



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

October 26, 2018

Mr. Ronny Miller, Owner
Milford Salvage Iron & Metal Company, Inc.
2823 East Buno Road
Milford, MI 48381

SRN: P0976, Oakland County

Dear Mr. Miller:

VIOLATION NOTICE

On Wednesday, October 10, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Milford Salvage Iron & Metal Company located at 2823 East Buno Road, Milford, Michigan. The purpose of this inspection was to determine Milford Salvage Iron & Metal Company's 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 the Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Torch Cutting of recycled metal pieces.	R 336.1201 (Rule 201)	Torch Cutting is performed outdoors with no enclosure or filtration system.

During this inspection, it was noted that Milford Salvage Iron & Metal Company had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised Milford Salvage Iron & Metal Company on October 10, 2018, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the Torch Cutting process equipment. An application form is available by request, or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right-hand side of the page).

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. Alternatively, this process may be exempt under Michigan Air Pollution Control Rule, **R336.1285 (2)(j)(ii)** which states, in part:

R 336.1285 Permit to install exemptions; miscellaneous.

Rule 285. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(j) Portable torch cutting equipment that does not cause a nuisance or adversely impact surrounding areas and is used for either of the following:

(ii) Scrap metal recycling and/or demolition activities that have emissions that are released only into the general in-plant environment and/or that have externally vented emissions equipped with an appropriately designed and operated enclosure and fabric filter.

If Milford Salvage Iron & Metal Company decides to operate pursuant to this exemption Rule **(R336.1285 (2)(j)(ii))**, then the company must ensure that torch cutting emissions are released only into the general in-plant environment and/or have externally vented emissions equipped with an appropriately designed and operated enclosure and fabric filter.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 16, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Milford Salvage Iron & Metal Company 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 violation cited above and for the cooperation that was extended to me during my inspection of Milford Salvage Iron & Metal Company. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Bognar
Environmental Quality Analyst
Air Quality Division
586-753-3744

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Joyce Zhu, DEQ