



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Advantage Metals Recycling 12th Street Facility
1153 S. 12th Street
Kansas City, KS 66105
FRS# 110001307416

Inspection Date(s):
June 22, 2023

LUKE
RODRIGUEZ

Digitally signed by LUKE
RODRIGUEZ
Date: 2023.08.08
08:31:25 -05'00'

Luke Rodriguez, Inspector, ECAD, Air Branch

Authorized for Release by:

TRACEY CASBURN

Digitally signed by
TRACEY CASBURN
Date: 2023.08.15
06:21:09 -05'00'

Tracey Casburn, Air Branch Chief, ECAD

11201 Renner Boulevard
Lenexa, Kansas 66219

Air Branch

CONTENTS

INSPECTION OVERVIEW	3
INSPECTION OBJECTIVE	3
FACILITY CONTACT INFORMATION	3
FACILITY OVERVIEW	3
FACILITY OPERATIONS SUMMARY	4
FIELD ACTIVITIES SUMMARY	4
INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS	5

TABLES

Table 1. PROJECT TEAM MEMBERS	3
Table 2. FACILITY CONTACT INFORMATION	3

APPENDICES

- A Receipt for Documents (1 page)
- B Photo log (10 pages)
- C Source Control Policy (5 pages)
- D Spill Prevention, Control, and Countermeasures Plan (66 pages)

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of this multi-media full compliance evaluation (FCE) inspection was to determine compliance of the facility with the Clean Water Act (CWA) and the Clean Air Act (CAA). This inspection was a multimedia inspection conducted with EPA Region 7 Water Branch staff. The inspection was part of the U.S. Environmental Protection Agency's (EPA) Creating Cleaner Air for Communities National Enforcement Compliance Initiative.

Table 1 lists the inspection team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Luke Rodriguez	EPA, Region 7, ECAD, Air Branch	Lead Inspector (Air)
Christina Gallick	EPA, Region 7, ECAD, Air Branch	Field team member (Air)
Naji Ahmad	EPA, Region 7, ECAD, Water Branch	Lead Inspector (Water)
Adam Hendrickson	EPA, Region 7, ECAD, Water Branch	Field team member (Water)
Mark Weckwerth	Unified Government of Wyandotte County, Department of Air Quality	Field team member (Air)

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Serena Dehoney, EHS Director	(816) 804-5258	Serena.dehoney@advantagerecycling.com
Blair Jorgensen, Facility Supervisor	(913) 201-5215	Blair.jorgensen@advantagerecycling.com
Jose Duran, Facility Supervisor	(816) 804-2060	Jose.duran@advantagerecycling.com
Zach Davis, Safety Engineer	(816) 260-8307	Zach.davis@advantagerecycling.com

FACILITY OVERVIEW

Advantage Metals Recycling owns and operates the 12th Street Shredder and Scrap Metal Recycling Facility in Kansas City, Kansas. Over the past 15 years, more than 25 emissions tests measuring volatile organic compounds (VOCs) have been conducted at scrap metal shredders. The historic test data shows that VOC emissions from shredding operations are at levels that can trigger regulatory applicability and the need for emission controls. The test data reveals that typical shredding operations emit VOCs at rates between 20 and 200 pounds (lbs) of VOCs per hour. Historically, State permitting agencies have not accounted for VOC emissions from shredders. The 12th Street Facility operated as a true minor source from construction until September 6, 2019, when Advantage Metals Recycling submitted an application for a Synthetic

Minor Operating Permit. The permit would require the facility to limit VOC emissions to below the major source threshold. This permit application is currently under review by the Kansas Department of Health and the Environment (KDHE), and the final permit has not been issued at the time of this report.

FACILITY OPERATIONS SUMMARY

The Advantage Metals Recycling 12th street facility is scrap metal recycling facility employing a hammer mill or “shredder” to sort bulk scrap into feed which can be recycled into constituent metals. The facility was constructed in 1961 and has operated a single shredder since then.

Recyclable materials are placed onto the shredder conveyor with a material handler. The recyclable materials are then forced into the shredder and are cut to a manageable size by the shredder hammers. Water is injected into the shredder to cool the shredder and control fugitive dust. The product from the shredder consists of damp ferrous metal, non-ferrous metal and fluff. It is then conveyed through specialized rolling magnets which separate most of the ferrous material from the non-ferrous material and fluff. The final ferrous material is conveyed to a shred stockpile to await transport via barge/rail/truck to customers. The non-ferrous material and fluff are shipped offsite for further metal recovery. The 12th Street Shredder is rated for a maximum production rate of 208 tons metal scrap per hour.

The 12th Street Facility employs roughly 25 people and operates 7 AM to 4 PM, 5 days a week.

