

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

B546573524

<b>FACILITY:</b> DRAYTON IRON AND METAL CO		<b>SRN / ID:</b> B5465
<b>LOCATION:</b> 5229 WILLIAMS LAKE RD, DRAYTON PLNS		<b>DISTRICT:</b> Warren
<b>CITY:</b> DRAYTON PLNS		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Tom J. Spurgeon , Administrative Director		<b>ACTIVITY DATE:</b> 09/10/2024
<b>STAFF:</b> Adam Bognar	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On Tuesday, September 10, 2024, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I, Adam Bognar conducted a scheduled inspection of Drayton Iron & Metal (the “facility”) located at 5229 Williams Lake Rd, Waterford Twp, MI 48329 . The purpose of this inspection was to determine the facility’s compliance status with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (EGLE-AQD) rules; 40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants (NSPS OOO); and Permit to Install No. 398-75A.

I arrived at Drayton Iron & Metal at around 11 am. I met with Larry Throesch - Manager, Stacey Spurgeon – Owner, and Thomas Spurgeon – Owner. I identified myself and stated the purpose of the inspection. Stacey showed me the records required by PTI No. 398-75A. After we reviewed records, Larry gave me a tour of the plant.

Drayton Iron & Metal operates a metal scrapyard and a concrete crusher at this location. At the metal scrapyard, the facility receives metal pieces from various sources, sorts them, cuts/sheer/crushes them to reduce size, then ships them to a foundry that purchases the recycled metal.

Additionally, the facility receives concrete chunks from various demolition/construction projects. These chunks are fed to a concrete crusher that reduces the size of the chunks to uniform size (approximately 4 inch and 1 inch diameter chunks).

The facility also receives extra wet concrete leftover from other projects. This wet concrete is allowed to dry on-site where it is then crushed with a wrecking ball, picked up by a loader, and loaded into the crusher.

In a previous inspection of this facility, I observed torch cutting being performed outdoors. Since the torch cutting is/was performed outdoors with no emission control, torch cutting at Drayton Iron & Metal was not exempt from the AQD Rule 201 requirement to obtain a permit to install. A violation notice was sent to Drayton Iron & Metal on June 19, 2019 seeking compliance with Rule 201.

Rather than apply for a permit to install or cease torch cutting, Drayton Iron & Metal decided to construct an enclosure/filtration system to capture torch cutting emissions. Torch cutting is exempt from the requirement to obtain a permit to install under Rule 285(2)(j) if it does not adversely affect the surrounding area and has 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.

The facility demonstrated the function of this enclosure to me during a previous inspection on August 26, 2020. I observed that the enclosure was not able to capture the majority of emissions from the torch cutting process. I informed Larry and Drayton Iron & Metal that AQD does not consider their torch cutting enclosure “appropriately designed” per the permit exemption rule.

Larry stated during previous inspections on July 30, 2021 and June 17, 2022 that Drayton Iron & Metal no longer torch cuts any materials (except on a limited basis to test the torching enclosure). Larry stated During the June 17, 2022 inspection that all materials are either sheered or broken apart with a large wrecking ball. During that inspection, I observed a large 7,000 lb steel wrecking ball near the torching area. Larry stated during that inspection that he will not torch cut any materials unless the fabric filter/enclosure system is functioning properly.

During both the July 30, 2021 and June 17, 2022 inspections, I re-iterated to Larry that Drayton Iron & Metal is not allowed to torch cut in that enclosure unless it is capturing all torching smoke and filtering it through a properly designed and operated fabric filter system pursuant to Rule 285(2)(j).

During an inspection on July 10, 2023, I observed staff at Drayton Iron & Metal torch cutting metal beams in the torch cutting enclosure. None of the blowers/fans were on during this torch cutting. I observed heavy smoke coming out of the torch cutting area and entering the surrounding environment. I explained to Larry that Drayton Iron & Metal is not allowed to torch cut outdoors with no enclosure. A violation notice was issued to Drayton Iron & Metal for torch cutting outdoors with no Permit to Install. Due to the recurring nature of this violation, this issue was referred to the AQD enforcement section.

