

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

U81170652541197

FACILITY: A-1 Auto Salvage & Scrap		SRN / ID: U811706525
LOCATION: 2574 State Street		DISTRICT: Jackson
CITY: Ypsilanti		COUNTY: WASHTENAW
CONTACT:		ACTIVITY DATE: 08/23/2017
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Inspection of a metal scrap yard.		
RESOLVED COMPLAINTS:		

Minor Source-**Facility Contacts**

Jim Burns – Owner

A1autosalvageandscrap@gmail.com

ph 734-637-3285

Website: <http://a1.openmobileone.com/>**Purpose**

On August 23, 2017, I conducted an unannounced compliance inspection of A-1 Auto Salvage & Scrap (Company) located at 2574 State Street, Ypsilanti, Michigan. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules.

Facility Location

The facility is in a commercial/industrial area of Ypsilanti with some residential homes just to the SW of the facility. See attached aerial photo of the facility.

Facility Background

There is no record of previous air quality inspections at this facility.

Regulatory Applicability

Torch cutting operations at the facility are no longer exempt from PTI requirements as outlined in letter that was sent to scrap yards in June although this facility was left off the list:

“Dear Scrap Metal Recycling Owner,

On December 20, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), finalized changes to Part 2 of the Michigan Air Pollution Control Rules. Specifically, Rule 336.1285(j) was amended, which pertains to portable torch cutting. Rules 336.1278 through 336.1290 were established to exempt insignificant sources of air pollution from having to obtain a permit to install.

The amended Rule 336.1285(2)(j) states that the requirement of Rule 336.1201(1) to obtain a permit to install (PTI) does not apply to any of the following:

(j) Portable torch cutting equipment that does not cause a nuisance or adversely impact surrounding areas and is used for either of the following:

(i) Activities performed on a non-production basis, such as maintenance, repair, and dismantling.

(ii) Scrap metal recycling and/or demolition activities that have emissions that are released only into the general in-plant environment and/or that have externally vented emissions equipped with an appropriately designed and operated enclosure and fabric filter.

As with all AQD permit exemptions, eligibility is based on any owner or operator's ability to provide a demonstration that the process equipment meets the requirements of the exemption. In the future if your facility is unable to successfully demonstrate that it meets the requirements of an applicable exemption, you may be required to obtain a PTI for continued operation of the process equipment.

Complaints that are received by the AQD that are attributed to torching activities will be investigated by district staff and evaluated for compliance with opacity limitations under Rule 336.1301(1) and the nuisance provision of Rule 336.1901. This letter is intended to create awareness of this new requirement and to initiate discussion regarding any questions you may have."

40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines regulations apply to the diesel engine that powers part of the equipment associated with an automobile crusher.

Arrival & Facility Contact

No visible emissions or odors were observed upon my approach to the Company's facility. I arrived at 10 am, proceeded to the facility office to request access for an inspection, provided my identification and spoke with Jim Burns (JM) the plant manager. I informed him of my intent to conduct a facility inspection and to review the various records as necessary.

JM extended his full cooperation and fully addressed my questions.

Pre-Inspection Meeting

JM outlined that there are 9 or 10 employees and they generally operate 5 days a week between 8:30 am to 4:15 pm and Saturday morning till noon.

They take mostly residential metal scrap. They receive approximately 180 cars a month and process a total 1.4 million pounds (1200 tons) per month. The cars are processed onsite going through a depollution station to remove gasoline and oil. They are then placed into an automobile crusher. After that, they are then placed inside a metal box containing as many as 5 cars to be shipped offsite generally to a shredder in Toledo.

They only do some torch cutting. They have done none for the last month as they currently don't have a torch cutting employee but torch about 2 hours a day when they do torch. They have a shear crane which alleviates the need for most torch cutting.

They do not remove mercury switches from vehicles.

Onsite Inspection

Lance, a facility employee, and Jim gave me a tour of the facility. He showed me the depollution station. See attached photos. It appeared that they were removing gasoline and oil. However, there was a large area where the soil was stained with oil nearby suggesting that they are not getting all the oil of the vehicles.

Next, we went and looked at diesel engine associated with the automobile crusher. The diesel engine was rated 170 hp that was built in 2000 and has 20,949 hours of use on it and was on during the inspection. I discussed briefly with him about the RICE MACT requirements.

Next, we looked at the adjacent automobile crusher. See attached photos. Lance indicated that basically no dust is created when the vehicles are crushed. It isn't equipped with a water spray bar. Large oil stains were located on the ground next to it. The main pollutant of concern is mercury since the Company had stopped removing mercury switches when a local environmental firm stopped taking them. See attached photos.

We then proceeded to walk over to the area where torching was conducted. There was some metal in small piles waiting for torching to resume. They use only one torch at a time on the ground that is supplied by small/portable oxygen/propane tanks. I discussed with the new rule chances associated with torch cutting. See attached photo.

