



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Azcon Metals, Duluth, Minnesota

FROM: Brianna Fenzl, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Azcon Metals

Facility Location: 630 Helberg Dr, Duluth, Minnesota

Date of Inspection: October 30, 2024

EPA Inspector(s):

1. Brianna Fenzl, Environmental Engineer
2. Emma Leeds, Environmental Engineer

Other Attendees:

1. Lynn Bergstedt, Vice President & General Manager, Azcon Metals
2. Kurt Maidl, Vice President & General Manager, Azcon Metals
3. Dan Parsons, Yard Operations, Azcon Metals

Contact Email Address: lbergstedt@azconmetals.com; kmaidl@azconmetals.com

Purpose of Inspection: Investigating visible emissions (orange smoke) observed by EPA on October 29, 2024 and compliance with the Clean Air Act

Facility Type: Scrap metal processor and broker

Regulations Central to Inspection: Minnesota State Implementation Plan and Clean Air Act

Facility Name: Azcon Metals
Facility Location: 620 Helberg Drive, Duluth, Minnesota
Date of Inspection: October 30, 2024

Arrival Time: 9:00 AM
Departure Time: 10:53 AM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet *See attachment to email.*
- ☐ Small Business Resource Information Sheet not provided. Reason:
- ☒ Provided CBI warning to facility

Was any information collected during the inspection claimed as CBI?

☒ Yes ☐ No.

Information Claimed as CBI: Photos taken at the facility and their descriptions were claimed as confidential and are provided in Appendix A.

The following information was obtained verbally from Azcon Metals (the facility) unless otherwise noted.

Process Description:

Scrap metal is visually inspected at the scale house, then brought through a radiation detector. It is inspected and then unloaded in the yard to be processed if it meets specifications. The facility has a stationary shear, mobile shear, and two cutting torches for cutting large pieces of scrap metal to the market standard to be sold. Torch cutting takes place outside and unenclosed. The facility uses one of the cutting torches for large mandrels (approximately 7 feet by 10 feet) from the mining industry that are approximately 8-12% manganese. Once the scrap is processed and cut, it is analyzed for the chemistry of the metal based on customer requirements and shipped out once sold.

Staff Interview:

Azcon Metals operates their yard from 7:30 AM to 3:30 PM, five days a week with approximately 15 employees. The facility primarily accepts scrap from the mining industry. It only accepts a small portion of peddler scrap, roughly 5% of their total scrap, and only auto parts, not automobiles. The facility accepts ferrous and non-ferrous metals. It will only accept appliances if the refrigerant has been removed, there is a receipt that the refrigerant was properly recovered, and the seller will sign an Azcon Metals certification.

Visible emissions can be seen during the torch cutting of the mandrels. When they are cut, visible emissions are released, and the typical conical end of the mandrel acts as stack-like exit for the plume

from the ground. The facility conducts torch cutting operations daily, and at the time of the inspection approximately 15-20 tons of material was being cut per day, including 8-10 mandrels. It takes 30 minutes – 1 hour to cut down one mandrel.

The facility recently conducted air monitoring on employees and ambient air between 2023-2024. Employees who were torch cutting wore monitors while ambient air monitors were placed at the site of torch cutting and at the edge of the property, about 500-600 feet away from active torch cutting. Residents across the bay have submitted many complaints to the city about the visible emissions from the facility.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA walked through the scrapyard and observed the piles of scrap metal, torch cutting site, and stationary and mobile sheers. Torch cutting was not in operation during the time of EPA's inspection.

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

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

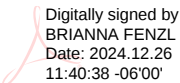
☒ Provided U.S. EPA point of contact to the facility

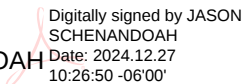
Requested documents:

- List of not accepted materials;
- Azcon Metals refrigerant removal certification statement; and
- 2023-2024 ambient and employee air emission monitoring reports.

Concerns: Visible emissions with orange color observed from the facility was noted as a concern by EPA. The facility stated the orange emissions are due to the mandrel torch cutting.

DIGITAL SIGNATURES

Report Author: BRIANNA FENZL  Digitally signed by BRIANNA FENZL
Date: 2024.12.26 11:40:38 -06'00'

Section Supervisor: JASON SCHENANDOAH  Digitally signed by JASON SCHENANDOAH
Date: 2024.12.27 10:26:50 -06'00'

Facility Name: Azcon Metals
Facility Location: 620 Helberg Drive, Duluth, Minnesota
Date of Inspection: October 30, 2024

APPENDICES

1. Appendix A: CBI Digital Image Log and Digital Video Log
2. Appendix B: Visible Emissions Video Log

Facility Name: Azcon Metals
Facility Location: 620 Helberg Drive, Duluth, Minnesota
Date of Inspection: October 30, 2024

APPENDIX B: VISIBLE EMISSIONS VIDEO LOG

Inspector Name: Emma Leeds

Archival Record Location: [Visible Emissions Log](#)

Video Number	File Name	Date and Time (CST)	Description of Image
1	IMG_0634.JPG	10/29/2024 10:59 AM	Orange smoke plume originating from Azcon Metals, taken from road outside the property
2	IMG_0635.JPG	10/29/2024 11:00 AM	Orange smoke plume originating from Azcon Metals, taken from road outside the property