



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

July 6, 2017

Mr. Joseph Joye, Jr.
Jo-Mar Enterprises
7489 East Davison
Detroit, Michigan 48212

SRN: B5794, Wayne County

Dear Mr. Joye, Jr.:

VIOLATION NOTICE

On June 8, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Jo-Mar Enterprises (Jo-Mar) located at 7489 East Davison, Detroit, Michigan. The purpose of this inspection was to determine Jo-Mar's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; Wayne County Installation Permits (WCIP) C-9979 and C-11172/11173 with letter of conditions (LOC) dated August 1, 1996; and the requirements of the Federal National Emission Standard for Chromium Emissions from Hard and Decorative Chrome Electroplating and Chromium Anodizing Tanks at 40 Code of Federal Regulations (CFR) Part 63, Subpart N (also known as MACT N).

As a result of the inspection, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Two hard chrome electroplating tanks (1,200 gallons and 700 gallons) utilizing hexavalent chrome with vertical mist eliminators and horizontal packed bed scrubber for emissions control.	WCIP C-11172/11173 LOC, Special Condition 21; 40 CFR 63.342(f)(1)(i) and (ii); R 336.1941(1)	The pressure drop gauge for the packed bed scrubber is non-operational with pitot tubes not hooked up properly.
	WCIP C-11172/11173 LOC, Special Condition 23; 40 CFR 63.342(f)(3)(i)(A); R 336.1941(1)	The operation and maintenance plan does not have standardized checklist to document operation and maintenance of equipment.
	40 CFR 63.342(f)(3)(i)(B) and (F); R336.1941(1)	The operation and maintenance plan does not include practices within Tables 1 and 2 of MACT N.
	WCIP C-11172/11173 LOC, Special Conditions 24, 26, 27, and 28;	Inspection records are not maintained.

	40 CFR 63.346(a), (b)(1), (2), (3), (4), (8), (9), (10), and (11) R 336.1941(1)	
	40 CFR 63.347(h)(1); R 336.1941(1)	Annual compliance status reports have not been received.
Cold Cleaner	R 336.1707(2); R 336.1707(3)(a); R 336.1707(4)	The cold cleaner did not appear to meet R 336.1707(2) requirements. The cold cleaner does not have a mechanically assisted lid. Operational procedures were not posted.

Hard Chrome Electroplating Process

Jo-Mar operates chrome plating lines under WCIP C-9979 and C-11172/11173. The LOC dated August 1, 1996 includes Special Conditions (SC) that pertain to the chrome plating line, also referred to as “process” which includes both 1,200 gallon and 700 gallon hard chrome electroplating tanks utilizing hexavalent chrome with vertical mist eliminators and a horizontal packed bed scrubber for emissions control. Collectively, this process is subject to MACT N; specifically, by the definitions within the MACT the process at Jo-Mar constitutes an existing affected source utilizing open surface hard chromium electroplating tanks located at a small, hard chromium electroplating facility. In addition, the MACT N has been incorporated into the Air Pollution Control Rules at R 336.1941(1), also known as Rule 941(1), and therefore the chrome plating process operated by Jo-Mar is also subject to this rule.

Jo-Mar is subject to the MACT N requirements for operations, maintenance, and housekeeping located within 40 CFR 63.342, for recordkeeping located within 40 CFR 63.346, and for reporting located within 40 CFR 63.347. The LOC contains specific requirements of the MACT within the SCs. AQD has determined that Jo-Mar is in noncompliance with the SCs and the paragraphs of MACT N as outlined below; language from the permit conditions and the regulation are paraphrased for brevity. An identified violation of MACT N also represents an identified violation of Rule 941(1).

During the inspection AQD staff observed that the pressure drop gauge for the packed bed scrubber is non-operational with pitot tubes not hooked up properly. This is a violation of SC 21, which requires the facility to equip and maintain pressure drop indicators across the emissions controls. It is a violation of 40 CFR 63.342(f)(1)(i) and (ii), which require a facility to operate and maintain the affected source, i.e. the two chrome tanks, including associated pollution control devices and monitoring equipment in a manner with good air pollution control practices. It is also a violation of 40 CFR 63.342(f)(1)(ii) which requires any

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malfunction, including that of the monitoring equipment, be corrected as soon as practicable.

During the inspection Jo-Mar did not have record of an operation and maintenance plan. A review of AQD's facility files identified a plan for the packed bed scrubber entitled "Operations and Maintenance Plan for Hexmaster Chrome Scrubber". However, this plan does not include a standardized checklist to document the operation and maintenance of the emissions control equipment and its associated monitoring equipment, and also does not incorporate the practices and procedures identified within Tables 1 and 2 of MACT N. This represents a violation of SC 23 and 40 CFR 63.342(f)(3)(i)(A), which require the inclusion of this standardized checklist within the operation and maintenance plan, and represents a violation of 40 CFR 63.342(f)(3)(i)(B) and (F), which require the inclusion of the practices and procedures within Tables 1 and 2.

During the inspection, AQD staff was informed that Jo-Mar does not maintain any records. This is a violation of the following subparagraphs of 40 CFR 63.346: (a), (b)(1), (b)(2), (b)(3), (b)(4), (b)(8), (b)(9), (b)(10), (b)(11). It is also a violation of the following SCs: 24, 26, 27, and 28. These requirements include maintaining records of the following:

- (i) documenting the quarterly inspections of the packed bed scrubber control device;
- (ii) the wash down of the mesh pads;
- (iii) any maintenance performed;
- (iv) any malfunctions that have occurred and the corrective actions taken;
- (v) the pressure drop across the packed bed scrubber control system;
- (vi) periods of excess emissions, as indicated by the pressure drop data;
- (vii) total process operating time.

Pursuant to 40 CFR 63.347(h)(1), a facility subject to MACT N is required to prepare a summary report to document ongoing compliance status of the affected source. The report is required to contain the information identified in 40 CFR 63.347(g)(3), must be completed annually, and is to be maintained on-site. The AQD has no record that Jo-Mar has completed the annual compliance status reports, therefore, the AQD considers Jo-Mar to be in violation of 40 CFR 63.347(h)(1).

Cold Cleaner

R 336.1707 (also Rule 707) applies to cold cleaners installed on or after July 1, 1979. During the inspection, it was observed that Jo-Mar uses methyl ethyl ketone (MEK), vapor pressure 1.49 psi, as solvent to clean materials.

Rule 707(2) requires that a cold cleaner using a solvent having a vapor pressure greater than 0.6 psia meet one of the following: a) The cold cleaner is designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (b) The solvent bath is covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (c) The cold cleaner is controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the department.

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During the inspection, it was observed that the cold cleaner does not meet any of the above requirements.

Rule 707(3)(a) requires the cover be mechanically assisted if the vapor pressure is greater than 0.3 psia. Rule 707(4) requires operational procedures be developed and posted near the cold cleaner. During the inspection, the cold cleaner was observed without a mechanically assisted lid and without posted operational procedures. These are violations of Rules 707(3)(a) and 707(4).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 27, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

If Jo-Mar believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Jo-Mar. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Todd Zynda, P.E.
Environmental Engineer
Air Quality Division
313-456-2761

cc: Ms. LaReina Wheeler, City of Detroit, BSEED
cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeffrey Korniski, DEQ