

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

N788566102

<b>FACILITY:</b> RJ Torching, Inc.		<b>SRN / ID:</b> N7885
<b>LOCATION:</b> G-5167 N DORT HWY, FLINT		<b>DISTRICT:</b> Lansing
<b>CITY:</b> FLINT		<b>COUNTY:</b> GENESEE
<b>CONTACT:</b> John Kinney , Yard Manager		<b>ACTIVITY DATE:</b> 01/13/2023
<b>STAFF:</b> Daniel McGeen	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Unannounced inspection.		
<b>RESOLVED COMPLAINTS:</b>		

On January 13, 2023, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an unannounced inspection of the Flint site of R.J. Torching, Inc. (R.J. Torching).

**Facility description:**

R.J. Torching conducts torch cutting operations in Flint. They also bring mobile torch cutting equipment to customers' sites.

**Environmental contacts:**

Jason Roughton, President; 248-770-1173; [jason@rjind.com](mailto:jason@rjind.com)

**EGLE AQD contacts:**

- Dan McGeen, inspector; 517-648-7547; [mcgeend@michigan.gov](mailto:mcgeend@michigan.gov)
- David Rauch, inspector; 517-216-0423; [rauchd2@michigan.gov](mailto:rauchd2@michigan.gov)

**Emission units:**

Emission unit*	Emission unit description	Michigan Air Pollution Control Rules	Operating status
Torch cutting process	Torch cutting processes, operating in enclosure, with 2 revamped SPARCS units, and Buffalo water turbine	Rule 301	Compliance
Yard area	General facility yard area	Rule 310	Compliance

\*An *emission unit* is any part of a stationary source which emits or has the potential to emit an air contaminant.

**Regulatory overview:**

R.J. Torching is classified as a minor source in the Michigan Air Compliance Enforcement System (MACES) database, although a particular pollutant is not specified. A major source has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. Criteria pollutants are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds, lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns.

R.J. Torching is considered a minor or area source for Hazardous Air Pollutants (HAPs), because it is not known to have a PTE of 10 TPY or more for a single HAP, nor to have a PTE of 25 TPY or more for combined HAPs.

**A number of the Michigan Air Pollution Control (MAPC) Rules potentially apply to R.J. Torching, and are listed below:**

**On 12/20/2016, the MAPC Rule 285(j) permit exemption rule for torch cutting was revised as MAPC Rule 285(2)(j). It had previously considered torch cutting processes to be exempt from needing a permit to install. The revised rule exempts the following:**

(j) Portable torch cutting equipment that does not cause a nuisance or adversely impact surrounding areas and is used for either of the following:

(i) Activities performed on a non-production basis, such as maintenance, repair, and dismantling.

(ii) Scrap metal recycling and/or demolition activities that have emissions that are released only into the general in-plant environment and/or that have externally vented emissions equipped with an appropriately designed and operated enclosure and fabric filter.

**MAPC Rule 301(1)(a) limits opacity to a 6-minute average of 20%, except for one 6-minute average per hour of not more than 27% opacity.**

**MAPC Rule 310 regulates open burning.**

**MAPC Rule 901(b) prohibits emissions which cause unreasonable interference with the comfortable enjoyment of life and property.**

**MAPC Rule 910 requires that an air-cleaning device be installed, maintained, and operated in a satisfactory manner.**

#### **Location:**

**The facility is located in a known Environmental Justice area. R.J. Torching is north of the intersection of East Carpenter Road with North Dort Highway. East Carpenter Road is the boundary between Genesee Township, to the north, and the City of Flint, to the south. There are heavy industries located along Dort Highway, and in an industrial park a few thousand feet to the east, along Energy Drive, with nearby residential areas, as discussed in further detail below.**

**The closest residences are in a residential neighborhood 500 feet west of R.J. Torching. The next closest residential areas are about 1,500 feet to the southwest, and about 2,700 feet to the southeast, as measured by me in Google Maps.**

**Immediately south of R.J. Torching is another metal recycling facility, Genesee Recycling. Further south are light industries or commercial businesses. Immediately across the street are industries or commercial businesses. About 1,000 feet to the east is the previously mentioned industrial park on Energy Drive. Immediately west of R.J. Torching is an active railyard.**

**R.J. Torching has an additional property on the east (opposite) side of N. Dort Highway, and also a nearby office, on Energy Drive.**

#### **Fee status:**

**This facility is not considered fee-subject, as it is not known to be a major source for criteria air pollutants, or for HAPs, nor is it subject to a federal New Source Performance Standard or a Maximum Achievable Control technology standard.**

**This facility is not required to report annual emissions through the Michigan Air Emission Reporting System (MAERS). Criteria for those facilities which must report to MAERS on an annual basis are identified in AQD-013: Criteria Pollutant Threshold Levels for the Point Source Emissions Inventory.**

**Most recent inspection:**

10/12/2021: No instances of noncompliance were found.

