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

N141528807

FACILITY: LORBEC METALS USA LTD		SRN / ID: N1415
LOCATION: 3415 WESTERN RD, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Jay Goldstein , President		ACTIVITY DATE: 03/13/2015
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Unannounced, scheduled inspection of facility which was last inspected by AQD in 2008.		
RESOLVED COMPLAINTS:		

On 3/13/2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of Lorbec Metals USA Ltd., a facility which was last inspected by the AQD in 2008.

Environmental contact:

Mr. Jay Goldstein, President; 810-736-0961; jay@lorbecusa.com

Facility description:

As indicated on the company's website, Lorbec Metals USA Ltd. is Flint's largest scrapyards, and specializes in recycling and trading all grades of ferrous and non-ferrous scrap metal.

Emission units:

Emission unit	Emission unit description	Air use permit	Exemption rule	Operating status
Torch cutting	Occasional torch cutting	NA	285(j)	Not operating
Wire incinerator	United Corporation W-3000 incinerator with afterburner	Permit to Install No. 10-84I	NA	Not operating
Aluminum sweat furnace	Aluminum scrap melting furnace	Permit to Operate 121-87	NA	Removed from site

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.

Permit to Install (PTI) No. 10-84I still exists for a wire incinerator which has not been used in a number of years. Additionally, Permit to Operate (PTO) No. 121-87 still exists for an aluminum sweat furnace, which was removed years ago. Torch cutting, which is done only occasionally here, is exempt from the requirement of Rule 201 to obtain an air use permit, under the current Rule 285(j) exemption for torch cutting.

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:

The facility is just north of the intersection of North Dort Highway with Western Road. The site is located directly across the street from a fire station on Western Road. To the east of Lorbec Metals and the fire station is a residential area. There is a scrapyard immediately west of Lorbec Metals, with auto part businesses further to the west. There is a car auction business to the immediate north of Lorbec Metals.

Site history:

This facility was Kastle Brothers, Inc., at the time the incinerator permit was issued, in 1984. In 1987, it operated as the Flint Compressing Company. Around 1988, it became Flint Recycling, until it was purchased by Lorbec Metals USA Ltd., around 1992. At some point in its past history, this facility was operated as Western Steel.

Recent history:

The facility was most recently inspected by AQD on 7/17/2008, and was found to be in compliance. The only complaint received by AQD in recent years concerning Lorbec Metals was a single complaint of smoke and odors in 2012. This did not result in a finding of noncompliance. Prior to that, the most recent air pollution complaint was received in 2004. As of 2015, the price of steel on the commodities market is down by over 30%, and this has had impacts on the metal recycling industry.

Arrival:

Prior to arriving at the site, I drove up North Dort Highway, to the west of the site, to check for odors. Weather conditions were cloudy and 43 degrees F, with winds out of the east. I did not smell anything except for a barely detectable petroleum-like odor. I could not see any visible emissions from the site. I then drove east on Richfield Road, and south on Western Road, detecting neither odors nor visible emissions.

I arrived at 10:42 AM, and parked next to the site office. I asked office staff if Larry Lifshiz or David Norcross were available, and was informed that they have retired. I was soon met by Mr. Jay Goldstein, President. I provided my identification/credentials, and a copy of the DEQ brochure *Environmental Inspections: Rights and Responsibilities*, per AQD procedures. I explained the reason for my visit.

We discussed the 2008 inspection activity report, in which AQD's Brad Myott noted that the aluminum sweat furnace and wire incinerator had not been operated for several years, and would need new air use permits if they were to start up again. Additionally, he noted that they could be subject to new federal rules for the aluminum sweat furnace (40 CFR Part 63, Subpart RRR, National Emissions Standards for Hazardous Air Pollutants for Secondary Aluminum Production) and the incinerator (40 CFR Part 60, Subpart CCCC, Standards of Performance for Commercial and Industrial Solid Waste Incineration Units). Mr. Goldstein informed me that the aluminum sweat furnace was removed from the site long ago, and plans are to cut up the wire furnace, which has not operated in roughly 10 years.

Inspection:

Mr. Goldstein explained that they are directly across the street from a fire station and a residential area, and they try to be good neighbors, by not creating excessive smoke or odors. He indicated that diesel exhaust from their mobile equipment at the site was the most likely source of the faint petroleum-like odor which I had, prior to my arrival.

They receive and process a wide variety of ferrous and non-ferrous scrap metal. However, although they accept individual auto parts, they do not accept entire autos. Metal scrap is sorted and processed by type.

We first entered their non-ferrous building, where non-ferrous metals such as copper are sorted. Copper wire with no coating on it is formed into little "briquettes," and goes to the domestic market. Wire which is coated no longer goes to the wire incinerator onsite. Rather, it is baled with the coating still on, and sent to China, to be processed there. A photo of the conveyor belt leading to the non-ferrous baler is attached, for reference.

I was shown that motor blocks are placed on a concrete pad to contain any leaking automotive fluids, for the purpose of preventing soil and/or ground water contamination. For the same reason, metal chips and turnings are kept indoors, in a large building onsite.

