



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

November 6, 2017

Mr. Alex Evans, Plant Superintendent
Metropolitan Alloys Corporation
17385 Ryan Road
Detroit, MI 48212

SRN: B3259, Wayne County

Dear Mr. Evans:

VIOLATION NOTICE

On September 13, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Metropolitan Alloys Corporation located at 17385 Ryan Road, Detroit, Michigan. The purpose of this inspection was to determine Metropolitan Alloys Corporation'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; and the conditions of Permit to Install (PTI) number 30-08A.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------------|---|--|
| FGFURNACES- Furnace 30 | PTI No. 30-08A, Special Condition III.1 | The batch production limit of 60 batches per 12- month rolling time period was exceeded for 10 consecutive months beginning with the 12- month rolling time period ending September 2016. The highest 12-month batch production for Furnace 30 was 109 batches for the time period ending May 2017. |
| FGFURNACES- Furnace 80 | PTI No. 30-08A, Special Condition III.1 | The batch production limit of 60 batches per 12-month rolling time period was exceeded for 3 consecutive months beginning with the 12-month rolling time period ending June 2016. |

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|---------------------------|---|--|
| | | The highest 12-month batch production for Furnace 80 was 117 batches for the time period ending June 2016. |
| FGFURNACES- Furnace 50 | PTI No. 30-08A, Special Condition III.1 | The batch production limit of 78 batches per 12-month rolling time period was exceeded for 15 consecutive months beginning with the 12-month rolling time period ending June 2016. The highest 12-month batch production for Furnace 50 was 233 batches for the time period ending June 2016. |
| FGFURNACES | PTI No. 30-08A, Special Condition III.2 | Facility used prohibited material, post-consumer metal scrap, in some of the furnaces. |
| FGFURNACES | PTI No. 30-08A, Special Condition VI.1a | Facility is not tracking usage of flux for each batch. |

Special Condition III.2 prohibits the use of post-consumer metal scrap in the Furnaces. During the inspection, Metropolitan Alloys Corporation stated to the AQD that some post-consumer metal scrap is used in some of the furnaces. This is a violation of the Special Condition and potentially affects Metropolitan Alloys Corporation applicability to 40 CFR Part 63, Subpart TTTTTT, National Emission Standards for Hazardous Air Pollutants for Secondary Nonferrous Metals Processing Area Sources. The AQD is currently not the delegated authority for this regulation. The United States Environmental Protection Agency retains enforcement authority for this regulation.

Special Condition III.1 limits the batches from Furnace 30, 80, and 50, to not more than 60, 60, and 78, respectively, per 12-month rolling time period as determined at the end of each calendar month. In reviewing batch records submitted by Metropolitan Alloys Corporation, the AQD has determined that Furnaces 30, 80, and 50 exceeded the 12 month rolling total batch limits of 60, 60, and 78, respectively for various time periods.

The conditions of PTI number 30-08A require records of the description and weight of materials charged in each furnace daily (e.g., maintenance of records, which shall be made available for review upon request by the AQD staff).

During this inspection, Metropolitan Alloys Corporation was unable to produce the required records. This is a violation of the recordkeeping specified within Special Condition VI.1a of PTI number 30-08A.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 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 reoccurrence. Also, please provide records of rolling 12 month batches for each of the furnaces for the time period covering July 9, 2013 through June 30, 2015.

If Metropolitan Alloys Corporation 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 September 13, 2017. 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,



Jorge Acevedo
Senior Environmental Engineer
Air Quality Division
313-456-4679

cc: Mr. LaReina Wheeler, City of Detroit BSEED
Ms. Sarah Breneman, USEPA Region V
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