



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



DAN WYANT
DIRECTOR

December 2, 2015

Ms. Janet Godfrey, Owner
Pita Metals/AMP Recycling
411 S. Fort Street
Detroit, MI 48217

SRN: N7742, Wayne County

Dear Ms. Godfrey:

VIOLATION NOTICE

On September 30, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Pita Metals and AMP Recycling Inc. located at 411 S. Fort Street, Detroit, Michigan. The purpose of this inspection was to determine 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 administrative rules; the conditions of Permit to Install (PTI) number 373-06; and 40 CFR Part 63 Subpart RRR (NESHAP for Secondary Aluminum Production).

During the inspection and pre-inspection file review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUFURNACE	40 CFR Part 63, Subpart RRR, §63.1515(a)	Failure to submit the initial notification due no later than 120 days after initial startup of the aluminum sweat furnace. Furnace startup was in 2008. To date, no notification has been received.
EUFURNACE	40 CFR Part 63, Subpart RRR, §63.1515(b)	Failure to submit the notification of compliance status due with 90 days of conducting a performance test. Performance test was conducted in September 2008. To date, no notification has been received.
EUFURNACE	40 CFR Part 63, Subpart RRR, §63.1516(b)	Failure to submit the excess emissions/summary report on a semi annual basis by March 1 and August 30 of each year since startup of the furnace. Furnace startup was in 2008. No semi annual reports have been received.

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Secondary aluminum production processes are subject to the federal Nation Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart RRR. An aluminum sweat furnace was started at your facility in 2008. An aluminum sweat furnace is an affected source per 63.1500(c) and was subject to the NESHAP upon start up per 63.1501(d). To date, the required notifications and semiannual reports for the NESHAP have not been received. Also, be advised that the regulation was recently revised in September 2015. You should review the revised requirements for sweat furnaces; including the alternative compliance options in lieu of ACGIH guidelines and the required annual flow rate measurements in 63.1506(c) and 63.1510. Here is a link to the regulation for your reference: <http://www3.epa.gov/airtoxics/alum2nd/alum2pg.html>.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 23, 2015 (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. Your response should also include the initial notification, notification of compliance status, and a semi annual excess emissions/summary report for the most recent 6 month period (January – June 2015). The information required in the notifications and semi annual reports is outlined in 63.1515 and 63.1516.

If Pita Metals/AMP Recycling 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. 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,



Katie Koster
Senior Environmental Engineer
Air Quality Division
313-456-4678

cc: Mr. Luke Wojewuczki, AMP Recycling
Ms. LaReina Wheeler, City of Detroit , BSEED
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski DEQ