

GRAND RAPIDS IRON & METAL

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**Metals Recycling
and Administration**
7915 S. Division Ave
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Papers and Plastics Recycling
1701 Clyde Park Ave #15
Wyoming, MI 49509

November 25, 2024
Project No. 241001

April Lazarro
Michigan Department of Environment, Great Lakes, and Energy – Air Quality Division
Grand Rapids District Office
350 Ottawa Avenue NW, Unit 10
Grand Rapids, Michigan 49503-2316

Response to the Letter Dated November 4, 2024
Grand Rapids Iron & Metal (GRIM) – P1508
Grand Rapids, Michigan

Dear April:

On November 4, 2024, EGLE-AQD issued a Violation Notice (VN) to GRIM alleging that Michigan Rule 201 has been violated. The specific allegation cited in the VN are as follows:

Process Description	Rule/Permit Condition Violated	Comments
Portable torch cutting equipment for scrap metal recycling	Rule 201	Operation of portable torch cutting without enclosure and fabric filter.

As requested, this letter provides information regarding the referenced citation, including: the date the alleged violation occurred; an explanation of the cause(s) and duration of the alleged violation; whether the violation is ongoing; a summary of the action(s) that have been taken and are proposed to be taken to correct the violation; the date(s) by which these action(s) will take place; and what steps are being taken to prevent a reoccurrence.

It should be noted that emissions information being requested for the Lefort Trax 720 logger, baler and shear installed at the facility is being submitted under separate cover on or before December 4, 2024, as required by the NV.

GRIM has owned a scrap yard in the Grand Rapids for more than 100 years and we pride ourselves on our relationship with the community. Torch cutting of large pieces of metal has been performed for most of this time at our other location. We know of no other way to reduce the size of some materials without torch cutting or using shears. The material must be cut down to smaller sizes so it can be transported for further processing offsite. It should be noted that we purchased shears and use shears whenever possible instead of torching large pieces of metal.

Emissions from our torch cutting operation are low. Our torch cutting operations are exempt under Rule 291. A memorandum is attached detailing the operations and emissions estimates including information on compliance with both Rule 291 as well as Rule 278a.

Ms. April Lazarro
November 25, 2025

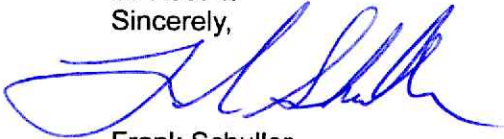
It should be noted that no actual torch cutting was taking place during your visit. That being said, we recognize the need to comply with applicable rules and regulations. To ensure compliance, GRIM will develop a Scrap Management Plan to include:

- Use of shearing or cutting whenever possible
- Inspecting scrap to avoid torching of rubber or plastic
- Proper sorting of scrap metal to avoid torching materials that would smoke excessively
- Immediate extinguishing of any accidental fires that occur.

Finally, environmental compliance is important to GRIM and facilities like our scrap yard play an important part in Michigan's recycling efforts. To ensure environmental compliance, GRIM will prepare a Scrap Management Plan that outlines internal procedures we can follow to ensure compliance. We work hard to be good neighbors and we have never been inspected or received a Violation Notice from EGLE before this letter.

If you have any questions, please contact me at frank.schuller@grimrecycle.com or (616) 304-5674.

Sincerely,



Frank Schuller
General Manager, Grand Rapids Iron & Metal

By email

cc:

Jenine Camilleri, EGLE-AQD (Lansing)
Heidi Hollenbach, EGLE-AQD (Grand Rapids)
Lillian Woolley, South Channel Environmental Consulting, LLC