

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N788530940

FACILITY: RJ Torching, Inc.		SRN / ID: N7885
LOCATION: G-5167 N DORT HWY, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Jeff Simpson, Yard Manager		ACTIVITY DATE: 09/01/2015
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Rule 310 open burning violation for allowing cut metal with rubber or plastic to smolder. Violation of Administrative Consent Order EPA 5-15-113(a)-MI-02 App A paragraphs 13, 16		
RESOLVED COMPLAINTS:		

Inspection Report

N7885- RJ Torching
G-5167 N. Dort Hwy, Flint

Inspection Date:

9/1/15

Facility Contacts:

Jeff Simpson, Yard Manager – 810-785-9759, jsimpson@rjind.com

MDEQ AQD Personnel:

Nathan Hude – 517-284-6779, huden@michigan.gov

Dan McGeen – 517-284-6638, mcgeend@michigan.gov

Facility Description:

RJ Torching, Inc.'s Flint site is a full service scrapyard, as indicated on their website. RJ Torching (aka RJ Industrial Recycling or RJIR) is a metal scrap/salvage yard which uses torches and crushers to cut larger pieces of metal to more manageable sizes so they can then be melted. The area consists of industry along N Dort Hwy for approx. 2 miles from I-475 exit 9, north to East Coldwater Road. RJ Torching is located in the northern portion of this stretch. Residential areas are located just over ½ mile to the north, less than ¼ mile to the west, south, and south-west, with sporadic homes to the east near CS Mott Lake. Prevailing winds for this area are generally westerly.

RJIR is classified as a minor source in the Michigan Air Compliance Enforcement System (MACES) database used by AQD, although a particular pollutant is not specified. 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.

The consideration as a minor source is only given due to the fact that reliable testing is unavailable for this type of source and emissions are based on the activity being conducted in the ambient environment (without a smoke stack) and results drastically change with metal type, foreign material on metal being torched, and torching best management practices.

RJ Torching, Inc. is also known as RJ Industrial Recycling (RJIR). RJIR developed the portable SPARCS (Smoke Particulate Air Reduction Cyclone System) filtration system to address opacity issues at their own sites. Torching Solutions, LLC, also known as RJ Industrial Manufacturing (RJIM), designs, builds, markets, and sells SPARCS units worldwide. RJIR does not have any air use permits for the Flint site. Torch cutting is considered to be exempt from the requirement of Michigan Air Pollution Control Rule 201 to obtain a permit to install, under Rule 285(f). A workgroup consisting of AQD staff and stakeholders from the metal recycling industry has recommended changes to this exemption, which would require production torch cutting to be equipped with particulate control; this rule change is being reviewed by the Office of Regulatory Reinvention. The SPARCS control devices may qualify for exemption under Rule 285(j), for "installation or construction of air pollution control equipment if the control equipment itself does not generate a significant amount of criteria air contaminants as defined in R 336.1119(e) or a meaningful quantity of toxic air contaminants." The SPARCS units are run by electricity, and should not generate any air contaminants themselves.

Applicable Regulations:

Administrative Consent Order EPA 5-15-113(a)-MI-02

Previous Inspections:

3/4/15, Dan McGeen; no concerns noted, observed operation of SPARCS
11/9/11, Michael McClellan; compliance pending, observed operation of Smoke Genie
12/3/10, Brian Culham; compliance unknown, smoke plume noted

Previous Violations:

1. 9/2/15- Rule 301 Opacity, Rule 901 Odor, Administrative Consent Order EPA 5-15-113(a)-MI-02 paragraph 23, Administrative Consent Order EPA 5-15-113(a)-MI-02 Appendix A paragraphs 8, 10, 19
2. 11/29/10- Rule 301 Opacity (case was referred to EPA thus developing Administrative Consent Order EPA 5-15-113(a)-MI-02)
3. 3/31/08- Rule 301 Opacity
4. 11/6/07- Rule 301 Opacity

Recent Complaints:

8/12/15- Opacity
8/11/15- Opacity
7/30/15- Opacity, Odor
7/24/15- Opacity, Odor

Inspection Key Concerns:

1. Cutting of cast iron pipes and valves was being conducted without use of SPARCS
2. Cut steel with rubber or plastic attached was allowed to smolder and smoke

Permit Unit Summary Tables

None

Unit Identification

None

MAERS Reporting

None

Inspection Summary

This was a self-initiated inspection due recent complaints as documented above, and odor (Rule 901) and opacity (Rule 301) violations documented on August 27, 2015.

Dan and I arrived on site at 12:43pm. Upon our arrival we witnessed an orangish/brown plume emanating from torch cutting with opacity of 60%. The torching was being conducted approx. 75 feet away from the SPARCS. The opacity stopped shortly after our arrival upon our approach to the cashier's office. When we approached the window, Dan asked for Brian Krasicky. Dan was informed that Brian was no longer with the company and Jeff Simpson would be contacted to assist us with our inspection. While we waited, we observed the yard. All torching operations had stopped though some previously cut items were allowed to smolder with smoke visible from our position.

Jeff arrived at 12:54 and Dan introduced me and informed him of the intent of our visit. I informed Jeff of the recent complaints and my observations on 8/27/15. He stated that he was not aware of any opacity issues that day. He asked where I had taken my reading to which I replied from across the road. He asked "can you do that?", to which I replied yes, the VE's were visible over the fence line and the roof of the office.

We asked if we could walk to observe the yard and Jeff said yes. On the way, I returned to the vehicle to retrieve my hard hat. Dan asked if any changes had occurred since his last visit and Jeff stated that they had increased their torch operators from one to three. We arrived to the torching area and Jeff pointed out a piece of cast iron that was still smoldering. There was also a rubber fan belt that was in a separate nearby pile that was smoldering. I informed Jeff that they cannot allow rubber and plastics to burn and smolder to which he replied "what do you want me to do? I guess we just won't torch anymore". Dan asked when they use SPARCS and Jeff replied "anytime there is big jobs". Dan asked if there were any restrictions with the use of SPARCS and Jeff replied that he was not comfortable answering that. For the use of SPARCS, the size needs to be greater than 2 feet by 4 feet.

I informed Jeff of the violations I noted on 8/27/15 and informed him that the company would be receiving a violation notice for opacity and odor. I also discussed the smoldering of the cast iron piping and the rubber fan

belt and informed him that this was considered open burning which could result in a violation of Rule 310 (open burning).

Dan and I left the site at approx. 1:30pm and returned back to the office. Upon further review of Administrative Consent Order EPA 5-15-113(a)-MI-02, RJ Torching will be written violations observed during our inspection for the following:

1. Rule 310- Open Burning; during torch cutting operations, cast iron and rubber products are allowed to smolder causing smoke and odors without being extinguished
2. Order Appendix A paragraph 13; "RJ shall conduct good housekeeping practices in the torch-cutting area to eliminate, to the extent practicable, foreign material that would create VEs if it is in contact with torch flames".
3. Order Appendix A paragraph 16; "RJ shall ensure that scrap to be torch cut is drained of all fluids, has had all non-metal material removed, to the extent practicable, and has been properly and thoroughly cleaned prior to torch cutting. RJ shall dispose of flammable, combustible, or explosive fluids and material in approved receptacles or disposal facilities in accordance with applicable local, state, and/or federal laws."

Recommendations for ambient air sampling will be explored through the DEQ Ambient Monitoring section. Monitor type, location, and funds will need to be explored to consider the feasibility of this type of monitoring.



Image 1(Smoldering) : Smoldering metal and rubber / belt components

NAME

DATE

9/3/15

SUPERVISOR

