



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

November 4, 2024

Frank Schuller
Grand Rapids Iron & Metal
7915 S. Division Avenue
Grand Rapids, Michigan 49548

SRN: P1508, Kent County

Dear Frank Schuller:

VIOLATION NOTICE

On October 18, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Grand Rapids Iron & Metal located at 7915 S. Division Avenue, Grand Rapids, Michigan. The purpose of this inspection was to determine Grand Rapids Iron & Metal'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 the Air Pollution Control Rules.

During the inspection, staff observed the following:

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.

During the inspection, the AQD observed portable torch cutting equipment performed for scrap metal recycling with externally vented emissions that was not equipped with an appropriately designed and operated enclosure and fabric filter. This is a violation of Rule 201 of the administrative rules promulgated under Act 451.

In addition, a Rule 278 exemption demonstration is requested for the Lefort Trax 720 logger, baler, shear installed at the facility as certain processes and process equipment may be exempt from obtaining a Permit to Install (PTI). Rule 278 establishes requirements of eligibility for exemptions listed in Rules 280 through 291. To be eligible for a listed exemption, the owner or operator of an exempt process or exempt process equipment must be able to provide information demonstrating the applicability of the exemption. Pursuant to Rule 278(a), this demonstration should be provided within 30 days of a written request by the AQD and should include the following information:

- The specific exemption being used by the process or process equipment.
- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 25, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to April Lazzaro at EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 or LazzaroA1@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Grand Rapids Iron & Metal 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 violation cited above and for the cooperation that was extended to me during my inspection of Grand Rapids Iron & Metal. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE