

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

B546555280

FACILITY: DRAYTON IRON AND METAL CO		SRN / ID: B5465
LOCATION: 5229 WILLIAMS LAKE RD, DRAYTON PLNS		DISTRICT: Warren
CITY: DRAYTON PLNS		COUNTY: OAKLAND
CONTACT: Tom J. Spurgeon , Administrative Director		ACTIVITY DATE: 08/26/2020
STAFF: Adam Bognar	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On August 26, 2020, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I, Adam Bognar conducted a scheduled inspection of Drayton Iron & Metal (the "facility") located at 141 East Montcalm, Pontiac 48342. The purpose of this inspection was to determine the facility's compliance status with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (EGLE-AQD) rules; 40 CFR Part 60 – Standards of Performance for Nonmetallic Mineral Processing Plants (Subpart 000); and Permit to Install No. 398-75.

I arrived at Drayton Iron & Metal at around 10 am. I met with Mr. Larry Throesch, Manager. I identified myself and stated the purpose of the inspection.

Drayton Iron & Metal is a metal scrapyard. They receive metal pieces from various sources, sort them, torch cut them to reduce size (if necessary), then ship them to a foundry that takes recycled metal. There are around 10-20 employees.

In my previous inspection of this facility, I observed torch cutting being performed outdoors. Since the torch cutting is/was performed outdoors with no emission control, torch cutting at Drayton Iron & Metal is not exempt from the AQD Rule 201 requirement to obtain a permit to install. Torch cutting at Drayton Iron & Metal is currently unpermitted. A violation notice was sent to Drayton Iron & Metal on June 19, 2019 seeking compliance with Rule 201.

Rather than apply for a permit to install, Drayton Iron & Metal decided to construct an enclosure/filtration system to capture torch cutting emissions. Torch cutting is exempt from the requirement to obtain a permit to install if it does not adversely affect the surrounding area and has emissions that are released only into the general in-plant environment and/or that have externally vented emissions equipped with an appropriately designed and operated enclosure and fabric filter.

Prior to this inspection, Mr. Throesch informed me that he completed construction of his torch cutting enclosure and fabric filter. An additional goal of this inspection was to observe the torch cutting enclosure in operation.

Mr. Throesch showed me the torch cutting enclosure. The enclosure is a three-sided structure built from shipping containers ("Connex boxes"). The walls are each two containers tall. A heavy-duty tarp is draped over the top of the structure to create a roof. There are two fan inlets located in the back wall of the structure which are designed to draw air from the torch cutting and push it through a filter system. The fans are located approximately 15 feet above the actual torch cutting. The filter system is constructed from an industrial air conditioning unit with additional filters stuck inside it. The air conditioning unit also has fans that pull air through the fabric filters. Torch cutting is conducted within this enclosure. The enclosure is relatively large since this facility needs to be able to torch cut large materials such as "I" beam.

Staff at Drayton Iron & Metal set up for torch cutting in the enclosure. There is one staff who torch cuts up to 8 hours per day, 5 days per week. I observed torch cutting from approximately 10:30 am to 11 am. The enclosure did not appear to capture the majority of the torch cutting smoke. There was a light breeze which was blowing torch cutting smoke out of the open end of the 3-sided enclosure. The wind seemed to be blowing from the southwest. The open side of the structure is facing east.

I informed Mr. Throesch that the enclosure is not adequately capturing the torch cutting emissions. I told Mr. Throesch that I have never seen a dust collector system equipped with fans instead of blowers. Fans are

generally not designed to blow against resistance, such as a filter. I questioned whether the fans would ever be powerful enough to draw torch cutting emissions 10-15 feet upwards.

Mr. Throesch said he would attempt to improve the structure. His tentative plan is to get a powerful blower and move the blower inlet closer to the actual torch cutting operation. Also, he may extend the roof tarp so that it drapes down over the top half of the open side, further shielding the enclosure from the wind. I asked him to update me about his progress by October 1, 2020.

Mr. Throesch recently purchased an additional shear for the facility to further reduce the need for torch cutting. The new sheer will attach to a backhoe. The other shear, used for smaller items, is located inside the Quonset hut. No emissions are expected from the shearing process.

Permit to Operate No. 398-75

PTI No. 398-75 was issued in 1988 for a jaw crusher, conveyor belt, screens, and magnetic separators. The original crushing plant was designed to process foundry slag which contained a high amount of iron. Currently this equipment is still operated, but it is now only used as a concrete crusher – no foundry slag is processed.

Special Condition 10 – Visible emissions are limited to 20% opacity. I did not observe the process operating during this inspection. I did not notice any opacity coming from the storage piles or process equipment.

