

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

B488428976

FACILITY: PADNOS SUMMIT STEEL		SRN / ID: B4884
LOCATION: 1900 W WILLOW, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: INGHAM
CONTACT: Kevin Whitehead , Yard Manager		ACTIVITY DATE: 03/30/2015
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Unannounced, scheduled inspection of facility last inspected by AQD in 2006.		
RESOLVED COMPLAINTS:		

On 3/30/2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of the Lansing facility of Padnos Summit Steel. Scheduled refers to an inspection which the AQD committed to doing, during the planning process at the start of the current fiscal year.

**Environmental contacts:**

Kevin Whitehead, Yard Manager; 517-372-6600; [kevin.whitehead@padnos.com](mailto:kevin.whitehead@padnos.com)

Tim Payne, Yard Manager; 517-372-6600; [tim.payne@padnos.com](mailto:tim.payne@padnos.com)

**Facility description:**

This facility is a metal recycling facility, one of a number owned and operated by Padnos in Michigan.

**Emission units:**

Metal shredder, spray system, crane, and various conveyors; Permit to Operate No. 52-75; not operating at this time

Torch cutting; done here periodically by a contractor; Rule 285(j); not operating at this time

**Regulatory overview:**

This facility is not classified as a major or minor source in the Michigan Air Compliance Enforcement System (MACES) database used by the AQD, but is most likely a minor source. 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. It is considered a minor or area source for Hazardous Air Pollutants (HAPs), because it is not considered 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.

**Fee status:**

This facility is not considered fee-subject, for the following reasons. Because it is not a major source for criteria pollutants, it is not classified as Category I. Additionally, because it is not a major source for Hazardous Air Pollutants (HAPs), and is not subject to federal New Source Performance Standards, it is not classified as Category II. Finally, because it is not subject to federal Maximum Achievable Control Technology standards, it is not classified as Category III. The facility is not required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS).

**Location:**

This facility is located in an industrial and commercial area, with a residential area immediately to the

east.

**Recent history:**

This facility was last inspected by the AQD on 6/5/2006, and found to be in compliance. The AQD has not received any complaints regarding this facility since 5/15/1997.

**Arrival:**

I drove downwind of Padnos, prior to arrival. I briefly noticed a barely detectable, oil-like odor, followed by a waste water-like odor. I could not determine if the petroleum odor was coming from Padnos, or the adjacent Lansing Wastewater Treatment Plant. Weather conditions were sunny, clear, and 40-45 degrees F, with winds out of the west at 5-10 miles per hour.

I arrived at the site office at 10:18 AM. I met with Mr. Kevin Whitehead, Yard Manager, and Mr. Tim Payne, Yard Manager. Mr. Whitehead had been a yard manager here, at the time of the 2006 AQD inspection. I provided my identification/credentials, along with a copy of the DEQ brochure, *Environmental Inspections: Rights and Responsibilities*, per AQD procedure. I explained that one of AQD's inspection goals this year is to inspect facilities which have not been inspected for a number of years. I asked if there have been any additional industrial processes added, which might have air emissions. I was informed that there have not been.

**Inspection:**

The facility appeared to be neat and well organized. There were a number of areas by the office, where materials were sorted. Incoming engine blocks were placed on a concrete pad, so that any leaking fluids could be captured and handled appropriately.

**Metal shredder, water sprays, crane, and various conveyors; Permit to Operate No, 52-75:**

The metal shredder, shown in the attached photos, was not operating, at the time of the inspection. It runs about one day per week, I was informed, and only processes clean industrial scrap. It was explained that water sprays are constantly in use to control dust, when the shredder operates. I inquired about the large rubber or vinyl mats suspended from the top of the process, and was informed that these provide noise reduction. Shredded metal is shipped offsite by railcars.

They do not shred automobiles here, I was informed, and use ferrous shears to cut metal from autos.

