

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

N547449510

FACILITY: OmniSource Corporation		SRN / ID: N5474
LOCATION: 815 Treat Street, ADRIAN		DISTRICT: Jackson
CITY: ADRIAN		COUNTY: LENAWEE
CONTACT: Russell Steele , Plant Manager		ACTIVITY DATE: 07/11/2019
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection of a scrap yard. Torch cutting had ceased.		
RESOLVED COMPLAINTS:		

Minor Source-

Facility Contacts

Russell Steele– Plant Manager

rsteele@omnisource.com

ph 517-265-5195

Website: <http://www.omnisource.com/>

Purpose

On July 11, 2019, I conducted an unannounced compliance inspection of OmniSource (Company) located in Adrian, Michigan in Lenawee County. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules.

Facility Location

The facility in an industrial area along the railroad tracks with residential homes just to the SW and NW of the facility. See aerial photo. Also refer to Attachment (1) which is the site plan for the facility.

Facility Background

The Company was last inspected on 8/10/2017 and found to be out of compliance due to unpermitted torch cutting operations.

Regulatory Applicability

Torch cutting operations at the facility are no longer exempt from PTI requirements as outlined in letter that was sent to the Company in June:

"Dear Scrap Metal Recycling Owner,

On December 20, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), finalized changes to Part 2 of the Michigan Air Pollution Control Rules. Specifically, Rule 336.1285(j) was amended, which pertains to portable torch cutting. Rules 336.1278 through 336.1290 were established to exempt insignificant sources of air pollution from having to obtain a permit to install.

The amended Rule 336.1285(2)(j) states that the requirement of Rule 336.1201(1) to obtain a permit to install (PTI) does not apply to any of the following:

(j) Portable torch cutting equipment that does not cause a nuisance or adversely impact surrounding areas and is used for either of the following:

(i) Activities performed on a non-production basis, such as maintenance, repair, and dismantling.

(ii) Scrap metal recycling and/or demolition activities that have 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.

As with all AQD permit exemptions, eligibility is based on any owner or operator's ability to provide a

demonstration that the process equipment meets the requirements of the exemption. In the future if your facility is unable to successfully demonstrate that it meets the requirements of an applicable exemption, you may be required to obtain a PTI for continued operation of the process equipment.

Complaints that are received by the AQD that are attributed to torching activities will be investigated by district staff and evaluated for compliance with opacity limitations under Rule 336.1301(1) and the nuisance provision of Rule 336.1901. This letter is intended to create awareness of this new requirement and to initiate discussion regarding any questions you may have."

Arrival & Facility Contact

No visible emissions or odors were observed upon my approach to the Company's facility. I arrived at 8:00 am, proceeded to the facility office to request access for an inspection, provided my identification and spoke with Russell Steele (RS) the plant manager. I informed him of my intent to conduct a facility inspection and to review the various records as necessary.

RS extended his full cooperation and fully addressed my questions.

Pre-Inspection Meeting

RS outlined that there are 21 employees and the facility generally operate 5 days a week between 7 am to 4 pm.

They receive all their scrap metal locally. They receive miscellaneous metal scrap including 1 to 2 vehicles a day.

They have several mobile cranes, front end loads and a skid steer. Scrap metal comes in via private vehicles, trucks and rail. They don't have a shear or shredder.

Torch cutting ceased about 3 months ago. They are currently working on removing the oxygen tank associated with the torch cutting. They no immediate plans to resume torch cutting but remains a possibility that they will build a torch cutting enclosure similar to the OmniSource facility in Jackson. If they go this route, RS estimates that it will be at least another year.

Any vehicles received go through a depollution station. They are not processed onsite but shipped to the sister facility in Jackson to be shredded. All mercury switches are removed as part of the national mercury switch recovery program.

Onsite Inspection

RS gave me a brief tour.

I asked RS to show me the car depollution station. See attached photo. It appeared to be similar to the station located at the Company's Jackson location but appeared to be a somewhat smaller operation. All liquids are removed. Mercury switches end up in a bucket that is shipped offsite once a year. The last shipment took place about one month ago. This location had a container labeled PCB's. RS explained that any capacitors that come in that aren't specially labeled as PCB free are handled as contain PCB's. See attached photos. Overall, it appeared to be a clean operation.

The torch cutting area still had some pieces of uncut metal on the ground but no recent signs of activity. The torch cutting equipment shed was mostly empty with some torch piled into the corner. There also was no recent sign of activity.

Otherwise, there wasn't much to see at the facility that was air quality related. They do have a water/sweeper truck that they use 2 or 3 times a week to keep dust down in the yard. The yard is completely cemented over which helps keep the dust down. However, just beyond the yard was parking lots used by trucks were some dust was noted.

Applicable Rules Review

N/A.

Post-Inspection Meeting

N/A. I thanked RS for his time and cooperation, and I departed the facility at approximately 10:00 am.

Compliance Summary

The Company is in compliance.



Image 1(Mercury Switches) : Current mercury switches in collection bucket.

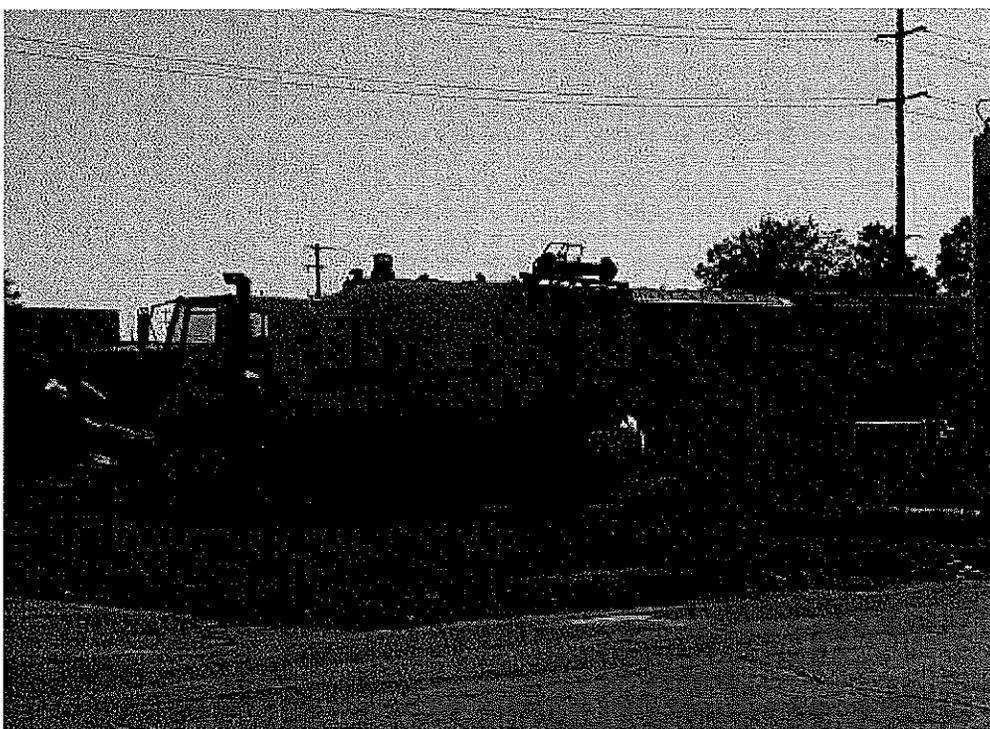




Image 3(Oxygen tank) : Oxygen tank and former torching area.

NAME M. Kowalchuk

DATE 7/15/19

SUPERVISOR [Signature]