This torch cutting enclosure has since been disassembled. I did not observe any evidence of torch cutting during this inspection.

Larry purchased an additional shear for the facility to further reduce the need for torch cutting. The new shear attaches to a backhoe. The other shear, used for smaller items, is located inside the Quonset hut. No emissions are expected from the shearing process.

### **Permit to Install No. 398-75A**

PTI No. 398-75 was issued in 1988 for a jaw crusher, conveyor belt, screens, and magnetic separators. The original crushing plant was designed to process foundry slag which contained a high amount of iron. Currently this equipment is still operated, but it is now only used as a concrete crusher – no foundry slag is processed. Because this feedstock has changed, I requested that Drayton Iron & Metal update their permit to install. PTI No. 398-75A was issued to this facility on March 3, 2021.

### **EUPROCESS**

This emission unit consists of crushing process equipment including screens, crushers, feeders, conveyers, ect. Emissions from crushing and drop points and controlled using water sprays.

Section I – SC 1: Limits opacity from drop points and transfer points to a six-minute average of 10%. I did not observe any opacity from EUPROCESS during this inspection. The crusher was not operating during my inspection. The John Deere loader has an issue with its fuel injectors. This loader is used to feed concrete into the crusher hopper.

Section II – SC 1: States that the permittee shall not process any asbestos tailing or waste materials containing asbestos in EUPROCESS. Stacey stated that no asbestos materials are processed. Only concrete material is crushed. I did not see any evidence of crushed materials other than concrete. Occasionally, a piece of metal or debris makes it into the crusher, but Drayton Iron & Metal does their best to remove any metal/scrap from the concrete prior to crushing. Customers do not want metal in their gravel.

Section II – SC 2: States that the permittee shall not process more than 25,000 tons of material through EUPROCESS per 12-month rolling time period. This facility began operating the crusher under this new permit on June 24<sup>th</sup>, 2021.

I verified that records of material usage were kept. Total amount of material crushed was 14,714 tons during the 12-month period ending in August 2024. The highest usage reported was during the 12-month period ending in May 2024 at 17,849 tons. Other time periods showed similar usage. I didn't notice any exceedances of the 25,000 ton per year limit.

Section III – SC 1: States that the permittee shall not operate any portion of EUPROCESS unless each portion of EUPROCESS meets the specific opacity limit from Appendix A of this permit. EUPROCESS was not operating during my inspection. I did not notice any opacity from EUPROCESS during this inspection.

Section III – SC 2: States that the permittee shall not operate EUPROCESS unless the fugitive dust plan for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix B of this permit has been implemented and maintained.

I did not notice any opacity from the storage piles or crushing process. There was not significant track-out onto the road outside the facility exit. According to Larry, Stacey, and the record sheet I reviewed, the facility grounds are wet three times per day. I observed facility staff had recently wet the grounds during this inspection. AQD has not received any complaints regarding this facility since 2019.

Drayton Iron & Metal noted that the crusher/water sprays are inspected for 2 hours per week and 10 hours monthly. This inspection and associated recordkeeping is required by NSPS OOO and is not included in the conditions of PTI 398-75A.

Records of water/dust suppressant applications to the facility grounds were maintained. The facility has a column for each date and marks an "X" each time the grounds are watered. Three X's in a day indicates that the grounds were wet in the morning, at lunch, and during the afternoon. On days where there is rain "RAIN" is marked instead of the X's.

Section III – SC 3: States that the permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and OOO (NSPS OOO), as they apply to EUPROCESS.

Drayton Iron & Metal must perform Method 9 visible emission readings on EUPROCESS in accordance with NSPS OOO. During my inspections on July 30, 2021, and on June 17, 2022 I explained this requirement to Larry and in an email to the facility owners. During my inspection on July 10, 2023, the test was still not completed; however, the facility stated that one of their employees was recently certified to complete this testing. On October 11, 2023, the facility completed their Method 9 visible emissions test in accordance with NSPS OOO. The results of this testing was provided to AQD.