I observed how rubber mats which are attached to some industrial steel scrap are carefully removed, by cutting the metal as close to the rubber as possible, while avoiding catching the rubber on fire. I was informed that these rubber mats then go to a shredder, in the local area, for recycling.

Cardboard is baled for recycling, Mr. Goldstein indicated, and pointed out numerous cardboard bales. He explained that very little material from this facility actually goes to landfills.

They no longer use their stationary shear process and conveyor (please see attached photo), it was explained. They now use a mobile hydraulic shear to cut metal. The mobile shear is a diesel powered unit, manufactured by Caterpillar.

They are gradually having unpaved roadways and yard areas covered with concrete, for the purpose of catching/containing any spilled fluids from scrapped metal machinery. I was shown a new concrete pad, where scrap metal peddlers unload their materials, and observed that it had caught leakage from machinery. In addition to preventing soil and ground water contamination, the concrete may potentially reduce fugitive dust, by reducing the amount of unpaved areas onsite.

Torch cutting; Rule 285(j):

They only do limited amounts of torch cutting onsite, and they do not process materials which would generate large amounts of smoke, Mr. Goldstein indicated. No torch cutting was taking place at the time of the inspection. Rule 285(j) exempts torch cutting from the requirement of Rule 201 to obtain an air use permit.

I mentioned 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, 3-4 weeks after the inspection, that the workgroup has completed its assigned task, and has been disbanded. On 4/15/2015, I e-mailed the draft language for the revised exemption to Mr. Goldstein, so Lorbec Metals has the opportunity to review and comment on the draft.

Wire incinerator with afterburner; PTI No. 10-84I.

They have not used their United Corporation W-3000 wire incinerator with afterburner in approximately 10 years, Mr. Goldstein indicated, as he showed me the unit (please see attached photos). It was not operating at this time, and did not look to have run anytime recently. He was aware that if they wished to operate the device again, it would require a new permit to install, and that additional federal requirements would apply. He explained that their current plans are to have the unit be cut up/scrapped. Therefore, I will request that AQD's Permit Section void PTI No. 10-84I.

Aluminum scrap melting furnace; PTO No. 121-87:

The aluminum sweat furnace was removed from the site a long ago, Mr. Goldstein informed me. Consequently, I will request that the Permits Section void PTO No. 121-87.

Conclusion:

I left the site at 11:34 AM. Mr. Goldstein was very knowledgeable and professional. I did not observe any instances of noncompliance. I will follow up on voiding the two air use permits, PTI No. 10-841, and PTO 121-87.

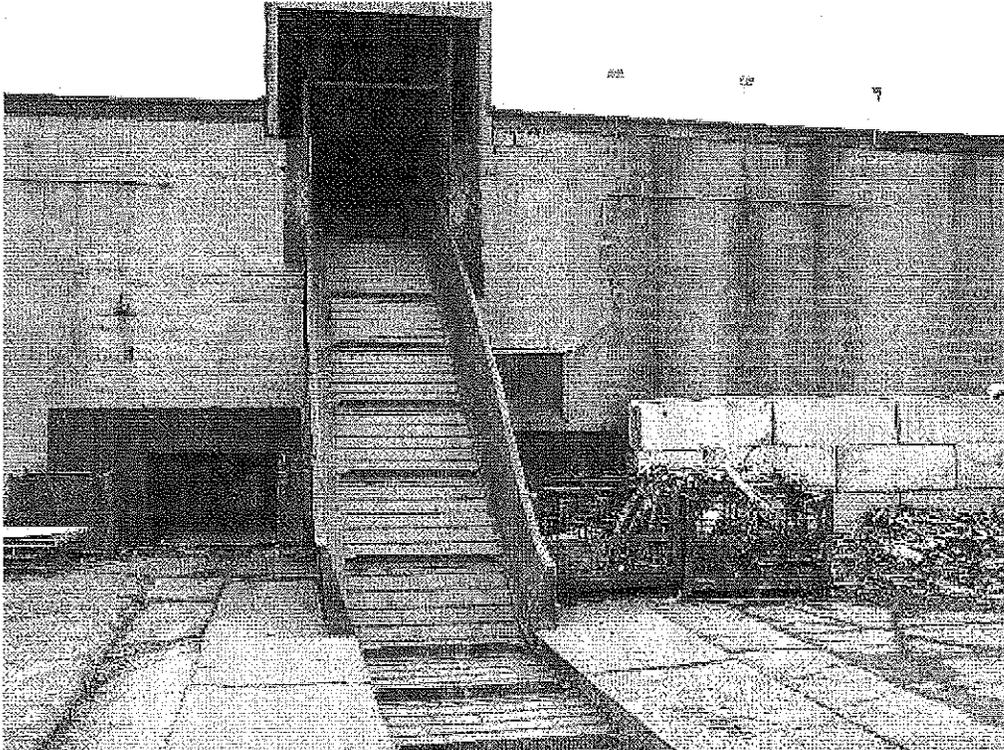


Image 1(Photo 1) : Non-ferrous baler.

