

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

A245744881

FACILITY: Louis Padnos Iron & Metal	SRN / ID: A2457
LOCATION: 2001 TURNER ST, GRAND RAPIDS	DISTRICT: Grand Rapids
CITY: GRAND RAPIDS	COUNTY: KENT
CONTACT: Robert McCormick , Safety & Environmental Coordinator	ACTIVITY DATE: 05/30/2018
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance
SUBJECT: Unannounced, scheduled inspection.	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

Staff, April Lazzaro arrived at the facility for an unannounced, scheduled inspection. The inspection was concurrent with the voluntary stack test on the shredder that the permit section will use to determine emission limits on a new shredder that Padnos plans to install in the Lansing District Office.

Staff met with Rob McCormick, corporate environmental staff and Todd Pastoor, the Turner Yard Supervisor. Also on site was staff of the Stack Test Group and the consultant, Matt Kwiatkowski. During the inspection, I also met with Padnos Vice President of Operations Randy Knibbe and Makayla Putnam, Environmental Specialist. For AQD, Lansing District Office staff, Dan McGeen was present to observe the testing and to gain familiarity with the shredding operation so that he can pass the information on to others.

FACILITY DESCRIPTION

This facility is scrap recycling facility that operates a variety of operations. It consists of contract scrap processing as well as a public scrap recycling endpoint. Scrap processing starts with fluid and chlorofluorocarbon recovery systems. Following inspection, material will be sorted. Large material is torched on the torching pad by Canyon Torching. Padnos staff indicated they do not do much torching at this location, and they call Canyon Torching if they are needed. The Breaking Pit is used on cast iron and operates like a large jack hammer to reduce the size of material. This operates about once a week. There is also a shear which is like a large pincer that also reduces the size of large material and is automated.

During the inspection, I asked about perfluorooctanoic acid (PFOS), and learned that the material has not been utilized at this facility. Recently a fire fighting foam system was installed and is PFOS free.

COMPLIANCE EVALUATION

This facility operates pursuant to Permit to Install (PTI) No. 278-06A which covers two shredders (EU-SHREDDER and EU-OLDSHREDDER) and associated post-shredder separation process activities, conveyors and material management. The permit is written so that only one shredder can legally operate at any one time. Furthermore, EU-OLDSHREDDER has not operated in some time and Padnos has no plans to operate it on a production basis. Emission limits for the shredder have been verified through stack testing and results are on file.

At the time of the inspection, the water flow was injected at 20 psi and Vaughn stated that he can bump that up if he sees smoke and more water is needed. The flow was operating at 0.27 gallons per second and the motor was fluctuating from 440-772 ampere/hr.

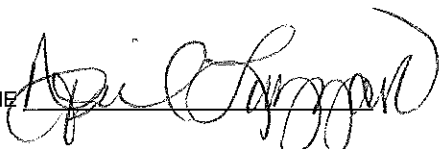
Staff went into the control tower to receive recordkeeping and data as required by the PTI No. 278-06A. We met with Vaughn, who has been operating the shredder for some time now. Two specific items were under review, including hours of operation and the average ton per hour through the unit. The shredder was tested at an average of 104 tons per hour, and has a capacity of 160 tons per hour. In the previous 24 months, the highest tonnage was 104 in January of 2018 and the lowest was 83 in September of 2016. Padnos has been advised in the past that a ~ 20% increase over the 104 tons per hour testing average will lead to additional testing. (The reason for this is that the unit was relatively close to PM-10 and quite close to the PM emission limits as established in the permit while operating at 104 tph) At this time, they have not yet achieved this level of production (~ 120 tph) Daily hours of operation are below the limit of 15 hours, with a high just over 12 hours for the time period reviewed. Recordkeeping for production and hours of operation are attached.

Staff observed the shredder metals separation system in operation, and zero opacity was observed from the cyclone or the z-box. Staff walked the site and observed the materials to be shredded looking for prohibited items. None were observed at that time. Padnos requires that any drum to be shredded is triple washed or incinerated and crushed first. Fluff removal still occurs on a daily basis, it is trucked out for disposal at a licensed landfill.

Padnos staff indicated that there has been no installation of new equipment on-site since the last inspection.

CONCLUSION

Padnos Turner Avenue facility was in compliance at the time of the inspection.

NAME  DATE 6-25-18 SUPERVISOR 