

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

N774230741

FACILITY: PITA METALS INC		SRN / ID: N7742
LOCATION: 411 SOUTH FORT ST, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Janet Godfrey , Owner		ACTIVITY DATE: 08/21/2015
STAFF: Katherine Koster	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY2015 Scheduled Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection

INSPECTED BY: Katie Koster, AQD

PERSONNEL PRESENT: Luke Wojewuczki, AMP Recycling Purchasing

FACILITY DESCRIPTION

AMP Recycling Inc., N7742, is located in the City of Detroit in Wayne County. The facility was previously known and is permitted as Pita Metals. Pita Metals and EPP are collocated with AMP Recycling and have common ownership. AMP Recycling processes scrap aluminum through a gas-fired sweat furnace from which aluminum sows are poured and sold. The sweat furnace is currently operated about two weeks on and three weeks off. The sweat furnace is equipped with an afterburner.

REGULATORY OVERVIEW

The facility is categorized as an area source with the sweat furnace covered under Permit to Install No. 373-06. The permit to install was issued on March 14, 2007 and the furnace started operation in January 2008. The facility is subject to the area source requirements of 40 CFR 63 Subpart RRR, Secondary Aluminum Production NESHAP. The one sweat furnace is currently the only affected sources under the NESHAP.

INSPECTION NARRATIVE

AQD inspector, Katie Koster, performed surveillance of AMP recycling on August 21, 2105 in order to observe the exhaust stack from the aluminum sweat furnace. I drove along Fort Street and Stocker to determine if it was still in operation. Based on the number of vehicles in the parking lot, it appeared to be in operation. I did not observe any visible emissions or odors from the facility or from the furnace stack.

On 9/30/15, I returned to Pita Metals/AMP Recycling. I met Mr. Luke Wojewuczki who accompanied me about the facility. The sweat furnace operates about two weeks on and three weeks off. It was not operating at the time. The facility had just finished processing last week. According to Luke, only aluminum is added to the furnace; no flux is in use. Since the aluminum comes from discarded engines and transmissions, there is also some steel mixed in. The steel is removed from the furnace during smelting. When the facility is ready to start processing, it takes about 1-2 days to heat up the furnace and another 1.5 days to cool it down. About 800-900 pounds of scrap is charged to the furnace at a time. Sows are tapped from the furnace and sold to a tool maker in Tennessee. An afterburner is in operation during processing; target afterburner temperature is set at a minimum of 1650F.

We went to the office where Mr. Wojewuczki presented afterburner temperature records, throughput records, and maintenance records. I briefly discussed MACT Subpart RRR with him.

Note, AQD conducted an inspection in 2012 and met with facility owner, Ms. Janet Godfrey. AQD inspector, Mr. Eric Grinstern, informed her of the MACT Subpart RRR requirements.

APPLICABLE RULES/PERMIT CONDITIONS EVALUATED

Below is an evaluation of the compliance requirements for the sweat furnace.

Permit to Install No. 373-06

EUFURNACE – Gas-fired sweat furnace

The sweat furnace has a hearth and holding chamber with a capacity of 4,000 pounds. Exhaust is controlled by an afterburner. The facility stated that no flux is used in the furnace. The facility stated that the afterburner is interlocked so that the charge door will not open unless the afterburner is at or above 1650 degrees F. Aluminum scrap is purchased directly from outside brokers or comes from transmissions, etc. that are disassembled by Pita Metals. The furnace ran the week prior to the inspection, but was not in operation during the inspection.

Emission Limits

EUFURNACE restricts the emission of PM-10 and dioxin/furans (D/F). The facility conducted testing on September 18, 2008 to evaluate the emission of PM-10 emissions. The test results showed compliance with the permitted limit as summarized below. PM-10 limit: 4.0 pph; Test result: 0.13 pph

The dioxin/furan emission limit is the NESHAP established limit. The NESHAP allows for the operation of an afterburner with a minimum temperature of 1600 degrees and a residence time of 0.8 seconds, as an alternative to conducting compliance testing to demonstrate compliance with the NESHAP limit. The afterburner manufacture provided calculations at the time of permitting document a residence time of 1.56 seconds. Review of recent temperature records while on site showed the afterburner operating above the 1,600 degree F minimum.

Status: IN COMPLIANCE

EUFURNACE limits opacity to a six-minute average of 10%. Since the furnace was not in operation at the time of the inspection, compliance could not be evaluated.

Status: UNABLE TO EVALUATE

Material Limits/Records

EUFURNANCE requires that no flux be used in the furnace. The facility stated that they do not use any flux and staff did not observe the presence of any flux onsite. Charge to the furnace is restricted to 3,000 pounds per hour. Based on information provided by Mr. Wojewuczki and

a spot check of records while on site indicates charge rates below 2,000 pounds per hour, which is below the permitted limit.

Status: IN COMPLIANCE

Process/Operational Limits

EUFURNACE requires the afterburner used to control emissions from the sweat furnace to have a minimum temperature of 1,600 degrees F and a retention time of 0.8 second.