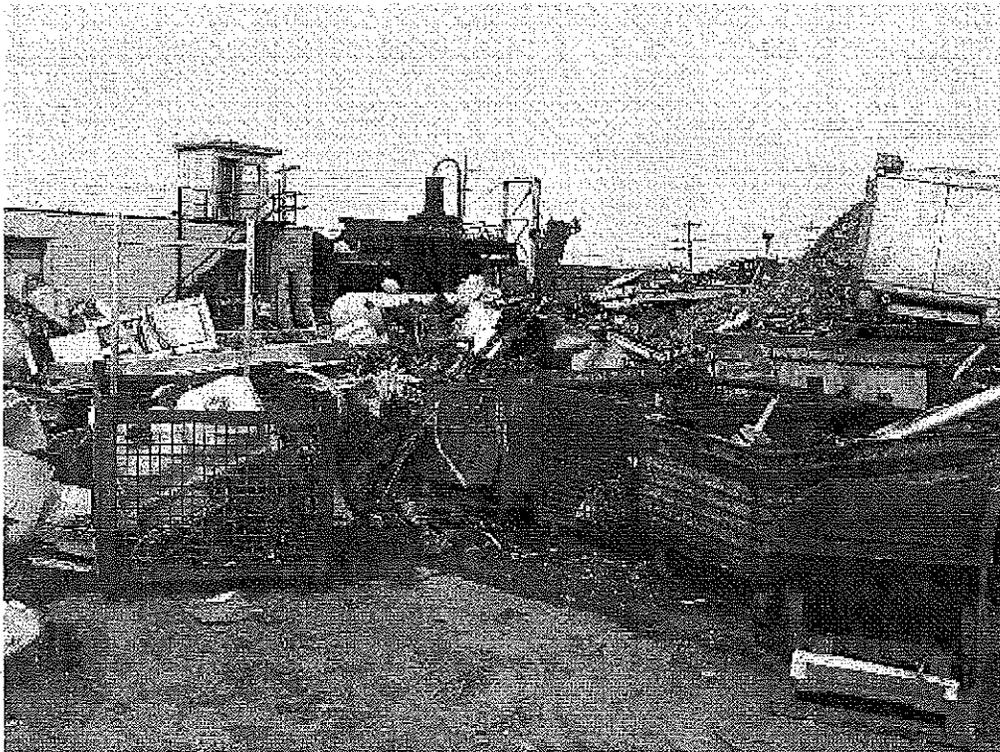


Image 2(Photo 2) : Stationary shear process and conveyor in background; no longer in use.

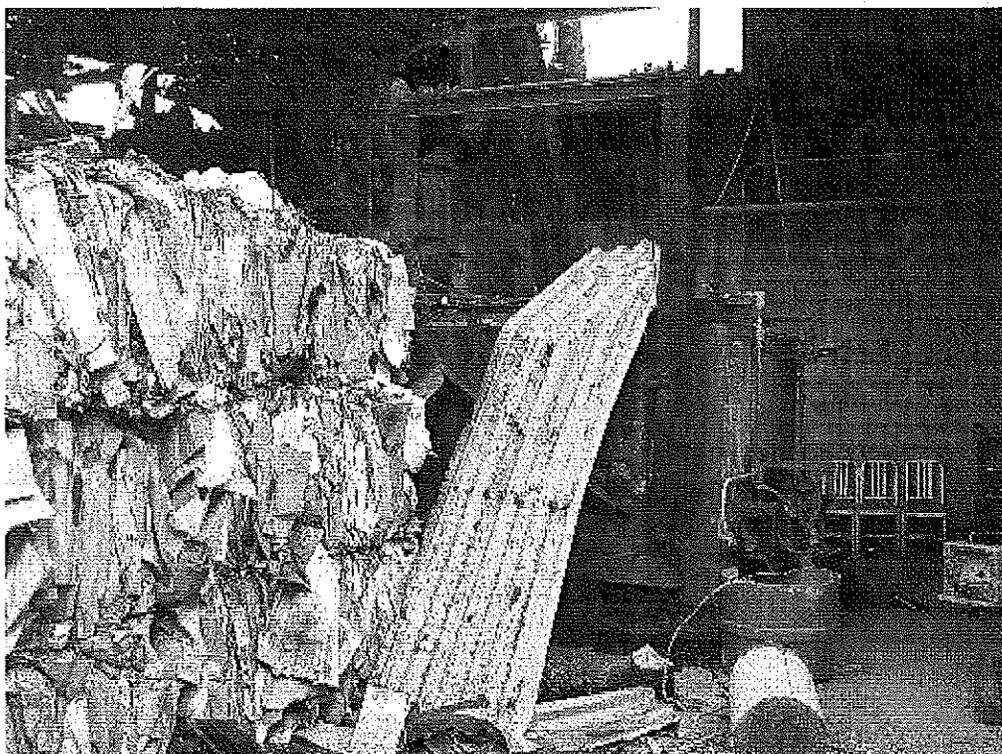


Image 3(Photo 3) : W-3000 wire incinerator. Cardboard bales in left foreground.



Image 4(Photo 4) : W-3000 wire incinerator exhaust stack.



Image 5(Photo 5) : Ferrous metal baler, in operation.

NAME 

DATE 4/15/2015

SUPERVISOR B.M.

