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

P096463964

FACILITY: City Recycling Inc.		SRN / ID: P0964
LOCATION: 1943 Mack, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Mark Jr. Wierszewski , Owner		ACTIVITY DATE: 08/09/2022
STAFF: Gerald Krawiec	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: AQD/EPA Joint Inspection		
RESOLVED COMPLAINTS:		

### AQD/EPA joint inspection conducted on August 9, 2022

I joined EPA staff, Valeria Apolinario, Environmental Engineer, and Daniel Schaufelberger, Environmental Scientist at 12:49pm for an unannounced inspection at City Recycling Inc. located at 1943 Mack Avenue in Detroit. The purpose of the inspection was to determine compliance with the Clean Air Act regulations 40 CFR Part 82 Subpart F: Recycling and Emissions Reduction. Mark Wierszewski Sr., President and Christina Stewart, Office Manager are the contacts. Mark Wierszewski Jr., who runs the business daily and has been AQD's contact was out of town, but available via cell phone if needed.

During the Opening Conference, EPA staff presented their credentials, provided a CBI warning to the facility, stated the authority and purpose of the inspection. Regulations central to the inspection are 40 CFR Part 82 Subpart F, including 40 CFR 82.155 safe disposal of appliances, such as small appliances and motor vehicle air conditioners, and 40 CFR 82.156, proper evacuation of refrigerant from appliances.

During the company's process description of the handling CFC containing products, it was learned that the company does not recover refrigerant from either appliances or motor vehicles. When an appliance comes into the facility, personnel conduct an inspection to verify that the sealed unit, or compressor is separated from the appliance. If the compressor is missing within the appliance, or the compressor and appliance are in 2 pieces, the appliance is accepted. If the sealed unit is still within the appliance, then the facility rejects the item. Only motor vehicles void of all fluids (dry) are accepted from commercial vendors.

During the plant tour, EPA staff took several photos. The signage at the scale (photo), there was only one refrigerator on the main scrap pile, it did not have compressor (photo). Compressors were found in a separate bin (photo). No vehicles were seen in the main scrap area. At this time there were no other small appliances on site such as dehumidifiers, vending machines, window AC units or anything else that may use a refrigerant.

During the Closing Conference, EPA requested several documents such as, material acceptance policy, copies of signed customer receipts, commercial contracts, and other information related to the handling and recordkeeping of refrigerant containing products. EPA staff discussed strategies for not incentivizing customers to vent refrigerant. Furthermore, EPA stated concerns with how the facility does not utilize

any verification statements to confirm whether refrigerant had been removed properly or leaked out.

EPA staff will be sharing samples of acceptable signage language, and various other forms to be completed by the company and the customer to assure proper handling and recordkeeping of refrigerant containing products.

**EGLE/AQD inspection on August 4, 2022.**

AQD staff conducted a scheduled inspection for FY 2022 of City Recycling Inc., located at 1943 Mack in the City of Detroit. The purpose of the inspection is to determine the facility's compliance with applicable state and federal air pollution rules and regulations. Owner, Mark Wierszewski Jr., accompanied AQD staff on the inspection.

#### **Background:**

City Recycling is located at 1943 Mack, bordered by St. Aubin Street on the east, Dequindre Street on the west and Illinois Street on the north in the City of Detroit. City Recycling is a family-owned business operating in this location since 1992. Over the past years it has acquired several parcels of land (vacant lots) adjacent to the main property. The size of this site has grown to 9.8-acres, there are no plans to expand beyond the facility's current boundaries.

The site holds a current business license for its metal recycling/scrap processing, issued by the City of Detroit, Buildings, Safety Engineering and Environmental Department (BSEED). City Recycling accepts ferrous and nonferrous material from the general public and commercial vendors.

The company was last inspected by AQD on August 8, 2019, and determined to be in compliance at that time.

#### **Complaint History:**

In 2018 there were 2 complaints alleging open burning that were received on May 31 and June 18. Both complaints were filed with Jenifer Dixon in Lansing and referred to the Detroit Office, both allegations came from the same person living near the facility. The complainant was contacted on both occasions and given my contact information; no additional complaints were received. The company was contacted and denied any open burning or torch cutting.

Multiple (17) observations/drive-by inspections did not yield any evidence of open burning, smoke, odor, fugitive dust or any issue within AQD's jurisdiction. These complaints were resolved (8/22/2018).

In 2021, 4 PEAS complaints (25785, 26139, 26217, 27622) were received from 3 complainants all alleging smoke from open burning and/or odors. I interviewed 2 of

complainants. These complaints were investigated by 2 different AQD inspectors and no odors or smoke was observed. The company was contacted and denied any open burning or conducting torch cutting. After some additional surveillance, these 4 PEAS complaints were each resolved within 30 days of the date it was received.