Based on my observations and record review, the facility is in compliance with all requirements of NSPS OOO.

Section IV – SC 1: States that the permittee shall not operate any portion of EUPROCESS unless the equipment's specified control device is installed, maintained, and operated in a satisfactory manner as listed in Appendix A. The crushing process was not operating during my inspection, so the water sprays were turned off. There is a water spray before and after the crushing process. In previous inspections, I observed that the water sprays did an adequate job of controlling dust from the crushing process and drop points.

Section IV – SC 2: States that the permittee shall install and maintain a scale on the loader that feeds the crusher which continuously shows the daily throughput rate for the conveyor. Drayton Iron & Metal purchased and installed a scale on their loader in September 2023 after my last inspection. This scale is used to report daily throughput.

Section V – SC 1: Requires the permittee to evaluate visible emissions from EUPROCESS within 180 days of commencing trial operation. Trial operation commenced on June 24, 2021. The facility completed this testing in October 2023. The facility was previously issued multiple violation notices for failing to complete this testing by June 24, 2021.

Section VI – SC 1,2: Specifies recordkeeping requirements for this facility. The facility is required to keep daily and monthly records of the amount of material processed through EUPROCESS. This data must be used to calculate an annual throughput rate based on a 12-month rolling time period. I verified that these records were maintained.

Section VII – SC 1,2: Specifies reporting requirements. Drayton Iron & Metal must notify the AQD within 30 days after the installation of this crusher. This requirement does not apply to this facility because they have operated the same crusher at this site since 1988. The only modification since then has been a change in feed stock that happened in the 1990's.

Section IX – SC 1: States that within 45 days of this permit, the permittee shall label all equipment using the company ID numbers in Appendix A. I verified that the equipment at this facility is labeled appropriately. The facility notified AQD that this equipment was labeled on June 25, 2021.

**EUTRUCKTRAFFIC**

Section I – SC 1: Limits opacity from EUTRUCKTRAFFIC to 5%. Compliance with this limit must be demonstrated using Test Method 9D. I didn't notice any opacity from the truck traffic. AQD has not received any complaints about this facility since 2019.

Section III – SC 1: States that the permittee shall not operate EUTRUCKTRAFFIC unless the fugitive dust control plan is implemented and maintained. Based on my observations during this inspection, the fugitive dust control plan has been implemented correctly. Stacey showed me records indicating that the grounds are wet three times per day. When it rains, the facility writes "Rain" instead of documenting their normal water applications. The grounds were wet during my inspection.

**EUSTORAGE**

Section I – SC 1: Limits opacity from EUSTORAGE to 5%. Compliance with this limit must be demonstrated using Test Method 9D. I did not notice any opacity from the storage piles during this inspection. The crushing process was not operating during my inspection.

Section III – SC 1: States that the permittee shall not operate EUSTORAGE unless the fugitive dust control plan is implemented and maintained. Based on my observations during this inspection and record review, the fugitive dust control plan has been implemented and maintained correctly.

The drop distance between the conveyor belt exit and the gravel pile is minimized as much as possible. The equipment is not designed to go any lower than its current setup.

I left the facility at around 12 pm.

**Compliance Determination**

Based on my findings during my inspection and record review, Drayton Iron & Metal is operating in compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (EGLE-AQD) rules; 40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants (NSPS OOO); and Permit to Install No. 398-75A.

Violation notices dated 7/14/2022 and 8/7/2023 will be resolved as part of an administrative consent order process.

Violation notices dated 4/22/2024 and 6/14/2024 will be resolved. Both violations were issued to the facility for failure to submit the 2023 Annual Emissions Report. The facility submitted their 2023 Annual Emissions Report on September 11, 2024. During this inspection, Stacey explained that she was unable to submit the report on her end. I contacted the emissions database help staff, and we were able to figure out the issue and get the report submitted.

NAME Adam Bognar

DATE 9/12/2024

SUPERVISOR Joyce