

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

N788573332

FACILITY: R.J. Torching, Inc.		SRN / ID: N7885
LOCATION: G-5167 N DORT HWY, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Jason Roughton , President		ACTIVITY DATE: 08/28/2024
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection.		
RESOLVED COMPLAINTS:		

On August 28, 2024, 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

EGLE AQD contacts:

Dan McGeen, Inspector; 517-648-7547; mcgeend@michigan.gov

Emission units:

Emission Unit*	Emission Unit Description	Michigan Air Pollution Control Rule	Compliance Status
Torch cutting process	Torch cutting processes fueled by oxygen and propane, operating in enclosure, using 2 "fan system" homebuilt control devices and 1 of 2 Buffalo water turbines	Rule 301	Compliance
Yard area	General facility yard area.	Rule 310	Compliance

**Emission unit* means any part of a stationary source that 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.

The United States Environmental Protection Agency has recently reached a proposed settlement with R.J. Torching to resolve past violations of air requirements. This settlement will require the company to use their existing rolling enclosure to house the company's torch-cutting operations and construct a new pollution control system to capture the emissions and remove particulate matter with a fabric filter system. It will also require opacity testing and improved monitoring and compliance with a more stringent air emission standard to mitigate past harm to the environment. As of the date of this report, the consent decree is awaiting court approval.

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

On December 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:

- Address: G-5167 North Dort Highway, Flint, Genesee County, 48505.
- Description: 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. The closest residences are 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. 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 MiEnviro. Criteria for those facilities which must report to MiEnviro on an annual basis are identified in AQD-013: Criteria Pollutant Threshold Levels for the Point Source Emissions Inventory.

Operating hours:

Per the facility's website, Monday-Friday, 7:00 AM to 4:30 PM.

Most recent site visits:

- January 13, 2023: During an unannounced inspection, no instances of noncompliance were found.
- August 30, 2023: While in the area, AQD staff observed excessive opacity coming from the site and stopped to investigate. A determination of noncompliance was made.

Most recent Violation Notice:

September 18, 2023.

Recent complaints (within last 5 years):

- 2020: 9
- 2021: 2
- 2022: 0
- 2023: 1
- 2024: 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. The AQD staff had the appropriate PPE.

Arrival:

The AQD was represented by inspector Dan McGeen, the author of this report. The AQD staff drove on N. Dort Highway, nearing the facility at about 7:28 AM. Weather conditions were overcast, humid, and 76 degrees F, with winds appearing to be out of the west at 10 miles per hour (mph) at the time. Driving north past the second opening in the fence (the site exit), D. McGeen briefly saw grayish smoke of about 20% opacity near ground level, north of the rolling enclosure.

The AQD staff turned around and soon headed south on Dort Highway. Upon entering the site at 7:37 AM, the AQD staff parked in the relocated parking area southeast of the liquid oxygen tank.

D. McGeen exited the car and immediately photographed yellow brown smoke of roughly 5% opacity rising above the west side of the enclosure, please see photo 001. The yellow brown smoke had disappeared, seconds later, please see photo 002. To the south of the enclosure, a Buffalo turbine was spraying a mist of water directly over the south fan system, which is the company's name for the rebuilt Smoke Particulate Air Reduction Cyclone System (SPARCS) units. No smoke emissions could be verified exiting the twin

The AQD staff was quickly contacted by R.J. Torching employees. D. McGeen explained the purpose of today's visit to Yard Manager Bob Brown, who said that President Jason Roughton would be here soon. A few minutes later, J. Roughton arrived, and met with the AQD staff.

Inspection:

J. Roughton said that once the consent decree is signed by a judge, they will begin to install the new fabric filter system. This system will use cartridge filters. Aside from a plenum which is on order, almost all of the components have been stored onsite for 3 months, he pointed out; please see photo 003. The plenum was ordered 2 weeks ago once they realized the cartridge filters had not come with one, and will take 4-6 weeks to deliver, he said. A fan is onsite, along with a silencer, which reportedly will keep noise levels below 85 decibels.

The electrical system infrastructure has been installed at the site, and D. McGeen was shown the housing for it. The roof has been replaced on the rolling enclosure with a new drip line added, J. Roughton said. They have not yet installed a steel beam on the back of the enclosure as future support for the cartridge filters. This was reportedly per the advice of their attorney, Kurt Kissling, because installing any part of the control equipment could potentially impact the interim measures under the pending consent decree.

The current control devices used onsite are a south fan system, which gets connected to the ductwork exiting the south side of the rolling enclosure, and a north fan system, which gets connected to the ductwork exiting the north side of the enclosure. They also have two Buffalo water turbines on site for directing a plume of water droplets at torch cutting emissions. An electrically powered Buffalo turbine is the main one they use during torch cutting, while a diesel-powered unit is kept for back up. The one in use today was said to be their electric unit.

The AQD staff asked to look inside the rolling enclosure. No torch cutting was currently taking place. It appeared to have ceased either upon or after D. McGeen's arrival. Steel machine components had recently been cut within the enclosure, please see photos 004 and 005. Some parts were just inside the doorway as defined by the conveyor belt curtain flaps, please see photo 006.

A small amount of smoke briefly exited the doorway of the enclosure, please see photo 007. A piece of machinery in the northeast corner of the enclosure emitted a narrow stream of smoke from smoldering material, which B. Brown extinguished with a nearby hose. Putting out smoldering or burning material was said to be a regular practice, based on prior guidance from the AQD.

J. Roughton pointed out all the materials they are removing from machinery prior to torch cutting, please see photos 008 and 009. This included cables, wires, and other electrical components. He indicated that they are doing this per AQD's guidance. Previously removed materials were in a bin awaiting disposal, please see photo 010.

The AQD staff asked how many torch cutters work inside the enclosure at any one time. J. Roughton indicated that they only have one person torch cutting at a time, now.

The AQD staff asked what kinds of metals they are torch cutting. It was explained that they are only torch cutting "straight steel," while cast iron is being cut by their 3 shearing processes they have at the site.

The AQD observed the north fan system, which had no visible emissions. No torch cutting was occurring, at this time.

Departure:

The AQD staff departed the site at 8:47 AM.

Compliance concerns:

No compliance issues were identified at this time.

Conclusion:

No instances of noncompliance were identified by the AQD staff during the August 28, 2024 inspection.



Image 1(001) : Roughly 5% opacity rising from west (left) side of rolling enclosure. Mist at center of image is water spray from Buffalo turbine aimed at exhaust from south fan system.



Image 2(002) : Yellow brown opacity from rolling enclosure ceased, seconds after first photo. The Buffalo turbine continued to spray mist, even after torch cutting ceased.



Image 3(003) : Components of cartridge filter air pollution control device stored onsite, awaiting signing of consent decree.



Image 4(004) : Steel scrap underneath the south half of the rolling enclosure.



Image 5(005) : Steel scrap under the north half of the rolling enclosure. Faint smoke visible at upper left.



Image 6(006) : Small amount of smoke at doorway of enclosure. Smoldering material within enclosure was promptly extinguished.



Image 7(007) : Steel scrap inside the enclosure, some of it close to the doorway, as defined by the conveyor belt curtain flaps.



Image 8(008) : Materials removed from steel scrap prior to torch cutting the scrap.



Image 9(009) : More materials removed from steel scrap prior to torch cutting, including electrical system components.



Image 10(010): Materials removed from scrap awaiting waste disposal.

NAME 

DATE 9/11/2024

SUPERVISOR 