



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 12, 2022

Frank Buono, President
Ajax Metal Processing, Inc.
4651 Bellevue Avenue
Detroit, MI 48207

SRN: B5830, Wayne County

Dear Frank Buono:

VIOLATION NOTICE

On March 15, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a Semiannual Compliance Report from Ajax Metal Processing, Inc. located at 4651 Bellevue Avenue, Detroit, Michigan. The report covers the period from July through December of 2021 is required pursuant to Renewable Operating Permit (ROP) number MI-ROP-B5830-2015b, flexible group FGMACT, Special Condition (SC) VII.7; and the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M - Surface Coating of Miscellaneous Metal Parts and Products, paragraph 40 CFR 63.3920(a).

The facility's report included calculations for each rolling 12-month organic hazardous air pollutant (HAP) emission rate for July through December of 2021. Ajax Metal Processing, Inc. also provided the 12-month rolling organic HAP emission rate calculations for January and February of 2022 upon AQD's request.

As a result, the following violation was identified:

| Process Description | Rule/Permit Condition Violated | Comments |
|--|--|---|
| The existing general use coating affected source in ROP No. MI-ROP-B5830-2015b, flexible group FGMACT. | MI-ROP-B5830-2015b, FGMACT, Special Condition I.2; 40 CFR 63.3890(b)(1) and 40 CFR 63.3900(a)(1) | Ajax Metal Processing, Inc. exceeded the facility's 12-month rolling emission limit of 2.6 pounds organic HAP per gallon of coating solids for the 12-month time periods ending with November 2021, December 2021, January 2022, and February 2022. |

Ajax Metal Processing, Inc. operates a collection of metal parts surface coating lines which comprise an existing affected source under 40 CFR, Part 63, Subpart M.

The provisions of this subpart are incorporated into MI-ROP-B5830-2015b within the flexible group FGMACT. 40 CFR 63.3890(b)(1) limits organic HAP emissions from an existing general use coating affected source to no more than 2.6 pounds per gallon coating solids.

As specified within the Semiannual Compliance Report for July through December of 2021, Ajax Metal Processing, Inc. chose the “emission rate without add-on controls option” to demonstrate compliance with the emission limit. As specified at 40 CFR 63.3900(a)(1) and in Special Condition I.2 of FGMACT, MI-ROP-B5830-2015b, by choosing the “emission rate without add-on controls option”, Ajax Metal Processing, Inc. is required to be in compliance with the organic HAP emission limit of 2.6 pounds per gallon coating solids at all times.

The records provided demonstrate that, for November of 2021 through February of 2022, 12-month rolling emissions of organic HAP from coating lines are at the amounts listed in the table below.

| Last month of 12-month compliance period | 12-month HAP emission rate calculations (pounds organic HAP per gallon of coating solids) |
|---|--|
| November 2021 | 2.7 |
| December 2021 | 2.8 |
| January 2022 | 2.9 |
| February 2022 | 2.9 |

The 12-month rolling time periods ending in November 2021, December 2021, January 2022, and February 2022 each exhibit an emission rate in excess of 2.6 pounds organic HAP per gallon of coating solids, and therefore represent violations of Special Condition I.2, FGMACT, MI-ROP-B5830-2015b, and 40 CFR 63.3890(b)(1) and 40 CFR 63.3900(a)(1).

Please initiate and continue actions necessary to correct the cited violation. AQD received a two-page letter on March 15, 2022 that accompanied the facility’s Semiannual Compliance Report. This letter is enclosed. AQD believes this letter constitutes an adequate response to this violation notice. The letter discusses the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation; and what steps are being taken to prevent a reoccurrence. A written response to this Violation Notice by the facility is not required.

Please be advised that all violations are reviewed by the AQD Enforcement Unit to determine if further enforcement action is appropriate.

Frank Buono
Ajax Metal Processing, Inc.
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If Ajax Metal Processing, Inc. has additional information to provide in response to this Violation Notice, please submit the written response to EGLE, AQD, Detroit District, at Cadillac Place, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202-6058 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. This information should be received by May 3, 2022 (which coincides with 21 calendar days from the date of this letter).

If Ajax Metal Processing, Inc. 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Sam Liveson
Senior Environmental Engineer
Air Quality Division
313-405-1357

Enclosure

cc: Alexandria Muench, Ajax Metal Processing, Inc.
Stephanie Jarrett, Fishbeck
Hosam N. Hassanien, City of Detroit BSEDD
Crystal Rogers, City of Detroit BSEED
Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
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