



STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY



GRETCHEN WHITMER
GOVERNOR

KALAMAZOO DISTRICT OFFICE

PHILLIP D. ROOS
DIRECTOR

August 14, 2023

Pat Farrell
Kalamazoo Metal Recyclers
1525 King Highway
Kalamazoo, MI 4900

SRN: N1373, Kalamazoo County

Dear Pat Farrell:

VIOLATION NOTICE

On August 3, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Kalamazoo Metal Recyclers located at 1525 King Highway, Kalamazoo, Michigan. The purpose of this inspection was to determine Kalamazoo Metal Recyclers 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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 364-78 and to investigate recent complaints which we received on July 10, 2023, July 31, 2023, and August 1, 2023, regarding burned plastic odors attributed to Kalamazoo Metal Recyclers operations.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|--|---|
| Shredder | Rule 201 | Failure to apply for a permit to install after reconstruction and modification of the process and process |
| Shredder | PTI No. 364-78, Special Condition (SC) 20(a) | Failure to maintain in operation a device to accurately monitor the pressure drop across the venturi scrubber |
| Torch Cutting | Rule 201 | Torch cutting operation no longer meets Permit to Install exemption Rule 285(2)(j). |

During this inspection, it was noted that Kalamazoo Metal Recyclers had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised Kalamazoo Metal Recyclers on August 3, 2023, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

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A program for compliance may include a completed PTI application for the reconstruction and modification of the shredder and the torch cutting process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 4, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Michael Cox at EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 or coxm9@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Kalamazoo Metal Recyclers believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Kalamazoo Metal Recyclers. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Michael T. Cox

Michael Cox
Environmental Quality
Analyst Air Quality
Division 616-240-3607

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Monica Brothers, EGLE