The afterburner manufacture provided calculations at the time of permitting document a residence time of 1.56 seconds. Review of recent temperature records showed the afterburner operating above the 1,600 degree F minimum. The set point is programmed at 1650F.

The facility is required to implement a MAP and O&M Plan for the control equipment. A MAP and O&M Plan were submitted as part of the permit application.

Review of facility maintenance records showed that they were implementing the requirements of the plans.

Status: IN COMPLIANCE

Equipment

The facility is required to install and operate an afterburner. The facility has installed and is operating the afterburner. Based on the records presented during the inspection, the facility is in compliance.

Status: IN COMPLIANCE

Testing

EUFURANCE required testing for PM10 emissions within 180 days of commencement of initial startup. Based upon startup in January 2008, testing should have been conducted in July 2008. Testing was conducted in September 2008. Testing demonstrated compliance with the PM10 emission limit.

Monitoring/Recordkeeping

The permit requires the facility to install and maintain a device to monitor and record the temperature of the afterburner on a continuous basis.

The afterburner temperature is monitored and recorded on a continuous basis by a "data logger". Additionally, staff manually records the temperature throughout the processing as a back up source of information. The residence time of the afterburner is based upon the design and certification by the manufacturer. Staff is not aware of a residence time monitor and considers this part of the condition to be an error.

Status: IN COMPLIANCE

Recordkeeping

Facility to maintain monthly and annual records of aluminum throughput for EGFURNACE.

Staff reviewed facility records while on site documenting compliance with the recordkeeping requirements.

Status: IN COMPLIANCE

Stack/Vent Restrictions

Requires the furnace to have a stack with a maximum diameter of 24 inches and a minimum height of 40 feet. Visual observation of the stack showed that it appeared to comply with the dimensions.

Status: IN COMPLIANCE.

40 CFR PART 63 SUBPART RRR

The facility is subject to Subpart RRR as an area source, with the affected emission unit being the aluminum sweat furnace. As an area source the furnace is subject to the dioxin/furan limit as well as the associated monitoring/reporting requirements.

Compliance Evaluation

**Subpart RRR
Notification and Reporting Requirements**

Requirement	Citation 40 CFR	Notification Submitted		Comments
		Yes	No	
Initial Notification (Existing – July 21, 2000) (New – July 21, 2000 or no later than 120 days after startup)	63.9(b)(2)		X	Notification not submitted
Notification of Compliance Status (Existing-May 23, 2003) (New – 90 days after performance test or 90 days after startup if not conducting a performance test.)	63.1515(b)		X	Notification not submitted
OM&M Plan (Existing-March 24, 2003) (New – 90 days after performance test or 90 days after startup if not conducting a performance test.)	63.1510(b)	X		Submitted with permit application Afterburner inspections conducted
Excess Emissions/Summary Reports (Semi-annually – 60 days after calendar half – 3/1 & 8/30)	63.1516(b)		X	Reports not submitted

MACES- Activity Report

<u>Must submit even if no excess emissions occurred</u>				
Annual Compliance Certification (With one of the semi-annual reports) <u>Must submit</u>	63.1516(b),(c)		X	Rule is unclear that areas sources need to submit annual certifications. EPA clarifying in amendments. Non-submittal not considered a violation at this time.
SSM Reports (30 days after calendar half when a SSM occurred – 1/30 & 7/30) <u>Must submit if a SSM occurred</u>	63.10(d)(5)(i)	-		N/A –SSM not triggered for period reviewed
Report of actions inconsistent with SSM Plan (2 working days after event –phone report, 7 working days after event – letter report)	63.6(e)(3)(iv) 63.10(d)(5)(ii)	-		N/A –SSM not triggered for period reviewed

D/F Limit

Emissions not in excess of 0.80 nanogram D/F TEQper dscm. §63.1504(f)(2)

Sweat furnaces are not required to conduct performance testing to demonstrate compliance with the D/F limit if they are equipped with an operate an afterburner with a minimum temperature of 1600 degrees and a residence time of 0.8 seconds. The facility is using the afterburner alternative as a compliance option.

Status: IN COMPLIANCE

Startup, Shutdown, and Malfunction Plan

Requires the facility to develop and implement a SSM Plan. §63.1516

The facility submitted a SSM Plan at the time of permit issuance. Review of facility records show that they appear to be adhering to the SSM Plan.

Status: IN COMPLIANCE

Capture/Collection System

Status: PENDING

The MACT is being amended and the capture/collection requirements for sweat furnaces are being modified. However, as of 9/30/15, the modifications have not been officially finalized but they have been signed and submitted to the federal register for publication. As such, AQD is delaying a compliance determination for this condition at this time.

COMPLIANCE DETERMINATION

Based on the information and observations made during this inspection, the facility is in compliance with the requirements of PTI No. 373-06.

In regards to the applicable requirements of Subpart RRR, below is a summary of compliance issues:

1. Failure to submit Initial Notification
2. Failure to submit Notification of Compliance Status Report
3. Failure to submit semi-annual Excess Emission/Summary Reports (July 2008 until current)

A violation notice will be issued.

NAME Kate Rose

DATE 9/30/15

SUPERVISOR W.M.