



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT OFFICE



DAN WYANT
DIRECTOR

January 9, 2014

Mr. Adam Hill, House Manager
Industrial Asset Recycling
51456 Oro Drive
Shelby Township, MI 48315

SRN: P0492, Wayne County

Dear Mr. Hill:

VIOLATION NOTICE

On December 19, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Industrial Asset Recycling (IAR) located at 3775 Outer Drive East, Detroit, Michigan. The purpose of this inspection was to determine IAR's compliance with the requirements of the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, the administrative rules, and Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart CCCC (Standards of Performance for Commercial and Industrial Solid Waste Incineration Units).

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Burning of wood in a custom made incinerator unit	40 CFR, Part 60, Subpart CCCC	Facility failed to comply with New Source Performance Standard Subpart CCCC for Commercial and Industrial Solid Waste Incinerator (CISWI) Units
Burning of wood in a custom made incinerator unit	Rule 210(1)	Facility is required to obtain a Renewable Operating Permit (ROP) to operate the wood burning unit pursuant NSPS Subpart CCCC.

The AQD has determined that the facility has installed an operable CISWI unit. In the State of Michigan, operation of this CISWI unit is subject to compliance with 40 CFR, Part 60, Subpart CCCC (Standards of Performance for Commercial and Industrial Solid Waste Incineration Units). In promulgating these regulations, the United States Environmental Protection Agency anticipated that facilities would find it more cost effective to use an alternative waste disposal method (such as landfill) and permanently shut down the CISWI unit rather than install sophisticated air pollution control systems to comply. This regulation specifies very stringent operation and emission requirements for a CISWI unit and includes the following principal components:

- Waste Management Plan requirements
- Operator training and qualification requirements

- Emission limitations and operating limits
- Initial and annual performance testing requirements
- Initial compliance requirements
- Continuous compliance requirements
- Monitoring requirements (e.g. continuous monitoring of operating parameters established during testing)
- Recordkeeping and reporting requirements (e.g. semi-annual and annual reports)
- Title V requirements (e.g. obtain an ROP as required under Rule 211(1)(c) and pay associated annual fees)

The AQD finds that IAR's CISWI unit is in substantial noncompliance with the above described principle components of the New Source Performance Standards requirements and Rule 210(1). If the company plans to attempt to operate this CISWI unit in compliance with these regulations, describe specifically how and when the company will do so in your compliance program. Information on the New Source Performance Standards requirements for CISWI units can be accessed on the internet at: <http://www.epa.gov/ttn/atw/129/ciwi/ciwipg.htm>

Information on Michigan's ROP program can be accessed on the internet at <http://www.michigan.gov/deg> click on "Air", then "Permits", and "Renewable Operating Permits" or you may contact us.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 30, 2014, which coincides with (21) calendar days from the date of this letter. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

In addition, should your program of compliance include the permanent shut down of the CISWI unit, please provide the date by which you will enter into a contract with a commercial waste disposal company and include the date by which at least one or more of the following shut down actions will be completed:

1. CISWI unit physically removed or dismantled
2. CISWI unit charge doors welded shut
3. CISWI unit exhaust stack and blowers removed

If IAR believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of IAR. If you have any questions regarding

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the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below or at the DEQ, Detroit Office, 3058 West Grand Blvd., Suite 2-300, Detroit, Michigan 48202.

Sincerely,



Todd Zynda
Environmental Engineer
Air Quality Division
313-456-2761

cc: Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Ms. LaReina Wheeler, City of Detroit, Department of Environmental Affairs