Owner, Mark Wierszewski Jr. feels there is an organized citizens group of people deliberately trying to cause problems for him. He has also had multiple inspections from the City of Detroit, BSEED.

#### **Operating Schedule:**

The company currently has 10 - 15 employees and operates 8-hours a day (8:00am – 4:00pm) 5 days a week. The company often operates 1 Saturday a month.

#### **Facility Description:**

City Recycling receives and processes mainly shred, industrial and demolition metal scrap varying in size, quality, and shape. The facility routinely receives various grades of steel and other ferrous (containing iron) and non-ferrous metals. The facility accepts, white goods, appliances, dry motor vehicles, etc. Materials come in from both commercial and individual (peddlers) sources.

These materials are all temporarily stored in the yard, while undergoing processing and transported offsite by truck. City Recycle processes/sizes these materials to fit into steel mills for recycling. Recyclable metal scrap is delivered on a nearly daily basis to this facility by truck, each of which is weighed onsite before unloading. The company does not accept scrap containing oil or flammable coatings, nor does it accept carbonaceous bulk solid materials. Larger scrap pieces, including I-beams, presses and dies require being cut into smaller pieces for recycling. Metal shears are used to cut materials to size, no torch cutting. Once the metal is cut to smaller sizes and separated by metal type it is shipped out by truck to steel mills for recycling.

#### **Inspection Narrative:**

Prior to this FY 2022 inspection, surveillance of this facility was conducted on 3/25, 4/2, 5/26, 7/12, and 7/26 before entering the facility to conduct this inspection on August 4, 2022. No evidence of open burning, smoke, odor, fugitive dust or track-out was ever observed.

Upon arrival, I conducted a pre-inspection conference with Owner, Mark Wierszewski Jr. Mr. Wierszewski also accompanied AQD staff as we toured this 9.8-acre site. There are several piles of scrap metal on site sorted by type. Incoming material is sorted, sized, and stored in a pile until ready for shipment to customers. Two metal shears are used to cut large pieces of material to a manageable size, torch cutting is not utilized.

The main building houses the scale room, offices, and small parts processing area. Small parts usually nonferrous are sorted and stored in drums and/or other containers. Another building on the corner of Mack and St. Aubin acts as a garage to store and/or repair equipment. The size of this building is approximately 6,000 square feet and heated by a used oil heater. The CLEAN BURN model CB-2500 is a multi-oil heating system with an input rating of 250,000 Btu/hr. The unit is only used to heat the building when there is personal working in the area. The fuel consists of used oil, transmission fluid and other combustible fluids generated onsite from their own vehicles and heavy equipment.

City Recycle purchases approximately 15-20 vehicles per month from commercial vendors. Vehicles must be dry (void of all fluids) and are dismantled, not crushed, or shredded. Approximately 2 appliances are received daily by the public (peddlers). Appliances are sent to a shredder outside the facility to be processed.

The company owns its own street sweeper and cleans Mack, St. Aubin, and paved areas of the property daily. A street sweeper log is kept. Occasionally streets in the neighborhood are swept as needed or by request of the homeowners.

Unpaved areas of the yard are covered in asphalt millings to reduce dust. Speed limit signs are posted limiting traffic to 5 mph.

Attached to this report are some pages from the company website listing the many metals purchased for recycle.

#### **Post Inspection:**

Upon return to the office, Mr. Wierszewski discussed the many improvements made to the operations.

The company has a CERTIFICATE OF OPERATION issued by the City of Detroit, Buildings, Safety Engineering and Environmental Department. A copy of this Certificate is attached along with its Fugitive Dust Plan.

#### **Regulatory Summary:**

Rule 282(2)(b)(iv) of the Michigan Air Pollution Control Rules exempts heaters fired by waste oil or fuels that are generated on site and the equipment is rated less than 500,000 Btu per hour from the Permit to Install program if certain conditions are met. The CLEAN BURN model CB-2500 is a multi-oil heating system with an input rating of 250,000 Btu/hr.

Rule 284(2)(g)(ii). of the Michigan Air Pollution Control Rules exempts the 2 diesel fuel tanks on site. The 1,000-gallon tank is used for off road fuel. The 500-gallon tank is used for on road fuel.

**Compliance Determination:**

Based upon this inspection of City Recycling Inc. located in the City of Detroit, it appears this facility is operating in compliance with applicable air quality rules and regulations, enforceable by AQD.

The USEPA has the authority to determine compliance with 40 CFR part 82 Subpart F, and the compliance status of this facility with those requirements are not addressed in this report.

NAME



DATE

4/7/23

SUPERVISOR

