



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

September 11, 2023

Robert McCormick
Louis Padnos Iron & Metal
3495 Viaduct SW
Grandville, Michigan 49418

SRN: A2457, Kent County

Dear Robert McCormick:

VIOLATION NOTICE

On August 22 and 30, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Louis Padnos Iron & Metal located at 2001 Turner Avenue NW, Grand Rapids, Michigan. The purpose of this inspection was to determine Louis Padnos 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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 278-06A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Ferrous separation process with a z-box and cyclone	PTI No. 278-06A, EU-FERROUSZBOX, Special Condition VIII.1	Failure to maintain stack height required by the permit.
Shredding operation	Rule 370	Failure to properly collect and dispose of air contaminants.
Non-ferrous separation system, conveyors, and two cyclones	Rule 201	Failure to obtain a Permit to Install.

During the inspection on August 22, 2023, the AQD found that the stack for EU-FERROUSZBOX had broken and fallen over approximately one month prior. This is a violation of PTI No. 278-06A, Special Condition VIII.1. It is noted that the stack had been repaired and was in place by the second inspection on August 30, 2023.

Additionally, during the inspection on August 22, 2023, a significant quantity of materials generated by the shredding operation was airborne. This was noted while in the shredder operator tower, and while walking around in the area of the shredder and associated ferrous and non-ferrous separation systems. This is a violation of Rule 370 for failure to properly collect and dispose of air contaminants.

During the August 22 and 30, 2023 inspections, AQD staff observed that EU-NONFERROUS, a non-ferrous separation system with cyclone separator, had been removed and replaced with a new non-ferrous separation system with two (2) cyclones. This is a violation of Rule 201, for the installation of an emission unit without obtaining a Permit to Install.

The Shredder Incoming Inspection plan utilized to demonstrate compliance with FG-SHREDDEROP, Special Condition III.9, was requested during the inspection records review. The plan that was received is dated September 20, 2007, and appears to be a copy of the plan from the AQD files. During the inspection, Louis Padnos Iron & Metal indicated that they have completely revamped the incoming inspection protocol, however, since the plan was not updated accordingly this letter serves as a request to revise and resubmit it in accordance with the special condition. Additionally, the Malfunction Abatement Plan, required by FG-SHREDDEROP, Special Condition III.10, has not been properly updated to include the two cyclones in the new non-ferrous separation system.

During the August 22, 2023 inspection, smoke was observed from the torching area, and observations made identified that a large press being disassembled via torching was leaking oil, was grease-covered, and rubber hoses had been torched. This is not acceptable and does not conform to the facility Best Practices for Torching Material, which was submitted in response to a 2012 Violation Notice for excess opacity from the torching emission unit. Therefore, pursuant to Rule 911, the AQD requests that Louis Padnos Iron & Metal submit a Malfunction Abatement Plan (MAP) for all torching activities at this facility.

An email communication from Louis Padnos Iron & Metal indicated that a trial operation of a hydrogen torching system will be conducted. A Rule 278 exemption demonstration is requested below. Additionally, the AQD requests an exemption determination for the shear emission unit which operates on a production basis.

Certain processes and process equipment may be exempt from obtaining a 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.

Finally, please provide a facility-wide Potential to Emit (PTE) demonstration for all criteria pollutants emitted at the stationary source. Information on calculating PTE can be found at:

<https://www.michigan.gov/egle/about/organization/air-quality/air-permits/new-source-review/potential-to-emit>

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Please submit the information regarding the Shredder Incoming Inspection plan, the MAP, the hydrogen torching process, the shear, and the PTE demonstration within 30 days of the date of this letter.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 2, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 Louis Padnos 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 violations cited above and for the cooperation that was extended to me during my inspection of Louis Padnos Iron & Metal. If you have any questions regarding the violations 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