

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

P083946748

FACILITY: Lake Pleasant Recycling		SRN / ID: P0839
LOCATION: 3380 Hudson Rd., HILLSDALE		DISTRICT: Jackson
CITY: HILLSDALE		COUNTY: HILLSDALE
CONTACT: Mike Gootee		ACTIVITY DATE: 10/23/2018
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection of an auto scrap yard.		
RESOLVED COMPLAINTS:		

Minor Source-**Facility Contacts**

Mike Gootee – Plant Manager

mike@cunninghameqsales.com

ph 517-523-2809

Website: <http://www.cunninghameqsales.com/default.htm>**Purpose**

On October 23, 2018, I conducted an unannounced compliance inspection of Lake Pleasant Recycling (Company) located in Hillsdale, Michigan in Hillsdale County. The main facility is located at 3380 Hudson Road with a satellite facility located at 4650 South Lake Pleasant Road. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules.

Facility Location

The main location has residential homes close by on the south and east sides while the satellite facility is in a more rural setting with a couple of nearby farms. See attached aerial photo of the main facility.

Facility Background

A previous inspection conducted on 8/16/2017 found a number of violations related to torch cutting and auto shredding.

Regulatory Applicability

The Company does not have a PTI permit for either location. There are no specifically applicable state/federal air requirements as the Company's operations are currently configured.

Portable torching is conducted generally inside the main shop building for minor maintenance and repair. This is considered exempt from PTI requirements per Rule 285 (2) (j)(i).

Rule 201 would apply if the Company failed to properly remove/handle mercury switches.

40 CFR Part 82, Subpart F under Section 608 of the Clean Air Act include requirements for the safe disposal of refrigeration and air-conditioning equipment. The Company does not accept items that still contain refrigerant but is still subject to one requirement:

If the final person in the disposal chain accepts an appliance that no longer holds a refrigerant charge, that person is responsible for maintaining a signed statement from the person who dropped off the appliance. The signed statement must include the name and address of the person who recovered the refrigerant, and the date that the refrigerant was recovered. Alternatively, this could be a copy of a contract stating that the refrigerant will be removed prior to delivery.

Arrival & Facility Contact #1

No visible emissions or odors were observed upon my approach to the Company's satellite facility. I arrived a 10:00 am onto the facility's access road.

Pre-Inspection Meeting #1

NA.

Onsite Inspection #1

There appeared to be nobody at the facility so I did not get out of the car. There was no signs of recent activity. The area where torch cutting was previously occurring appeared to have been abandon. I left the area shortly after arriving and proceeded to the main facility location.

Arrival & Facility Contact #2

No visible emissions or odors were observed upon our approach to the Company's man facility. I arrived at 10:15 am proceeded to the facility office to request access for an inspection, provided omy identification and spoke with Mike Gootee (MG) the plant manager. I informed him of my intent to conduct a facility inspection and to review the various records as necessary.

MG extended his full cooperation and fully addressed omy questions.

Pre-Inspection Meeting #2

We were joined by Jason Kurpinski (JK) who is the Company's environmental consultant (HMB ECO Limited) and happened to be onsite during the inspection. MG outlined that there are currently 6 employees and they generally operate 5 days a week between 8 am to 4 pm and Saturday mornings.

They take mostly residential metal scrap. They receive approximately 50 to 100 cars a month and process a total 1.5 million pounds of metal per month. The cars are processed onsite going through a depollution station to remove gasoline and oil. They are then placed inside a metal box containing as many as 5 cars to be shipped offsite.

They no longer do torch cutting at the satellite location and that site will likely be totally abandon. They do some repair portable torch cutting inside the shop building at the main facility.

The portable auto shredder is in the process of being sold. It has not been used in 3 or 4 months. It has been disassembled into several large components. The main shredder portion of it has been moved to behind the office building where it occasionally operated to show perspective clients that it is still in working condition.

They joined the ELVS federal auto program to recycle mercury switches. MG estimated they find less than one mercury switch per month and have sent in mercury switches on occasion.

They no longer open burn and currently have a dumpster onsite with a contract with a disposal company.

Onsite Inspection #2

JK gave me a brief tour of the facility. He first showed me the new waste dumpster. Next, we went and looked at the various components of the portable auto shredder located in 3 different locations in the yard. See attached photos. He showed me a small scrap metal pile that had been generated when they operated a portion of the shredder to a potential buyer.

Next, we went out into the yard to look at scrap piles. The scrap piles appear to be cleaner and better organized than during the previous inspection. However, some oil was seen leaking from a couple of engine blocks on to a cement pad. Also, noted some old refrigerators in the piles. See attached photos.

JK showed me the new shear they purchased when they stopped torch cutting. See attached photo.

Attached photo shows a pile of scrap metal that had been recently sheared.

