

B2116
MAVILA

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B211661910

FACILITY: MSC Land Company, LLC		SRN / ID: B2116
LOCATION: 1491 W JEFFERSON AVE, TRENTON		DISTRICT: Detroit
CITY: TRENTON		COUNTY: WAYNE
CONTACT: Tim Francis, Project Manager		ACTIVITY DATE: 07/28/2021
STAFF: Samuel Liveson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection. Revise report to correct facility name from Detroit Steel Co, Trenton to MSC Land Company, LLC after comments from the facility. According to Mr. Tim Francis, MSC Land Company, LLC became the property owner in October 2018.		
RESOLVED COMPLAINTS:		

On Wednesday, July 28, 2021, AQD staff (Sam Liveson) conducted an announced, scheduled inspection of MSC Land Company, LLC (MLC) located at 14914 W Jefferson Avenue in Trenton, Michigan. The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act; Part 55, Air Pollution Control, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; and the Michigan Air Pollution Control Rules.

Announced Inspection

To ensure AQD was onsite during torch cutting operations, on Friday, July 23, 2021 AQD scheduled the inspection with the facility for the following week.

Opacity Evaluation

Prior to the facility inspection, AQD conducted an opacity observation from about 12:05 PM to 1 PM from Payne Avenue off of Jefferson; from Helen Avenue east of W Jefferson (near Meyer Elias Park); and along Jefferson Avenue. Temperature was 84 °F. Weather was partly cloudy. A flag at Pullman (280 West Jefferson) indicated wind was easterly (headed west). During this opacity evaluation, no opacity or water spraying were observed.

Complaints

On August 21, 2020, AQD received four complaints regarding torch cutting operations on site.

On September 21, 2020, AQD received eleven complaints related to the torch cutting operations at MLC.

The facility responded by postponing its planned torch cutting operations for several months. The day of this inspection, July 28, 2021 was when the facility was restarting torch cutting operations.

Rule 278a Demonstration for Torch Cutting Exemption

On October 5, 2020, AQD submitted a written Rule 278a request per Michigan Air Pollution Control Rule (Rule) 278a(2). On November 20, 2020, MLC provided a Rule 278a analysis demonstrating that torch cutting operations were exempt from obtaining a permit to install (PTI) under Rule 285(2)(j)(i) for portable torch cutting equipment that does not cause a nuisance or adversely impact surrounding areas and is used for activities performed on a non-production basis such as dismantling.

Site Inspection

AQD arrived around 1 PM and met with Mr. Tim Francis, Project Manager with ASTI Environmental. AQD showed Mr. Francis their employee ID card and discussed the purpose of the inspection.

The site is being cleaned up to be repurposed. Mr. Francis explained that the main notable things remaining on site are the river pump house, remnant steel pieces, and an open basement.

River Pump House

AQD observed the river pump house buildings. Mr. Francis explained that the owner decided to leave the pump house buildings for aesthetic purposes. These are two one-story house-shaped structures located next to one another. These do not appear to have air quality concerns.

Remnant Steel Pieces

Several large, dark orange, railcar shaped and sized pieces of remnant steel are located throughout the site. Mr. Francis explained that steel was poured into tankers lined with refractory brick, and conveyed a half mile across the site for further processing. During plant operation, railcar steel was scrapped if it was off spec or unable to be used before hardening. These were the pieces currently being cut to be removed off site. Once pieces of remnant steel are small enough to be removed by truck, they are piled by the roadway and loaded out.

Remnant Steel Torch Cutting

AQD observed the torch cutting of a piece of remnant steel on site. Opacity observed from cutting did not appear to violate Rule 301(1)(a), written below.

Rule 301. (1) Except as provided in subrules (2), (3), and (4) of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:
(a) A 6-minute average of 20% opacity, except for 1 6-minute average per hour of not more than 27% opacity.

AQD visited the several remaining pieces of remnant steel on site.

Steps to Minimize Opacity

Mr. Francis explained steps to minimize opacity since torch cutting the previous fall. Mainly, the facility monitors wind speed and they delay torch cutting during still winds in order that wind may dissipate any smoke generated by torch cutting. The facility has a 5 mile per hour wind requirement for torch cutting.

Secondly, it appears the facility is using two dust bosses (water misters) that are smaller than the two dust bosses used the previous year. These dust bosses can be moved by hand (or by pickup truck) to more accurately control fugitive dust. The dust bosses are used with a 4,000 gallon water truck. The water truck is refilled from a tank of city water located near the site entrance.

Open Basement

AQD visited the open basement on site. It appears a step the facility is taking to cleanup the site is filling in tunnels from an open basement on site. These tunnels do not appear to have air quality concerns.

Miscellaneous Equipment

A mobile 58 KW diesel generator is associated with torch cutting. The emergency engine doesn't appear to be subject to 40 CFR Part 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines because it is mobile (it is mounted on tires), per 40 CFR 63.6585(a). The diesel generator does not appear to be subject to 40 CFR Part 60 Subpart JJJJ - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines because the emergency engine does not meet the definition of stationary internal combustion engine in section 60.4219 because the engine is mobile (it is mounted on tires). The engine appears to be exempt from obtaining a PTI per Rule 285(2)(g) for internal combustion engines that have less than 10 MMBtu/hour maximum heat input.

Oxygen and propane tanks on site associated with torch cutting appear to be exempt from obtaining a PTI per Rule 284(2)(j) for storage of oxygen, and Rule 284(2)(b) for storage of propane in a vessel that has a capacity of less than 40,000 gallons, respectively.

Conclusion

Based on the AQD inspection and records review, it appears that MLC is in compliance with the federal Clean Air Act; Part 55, Air Pollution Control, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; and the Michigan Air Pollution Control Rules.

NAME



DATE

2/22/22

SUPERVISOR

JK