



DRAYTON IRON & METAL, INC.

(Mailing Address)

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(Physical Address)

5229 Williams Lake Road
Waterford, MI. 48329

September 7, 2023

B5465

TO: State of Michigan
Department of Environment, Great Lakes, and Energy
Warren District Office

ATTN: Adam Bogner/Senior Environmental Engineer Air Quality Div.
Jenine Camilleri/Enforcement Unit Supervisor EGLE

FROM: Larry Throesch / Yard Manager
Stacey Spurgeon / Administrative Asst.

RE: Violation Notice Written Response for the **SECOND TIME**, SRN: B5465, Oakland County
ALL VIOLATIONS RECEIVED ON JULY 10, 2023

Violation of Rule #1:

Violation on July 10, 2023. Drayton Iron and Metal hired an outside source to torch a piece of heavy steel. We have not been torching ourselves per EGLE, AQD and the Township of Waterford. We will not have torching of Steel on the property per EGLE, AQD. All torch cutting tools have been put away, Air tanks have been disassembled. Shipping container units for torching are being disassembled per Waterford Township. We have since received a lower monetary notice to ship UNPREPARED Steel.

Violation of PTI No. 398-75A EUPROCESS Section V Special Condition 1:

Violation on July 10, 2023. Visible emissions were not done but have since been done. I am including a copy of that report along with pictures.

AQD was not contacted but will be contacted for all testing in the future, there is no excuse. Please also note that the MULTIPLE VIOLATIONS for this is incorrect since the person who completed the course was not certified until October 19th, 2022. Mr. Bogner was kept up to date on this process via email.

Violation of PTI No. 398-75A EUPROCESS Section VI Special Condition # 2:

Violation on July 10, 2023

Drayton Iron and Metal, Stacey Spurgeon, has kept monthly records of the amount of material processed, we just didn't keep records to Mr. Bogner's satisfaction.

Material leaving the facility is all documented.

Watering Suppressant on the crusher is checked daily before the machine starts processing.

All records will be put into the main spreadsheet at the end of every month, available for review by the 7th of every month.

WET Concrete is allowed to **DRY** before crushing, the crusher **WILL NOT** crush **WET** material. There is a counter on the bucket of the loader which keeps track of the daily amounts of concrete being crushed (per bucket). There is currently a 3 ½ yard bucket on the loader, 3 ½ yards is equal to about 3000 lbs. of concrete. The company is also researching a Loader Scale. The Loader Scale will give an actual readout of the unprepared concrete going into the crusher daily and an actual readout of the prepared concrete going out of our facility.

Violation of EUPROCESS Section III Special Condition 2:

Violation on July 10, 2023

The facility maintained daily records of all watering/dust suppressant applications, again just not to Mr. Bogner's satisfaction. All watering and dust suppressant is done daily, three times per day to be exact. The times were as follows: 8:30 am, 12:30 pm & 2:30 pm. Mr. Bogner wanted it done a different way. According to Mr. Bogner, just checking a box every time the water is done would be great. Specific times, on a daily basis, are clearly not good enough and all Watering Vehicles have a binder and paperwork that can be "check marked" when watering is done, which will be at least three times per day.

Violation of EUPROCESS Section III Special Condition 1:

Violation on July 10, 2023

Water Suppressant applications were maintained to the storage piles, just not in a satisfactory manner for Mr. Bogner. All Water Suppressant applications will now be noted by a check mark on a sheet which is in a binder in the Watering Vehicles.

Violation of EUPROCESS Section II Special Condition 2:

Violation July 10, 2023

The facility **DID NOT** or **HAVE WE EVER** processed more than 25,000 Tons of Material during a 12 Month period. Mr. Bogner & I seem to have a misunderstanding about the Rolling Total Records.

The record of throughput has **NEVER** shown that the company is processing more than 25,000 tons per year. A **ROLLING TOTAL** record has been done. The records indicate a monthly total (every month) in one column and a **ROLLING TOTAL** (every month) in the next column. I do not know what Mr. Bogner is looking for but I am also including an EXCEL Tutorial on **Rolling Totals**.

If there should be any more questions or problems, I am sure they will all be discussed during our meeting scheduled for September 12, 2023

Stacey Spurgeon