JK then showed me the depollution area. Two operators were there in the process of removing gasoline from a

car. (See attached photo.) Nearby, were several large totes containing waste oil. In the depollution area shed, there was a white bucket that they are using for mercury switches. (Note: It was empty.) See attached photo. I questioned the two operators. They did seem well aware of the need to remove mercury switches and commented that they do so occasionally. (Rule 201 would apply if they processed/smashed the vehicles without first removing mercury switches.) I asked them if they had ever checked anti-lock brakes assemblies for mercury and they said no.

We returned to inside the main shop where JK showed me a portable torch cutting unit. See attached photo.

Post-Inspection Meeting

I held a post-inspection meeting with MG and JK. I outlined a few observations. I asked MG how the Company handled refrigerants. He indicated that they don't accept any items that still contained refrigerants. He showed me signed wavier type slips that showed that a particular item did not contain any refrigerants. I noted that the operators were not checking for mercury in anti-lock brake assemblies and suggested that he review material on the ELVS website that gives information on what auto models have these type of systems and how to remove them. MG stated he would do that. I noted that the yard looked much better than during the previous visit but there was still some oil not being removed from engine blocks. JK indicated that he would work with the Company to make sure they do a better job at depollution of their autos.

I thanked MG and JK for their time and cooperation, and I departed the facility at approximately 11:00 am.

Compliance Summary

The Company is in compliance.



Image 1(Scrap yard) : Scrap yard.



Image 2(Scrap yard-oil) : Scrap yard with oil spilled onto cement pad.



Image 3(Auto shredder convey) : Auto shredder conveyor.



Image 4(Sheared scrap) : Scrap that had been sheared.

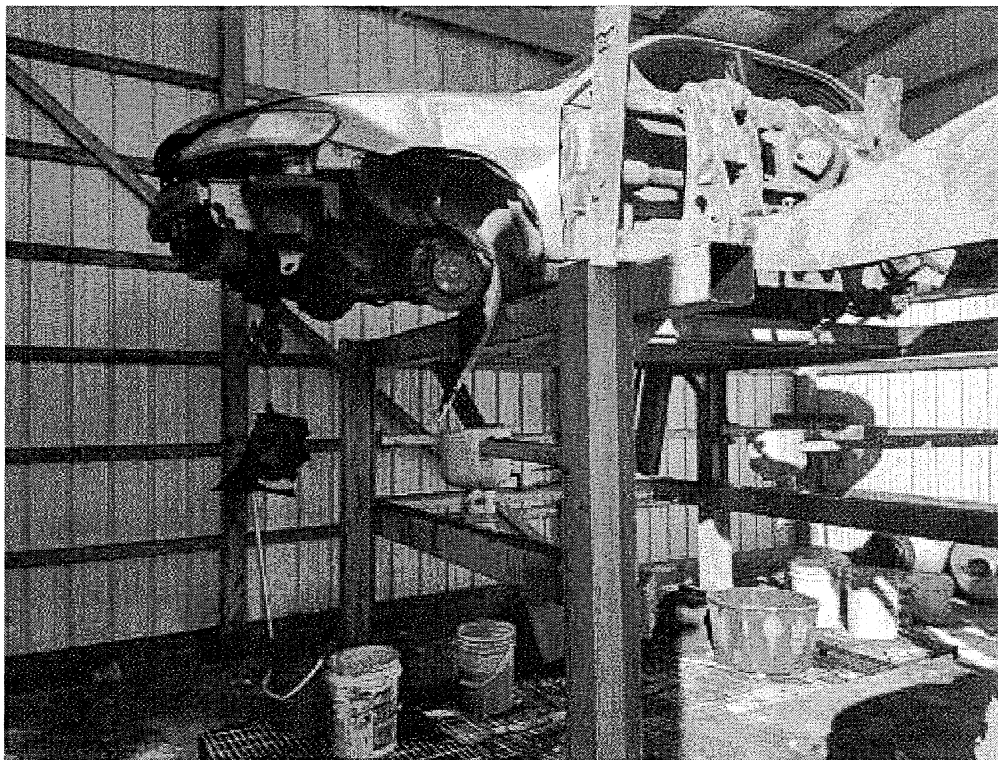


Image 5(Depollution station) : Depollution station.



Image 6(Mercury bucket) : Mercury auto switch recovery bucket.