**Torch cutting; Rule 285(j):**

No torch cutting was taking place at the time of the inspection. I was informed that when they have their contractor do torch cutting, it is only clean ferrous scrap, not painted scrap, oily scrap, or wires. They do not torch cut oversize scrap, or scrap which contains manganese, as these materials could give off large quantities of smoke. Rule 285(j) exempts torch cutting from the requirement of Rule 201 to obtain an air use permit.

I mentioned to Mr. Whitehead and Mr. Payne that a workgroup, consisting of AQD staff, and stakeholders from the metal recycling industry, has been meeting to consider changes to this exemption. The changes would require production torch cutting facilities to be equipped with particulate control, as well as facilities where a nuisance situation or adverse environmental impacts exist offsite. I subsequently learned, shortly after the inspection, that the workgroup has completed its assigned task, and has been disbanded. On 5/15/2015, I e-mailed a copy of the draft changes to the exemption language to Mr. Whitehead and Mr. Payne, so that Padnos Summit Steel has the opportunity to review and comment on the draft language.

**Miscellaneous:**

They receive aluminum scrap here, but do not process it at this site. They load it into Gaylord boxes, and ship it out. Likewise, when they receive copper scrap, they do not process it, but ship it out in boxes.

**Conclusion:**

I did not observe any instances of noncompliance. Facility staff were very knowledgeable and professional. I left the site at 11:13 AM.

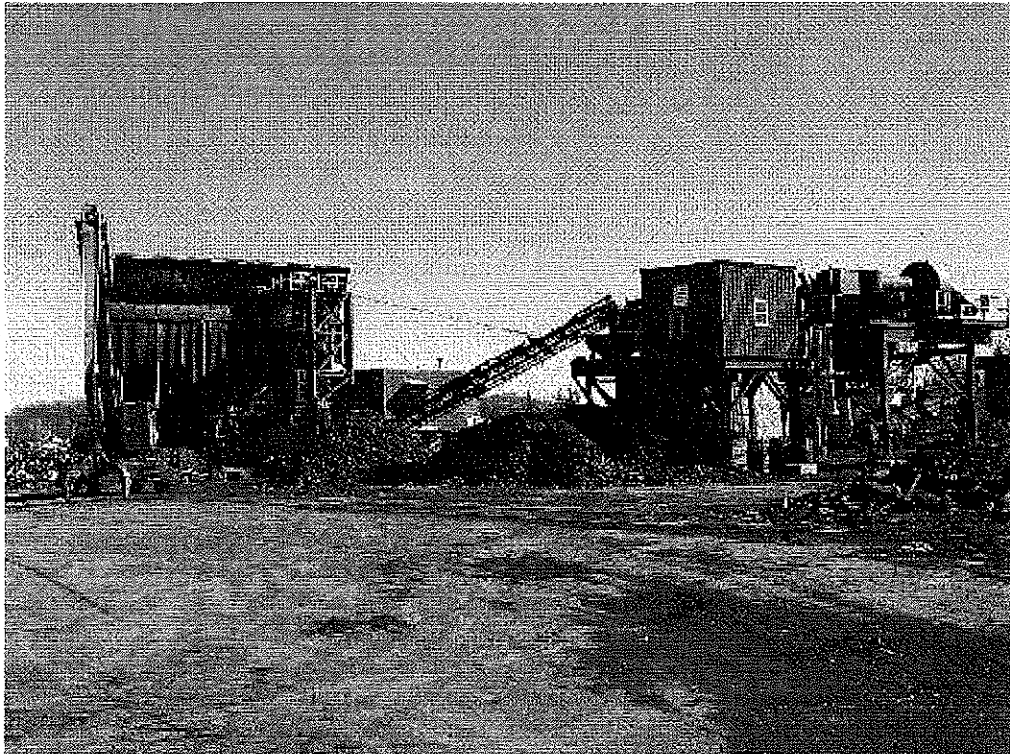


Image 1(Photo 1) : Industrial metal shredder, not operating at time of inspection.



