



December 12, 2017



Mr. Jorge Acevedo
Senior Environmental Engineer
Air Quality Division
Department of Environmental Quality
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202-6058
(313) 456-4679

RE: 11/6/17 Violation Notice

Dear Mr. Acevedo,

On **Wednesday, September 13, 2017**, you conducted an inspection of our facility, Metropolitan Alloys Corporation located at 17385 Ryan Road, Detroit, Michigan to determine if we are in 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 to Permit to Install (PTI) number 30-08A.

With the original permit 30-08A we did not think we would exceed the allowable batches. However, with the overall improvements we made to the plant in terms of productivity, our outputs have indeed exceeded the allowable batch production of certain furnaces.

Attached, please find the spreadsheets detailing the outputs over 12 month rolling periods for furnaces #50, #30, #80, #90 and #100 over the years. An important note should be made that in all cases we have not exceeded the allowable Hydrogen Fluoride (HF) emissions of 10 tons per year. It should also be noted that we only use flux in furnaces #30, #80 and #90 furnaces. We *do not* flux furnaces #50 and #100.

We *do* have records of all the materials being charged into each of our furnaces. There may have had some miscommunication during your visit, because we did have all the records of furnace charges made in the Special High Grade (SHG) #50 furnace and these records were available at the time. (Sample copy attached)



Corrective actions:

- 1) Immediately submit a "Permit to Install Application" to increase the allowable "batches" for each furnace to prevent potential future violations. We are still in process of doing modifications to the Permit to Install Application.
- 2) The furnace outputs were not monitored properly, therefore, immediately we will be closely monitoring all future furnace outputs using the format of the attached spreadsheets. (Attached, per your request are the records of 12 month batches for each of the furnaces for the time period covering July 9, 2013 through June 30, 2015)
- 3) Our facility does not use prohibited post-consumer scrap, in some of our furnaces, therefore, no corrective action is required.
- 4) We have immediately added a line on our heat sheets showing flux usage on each heat sheet (Sample Heat Sheet #80121217 is attached where we used 20 lbs. of flux). Please see the attached Safety Data Sheet (SDS) for the most current flux we use which is obtained from Pryrotek. This flux comes in 10 lb. bags.

On a personal note, we very much appreciate your help and guidance in helping us to achieve the level of compliance we need to attain. Your patience and allowing for more time to collect our data is also greatly appreciated. We look forward to working closely with you in the future.

Take Care and Stay Safe,

A handwritten signature in blue ink, appearing to read "Henry A. Szybowicz", is written over a horizontal blue line.

Henry A. Szybowicz
Safety & Quality Manager