



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

November 8, 2021

Mr. Steven Benacquisto
Ferrous Processing and Trading Co.
1950 Medbury Street
Detroit, MI 48211

SRN: N7683, Wayne County

Dear Mr. Benacquisto:

VIOLATION NOTICE

On September 29, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a visible emissions evaluation of Ferrous Process and Trading (FPT Medbury) located at 1950 Medbury Street, Detroit, Michigan. The purpose of this evaluation was to determine FPT Medbury's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and to investigate a recent complaint which we received on September 14, 2021, regarding smoke and fumes attributed to FPT Medbury's operations.

During the visible emissions evaluation, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Torch cutting operations	R 336.1301(1)(a)	On September 29, 2021, there were three exceedances of the 6-minute average opacity limit; the highest was 45.8%. 20% opacity on a 6-minute average, except for one 6-minute average of not more than 27% per hour, is the limit.

During this evaluation it was noted that FPT Medbury torch cutting processes were emitting opacity in excess of emissions allowed by Rule 301 of the administrative rules promulgated under Act 451. Below are the times that those exceedances occurred, and the average opacity observed:

1. 45.8% from 7:57:15 AM to 8:03:15 AM
2. 39.4% from 8:04:00 AM to 8:10:00 AM
3. 30.2% from 8:11:30 AM to 8:17:30 AM

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Enclosed are copies of the instantaneous and six-minute average readings taken of FPT Medbury.

Please initiate actions necessary to correct the cited and submit a written response to this Violation Notice by November 29, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the occurred; an explanation of the causes and duration of the ; whether the ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If FPT Medbury believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the cited above and for the cooperation that was extended to me during my evaluation of FPT Medbury. If you have any questions regarding the or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Sam Liveson
Environmental Engineer
Air Quality Division
313-405-1357

Enclosure

cc: Ms. Lisa Carroll, FPT
Ms. Crystal Rogers, City of Detroit BSEED
Mr. Hosam N. Hassanien, City of Detroit BSEDD
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE