

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

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| FACILITY: FPT-PONTIAC DIVISION L.L.C. | | SRN / ID: B4146 |
| LOCATION: 500 COLLIER RD, PONTIAC | | DISTRICT: Warren |
| CITY: PONTIAC | | COUNTY: OAKLAND |
| CONTACT: | | ACTIVITY DATE: 08/31/2020 |
| STAFF: Joe Forth | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR |
| SUBJECT: On-site Inspection | | |
| RESOLVED COMPLAINTS: | | |

On August 31, 2020, AQD Staff Joseph Forth conducted a scheduled inspection of Ferrous Processing and Trading (FPT)-Pontiac (B4146) located at 500 Collier Road, Pontiac, MI, 48056. The purpose of the inspection was to determine facility's compliance with the Federal Clean Air Act; and Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451 and Permit to Install (PTI) No. 120-80.

I arrived at 2:00 pm and was met by Ms. Lisa Carroll, Environmental Director. I presented my credentials and stated the purpose for inspection. FPT employs 23 people at the Pontiac location. Shifts run from 7:00 am to 4:00 pm, Monday through Friday.

The facility is a large lot containing various equipment used to transport the processed metal. The only equipment that produces potential air emissions is the fragmentizer (crusher) located on-site. The fragmentizer is controlled by several devices. Water mist is injected into the fragmentizer to cool the machine, prevent fires due to friction of material, and prevent visible emissions. Additionally, air for removal of particulate matter due shredding is a closed system and air is not released to atmosphere and its dust content is removed using a dust collection system consisting of one large cyclone for very large particles (primary), four small cyclones for large particles (secondary) and roller cloth filter for fine particles (tertiary). Cyclones are monitored for power (KWH) usage. The roller filter is equipped with magnehelic gauge to monitor pressure drop (ΔP) between 20-27 inches of water. When the filter roll is empty, the operator hears an alarm. Filter cloth is automatically rolled based upon pressure drop (ΔP = max 26 inches of water). Cyclones are monitored for power (KWH) usage. The roller filter is equipped with magnehelic gauge to monitor pressure drop (ΔP) between 20-27 inches of water. When the filter roll is empty, the operator hears an alarm. Filter cloth is automatically rolled based upon pressure drop (ΔP = max 26 inches of water). The fragmentizer is permitted per PTI No. 120-80. The facility has no cold-cleaners, back-up generators, or boilers. FPT says no new equipment has been installed. During the inspection, the fragmentizer was not currently operating as it was receiving maintenance. However, operators were willing to turn on the interior water spray nozzles to demonstrate that they are operational. The enclosure for the system was not closed at the time of inspection, due to the equipment not being operated at that time. Operators described to me how the doors of the equipment close when the system is operating. I was shown the water truck that the facility uses to wet the roadways of the facility. The facility wets the roads as needed, but at least twice a month.

On December 30, 2019, FPT-Pontiac was issued a violation notice by the USEPA for operational and recordkeeping issues. FPT-Pontiac is currently still disputing the violations with the EPA. During my inspection I did not see the same issues that were noted in the violation notice by the EPA. These issues may have been remediated since the issuance of the violation notice.

Compliance

PTI No. 120-80

Special Conditions

10. The fragmentizer was not operating at the time of inspection, so visible emissions were not able to be evaluated.

11. a. The permittee applies water to all plant roadways at least twice a month, more as needed.
b. The permittee appears to be keeping the grounds facility clean of non-metal materials (upholstery, plastic, etc.)

12. Particulate emissions from the primary cleaning operation (large cyclone) shall be below 0.05

pounds per 1000 pounds of exhaust gas. With proper operation and maintenance of the large cyclone of the fragmentizer this emission limit can be achieved. Emissions testing has not yet been requested by the AQD.

13. Particulate emissions from the secondary (4 smaller cyclones) and tertiary (roller cloth filters) cleaning operations shall be below 0.10 pounds per 1000 pounds of exhaust gas. With proper operation and maintenance of the controls of the fragmentizer this emission limit should be satisfied. The facility inspects the controls before and after production. Cyclones are monitored for power (KWH) usage. The roller filter is equipped with magnehelic gauge to monitor pressure drop (ΔP) between 20-27 inches of water. When the filter roll is empty, an alarm is generated. Filter cloth is automatically rolled based upon pressure drop ($\Delta P = \text{max } 26$ inches of water). Emissions testing has not yet been requested by the AQD.

14. The permittee claims no gas canisters are processed in the fragmentizer.

15-17. The exhausts for the fabric filter collector, secondary cleaning cyclone, and tertiary cleaning cyclone appeared to be unobstructed. Heights of the exhaust not confirmed during this inspection.

18. FPT claims that all 5 cyclones and the fabric collector are installed and properly maintained. EPA cited them for not having the fabric collector enclosed. At the time of inspection, the housing for the fabric filter appeared to be fully enclosed when the access door was closed.

19. FPT provided daily inspection logs (See Attached) which are filled out on days which the fragmentizer is operated. In the EPA violation notice, it claims that the logs provided to them did not contain hours of operation or daily maintenance inspections. The inspection logs provided to me show that the operators inspect every part of the shredder, including controls, conveyors, hydraulics, etc. The log stipulates that if operation lasts longer than 8 hours, additional inspections are required. There is a field on the log for any defects that occur during operation and maintenance done during the shift. The log also shows hours of operation and tons produced.

20. During the inspection, the trash conveyor was exposed, due to maintenance, which could last a few hours, being conducted. I was assured that when in operation, the system doors close and the process is enclosed.

21. Operators demonstrated the spray nozzles in the system, these nozzles are used to wet the material to both keep particulate matter suppressed and to prevent fires within the system.

22-28. The AQD has not yet requested emissions testing for the beryllium, cadmium, chromium, nickel, lead, copper, and zinc emission rates. Therefore, compliance with these conditions has not yet been evaluated.

29. The facility performs inspections before and after each operation of the fragmentizer, according to inspection logs. Any alignment or balancing of the machinery is noted and performed on an as needed basis.

30. FPT operates the spray nozzles within the fragmentizer constantly while operating.

Conclusion

In December 2019, the USEPA issued a violation notice to FPT-Pontiac for issues relating to operational and recordkeeping requirements for PTI No. 120-80. Based on my inspection, it appears that at least currently, the facility is operating in accordance with their permit. I intend to inspect the facility again next year to verify continued compliance.

NAME *Joseph M. Felt*

DATE 9-28-2020

SUPERVISOR *Sebastian Kallumkal*