

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

P092069679

FACILITY: Wolverine Scrap Metal Corporation		SRN / ID: P0920
LOCATION: 1721 Chicago Drive SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: AL Hosford , Treasurer		ACTIVITY DATE: 10/17/2023
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection in response to a complaint.		
RESOLVED COMPLAINTS:		

At approximately 9:50 AM, April Lazzaro (AL), Air Quality Division and Daniel Lee (DL), Detective with the Environmental Investigation Section arrived at the facility to conduct an unannounced inspection in response to a complaint regarding smoke and odors from torching. Upon arrival in the area, no smoke was identified, however there was a smell of metal in the air.

FACILITY DESCRIPTION

Wolverine Scrap Metal Corporation is a family-owned scrap yard that provides bulk scrap metal removal services and management for commercial and industrial accounts. They also handle e-waste and old appliance recycling services. In addition to these activities, they conduct metal scrap size reduction activities daily using several torches of various sizes. This is done using a stationary oxygen tank and portable propylene fuel tanks, as well as a smaller completely portable propylene fuel and oxygen system for smaller scrap cutting further back on the property. Since the torching is done daily it is considered production torching.

COMPLIANCE EVALUATION

Upon arriving at the facility and providing state issued identification, AL and DL commenced with introductions and stated that the purpose of the inspection was to follow up on a complaint received regarding smoke and odors from torching. We asked to speak with Scott Hosford, who has been the previous contact for the facility, and were told he was in a meeting. However, AL Hosford, Treasurer was available and took us on a tour of the torching operations.

Detective Lee informed AL Hosford that he was accompanying the AQD on the inspection, if there is a criminal environmental crimes law enforcement case at the facility in the future. As we walked, I spoke with AL Hosford about the previous visits made by the AQD, and the discussions that were held, where Scott Hosford told the AQD that the company was going to discontinue torching. AL Hosford indicated that he didn't know all the plans Scott Hosford had for the company but couldn't imagine it not including torching since they do it every day.

While the torching was paused due to the employee being on break, the areas where it is conducted was observed. The item that was in the process of being torched was a large piece of equipment from a factory in Zeeland that had to be unloaded by a special crane due to the size. The equipment was old and was covered in grease, grime and dirt. The ground in the area was stained with what appeared to be oil and grease as well. AL Hosford said they try to remove most oils before cutting, however they do keep a hose nearby to put out fires when those occur. They also have a breaking ball that they use to break up large scrap when they can, and pieces like cast iron will break easier when it is cold outside.

The smaller torching area is to cut rods and smaller scrap into recyclable pieces. The rods that were observed were clean and free of debris.

During two previous inspections, the AQD requested and conducted a cost analysis and review of replacement invoices for parts for the torching wands. The most recent review conducted in 2022 found that the torching equipment had been reconstructed. That means that the equipment no longer qualifies to use the torching exemption found in the pre-2016 version of Rule 285(2)(j) as described in a previous activity report (it is noted that report incorrectly referenced Rule 282(2)(j)). The current exemption only applies to portable torch cutting equipment that does not cause a nuisance or adversely impact surrounding areas and is used for non-production work, or if emissions are released into the general in-plant environment and/or has an externally vented emissions equipped with an appropriately designed and operated enclosure and fabric filter.

Since Wolverine Scrap Metal Corporation is conducting production torching and it is not inside a building and/or does not have an appropriately designed enclosure and fabric filter, it is in violation of Rule 201 for failure to obtain a Permit to Install. A Violation Notice will be issued.

It is noted that two Violation Notices have been issued in the past to the facility. The first was for failure to obtain a permit, and the second was for failure to respond to the first violation. Wolverine Scrap Metal Corporation should prepare a complete response to the Notice that includes the following information as required: 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. If Wolverine Scrap Metal Corporation continues to conduct torching at this facility, an enclosure with fabric filter control is required.

CONCLUSION

Wolverine Scrap Metal Corporation was in non-compliance at the time of the inspection.

NAME April Lazzaro DATE 10/23/2023 SUPERVISOR HH