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MAVILDEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

P095850115

FACILITY: GLR Advanced Recycling		SRN / ID: P0958
LOCATION: 12600 Stark, LIVONIA		DISTRICT: Detroit
CITY: LIVONIA		COUNTY: WAYNE
CONTACT: Scott Patrick , Operations Manager		ACTIVITY DATE: 08/28/2019
STAFF: Gerald Krawiec	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled Inspection for FY 2019		
RESOLVED COMPLAINTS:		

AQD staff conducted a scheduled inspection for FY 2019 of GLR Advanced Recycling, located at 12600 Stark in the City of Livonia. The purpose of the inspection is to determine the facility's compliance with applicable state and federal air pollution rules and regulations.

Safety Consultant, Glenn Kittleson; Operations Manager, Scott Patrick; and Supervisor Scott Lathrop accompanied AQD staff on the inspection. Chief Operating Officer, Todd Goodwin joined this cadre prior to completion of the physical inspection.

**Background:**

GLR Advanced Recycling is family owned and operated business for three generations (90+ years) operating at this location since 2014. Founded in 1927 by salvaging old newspaper and rags. Headquartered in Roseville, today GLR operates at 8 locations throughout the State of Michigan.

**Complaint History:**

In May 2017 this office received an odor complaint forwarded from Jennifer Dixon. Upon investigation it was determined the source of the odor complaint is GLR's overflowing water retention pond, causing overflow from the pond to be discharged into a sewer located in an alley adjacent to the complainant's commercial rental property. No odor was detected at this site or in the area.

Director of the Livonia's Inspection Department, Jerome Hanna is on-site as well as personnel from DEQ's Water Resources Division (WRD), in-addition to the Livonia Fire Dept. It was clear that AQD does not have jurisdiction regarding this complaint as all the appropriate authorities are on-site.

**Facility and Process Description:**

GLR is located on a 14-acre site (12 working acres). At this site, GLR employs approximately 30 staff, operates 8 hours/day, 5 days/week and 5 hours on Saturday.

GLR, receives and processes mainly automobiles along with some industrial and demolition metal scrap varying in size, quality and shape. The facility routinely

receives various grades of steel and other ferrous (containing iron) and non-ferrous metals.

Approximately 150 automobiles/day are received for processing. Batteries are removed first, vehicles then go to one of four fluid removal stations where gasoline, oil, brake fluid, power steering fluid, coolant, etc. are removed for recycling. Refrigerants are captured using an EPA approved process for recycling. Wheels and tires are removed and inspected, then separated into useable versus unusable piles.

The dry vehicle then has its engine and transmission removed as one unit, without torch cutting. Part's such as alternators and starters are removed. The remaining stripped vehicle then goes to a machine known as "The Logger" where it is compressed (crushed) into a shape that GLR refers to as "logs" which are ready for recycling.

Hybrid vehicles are handled completely different. They are manually dismantled in a separate area of the site. Due to the high voltage batteries in these cars, only specially trained staff using special tools are employed to perform this specialized dismantling.

GLR also accepts various small quantities of material such as small parts, brass, copper, aluminum, wire etc. from individuals.

#### **Inspection Narrative:**

Upon arrival, I conducted a pre-inspection conference with Safety Consultant, Glenn Kittleson. Mr. Kittleson alerted other pertinent GLR staff of the pending inspection.

Safety Consultant, Glenn Kittleson accompanied AQD staff as we toured this site. Three other persons (described above) joined the inspection when available. We walked through the process as described above. There are several piles of scrap metal on site sorted by type.

Metal shears are used to cut large pieces of material to a manageable size, torch cutting is utilized on a limited basis. The machine known as "The Logger" which crushes vehicles into the shape of a log was not in operation at this time.

There are several open buildings on the site, the fluid removal stations for example are enclosed on three sides. Other buildings are used to warehouse materials and/or small parts sorting. Located in the maintenance shop are gas and electric welding equipment as well as a small parts washer that measures 20 in. x 32 in. ~ 4.5 sq. ft. Washer solution is changed monthly, SDS for that solution is available.

Gasoline drained from the incoming vehicles is filtered and made available to employees for their cars and trucks at no cost. Not all employees take advantage of this opportunity.

Although this was a windy day, fugitive dust was not a concern. A large area of the site is paved, and traffic is heavy. Upon entering the facility there was not any track-out observed. The company does not own a street sweeper, however, contracts the sweeping of all the paved areas of the site to a third party.

Unpaved areas of the site were not dusty as traffic is limited in this area. Speed limit signs are posted limiting traffic to 5 mph.

No visible emissions were observed during this inspection.

There is not an emergency generator at this location.

#### Post Inspection:

Upon return to the office with the cadre assisting in this inspection, Mr. Kittleson provided several invoices for street sweeping as evidence that sweeping is done regularly. I reviewed several invoices and suggested that this information be put into a data base so that in future inspections this information can be easily reviewed. Mr. Kittleson liked the suggestion and stated that a spreadsheet would also be of value to the company.

Mr. Kittleson also provided the SDS information for the parts washer solution. As part of the closing discussion, I explained the permit exemptions that applies to the parts washer and welding equipment.

Attached to this report is a company brochure and SDS information.

#### Regulatory Summary:

Rule 281(2)(h) applies to the cold cleaner since it has an air/vapor interface of not more than 10 sq. ft.

Rule 285(2)(i) applies to brazing, soldering, welding, or plasma coating equipment

#### Compliance Determination:

Based upon this inspection of GLR Advanced Recycling located in the City of Livonia, it appears this facility is operating in compliance with the applicable air quality rules and regulations.

NAME B. Krawiec

DATE 12/6/19

SUPERVISOR JK