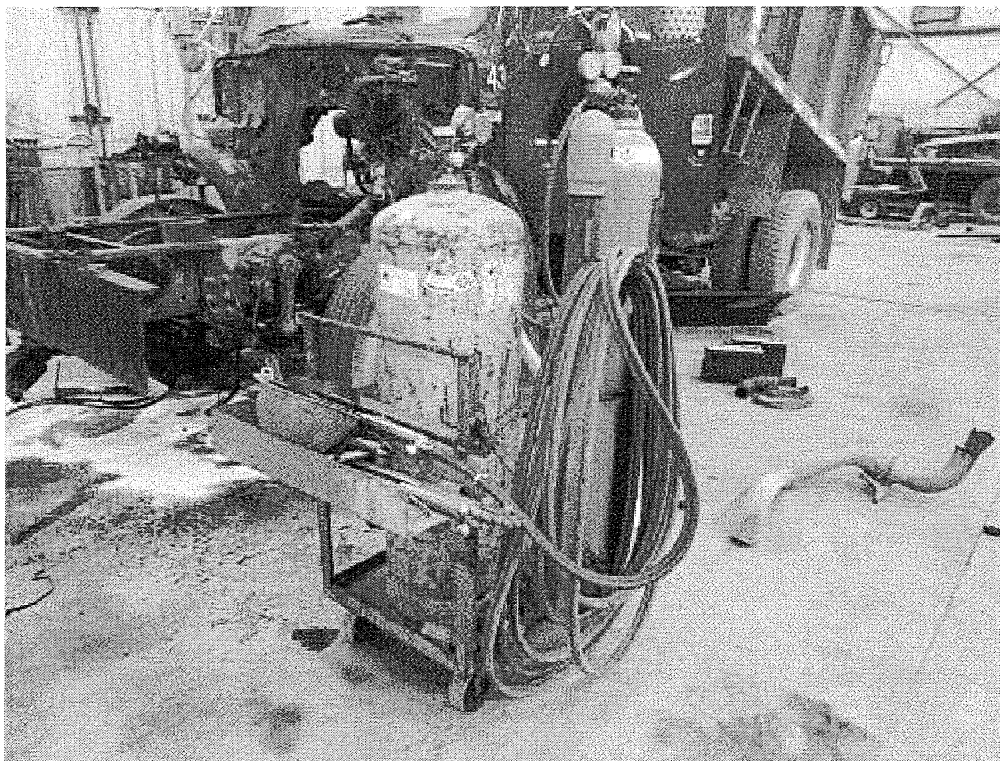


Image 7(Portable torch) : Portable torch cutting station inside shop.

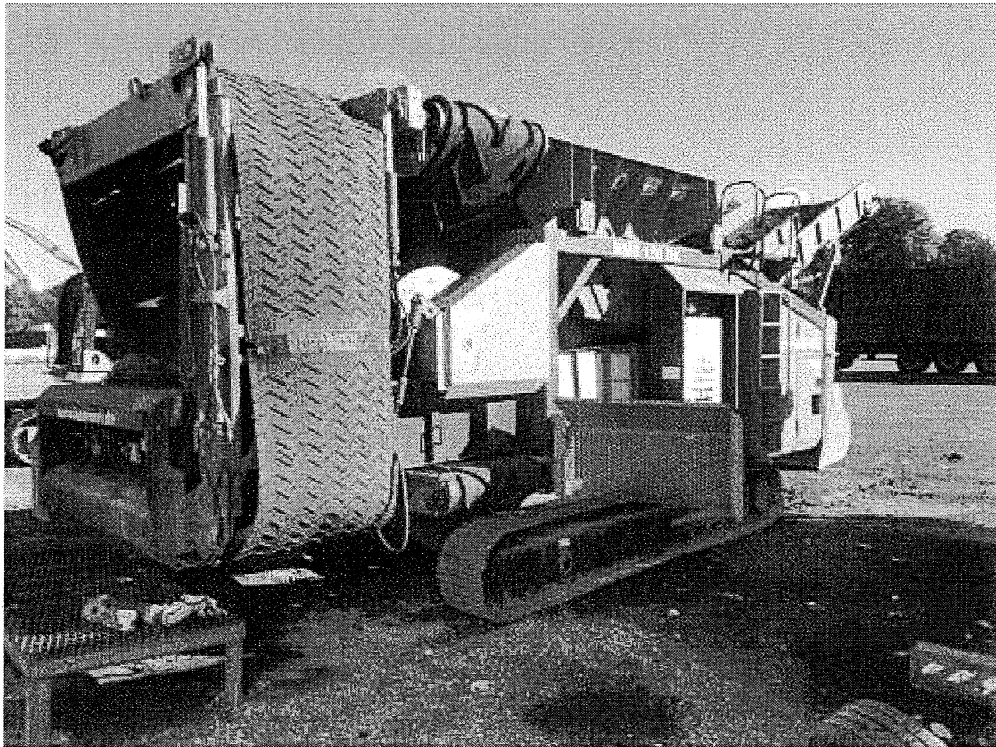


Image 8(Shredder component) : Auto shredder component.



Image 9(Shredder component) : Another part of the auto shredder plant.



Image 10(Aerial Photo) : Aerial photo of main facility.



Image 11(Auto shredder) : Main component of portable auto shredder process plant.



Image 12(Shear) : Shear

NAME M. Kovalchuk

DATE 10/23/2018

SUPERVISOR [Signature]