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

N704972281		
FACILITY: Regional Steel Distribution Center (RSDC)		SRN / ID: N7049
LOCATION: 1775 Hollaway Dr, HOLT		DISTRICT: Lansing
CITY: HOLT		COUNTY: INGHAM
CONTACT: Brian Smith, Business Systems Manager		ACTIVITY DATE: 06/12/2024
STAFF: Loren Hicks	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Regular unscheduled inspection.		
RESOLVED COMPLAINTS:		

On June 12, 2024, EGLE-AQD (represented by L. Hicks) conducted a regular unscheduled inspection of Regional Steel Distribution Company, which was last inspected by the AQD in 2011, for the purposes of assessing compliance. RSDC is a large metal coil and blank processing facility, they also offer inspection, storage and shipping services. Although RSDC does not hold any air use permits, they have been assigned a State Registration Number (SRN) N7049; the facility is a minor source of both criteria and hazardous air pollutants.

In the report from 2011, the AQD inspector B. Culham spoke with HR Manager G. Miller regarding the status of their four blanking lines, single slitter line, and single off-line parts washer (all units operate as exempt).

On June 12, 2024, L. Hicks visited RSDC to assess whether the reported equipment was still operating, and whether any new equipment had been installed since the last inspection. No odors or visible emissions noted on arrival. About 1:30 p.m. I checked in at the front desk and asked for G. Miller; I was informed that she no longer worked for the company, and I was transferred to Brian Smith, Business Systems Manager. I introduced myself, explained the purpose of my visit, and asked a few initial questions. We then donned PPE for a tour of the facility's production floor.

All equipment noted in the previous report is still running as part of production, most of it 24/7 with the exception of two of the blanking lines; since 2011, they've added 3 bundle turners, one laser cutting line, and one cut to length process. The bundle turners rotate finished material bundles one hundred and eighty degrees about the horizontal axis. The cut-to-length process operates very similarly to the blanking process, and so would be exempt under R1285(I)(vi)(B). The laser cutting line operates in principle similarly to their blanking lines, but without the use of a die. Their laser is an Ytterbium Laser System [YLS-800] made by LaserCoil with Fibertech laser heads and a Senturion dust collection system. The system is housed in its own permanent enclosure with control equipment inside the plant, so it is my belief that this process would be exempt under R1285(I)(vi)((B) and potentially R1285(I)(vi)(C). They do work with a compliance contractor: Tim Herbert, from Environmental Resources Group, LLC, and they did provide a Dust Hazard Analysis for the lasercutting-line on request. It is worth noting that the laser-cutting line is primarily used for discontinued and prototype parts.

After process, we toured storage areas, transfer areas, and their indoor machine shop. RSDC participates in an oil reclamation program which includes a 15,000gallon storage tank that is emptied weekly. RSDC has in their machine shop a parts washer in good condition (I provided them with some proper use signage), as well as a small heat treat oven (<10,000,000 BTUs/hr) and a TIG welder. RSDC does have a

generator that is used exclusively to power their offices in the case of a blackout. RSDC does maintain an extensive air compression system. After the tour, we exchanged information, and I requested some follow up materials. Upon further review of said materials and my own observations, all process equipment operated at the site appears to be exempt from permitting and was in compliance with all applicable air rules and regulations.

NAME Loren Hicks

DATE 06/25/24 SUPERVISOR RB