**Image 2(Photo 2)** : Looking towards south end of metal shredder, shredded metal in left foreground.

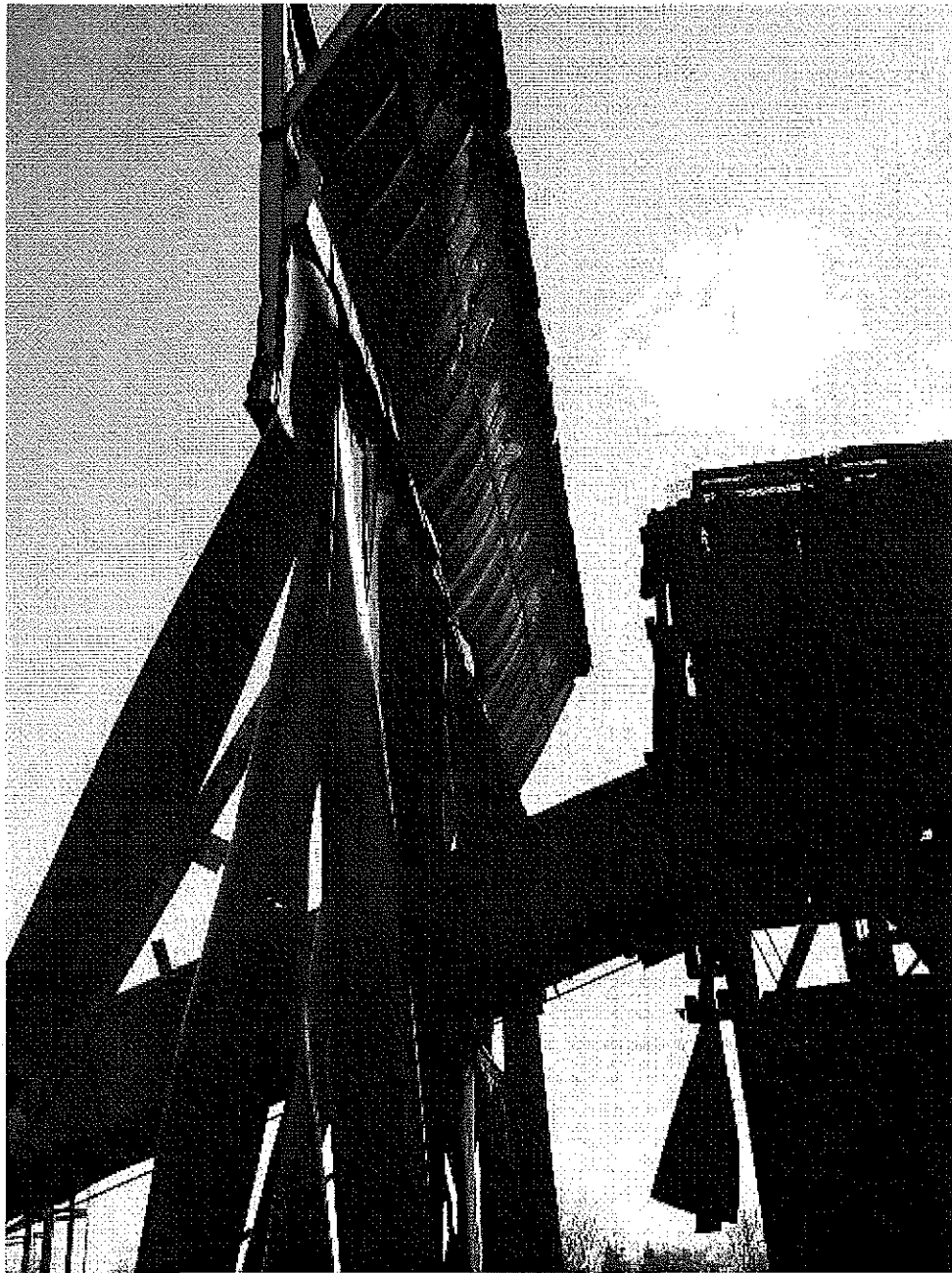


Image 3(Photo 3) : Vertical mat, used for noise reduction.

NAME *[Signature]*

DATE 6/1/2015

SUPERVISOR *[Signature]*

