

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection**

U13160230033772

FACILITY: Springfield Metal Recyclers		SRN / ID: U131602300
LOCATION: 103 Bishop Drive, Springfield		DISTRICT: Kalamazoo
CITY: Springfield		COUNTY: CALHOUN
CONTACT: David Armour , Owner		ACTIVITY DATE: 03/09/2016
STAFF: Rex Lane	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self Initiated Inspection at request of Mr. Fred Sellers, MDEQ-OWMRP, Kalamazoo District Office		
RESOLVED COMPLAINTS:		

On March 9, 2016, Air Quality Division (AQD) staff (Rex Lane, Monica Brothers and Amanda Chapel) conducted an unannounced air quality inspection of Springfield Metal Recyclers (SMR) based on a request from Mr. Fred Sellers, Kalamazoo District Supervisor, MDEQ Office of Waste Management & Radiological Protection (OWMRP). SMR's business address is 103 Bishop Drive, Springfield, MI and includes the former Clark Equipment/Ingersoll-Rand property (SRN: B4214) located at 525 24<sup>th</sup> Street North, Springfield, MI. Aerial maps of the property and information from SMR's web site are attached to this report. SMR commenced operation in July 2015 following installation of a certified scale and accepts ferrous and non-ferrous scrap and also accepts junk cars and appliances (appliance dealers or authorized repair businesses only). According to Mr. Armour, any refrigerants associated with certain appliances has been removed by the dealer or repair business prior to drop off at this facility. Mr. Armour stated that they are demolition contractors by trade and they would also like to bring in manufactured homes for dismantling and recycling of its metal components. The entire facility is approximately 150 acres in size and about 50 acres of the facility has a concrete pad.

AQD staff arrived on-site at 2:50 pm and made initial contact with Mr. David Armour, owner of SMR. With permission of Mr. Armour, staff took digital pictures of process equipment (i.e. wood shredder; jaw and impact crushers) and accumulated solid waste storage piles while walking around the property. These digital pictures were saved on the district office server so that other MDEQ Kalamazoo District staff could review for possible regulated activities (e.g. solid waste, industrial storm water, etc.).

Mr. Armour showed staff a Norkot 9100 shredder that was not in use, but was used once this past winter on a trial basis to shred wood products obtained from the demolition of manufactured homes. According to Mr. Armour, the shredder is equipped with a water spray bar, but there is no water available on-site. Staff advised Mr. Armour via a conference call on March 14, 2016 and in a follow up email on March 16, 2016 that the shredder cannot be operated again until SMR obtains an air use permit for this process equipment from our department.

Mr. Armour then showed staff a small jaw crusher and an impact crusher that is mounted on a truck frame and powered by an old truck engine. Mr. Armour indicated that he would like to crush the accumulated concrete and asphalt cement storage piles on the property. Staff advised him that this process equipment could not be operated until SMR obtains an air use permit from our department. Alternatively, Mr. Armour could enter into a contract with a firm to bring in a portable crusher that operates under an active air use permit to process these concrete and asphalt cement storage piles.

There were several large piles of shredded plastic and mixed paper on site. Mr. Armour showed staff a wire baler that will be used to produce large bales that will be shipped off site to a business in Pennsylvania.

On the west end of the property, there were large piles of structural steel and miscellaneous steel scrap. SMR has a small oxy-acetylene torch that they are using to cut steel I beams salvaged from part of the large Clark Equipment building fire that occurred in September 2015. This equipment is cutting only clean steel I beams and is currently exempt from permitting requirements under Rule 285(j).

A newer addition to the Clark Equipment building on the east end will remain following demolition of the burned portions of the structure. Staff asked Mr. Armour about a furnace installed in this addition and he indicated that he owns property on the north side of Lafayette Avenue that contains a large number of old wooden pallets and that he would like to burn them during the colder months at this location. The wood burning furnace is exempt from air use permitting requirements under Rule 282(b)(iii) provided it only combusts wood, wood residue, or wood waste which is not painted or treated with wood preservatives, which does not contain more than 25%

plywood, chipboard, particleboard, and other types of manufactured wood boards, which is not contaminated with other waste materials, and the equipment has a rated heat input capacity of not more than 6,000,000 Btu per hour.

SMR also has a raised platform for draining fluids from junk automobiles. Mr. Armour indicated that the fluids are drained into plastic totes and the whole automobile body is then shipped without further processing to Omni Source in Jackson, MI to be shredded. Mr. Armour indicated that he would like to purchase and install a waste oil furnace at this facility. A waste oil furnace is exempt from air use permitting requirements under Rule 282(b) (iv) provided the waste oil or used oil fuels which are generated on the geographical site and the equipment has a rated heat input capacity of not more than 500,000 Btu per hour.

Mr. Armour mentioned to staff that there is about 40 acres of vacant land to the east that he would like to grow hay on and that the City of Springfield had told him he could move forward with these plans if approval was obtained from MDEQ. Staff asked if the soil was contaminated and that Mr. Armour should not engage in any activity that would impact the ongoing groundwater remediation and cleanup project on the north end of the property. Mr. Armour stated that a portion of this vacant land was used for an employee parking lot but that no manufacturing was ever conducted in this area. Staff indicated that this request was beyond their scope of expertise but that this information would be shared with Kalamazoo District Remediation and Redevelopment Division (RRD) staff for further consideration. Mr. Gregg Brettman, RRD is currently assigned to facilities located in Calhoun County and was advised of this request by Mr. Fred Sellers.

A violation notice will not be sent at this time since either process equipment that is subject to permitting requirements was not fully installed or in operation at the time of the inspection and Mr. Armour was advised and acknowledged that the demolition wood shredder and concrete/asphalt crusher cannot be operated at the facility without first obtaining an air use permit(s) that authorize operating of this process equipment. This was reiterated in a March 14, 2016 conference call with Mr. Armour, Mr. Fred Sellers and Ms. Lee Anne Thor, MDEQ-OWMRP; Ms. Janelle Hohm, MDEQ – Water Resources Division and staff. On March 16, 2016, staff emailed Mr. Armour links to the MDEQ's air use permitting web page and to MDEQ's Clean Air Assistance (CAA) Program and also included contact information for Ms. Jenifer Dixon, CAA Program. -RIL

NAME                     RIL                                          DATE           3/17/16                                SUPERVISOR           MD 3/17/2016