 CFR Part 63, Subpart N

The CHROMATELINES 1 & 2 do not use electrodes or current control to deposit metals. Hence CHROMATELINES 1 & 2 are not subject to 40 CFR 63.340(c).

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

Not applicable. All lots are paved.

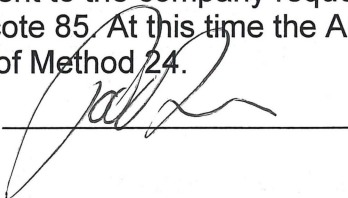
MAERS REPORT REVIEW:

The 2018 MAERS report was submitted on time. The audit was passed.

FINAL COMPLIANCE DETERMINATION:

At this time, the facility appears to be in compliance with MI-ROP-B5830-2015b. A letter will be sent to the company requesting that Method 24 analysis be conducted on Precote 80 and Precote 85. At this time the AQD will not authorize using manufacturing formulation data in lieu of Method 24.

NAME



DATE

2/28/20

SUPERVISOR

JK