

6-6-18

Michigan Department of Environmental Quality

Saginaw Bay District office Suite B

401 Ketchum Street, Suite B

Bay City, MI 48708

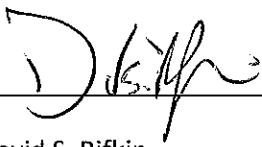
Attention: Ms. Gina L. McCann Sr. Env. Quality Analyst

Dear Ms. McCann,

Please find this letter as our written response to your letter dated May 25, 2018. Your letter states that on May 14<sup>th</sup> a complaint was issued against Rifkin Scrap Iron regarding fugitive black smoke from torch cutting operations. During your visit you mentioned that a letter was issued in 2017 from Mdeq regarding Act 451 Rule 910 stating that torch cutting must be done in an operated enclosure with fabric filter. We were unaware of this change and you mentioned this letter was sent out standard mail non-receipt requested. In your letter dated May 25<sup>th</sup>, 2018 you require responses to specific questions. As such please note the following:

- Rifkin Scrap Iron utilizes liquid oxygen and propane cutting torches to process steel that cannot be: sheared, baled, or sorted
  - Rifkin does NOT torch the following: Cast iron, Manganese Steel, rubber or fiberglass lined tanks.
- It is our opinion that the complaint made against Rifkin on May 14, 2018 was due to a rubber hydraulic hose catching on fire that was attached to steel machinery from GM Bay City Power Train. This fire was very brief in duration, as the operator has pressurized water extinguishers and water buckets at his disposal.
- David Rifkin has been in contact with SPARCS Torching Solutions Inc. Headquartered in Flint, MI
  - SPARCS manufactures torching enclosures
  - We are making a determination if their systems are compatible with our operation
- David Rifkin has met with a local fabricator about building "from scratch" a custom unit
  - Presently we are working on initial plans and rough sketches.
- Rifkin also will continue to send out to other processors items that generate unwanted, fugitive smoke, i.e. Cast iron, manganese steel, lined tanks, or any other items may generate unwanted smoke.

Please note that Rifkin is presently awaiting site plan approval for our relocation from Niagara St. to our property on Washington Avenue in Saginaw. It is our intention to start full construction by early July and have the facility operational by early November. During this construction period it is our intentions to finalize designs, construct, and build a torching facility that will be fully compliant. We would appreciate any assistance or help that MDEQ would be able to provide, so that the new system is compliant the first time around.

A handwritten signature in black ink, appearing to read 'D. Rifkin', is positioned above a horizontal line.

David S. Rifkin

President and CEO