Special Condition 11 – States that the applicant shall not operate the crushing and handling process unless the water spray control system at the inlet and outlet of the jaw crusher is installed and operating correctly. Mr. Spurgeon stated that the crusher is equipped with water sprays at the inlet and outlet of the crusher. I observed the spray nozzles for the water spray control system. These sprays are operated whenever the crusher is operating. The crusher was not operating during this inspection.

Special Condition 12 – States that the applicant shall not operate the crushing and handling process unless the fugitive dust control program is maintained. The fugitive dust program requires high traffic roadways to be wetted to prevent dust, notify vendors of their responsibility to clean wheels and body prior to leaving site, and maintaining storage piles in a wet condition whenever required.

I did not notice any fugitive dust or opacity coming from the crushing equipment. It was raining during this inspection and the equipment was not operating. Mr. Spurgeon stated that they utilize a water truck to wet all high traffic areas during dry days. I observed that a water truck is located on site.

I did not notice significant track-out at the facility exit, however; this will be monitored in future inspections since there is not a wheel wash station or rumble strips.

According to Mr. Larry Throesch, the dust collector associated with the “bulk cement storage system” is no longer on site. There is no bulk cement storage system. Concrete is simply stored in large piles near the crusher.

The crusher is now being used for a different purpose than what was described in this permit to install. This constitutes a modification of this process equipment. This is a violation of EGLE-AQD Rule 201. A violation notice was sent to Drayton Iron & Metal on September 22, 2020 seeking compliance with AQD Rule 201. Mr. Throesch informed me on September 17, 2020 that he plans to submit the permit modification application by September 25.

Subpart 000

Drayton Iron & Metal appears to be subject to 40 CFR Part 60 – Standards of Performance for Nonmetallic Mineral Processing Plants because the equipment has been modified since August 31, 1983. Mr. Throesch stated that the facility stopped crushing the “foundry slag” and began crushing concrete in 1990 (approximately). Mr. Throesch stated that none of the crushing equipment, including the conveyors, crushers, and ancillary equipment, has ever been replaced. Facility does not appear to be subject to the monthly inspection requirement for the water spray control technology since no modifications to the crushing plant have been made since April 22, 2008.

The facility is subject to the requirement to perform Method 9 visible emissions readings on affected facilities (facilities subject to Subpart 000). Affected facilities include the crusher, grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, storage bins/piles, and enclosed truck or railcar loading stations. It does not appear that an any performance test has been performed. AQD will be working with

Drayton Iron & Metal to conduct these tests. [BA(1)]

I left the facility at around 11:30 am

Compliance Determination

Observations made during this investigation indicate that Drayton Iron & Metal is not operating 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); EGLE-AQD Administrative Rules; 40 CFR Part 60 – Standards of Performance for Nonmetallic Mineral Processing Plants (Subpart 000); and Permit to Install No. 398-75.

There are three compliance issues at Drayton Iron & Metal:

1. Drayton Iron & Metal constructed a torch cutting enclosure and fabric filter system to control torch cutting emissions; however, my observations during this inspection were that the enclosure did not adequately capture torch cutting emissions. Torch cutting at Drayton Iron & Metal is still non-compliant. Drayton Iron & Metal is actively working on improving the torch cutting enclosure and has been updating me with their progress. Progress on the torch cutting enclosure will be monitored closely to ensure compliance in a timely manner.
2. Drayton Iron & Metal has modified their crushing operation to utilize crushed concrete as a feedstock instead of foundry slag. This is a violation of EGLE-Rule 201. A violation notice was sent to Drayton Iron & Metal on September 22, 2020. I informed Drayton Iron & Metal that they must submit a permit to install application (modification) to the EGLE-AQD permit section by October 2, 2020. If a permit application is not submitted by that date, then a violation notice will be issued to Drayton Iron & Metal.
3. Drayton Iron & Metal has not conducted a visible emissions test on the concrete crushing equipment subject to Subpart 000. Equipment affected by Subpart 000 includes crushers, conveyors, storage piles, and unpaved areas with heavy vehicle traffic. Additional affected equipment may be identified after Drayton Iron & Metal receives a permit to install modification. The concrete crushing season is coming to an end. Drayton Iron & Metal should receive an updated permit to install before the start of next crushing season (Spring 2021). A visible emissions test will be scheduled shortly after the start of next crushing season. A violation notice was sent to Drayton Iron & Metal on September 22, 2020 seeking compliance with the visible emission reading requirements of Subpart 000.

NAME Adam Bognar

DATE 9/25/2020

SUPERVISOR Sebastianykallemkal