



January 5, 2024

Ms. April Lazzaro
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
Grand Rapids District Office
350 Ottawa Avenue, NW Unit 10
Grand Rapids, MI 49503
LazzaroA1@michigan.gov

Re: Response to Violation Notice dated November 30, 2023
Canyon Commercial Construction, Inc. (SRN A2457)

Ms. Lazzaro:

Canyon Commercial Construction, Inc. (Canyon) submits this letter in response to AQD's violation notice dated November 30, 2023, regarding a compliance evaluation of portable torch cutting operations at the Padnos Turner yard. Canyon and the Turner yard have suspended torch cutting operations as of December 9, 2023. Currently, Canyon does not know when torch cutting operation will resume. Canyon will notify AQD with any changes or updates to torch cutting operations at the Turner yard.

For rule 911: AQD states that on August 22, 2023, upon arriving, it observed smoke from large equipment being torched. AQD also states that the large equipment was oil filled and covered with grease. In response to this and going forward, Canyon will seek assistance from the Turner yard in inspecting all large and small equipment to ensure it is free of oil and grease before torching. Unified inspections will be done to ensure we limit smoke to an acceptable level. There were no opacity readings provided for this observation. Canyon would like some clarification regarding how excessive the smoke was and how long the emission lasted.

For rule 310: AQD states that on September 27, 2023, it received a complaint regarding smoke and flames observed at the facility that included imagery of the onsite activities. It is Canyon's understanding that this incident was caused by incoming scrap bound to a different onsite location and not the torch yard area. Canyon would like clarification and questions why it would be included in this citation.

For rule 310: AQD states that on October 23 and October 25, 2023, it received additional complaints of smoke and fire at the facility that again included imagery. Canyon questions the credibility of the photos as it is unclear as to what is causing the flames. Canyon as well as the clients we serve do not allow open burning of any kind. In addition, fire prevention equipment is present at each torch yard area. Canyon Torch Cutting Personnel know to extinguish any open burning that occurs immediately.

For rule 911: AQD referenced a Malfunction Abatement Plan submitted by the Turner Yard on October 11, 2023. Canyon would like to make clear that a (MAP) was not requested from us and questions why it would be included in this citation.

For rule 278: The Demonstration record is attached to this response and contains all costs incurred by Canyon for The portable torching emissions unit. As requested, the record includes an itemized list with receipts, for all repair Parts and replacement emission units (torches).

For rule 301: AQD states that on December 5, 2023, it observed visible emissions from the torch cutting process exceeding 20% opacity on a 6-minute average. Canyon would like more information regarding what material was torch cut during this observation. This information is needed to provide an explanation for the cause.

In conclusion, the action taken to correct these violations is the suspension of torch cutting Operations at the Turner yard as of December 9, 2023. Again, Canyon will notify AQD with any updates or Changes to torch cutting operations at the Turner yard.

Please contact me with any questions and if you should require any additional information.

Joel Cantu
Safety Coordinator
Canyon Commercial Construction, Inc.
Mobile: (713) 299-7965
Office: (281) 319-4042
Fax: (281) 913-1234
joel@canyoncommercial.com
P.O. Box 2365 Huffman, Texas 77336