



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: OCT 07 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Rifkin Scrap Iron and Metal, Co., Saginaw, Michigan

FROM: David Sutlin, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Chief
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Rifkin Scrap Iron and Metal, Co.

Facility Location: 1011 N. Washington Avenue, Saginaw, Michigan

Date of Inspection: August 20, 2019

EPA Inspector(s):

1. David Sutlin, Environmental Engineer
2. Manojkumar Patel, Environmental Engineer

Other Attendees

1. Larry Rifkin, Chairman of the Board, Rifkin
2. Jan Hoffman, CFO, Rifkin
3. David Rifkin, CEO/President, Rifkin (by phone)

Contact Email Address: Dsrifkin@rifkin-co.com

Purpose of Inspection: Torch cutting inspection

Facility Type: Scrap metal recycling

Regulations Central to Inspection: Michigan SIP

Arrival Time: 12:00 PM

Departure Time: 12:45 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Rifkin unless otherwise noted.

Process Description:

This facility accepts scrap metal including steel pieces, which are cut using shears. The facility uses propane/oxygen torches to cut pieces, such as plate steel, that cannot be cut using shears. Once the scrap is cut down to size, it is resold. The facility has less than 20 employees and torch-cuts less than 150 tons of metal per year.

Staff Interview:

To control emissions from torch cutting, the facility has constructed a fixed enclosure, which exhausts to an emission control system. The enclosure's footprint is approximately 12 feet by 16 feet and accommodates a single torch-cutter. The enclosure consists of sheet metal covering three sides, and the forth side is comprised of doors that swing partially open during torch cutting, for safety purposes. To load scrap into the enclosure, the enclosure's roof is temporarily removed using a magnet hung from a crane. The control system consists of a set of filters, followed by a fan, and then a stack. The facility had experimented with furnace-like filters which did not work well according to David Rifkin. At the time of the inspection, the facility was planning to install baffles upstream of the filters in order to knock down heavier particles and to test new types of filters, which were expected to be more resilient.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

EPA inspected the torch-cutting enclosure and observed several metal pieces on the ground inside the enclosure, that had appeared to have been torch-cut. EPA did not observe any torch-cutting taking place during the inspection. Behind the enclosure, EPA observed ductwork leading to the fan and then to the exhaust stack. The original filters referenced by David Rifkin had been removed.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Requested documents:

- Specifications/diagrams for the emission capture and control system

SIGNATURES

Report Author: _____

Date: _____

Section Chief: _____

Date: _____

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APPENDICES AND ATTACHMENTS

Appendix A: Digital Image Log

Facility Name: Rifkin Scrap Iron and Metal, Co.

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Manojkumar Patel	2. Date(s) of Inspection: August 20, 2019
3. Company/Facility Name: Rifkin Scrap Iron and Metal, Co.	4. Street Address, City, State: 1011 N. Washington Avenue, Saginaw, Michigan
5. Number of Images: 7	6. Archival Record Location: CD-R labeled as "Rifkin, Saginaw, MI; 8-20-19 Inspection; Photos"

Image Number	File Name	Date and Time (incl. time zone and DST)	Description of Image
1	P8200072.JPG	8/20/2019 11:16	Scrap inside torch-cutting enclosure
2	P8200073.JPG	8/20/2019 11:16	Exhaust ports and ductwork inside torch-cutting enclosure
3	P8200074.JPG	8/20/2019 11:16	Close-up of exhaust ports
4	P8200075.JPG	8/20/2019 11:18	Torch-cutting exhaust stack
5	P8200076.JPG	8/20/2019 11:18	Torch-cutting exhaust fan
6	P8200077.JPG	8/20/2019 11:19	Ductwork connecting enclosure to exhaust fan
7	P8200078.JPG	8/20/2019 11:19	Exterior of torch-cutting enclosure