

Manila

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

M479840920

FACILITY: Pro V Enterprises		SRN / ID: M4798
LOCATION: 4401 WYOMING AVE, DEARBORN		DISTRICT: Detroit
CITY: DEARBORN		COUNTY: WAYNE
CONTACT: Jennifer Cotton , Office Manager		ACTIVITY DATE: 07/17/2017
STAFF: Katherine Koster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Targeted FY2017 Inspection		
RESOLVED COMPLAINTS: C-17-01665		

**REASON FOR INSPECTION:** Targeted Inspection

**INSPECTED BY:** Katie Koster, AQD

**PERSONNEL PRESENT:** Mohsen Kambod, ETC, Jeanette Noechel, WHMD, Katie Koster, AQD, Andrew Edmunds and Jennifer Cotton, Pro-V

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**FACILITY BACKGROUND**

Pro-V is engaged in the following activities: trucking, warehousing of metals and scraps, scrap metal recycling, truck and heavy equipment repairs, and scrap metal cutting and welding. The source operates Monday through Friday from 6:00 am to 4:00 pm daily and occasional weekends. It employs 10 – 12 people. Torch cutting occurs between the hours of 6 a.m. and 2:30 p.m. However, there are days when no torching occurs at all. Pro-V bought the facility in 2008. Prior to that it was Ferrous Environmental Recycling Corp.

**COMPLAINT/COMPLIANCE HISTORY**

Two complaints regarding opacity (yellow smoke) were received in 2015 which were investigated and the smoke was confirmed.

One additional complaint was received via Region V from a former employee. This inspection was an investigation of this complaint.

**OUTSTANDING CONSENT ORDERS**

None

**OUTSTANDING LOVs**

None

**INSPECTION NARRATIVE**

On 7/17/17, AQD inspector, Katie Koster, and Waste Inspector, Jeanette Noechel, arrived at Pro-V in Dearborn around 10:30 a.m. We met with Ms. Jennifer Cotton, office manager. She requested that we conduct the inspection with the facility's consultant, Mr. Mohsen Kambod, ETC LLC, who was in St Clair Shores at the time. We agree to wait for him as he was on his way.

In the meantime, we discussed facility operations with Ms. Cotton and I reviewed the records. Pressure drop records, visible emission observations, and hours of operations and number of pieces torched per day were provided. I also requested and reviewed the order for the replacement bags for the baghouse. I was also provided with the baghouse operation and maintenance manual. I requested copies of a subset of these records which Ms. Cotton provided.

Once Mr. Kambod arrived, we were accompanied about the site by him and the plant manager, Andrew Edmunds. First, we went into the warehouse and observed the truck and equipment repair area. There is a waste oil furnace in this location. 280,000 BTU/hr was the rated capacity. It has been on site for about 2 years and all oil burned is generated on site from oil changes of the company's diesel trucks. There is a power washing station which Mr. Edmunds stated only used high pressure water to clean off the trucks.

The rest of the facility was storage of materials for AK Steel, such as bags of alloys, as well as piles of silicon fines and metal turnings from machine shops. Another company, BMI, rents space in the building too. They periodically repair the iron and slag tilters from AK Steel and reapply the refractory. We walked to the back of the facility where the baghouse to control torch cutting was installed inside of the building and vents through an existing brick stack. At this time, the facility is mainly torch cutting tundish skulls from AK Steel. I also observed a pile of traditional looking scrap metal that was awaiting resizing via torch and would be sent to AK to be charged into the BOF vessels. According to Mr. Edmunds, the company purchased a shear to cut scrap but it doesn't work for thick items. The baghouse is a 5-compartment pulse jet baghouse. It was purchased used. I noted the presence of the magnahelic gage. Torch cutting was not occurring at the time and the fans were not on so the pressure drop gauge was near zero.

We walked outside and viewed to stationary hood with walls and doors that encloses the torching area. Only two torchers operate at a time. The roof has to be removed and the scrap placed into the enclosure via crane. Then, the roof is replaced and the torcher opens a slender door to access the material. The company started up the operation so that we could observe. There was a large amount of yellow fumes generated from torching the tundish skull. All of the smoke appeared to be fairly well captured. I noted some intermittent puffs of yellow emissions from the tops of the doors. The facility indicated that the doors have recently been replaced and all of the gaps between the top of the doors and the roof had not yet been sealed but the plan was to have this completed soon. No emissions were observed from the baghouse stack during this activity. The pressure drop was at 4 in w.c. 264 bags were replaced (all of them) in March. I spoke with the torching manager and he stated that the company will stop torching if fugitive emissions are being observed or if the baghouse pressure drop gets too high. He stated that the torchers are paid by the hour, not by the ton of material torched. He claims they stop and run a cleaning cycle when pressure drop is too high.

The yard is unpaved and there are miscellaneous piles all over such as scrap metal, machine shop turnings, silicon fines, coke breeze, swarf, pit slag, etc. I did not notice fugitive dust or track out at the time. However, it had recently rained and based on my observations, fugitive dust and/or trackout could be a potential problem. The prior facility had a fugitive dust plan in place through a permit.