Not far from where the torch cutting is done were 2 large piles of tires. See attached photos. They appear to have been there a long time and suspect there is more than 500 of them. They use a crane shear to slice up the tires and place them in the same metal box that is shipped offsite with the crushed cars.

Walked through the rest of the scrap yard, I didn't see any evidence of open burning taking place. I noted a small

amount of dust from truck traffic inside the yard which I noted to JB.

Applicable Rules Review

Rule 201 applies to the automobile crusher since the mercury in mercury switches is potentially being released when the vehicle is smashed.

Rule 201 applies to torch cutting as that type of process is no longer exempt from permitting requirements.

40 CFR Part 63 Subpart ZZZZ. RICE MACT applies to a less than 500 hp CI diesel fired engine located at an area source. The engine pre-dates 2007 and the New Source Performance Standards (NSPS) for Stationary Compression Ignition (CI) Internal Combustion Engines, which are codified in the Code of Federal Regulations (CFR) at 40 CFR part 60 subparts IIII. The nonroad engine exemption does not apply to the crusher diesel engine since it has been located on site for more than 12 months.

Post-Inspection Meeting

We held a brief post-inspection meeting with JB. I indicated to him that I would be following up with a letter that outlined the violations that I noted and that he would be given 21 days to respond. He indicated that he would be willing to enter the mercury switch recover program and I promised to follow-up with an email on instructions on how to do it. He indicated that the facility would likely be sold soon.

I thanked JB and Lance for their time and cooperation, and I departed the facility at approximately 10:45 am.

Compliance Summary

The Company is out of compliance with the automobile crusher. Mercury switches need to be removed to avoid the requirement for a permit.

The Company is out of compliance with their torch cutting operation. They will need to either obtain a PTI permit, torch cut indoors in a building properly controlled by a dust collector or cease operations to get back into compliance.

The Company is out of compliance with federal RICE MACT requirements for the diesel engine associated with the automobile crusher.

A Violation Notice (VN) will be sent to the Company outlining these violations.



Image 1(Aerial photo) : aerial photo



Image 2(Depollution area) : Depollution area



Image 3(Depollution area) : Storage tanks associated with car depollution area.

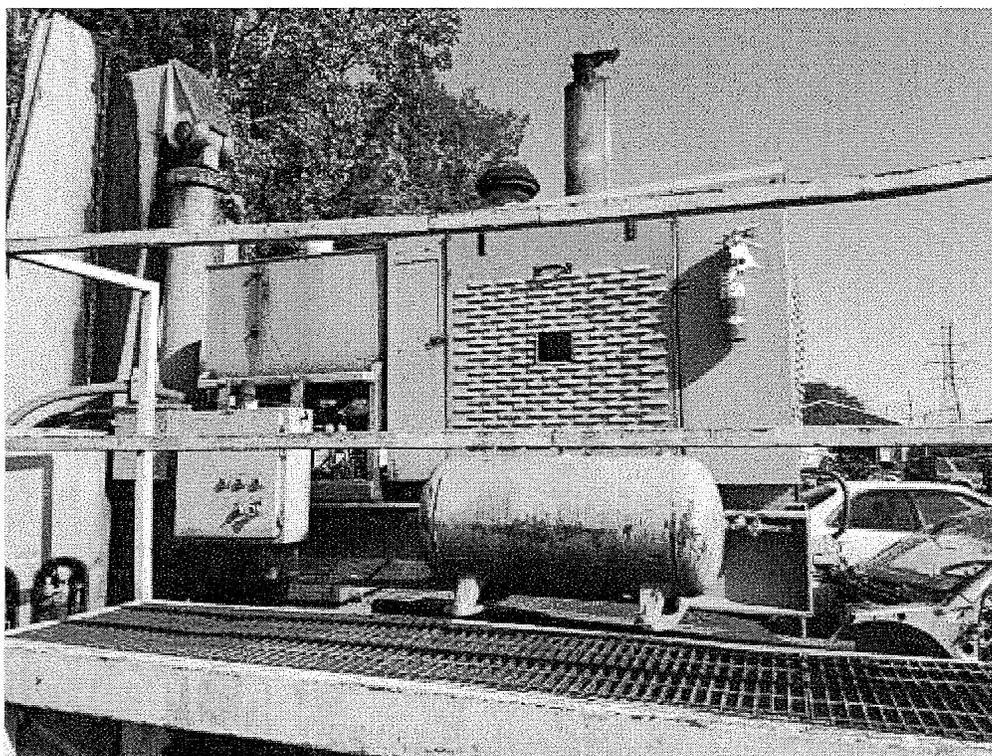


Image 4(Diesel engine) : 170 hp diesel engine used to power automobile crusher.



Image 5(auto crusher) : Auto crusher



Image 6(Torch cutting) : Torch cutting area with portable oxygen/propane tanks.



Image 7(Tire pile #1) : Tire pile # 1.



Image 8(Tire Pile #2) : Tire Pile #2.



Image 9(General scrap pile) : General scrap pile.

NAME M. Kovalchik

DATE 8/23/2017

SUPERVISOR [Signature]