DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

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FACILITY: Milford Salvage Iron & Metal Company, Inc.		SRN / ID: P0976
LOCATION: 2823 East Buno R	oad, MILFORD	DISTRICT: Southeast Michigan
CITY: MILFORD		COUNTY: OAKLAND
CONTACT: Ronny Miller, Owner		ACTIVITY DATE: 10/11/2018
STAFF: Adam Bognar	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Self-Initiated Inspec	tion	
RESOLVED COMPLAINTS:		

On Wednesday, October 10, 2018, Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) staff, I, Adam Bognar, conducted an unannounced self initiated inspection of Milford Salvage Iron & Metal CO. (the "facility") located at 2823 Buno Road, Milford, MI 48381. 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; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) rules.

I arrived at the facility at around 2 pm. I met with Mike, an employee. I identified myself, provided credentials, and stated the purpose of the inspection. Mike gave me a tour of the facility.

Milford Salvage Iron & Metal CO. is a metal scrap yard. They receive scrap metal (iron, aluminum, copper, ect.) from various sources, separate it based on the type of metal/source, and cut it into portions that can be easily recycled. This crude separated product is sold to customers.

Cutting of the scrap metal is done by torch cutting. A mixture of oxygen and propane is used in the torch cutters. Torch cutting is performed outdoors next to the scrap pile.

I advised Mike that torch cutting in this manner is a violation of MDEQ-AQD Rule 201. A permit to install is required for the torch cutting operation. MDEQ-AQD permit to install exemption Rule 285 (2)(i)(ii) only exempts torch cutting that is performed at scrap metal recycling facilities if the torch cutting does not cause a nuisance, does not adversely impact surrounding areas, and is exhausted to the general in-plant environment or to an appropriately designed enclosure equipped with a fabric filter.

Milford Salvage Iron & Metal CO. performs this torch cutting outdoors with no enclosure or fabric filter. Milford Salvage & Metal CO. must obtain a permit to install for this torch cutting operation. A violation notice was sent to the facility on October 26, 2018 seeking compliance with Rule 201 requirements.

Mike informed me that this facility has been torch cutting in this manner for many years and has not heard of this air quality regulation. He also informed me that there are other metal scrap yards operating in this manner that have not been cited for this issue by the MDEQ-AQD.

Compliance Determination

Observations made during my inspection indicate that Milford Salvage Iron & Metal CO, 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); and Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules. A violation notice was sent to Milford Salvage Iron & Metal CO. on October 26, 2018 seeking compliance with Rule 201 requirements.

NAME Allown Bogo DATE 10/23/2018 SUPERVISOR_