

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

P049224507

FACILITY: Industrial Asset Recycling		SRN / ID: P0492
LOCATION: 3775 Outer Drive East, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: David Terry , Chief Executive Officer		ACTIVITY DATE: 02/03/2014
STAFF: Todd Zynda	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Self Initiated Inspection (as result of complaint investigation)		
RESOLVED COMPLAINTS:		

This Self Initiated Inspection report is similar to the Complaint Investigation Report CA_P049224232. Please see the complaint investigation report for photos.

REASON FOR INSPECTION: Self Initiated Inspection/Complaint Investigation

INSPECTED BY: Todd Zynda, AQD

PERSONNEL PRESENT: David Terry

FACILITY PHONE NUMBER: (586) 991-0163

FACILITY WEBSITE: www.iarecycling.com/

February 3, 2014 Complaint Investigation/Self Initiated Inspection

On February 3, 2013, at approximately 2:27 PM, a complaint was reported by emailing the Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) Detroit office. The complainant (a representative from the Urban Development Corporation) reported that emissions are originating from the stack on the building at 3775 Outer Drive East, Detroit, Michigan.

In response to the complaint, AQD staff, Mr. Todd Zynda conducted a complaint investigation at 3775 Outer Drive East. Mr. Zynda arrived in the area at approximately 3:15 PM. At the time of investigation, winds were calm, and the temperature was approximately 26 degrees Fahrenheit (°F) with clear skies. Upon arrival, visible emissions were not observed. A level 2 odor of burning wood was detected in the north parking lot adjacent to the building. AQD personnel (Todd Zynda) entered the property and stated the purpose and authority for inspection and presented AQD identification. Mr. Zynda was greeted by Mr. David Terry, Chief Executive Officer of Industrial Asset Recycling (IAR). During the opening meeting contact information was exchanged.

Mr. Terry stated that he was the former owner of Metro Pallets Sales (according to the Michigan Department of Licensing and Regulatory Affairs Business Entity Search, Metro Pallet Sales, is an active company, but not in good standing as of February 15, 2008). According to Mr. Terry, IAR purchased the property at 3775 Outer Drive East during a 2009 federal foreclosure. Mr. Terry stated that the combustion unit was installed in 2011. Mr. Terry stated that IAR performs demolition of industrial machinery and equipment for manufacturing facilities. Operations at 3775 Outer Drive East include storage for equipment removed from manufacturing facilities. An IAR pamphlet was provided to AQD and is included in the file for reference.

Mr. Zynda explained that there had been a complaint earlier in the day of visible emissions originating from 3775 Outer Drive East and would like to take another look at the combustion unit. During the inspection, Mr. Terry provided information that on how he designed the combustion unit himself based on specifications he found on the internet. Mr. Terry stated that combustion unit is used to keep the warehouse warm during the winter months. Mr. Terry also stated that the warehouse is equipped with natural gas heaters that are occasionally used to heat the warehouse. According to Mr. Terry the combustion unit is utilized to save money. The wood material used in the combustion unit is obtained for free or at a discount.

During the inspection AQD documented the combustion unit and material staged for burning with photographs (see attached photos). Mr. Zynda inquired how the company distinguishes between treated wood pallets and non-treated pallets. Mr. Terry showed an area where treated pallets are set aside, so they are not burned. Mr. Terry demonstrated that the treated pallets sometimes have a stenciled emblem on them indicating that the pallet is pressure treated or glued particle board. During the inspection wood staged near the operation of the

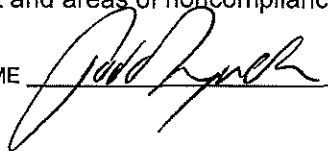
unit was observed to contain other waste material, such as metal (nails, staples, etc.) along with painted wood (see attached photos).

During the facility inspection, AQD discussed that the equipment could possibly be exempt under R 336.1282(b) (iii). A copy of the Permit to Install (PTI) exemption handbook was provided to Mr. Terry. Mr. Terry inquired if IAR could have the rated heat input capacity of the unit certified by a third party. Mr. Zynda stated that he was unaware if that would be possible. It was agreed that AQD would send a letter to IAR outlining options to demonstrate compliance. IAR agreed to be in contact with AQD to assess a path forward to resolve violations. Prior to leaving the facility, Mr. Zynda explained that in addition to the cited violations the facility is also subject to Rule 301 (standards of density of emissions). Mr. Terry stated that if there are documented emissions from his facility it is because IAR staff is not operating the combustion unit properly. Additionally, Mr. Zynda inquired if the unit is used to combust coal as specified in IAR letter. Mr. Terry stated that the unit does not use coal, and that was a mistake in the letter sent to AQD.

Final Compliance Determination

After further review, PTI exemption Rule 282(b)(iii) does not appear to be applicable due to the home-made style of the unit and the burning of "other waste materials" (painted wood, metal, etc.). During the site visit, painted wood was documented in the material staged for burning. Due to the home made construction of the unit, it is not likely that the rated heat input capacity and the proper design of the combustion unit can be verified.

At the time of the inspection, this facility does not appear to be in compliance with state and federal regulations. A violation notice was issued on January 9, 2014 for the noncompliance with 40 Code of Federal Regulations (CFR), Part 60, Subpart CCCC (commercial and industrial solid waste incinerator) and Michigan Administrative Code R336.1210(1). A follow up letter was sent on February 5, 2014 regarding the combustion unit and areas of noncompliance.

NAME 

DATE 3/26/14 SUPERVISOR W.M.