



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

Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Advantage Metals Recycling Cheyenne Facility
1015 S. Packard
Kansas City, KS 66105
FRS# 110032747847

Inspection Date(s):
June 22, 2023

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- A Receipt for documents (1 page)
- B Photo log (11 pages)
- C Source Control Policy (5 pages)
- D Spill Prevention, Control, and Countermeasures Plan (64 pages)
- E Refrigerant Recovery Management Plan (26 pages)
- F RRMP Training Records (8 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
Jacob Brooks, Facility Manager	(859) 609-6617	Jacob.brooks@advantagerecycling.com
Blair Jorgensen, Facility Supervisor	(913) 201-5215	Blair.jorgensen@advantagerecycling.com
Morgyn Stover, Facility Supervisor	(816) 506-4584	Morgyn.stover@advantagerecycling.com

FACILITY OVERVIEW

Advantage Metals Recycling owns and operates the Cheyenne Scrap Metal Recycling Facility in Kansas City, Kansas. While the facility does have some equipment which is regulated by either Kansas Air Quality Regulations and the CAA, none of the applicable regulations nor the potential emissions of the equipment require that the facility obtain either a construction or operating permit. This facility employs roughly 24 people and operates 8:00 AM to 4:30 PM Monday through Friday and 8:00 AM to 12:00 PM on Saturdays.

FACILITY OPERATIONS SUMMARY

The Advantage Metals Recycling Cheyenne Facility is scrap metal processing facility. This facility accepts scrap from the public as well as industrial suppliers. This scrap includes appliances, transformers, propane cylinders, aerosol cans, drums, storage tanks and vehicles. The Cheyenne facility inspects, sorts, and processes this scrap for transportation to either additional processing facilities like the Advantage Metals Recycling 12th Street Shredder or other end use customers. Processing may include cutting scrap which is too large to transport effectively or too large for a shredder or kiln. When the facility receives scrap which contains fuels or refrigerants, these are drained on-site at either the vehicle drainage rack or the refrigerant recovery stand.

FIELD ACTIVITIES SUMMARY

I arrived at the facility on June 22, 2023, and completed a drive by surveillance inspection at 1:00 PM. 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. Hendrickson 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. 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.

Source Control Policy

Advantage Metals Recycling Cheyenne Facility receives scrap from industrial customers and the public. The company follows a written Source Control Policy which states that it is “intended to help protect our employees and customers from the safety and environmental risks associated with receiving, storing, and processing prohibited items as scrap, and to ensure compliance with applicable safety and environmental laws and regulations.” This policy outlines the actions and procedures which Advantage Metals Recycling undertakes 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**. The Advantage Metals Recycling website for the Cheyenne Facility is intended for the public and lists scrap which is acceptable, scrap for which acceptance is conditional on certain requirements being met, and scrap which is never acceptable.

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

The Advantage Metals Recycling Cheyenne 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 Cheyenne 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 their throughput was less than 10,000-gallons per month.

Vehicle Draining

The Advantage Metals Recycling Cheyenne Facility accepts vehicles from the public as scrap. These vehicles must be drained of their refrigerants, fuels, and lubricants prior to further processing. The vehicles are raised on a rack and liquids are drained to collection containers. This rack is visible in Photo 8 of **Appendix B**.

40 CFR 82 Protection of Stratospheric Ozone

Part 82 of Title 40 of the Code of Federal Regulations specifies requirements on the production, usage, transformation, destruction, importation and exportation of ozone-depleting substances (commonly referred to as CFCs). Substances which are regulated under Part 82 include the refrigerants common in vehicle air conditioners and appliances. Advantage Metals Recycling disposes of appliances and is therefore subject to the requirements of Part 82 Subpart F – Recycling and Emissions Reduction. AMR maintains a Refrigerant Recovery Management Plan which is included as **Appendix E**. This plan includes procedures for inspecting, identifying, and properly handling CFC containing scrap. § 82.154(a) prohibits the ventilation of any refrigerant from appliances during disposal of an appliance. Advantage Metals Recycling uses the equipment visible in Photo 9 of **Appendix B** to transfer refrigerants from appliances into canisters. These canisters are then collected by a third party for disposal or recycling off-site.

Section 82.161 specifies requirements for technician certifications. The training records of the employees at Advantage Metals who complete this work are included as **Appendix F**.

Torch Cutting and Opacity

The AMR Cheyenne Facility receives scrap including steel beams, boilers, and other scrap which needs to be cut into smaller pieces. This is completed by several employees with propane and oxygen torches. The visible emissions generated by this process are visible in Photos 5, 6 and 7

of **Appendix B**. This activity is conducted daily and generates particulate matter but the amount is highly dependent on the type of material being cut. Mrs. Dehoney told me that the facility believes that the emissions from this activity are fugitive emissions and therefore the opacity reading should be taken at the property boundary, not at the location where the emissions are generated. Ms. Dehoney stated that the facility has not determined the opacity generated by the activity, only whether opacity is visible leaving the property boundary. K.A.R. 28-19-650(b) specifies the special opacity limits which apply in Wyandotte County. K.A.R. 28-19-650(b) is approved in the Kansas State Implementation Plan. K.A.R. 28-19-650(b) states: “Air emissions within Wyandotte county from any processing of materials or other uses of the premises within the county shall not exceed 20 percent opacity.” “Other uses of the premises” appears to be inclusive of all possible sources of air emissions including those which could not reasonably pass through a stack or vent. The cutting activity observed at the Cheyanne facility may qualify as “other uses of the premises” and could be subject to an opacity limit of 20 percent read at the location of the activity and not at the fence line. K.A.R. 28-19-650(d) states that the method of the determination of opacity of air emissions shall be made according to 40 C.F.R. Part 60, Appendix A, Method 9.

Potential Finding 1: Propane torch cutting opacity not being monitored by facility.
Observation Summary: I observed opacity generated by propane torch cutting of scrap. The facility is not monitoring opacity from the activity.
Citation: <i>K.A.R. 28-19-650(b)</i>
Evidence: Photos 5, 6 and 7
Description of Observation: Special opacity limits applicable to Wyandotte county specify a 20% opacity limit that applies to “air emissions. . . from any processing of materials or other uses of the premises.” The facility is not monitoring opacity from this activity and does not know whether they have exceeded the opacity limitations K.A.R. 28-19-650(b).