Note: since 10/12/2021, AQD has checked for excess opacity from RJ Torching on 22 occasions, prior to today's inspection. No instances of noncompliance could be confirmed.

**Recent complaints (within last 5 years):**

- 2017: 0
- 2018: 3
- 2019: 0
- 2020: 9
- 2021: 2
- 2022:0

**Safety apparel required for visiting site:**

Site requirements for personal protective equipment (PPE) are steel-toed boots, hard hats, safety glasses with side shields, high visibility safety vests, and hearing protection. AQD staff had the appropriate PPE. Additionally, out of personal preference, the undersigned wore a disposable paper mask, due to the ongoing COVID pandemic.

**Arrival:**

AQD was represented by inspector David Rauch and Dan McGeen, the author of this report. AQD staff drove on N. Dort Highway, nearing the facility at about 8:45 AM. Weather conditions were overcast and 28 degrees F, with winds variable, appearing to be out of the NNE at 5 miles per hour (mph) at the time. AQD staff drove past R.J. Torching to check for odors, experiencing a barely detectable smokey odor at 8:47 AM. AQD staff then turned around and headed south on Dort Highway, with the winds out of the NNW at 10-15 mph. No opacity could be seen from the facility during the drive-by observations.

Upon entering the site, AQD staff drove slowly over the weigh scale and parked in the designated parking area adjacent to the scale. Upon arrival, AQD staff checked in with R.J. Torching Yard Manager, John Kinney, and advised of the inspection.

During the inspection AQD staff inquired about whether torch cutting had been reduced due to market conditions. R.J. Torching staff explained that the amount of work performed varied depending on the types of scrap metal that is brought to R.J. Torching. A further explanation was provided that scrap metals from demolition, which are lighter materials, can be processed by mechanical shearing, rather than torch cutting. R.J. Torching staff indicated that its primary work involved steel, and not cast iron, and that the company avoids cutting metal alloys that are known to emit excessive smoke.

R.J. Torching staff indicated that the company operates a 10-hour shift, with torch cutting concluding for the day at 2:30 PM and other onsite work continuing until 5:00 PM.

**Inspection:**

Torch cutting was being done by a single operator, at the time of the inspection. R.J. Torching staff indicated that whether one or two employees will perform torch cutting simultaneously depends on the amount and type of work that R.J. Torching has to perform at any given time.

Two steel presses were inside the rolling enclosure, with the larger one in the southern side of the enclosure. The south revamped SPARCS unit was operating, with opacity averaging around 5-10%, instantaneously.

J. Kinney explained that the north revamped SPARCS unit, which serves the north side of the rolling enclosure, had gone down the morning of the inspection, due to a problem with a bearing. To demonstrate R.J. Torching's prompt response, J. Kinney allowed AQD staff to observe the disassembled unit, which he represented was in the process of being repaired. AQD staff observed that the used panel filters had been removed from the device, apparently for access, as well as the spark arrestor.

Torch cutting was being conducted in the south side only of the rolling enclosure, while the north control device was being repaired. The repair work was said to be completed by 10:04 AM. The timing of the repairs appeared to comply with MAPC Rule 910, which requires a control device to be installed, maintained, and operated properly.

While the north control device was being repaired, AQD staff observed emissions from the south control device. No opacity from the south revamped SPARCS unit was observed against the overcast gray sky. However, against the brown paint of the metal-sided rolling enclosure, 5% opacity of light gray smoke was observed. At approximately 9:16 AM, AQD staff observed 15% opacity from the unit. Opacity was observed briefly reaching 20%, but also dropping to as little as 0%. Some fugitive emissions were observed from the west end of the enclosure, which appeared to be less than 20% opacity, instantaneously.

During observations of visible emission, winds increased to 10-15 mph out of the NNW or N, and snow began to fall. Method 9 visible emission readings were performed for 6 minutes and 15 seconds. Please see attached Method 9 visible emission reading form.

- Highest 6-minute opacity: 6.46%
- 2nd highest 6-minute opacity: 6.0%

The above 6-minute averages are within the MAPC Rule 301 limits.

#### Records Review:

During the inspection, AQD staff requested to see copies of R.J. Torching's daily opacity measurements. R.J. Torching indicated that it did not keep daily records of opacity readings.

#### Conclusion:

No instances of noncompliance were identified by AQD staff during the January 13, 2023 inspection.

NAME 

DATE 3/30/2023

SUPERVISOR 