

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

P101748707

FACILITY: Rivore Metals		SRN / ID: P1017
LOCATION: 141 East Montcalm, PONTIAC		DISTRICT: Southeast Michigan
CITY: PONTIAC		COUNTY: OAKLAND
CONTACT: Bogdan Pernes , General Manager		ACTIVITY DATE: 04/23/2019
STAFF: Adam Bognar	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Self Initiated Inspection		
RESOLVED COMPLAINTS: C-19-01523		

On April 23, 2019, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I, Adam Bognar conducted an unannounced self-initiated inspection of Rivore Metals (the "facility" or "Rivore") located at 141 East Montcalm, Pontiac 48342. The purpose of the inspection was to determine the facility'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 (Act 451); and Michigan Department of Environmental Quality-Air Quality Division (EGLE-AQD) Administrative Rules.

Additionally, this inspection was in response to complaint No. C-19-01523 filed with the Southeast Michigan District Office on April 10, 2019. Complainant indicates a burning odor due to metal cutting was emanating from the facility during the morning hours. In addition, the complainant states green/brown smoke was encountered on Sat. April 6, 2019. The intensity ranges from 2 to 3 and they are concerned about the potential health effects. Wind direction was N/NE.

Before I visited Rivore, I performed an odor observation at the complainant's location at around 2:30 pm. The weather conditions were overcast, 50°F with a N/NW wind of approximately 10 mph. I smelled a faint metal odor downwind from the facility. I observed plumes of white smoke coming from Rivore on an intermittent basis.

I arrived at Rivore at around 3:15 pm. I was met with a number of staff who called the general manager to inform him of my intent to inspect the facility. I spoke to Mr. Bogdan Pernes, General Manager over the phone. I identified myself, provided identification, and stated the purpose of the inspection. Mr. Pernes asked if I would be willing to postpone the inspection until Thursday because he was busy with an Audit at a sister Rivore facility. I explained that Rivore needs to have someone available at all times of operation to allow an AQD inspector to inspect the facility. Mr. Pernes agreed to come and assist me with my inspection.

At around 3:45 Mr. Bogdan arrived at the facility. He explained the operations at Rivore and gave me a tour of the facility.

Rivore is a ferrous metal scrapyard. They receive ferrous metal pieces from various industries, sort them, cut them to reduce size (if necessary), then ship them to a foundry that takes recycled ferrous metal. There are 12 full time employees operating 1 shift from approximately 8 am to 4:30 pm Monday through Saturday. 2-3 staff are full time torch cutters, while the other 9-10 staff are operators that sort and move the metal using various heavy machinery. The majority of the facility grounds consists of piles of metal scrap awaiting to be processed or sent off to a foundry. Rivore has operated at this location for approximately 1.5 years.

Torch cutting is performed in a designated area. The two torch cutters were just finishing up for the day when I observed this area, so I was not able to observe active torch cutting during this inspection. A combination of acetylene and oxygen is used as the torch fuel. Torch cutting is performed outdoors on the ground, on bare earth (no barrier to catch slag). Torch cutting emissions are not ventilated to the general in-plant environment or to an appropriately designed and operated enclosure and fabric filter. For these reasons, Rivore is not exempt from the AQD Rule 201 requirement to obtain a permit to install pursuant to Rule 285 (2)(j). Torch cutting at Rivore is currently unpermitted.

I explained to Mr. Pernes that torch cutting at Rivore is currently in violation of AQD Rule 201. I explained that he will need to submit an administratively complete permit to install application in a timely manner in response to this violation. A violation notice was sent to Rivore on May 3, 2019 seeking compliance with Rule 201.

Compliance Determination

Observations made during the inspection and record review indicate that Rivore is not operating in 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 (Act 451); and EGLE-AQD Administrative Rules.

Complaint No. C-19-01523 is considered resolved. A violation notice was sent to Rivore on May 3, 2019

seeking compliance with Rule 201. Rivore Metal's compliance with Rule 201 should help reduce emissions and alleviate the issues noted by the complainant.

NAME Adam Boyer

DATE 4/30/2019

SUPERVISOR SK