

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

P085144694

FACILITY: KBR Recycling		SRN / ID: P0851
LOCATION: 9248 Oakville Waltz Road, WILLIS		DISTRICT: Jackson
CITY: WILLIS		COUNTY: MONROE
CONTACT: Kevin Butzin ,		ACTIVITY DATE: 06/12/2018
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Follow-up inspection of a torch cutting operation.		
RESOLVED COMPLAINTS:		

Minor Source-**Facility Contacts**

Kevin Butzin-Owner

kevinbutzin@yahoo.com

ph (734) 587-3710

<http://kbrrecycling.com/>**Purpose**

On June 12, 2018, I conducted an unannounced compliance inspection of KBR Recycling (Company) located in Willis, Michigan in Monroe County. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules.

Facility Location

The facility is in a rural setting with one residential home just to the west of the facility.

Facility Background

The facility was last inspected on September 14, 2017 and was found to be out of compliance for conducting torch cutting without a Permit to Install (PTI) permit.

Regulatory Applicability

Only generally applicable rules such as Rule 301, 310 and Rule 901 apply to this facility.

Torch cutting operations at the facility are no longer exempt from PTI requirements as outlined in letter that was sent to scrap yards in June 2017:

"Dear Scrap Metal Recycling Owner,

On December 20, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), finalized changes to Part 2 of the Michigan Air Pollution Control Rules. Specifically, Rule 336.1285(j) was amended, which pertains to portable torch cutting. Rules 336.1278 through 336.1290 were established to exempt insignificant sources of air pollution from having to obtain a permit to install.

The amended Rule 336.1285(2)(j) states that the requirement of Rule 336.1201(1) to obtain a permit to install (PTI) does not apply to any of 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.

As with all AQD permit exemptions, eligibility is based on any owner or operator's ability to provide a demonstration that the process equipment meets the requirements of the exemption. In the future if your facility is unable to successfully demonstrate that it meets the requirements of an applicable exemption, you may be required to obtain a PTI for continued operation of the process equipment.

Complaints that are received by the AQD that are attributed to torching activities will be investigated by district staff and evaluated for compliance with opacity limitations under Rule 336.1301(1) and the nuisance provision of Rule 336.1901. This letter is intended to create awareness of this new requirement and to initiate discussion regarding any questions you may have."

Arrival & Facility Contact

No visible emissions or odors were observed upon our approach to the Company's facility. I arrived at 9:40 am, proceeded to the facility office to request access for an inspection, provided my identification and spoke with Kevin Butzin (KB) the owner. I informed him of my intent to conduct a facility inspection and to review the various records as necessary. KB extended his full cooperation and fully addressed my questions.

Pre-Inspection Meeting

KB outlined that there are 5 employees and they generally operate 5 days a week between 8 am to 5 pm and Saturday 8 to 12 pm.

The receive 20 cars per month that arrive by trailer or are driven in. They drain all fluids out then use a crane to smash them into a metal box to ship offsite to a shredder in Toledo. They process about 500,000 pounds of metal per month.

KB indicated that since the last inspection, they now have a contractor come in a couple times a month with a giant shear to cut metal that they use to torch cut outdoors. They still have 2 small portable torching units that are used on a non-production basis, such as in maintenance, repair, and dismantling.

They now recycle mercury switches from autos. KB estimated that they find/remove about 3 switches per month.

Onsite Inspection

KB gave me a brief tour of the facility.

We walked past the depollution area. An operator was draining oil from a car while we were there.

KB showed me the torch cutting area where production scale torching use to occur. See attached photo. It wasn't active during the inspection with no torches present.

KB showed me where the 2 portable torch cutting units were being stored which was in 2 different sheds. See attached photo.

Applicable Rules Review

The type of torch cutting that they still do at the facility appears to be exempt from PTI requirements.

Post-Inspection Meeting

I held a post-inspection meeting with KB. I told him that I did not have any compliance concerns.

I thanked KB for his time and cooperation, and I departed the facility at approximately 10:00 am.

Compliance Summary

The Company is in compliance.



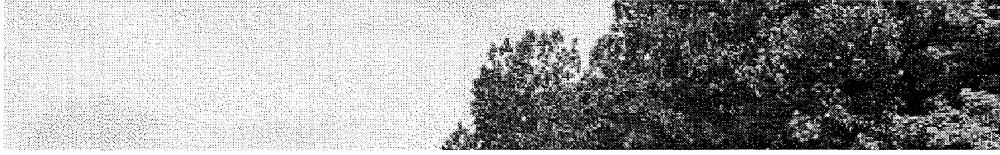


Image 2(Scrap yard) : Scrap yard



Image 3(Torch cutting area) : Torch cutting area. They still occasionally torch cut bolts off very large objects so that the item can be sheared.



Image 4(Portable torch) : 1 of 2 portable torch cutting devices

NAME M. Kovalchik

DATE 7/2/2018

SUPERVISOR 