At this time, I could not confirm evidence that the records were being "falsified" as alleged in the complaint. However, the permit is not specific on what constitutes proper operation of the baghouse and what conditions require inspection and corrective action. Based on the daily records, there were periods of time the baghouse was above 6 in w.c. and it is unclear what procedures, if any, are in place

to address this situation. AQD will request a malfunction abatement plan for the baghouse. I informed the consultant that based on the records, we would expect more expedient corrective action that what appears to have happened.

**APPLICABLE RULES/PERMIT CONDITIONS**

PTI 164-15 (Permit was issued October 2015) – EUTORCH - Propane/oxygen torch for cutting steel. Emissions are collected in an enclosed hood and ducted to a baghouse.

**DESCRIPTION:** Propane/oxygen torch for cutting steel.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT:** Emissions are collected in an enclosed hood and ducted to a baghouse.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1.PM	0.01 lb/1,000 lb exhaust gas, dry gas basis	Test Protocol*	EUTORCH	GC 13	R 336.1331

**IN COMPLIANCE** - No emissions were observed from the baghouse stack while torch cutting. At this time, compliance was chosen. Some fugitive emissions were escaping the hood intermittently but it is unclear whether this would have been an exceedance of the PM limit.

**II. MATERIAL LIMITS NA**

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUTORCH unless the enclosed hood and fabric filter dust collector (baghouse) are installed, maintained, and operated in a satisfactory manner.

**IN COMPLIANCE.** Based on the observation of torch cutting while on site, emissions were generally well captured except for some periods where fugitive emissions were escaping from a gap between the doors and the top. Facility stated that this would be plugged soon. On 7/31/17, I received an email with photos that the gaps in hood were sealed. The email is attached.

Pressure drop was out of range and persisted for several days per month over 3 months. All of the bags were eventually changed in March. A MAP will be requested so that there is clear guidance on what is meant by maintained and operated in a satisfactory manner and what corrective actions are required/expected when the baghouse pressure drop is out of range.

**IV. DESIGN/EQUIPMENT PARAMETERS and V. TESTING/SAMPLING NA**

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years.

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each type of steel processed using EUTORCH, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

**IN COMPLIANCE.** MSDS's are maintained on site.

2. The permittee shall monitor and record, in a satisfactory manner, the pressure drop across the fabric

filter dust collector (baghouse) for EUTORCH on a daily basis during operation of EUTORCH. IN COMPLIANCE. Records are maintained and were presented.

3. The permittee shall verify the presence of visible emissions by taking six-minute visible emission readings for EUTORCH a minimum of once per calendar month for one year and upon Department request thereafter. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If the permittee observes any visible emissions, the permittee shall immediately implement the following procedures:
  - a) The permittee shall perform the six-minute visible emission readings at least once every 30 minutes until emissions are no longer visible or until emissions have been observed for more than two hours.
  - b) If visible emissions have been observed for more than two hours, a certified reader shall determine the opacity using Federal Reference Test Method 9 (40 CFR Part 60, Appendix A).
  - c) If the results of the Federal Reference Test Method 9 visible emission observation indicate a violation of the opacity standard specified in GC 11, the permittee shall immediately initiate corrective actions.

IN COMPLIANCE. These readings were performed by the consultant, Mr. Mohsen Khambod and were non-certified. Based on the records, the facility chose to implement the observations past the one-year deadline. It does not appear that the "readings" ever resulted in the need to implement 3.a-c. However, the wording of this condition is not very satisfactory to prevent an opacity exceedance.

4. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for EUTORCH. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, and status of visible emissions. The permittee shall keep all records on file at the facility and make them available to the Department upon request.  
 IN COMPLIANCE – Records are maintained and were presented during the inspection. Some of the records do not contain the time of the inspection to verify the required minimum was met. However, if AQD has future concerns about emissions, AQD has ability to request readings if needed.

**VII. REPORTING NA**

**VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter (inches)	Minimum Height Above Ground (feet)
1. SVBAGHOUSE	30	35

IN COMPLIANCE - Based on visual observation, the stack height is most likely meeting the requirements above.

**IX. OTHER REQUIREMENTS NA**

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**EXEMPT EQUIPMENT**

Waste oil furnace appears to be exempt per Rule 282(2)(b)(iv) as all oils and fuels are generated on site and the furnace is rated below 500,000 BTU/hr.

**NSPS/MACTS/NESHAP**

No boilers or generators appear to be onsite.

**APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS**

I did not observe fugitive dust issues or track out while on site. However, the property has the potential to generate these issues. A fugitive dust plan will be requested.

**MAERS REPORT REVIEW**

According to the permit evaluation form, this is a true minor source. At this time, the facility does not appear to be subject to MAERS.

**FINAL COMPLIANCE DETERMINATION**

Facility appears to be in compliance with the conditions evaluated in this report at this time. However, AQD will request a Malfunction Abatement Plan for the baghouse and a fugitive dust plan for the property.

NAME Kate KoseDATE 8/11/17SUPERVISOR W.M.