FIELD ACTIVITIES SUMMARY

I arrived at the facility on June 22, 2023, and completed a drive by surveillance inspection at 9:00 AM. The sky was clear and there were no visible emissions at that time. The inspection team made entry at the front gate and I introduced myself and members of the inspection team, presented my credentials, and provided my business card to Ms. Dehoney. The inspection team conducted an opening conference during which Mr. Ahmad and I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CWA and the CAA. I explained that after asking for some general business information, I would observe work practices, process units, emission units, control equipment and review associated records. I explained to Ms. Dehoney that the facility could make a claim of business confidentiality and provided her with a Confidential Business Information form. Ms. Dehoney deferred the decision on whether to make a claim of confidentiality until she had reviewed the records to be submitted

electronically. She did not make a claim of confidentiality at the time of the electronic submission of records on June 30, 2023.

I was given a facility tour by the facility staff listed in Table 2. I reviewed the condition of emission units the operating status of the equipment, and any required record keeping for the equipment. I requested digital copies of the records indicated on the Receipt for Documents (**Appendix A**) to be submitted by June 30, 2023. I conducted a closing conference with facility staff listed in Table 2. I provided the facility with a copy the Receipt for Documents form. The records were submitted by June 30, 2023, as requested.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions and activities were documented in field records. All photographs are attached as **Appendix B**. I made the following observations during the inspection with the exception of the observations made regarding CAA 112(r) compliance; Ms. Gallick recorded those observations. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

Shredder Production and VOC Emissions

I requested the actual throughput records for the facility over the last 36 months. Over this period there were 25 different 12-month rolling periods. The highest throughput over that period occurred during the period from October 2020 to the end of September 2021. The throughput during this interval was 301,808 tons.

Source Control Policy

Advantage Metals Recycling 12th Street Facility receives scrap exclusively from industrial customers and other Advantage Metals Recycling facilities. The company follows a written Source Control Policy. This policy outlines the actions and procedures which Advantage Metals Recycling follows in order to manage the risks associated with materials which may pose a hazard to facility equipment, personnel or the community. These measures include

Communication and Outreach to industrial clients, scrap inspection protocols, training for employees, and procedures for warning suppliers which have failed to adhere to the policies. A copy of this policy is attached as **Appendix C**.

Parts Washer subject to K.A.R. 28-19-714.

The Advantage Metals Recycling 12th Street Facility maintains a single solvent metal parts washer. This parts washer is visible in Photos 3 and 4 of **Appendix B**. The parts washer was equipped with a cover that was closed when not in use and there was a permanent, conspicuous label summarizing the operating procedures attached to the washer.

Gasoline Tank subject to 40 CFR 63 Subpart CCCCCC

The Advantage Metals Recycling 12th Street Facility maintains a 500-gallon gasoline storage tank for fueling motor vehicles and assorted equipment. The throughput from this tank is less than 10,000-gallons per month and the tank is subject to the requirements in § 63.11116.

Section 63.11116 requires that a facility not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time and that the measures in § 63.11116(a)(1) – (4) are taken when appropriate. The facility complies with this requirement by maintaining a Spill Prevention, Control, and Countermeasures Plan, included as **Appendix D**. This plan specifies practices and policies for addressing the appropriate usage of the gasoline tank and the appropriate actions to take in the event of a spill. The facility was able to produce purchase records to demonstrate that its throughput was less than 10,000-gallons per month.

Clean Air Act 112(r) – General Duty Clause

Ms. Gallick asked Ms. Dehoney questions about the May 19, 2023, fire. Ms. Dehoney said the fire occurred in the scrap pile of items received before they enter the shredder. The pile contained household goods, automobiles, bikes, and additional items from industrial sites. The facility began investigating the fire as it was still burning. They were unable to determine a cause of the fire. The facility has a Source Control Policy (**Appendix C**) which states all items should be drained before being placed in the scrap pile. The facility does outreach on what they can and cannot accept, have signs at the facility of what they cannot take, and inspect received items for compliance throughout the process of receiving to shredding.

Ms. Gallick asked if Advantage Metals had done a hazard assessment. Ms. Dehoney replied that the facility had previously completed a hazard assessment to determine safety requirements for the process. The facility has an emergency response plan. This does not identify potential release scenarios because there are minimal chemicals onsite. The facility has one 500-gallon tank of gas and one 500-gallon tank of diesel. These tanks were not impacted by the fire. In addition, the facility trains its employees on emergency response in “toolbox meetings” and annual training and drills. The facility coordinates with the local fire department, who may be onsite up to 5 times a month. During some site visits, the fire department practices using the Jaws of Life® on vehicles before the vehicles are shredded. The facility has fire suppression equipment including portable extinguishers, 1.5” hose, and intermediate bulk container totes with water. Facility policy is to immediately call the fire department if there is a fire and to use this equipment until responders arrive.