DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Self Initiated Inspection

DISTRICT: Grand Rapids
COUNTY: KENT
ACTIVITY DATE: 04/11/2014
SOURCE CLASS: Minor
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Staff, April Lazzaro arrived at the facility to conduct an unannounced, unscheduled inspection and met with Randy VandenToorn, Owner. Mr. VandenToorn was presented with the DEQ Environmental Inspections: Rights and Responsibilities brochure and he stated he was familiar with it and its contents. We discussed the purpose of the inspection was to determine compliance with Permit to Install 1094-80 and that it had been almost 10 years since the last inspection.

We were met by Dustin VandenToorn who accompanied us on the physical inspection of the shredder. The shredder has not been modified, and is remains a 12-15 tph mill. Only routine maintenance has been conducted on the unit as necessary. Randy indicated that they maintain the fugitive dust plan by conducting water application and sweeping the yard as necessary. They realize it is best to do this when it's wet as to not create dust as they are sweeping.

The cyclone and scrubber control system has been maintained and inspected daily, when in operation, since the required repairs were made in 2006. The unit was not in operation at the time of the inspection, but no visual issues were identified. The scrubber water is continuously circulated, even when the unit is not running. This is how the water is kept from freezing in the winter months. The scrubber water goes through a small settling pond prior to recirculation and any solids are cleaned out daily. The entire batch of scrubber water is changed out as needed; around every two months. The control equipment has not been painted since 2006 and the dark paint still appears shiny in places. Staff feels that this is an indication of proper maintenance of the cyclone and scrubber particulate control system.

Additional upgrades have been conducted on the system which includes a well with 100 gpm flow for dust and fire suppression. The company has also installed water spray nozzles at the hammermill itself to control any particulate matter that may not be controlled by the scrubber. The facility maintains record of production hours in the tower which was observed. To reduce any downtime from the occasional fire in the mill, the operator has a water deluge 'button' right in the tower that can deliver 100 gpm to the mill to quickly extinguish a fire if needed.

Four older, permitted diesel engines provide power to the shredder. The engines are not original to the system but were replaced per Rule 285. Randy indicated they are thinking about switching to natural gas engines due to the cost of diesel fuel. I recommended that he discuss with the engine manufacturer getting a certified engine, because of the new EPA regulations on internal combustion engines. The current engines are not subject due to their age.

The facility utilizes a shear to reduce metal to a size that is acceptable for the shredder. The larger pieces of scrap that the shear can't cut are torched. We discussed that the 6-minute average of 20% opacity also applies to torching. Dustin indicated he would keep that in mind when torching is conducted.

Overall, the yard was clean and well maintained. This facility was in compliance at the time of the inspection.

DATE 4-16-14

PAB SUPERVISOR