REGION 5
CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
OmniSource, St. Marys, Ohio

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

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

TO: File

BASIC INFORMATION

Facility Name: OmniSource St. Marys

Facility Location: 4575 County Road 33A, St. Marys, Ohio

Date of Inspection: April 2, 2025

EPA Inspector(s):
1. David Sutlin, Environmental Engineer
2. Meghan Pashen, Environmental Engineer
3. Olivia Davidson, Physical Scientist

Other Attendees:
1. Jared Trogdlon, Yard Supervisor, OmniSource
2. Mike Starkey, Yard Manager, OmniSource
3. Taylor Bowling, Safety Manager, OmniSource

Contact Email Address: Eric.Martinez@OmniSource.com

Purpose of Inspection: To investigate compliance with requirements of the facility's Clean Air Act permit.

Facility Type: Torch cutting

Regulations Central to Inspection:
The facility's federally enforceable state operating permit requires:

- All jet torching operations to be performed within the facility's 3-sided enclosure, controlled by a baghouse.
- Limiting opacity from fugitive particulate emissions to 20% as a 3-minute average
- Limiting opacity from the baghouse stack to 0% as a 6-minute average

Arrival Time: 2:45 PM
Departure Time: 4:30 PM

Inspection Type:
☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☐ Provided Small Business Resource Information Sheet
☒ Small Business Resource Information Sheet not provided. Reason: Not a Small Business
☒ Provided CBI warning to facility
Was any information collected during the inspection claimed as CBI?
☐ Yes ☒ No.

The following information was obtained verbally from Jared Trogdlon and Mike Starkey unless otherwise noted.

Process Description:
The facility receives industrial scrap and employs a staff of 4-5 torch cutters that use oxygen-propane torches of various sizes to cut the material into smaller pieces. The facility maintains three stations for torch cutting. The first, New Production, is used for cutting mainly clean plate metal from stamping operations and similar materials. Torch cutting at New Production is performed in the open air with no emission controls. At the second torch cutting station, Bulk Torching, large obsolete machinery such as presses and forklifts are torch cut, also in the open air with no controls. The third station, Jet Torching, is used for very large items such as 10-ton mill rolls. Here, torching is performed under a 3-sided enclosure controlled by a baghouse. The enclosure moves back and forth on rails to allow a crane to move the pieces into position.

Staff Interview:

- The main difference between jet and non-jet torching is that jet torching uses larger lances with a capacity to consume more oxygen.
- Jet torching is not performed all the time and was not being performed at all on the day of the inspection.

- Staff perform weekly visible emission checks for jet torching only, as required by the facility's air permit.
- On rare occasions, some visible emissions are observed from the baghouse stack. When this happens, torch cutting is stopped, and baghouse filters are inspected and cleaned.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:
Just prior to entering the facility, EPA observed and recorded yellow/brown emissions rising from within the yard. At the start of the tour, EPA used EPA Alternative Method 082 to capture digital opacity video of torch cutting operations at the New Production station. Thin metal plates were being cut during the recording. Next, EPA toured the Jet Torching station. No torch cutting was taking place, however there were several large steel mill rolls staged for cutting. Mr. Trogdlon explained that large steel pieces such as these typically get cut into 5 sections and that the cutting would occur on demand. We next entered the enclosure to inspect the capture system. We observed several sections of ductwork with openings for fume capture throughout the enclosure, but the ductwork had been disconnected from the single opening in the back of the enclosure, leading to the baghouse. Finally, EPA observed the Bulk Torching station. No torch cutting was taking place, and Mr. Trogdlon explained that this material still needed to be cleaned to remove non-metal components before torch cutting could proceed. EPA observed several forklifts in the staging pile.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

Field Measurements: were taken during this inspection and are listed in Appendix B.

- Digital opacity video of torch cutting at the New Production station.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Records of visible emission weekly checks
- Annual Permit Evaluation Reports

Concerns: EPA shared information about a recent citizen complaint describing a yellow/green haze as coming from the facility. EPA observed similar yellow emissions escaping the facility prior to EPA entering the facility.

Compliance Assistance: Given the concerns over visible emissions and opacity, EPA suggested that the enclosure and baghouse could be used for torch cutting New Production and Bulk Torching items when the capture/collection system was not being used for Jet Torching.

DIGITAL SIGNATURES

Report Author: DAVID SUTLIN Digitally signed by DAVID SUTLIN Date: 2025.05.02 12:31:12 -05'00'

Section Supervisor: BRIAN DICKENS Digitally signed by BRIAN DICKENS Date: 2025.05.05 09:57:10 -05'00'

APPENDICES

1. Appendix A: Digital Image Log and Digital Video Log
2. Appendix B: Field Measurement Data

APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: David Sutlin
Archival Record Location: *Region 5 Electronic Record Center:*\Enf_OmniSource St. Marys_OH_25*Enf_OmniSource St. Marys_OH_25_Inspection**Photos and Videos*\

Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	MAH0089.MP4	4/2/2025 14:26	Video of torch cutting, taken from offsite location
2	P4020013.JPG	4/2/2025 14:37	Fumes from torch cutting at New Production station
3	P4020014.JPG	4/2/2025 14:37	Fumes from torch cutting at New Production station
4	P4020015.JPG	4/2/2025 14:37	Fumes from torch cutting at New Production station
5	DSC00090.JPG	4/2/2025 15:41	Torch cutting at New Production station
6	MAH0091.MP4	4/2/2025 15:41	Video of torch cutting at New Production station (used for digital opacity measurements)

APPENDIX B: FIELD MEASUREMENT DATA

EPA conducted two digital opacity observations as part of the inspection:

Camera Operator: David Sutlin
Location of Opacity Reports: *Region 5 Electronic Record Center:*\Enf_OmniSource St. Marys_OH_25*Enf_OmniSource St. Marys_OH_25_Inspection**Digital Opacity*\

Observation	Location	Date/Time	Methods	Results
Offsite	Outside fence line, just west of entrance Lat: 40.5467592° Lon: -84.3668972°	Start: 14:26 Stop: 14:32	EPA Alt 082 / DCOT: DOCS II	29.58% as a 6-minute block average
Onsite	New Production Torching Station Lat: 40.5493231° Lon: -84.3665808°	Start: 15:45 Stop: 15:51	EPA Alt 082 / DCOT: DOCS II	11.25% as a 6-minute average