



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
OmniSource fka Toledo Shredding LLC, Toledo, Ohio

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

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

TO: File

BASIC INFORMATION

Facility Name: OmniSource, LLC fka Toledo Shredding, LLC

Facility Location: 275 Millard Ave., Toledo, Ohio 43605

Date of Inspection: April 1, 2025

EPA Inspector(s):

1. David Sutlin, Environmental Engineer
2. Meghan Pashen, Environmental Engineer
3. Olivia Davidson, Physical Scientist

Other Attendees:

1. Eric Martinez, Environmental Manager, OmniSource
2. Jeff Grunberg, Supervisor, OmniSource
3. Rob Carman, Supervisor, 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: Automobile shredder

Regulations Central to Inspection:

The facility's federally enforceable state operating permit for its auto shredder requires:

- Limiting fugitive VOC emissions from the shredder to 1.51 lbs. per hour
- Limiting total VOC emissions from the shredder to 47 tons per year
- Limiting fugitive particulate emissions from the shredder to 2.26 lbs. per hour
- Limiting annual operating hours to 3,000 hours, based upon a rolling, 12-month summation
- Maintaining pressure drop across the scrubber at or above 14" W.C.
- Maintaining scrubber water flow rate at or above the minimum level established during the most recent stack test
- Maintaining hammermill water application rate at or above 20 gallons per minute when motor amperage exceeds 425 amperes

Arrival Time: 1:30PM

Departure Time: 3:00PM

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 Eric Martinez, Jeff Grunberg, or Rob Carman unless otherwise noted.

Company Ownership: OmniSource purchased the facility from Toledo Shredding in 2024.

Process Description:

Automotive bodies and other metal scrap loads are brought into the facility on trucks and weighed at the scale house. The facility's suppliers certify the removal of fluids from the cars prior to delivery. Cars that have not had fluids removed are referred to another nearby OmniSource facility for processing. After scrap has been staged for shredding, alternate loads of auto bodies and light sheet iron are continuously placed on a conveyor and fed into the 3,500 horsepower, 74-inch-wide hammermill shredder. Water is sprayed onto the hammermill as shredding occurs, in order to suppress dust and cool the shredder. After exiting the shredder, the material passes through a Z-box

where waste material is pulled into a cyclone and the clean air vented back into the Z-box in a closed loop.

The shredder is unenclosed except for a capture hood at the outfeed of the shredder. The shredding operation typically occurs from 5:30am to 2pm, 5 days per week except days when the shredder is down for maintenance.

Staff Interview:

- The facility tries to achieve a 50 gross tons per hour scrap infeed rate to the shredder.
- The facility estimates that auto bodies make up approximately 25% of its scrap, by weight.
- There have been no major modifications to operations since the recent change in ownership.
- The emissions captured at the outfeed of the shredder are ducted to a cyclone followed by a wet scrubber. Pressure drop and water flow rate are monitored on the scrubber.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA observed steam and visible emissions exiting from both the top of the shredder as well as the hood over the shredder outfeed. The shredder appeared fully open to atmosphere except for the outfeed. Photos and videos of the steam and emissions, including optical gas imaging videos, were taken. See Image/Video log below.

EPA next toured the area designated for processing of small appliances. The facility provides refrigerant recovery service at no cost to suppliers, and EPA observed physical indications of refrigerant recovery on the majority of appliances. EPA also observed the scale house sign notifying suppliers of the facility's policy regarding refrigerants.

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:

- Detailed description and specifications of the shredder's emission control systems
- VOC stack test results
- Photo of the oil removal system at the shredder's sump pit
- Any records of downtime for the sump pit oil removal system

- Maximum scrap infeed rate for the shredder
- Records of shredder operating time
- Parametric monitoring data, including flow rate and pressure drop for the scrubber and water flow rate for the for the hammermill
- Quarterly deviation reports
- Annual emissions calculations spreadsheets

Compliance Assistance: EPA recommended updating the scale house sign to notify suppliers that the facility recovers refrigerant from small appliances.

DIGITAL SIGNATURES

Report Author: **DAVID SUTLIN**  Digitally signed by DAVID SUTLIN
Date: 2025.05.02 08:50:44 -05'00'

Section Supervisor: **BRIAN DICKENS**  Digitally signed by BRIAN DICKENS
Date: 2025.05.02 12:12:44 -05'00'

APPENDICES

Appendix A: Digital Image Log and Digital Video Log

APPENDIX A: DIGITAL IMAGE LOG AND VIDEO LOG

Inspector Name: David Sutlin

Archival Record Location: *Region 5 Electronic Record Center:\Enf_OmniSource Toledo Shredding_OH_25\Enf_OmniSource Toledo Shredding_OH_25_Inspection\Photos_Videos*

Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	P4010001.JPG	4/1/2025 13:57	Auto shredder and emission control system
2	P4010002.JPG	4/1/2025 13:57	Auto shredder and emission control system
3	P4010003.JPG	4/1/2025 14:04	Trailing visible emission plume from shredder
4	P4010008.MOV	4/1/2025 14:10	Auto shredder in operation
5	FLIR0143.mp4	4/1/2025 13:57	FLIR video of shredder operations
6	FLIR0144.mp4	4/1/2025 14:01	FLIR video of shredder operations
7	FLIR0145.mp4	4/1/2025 14:02	FLIR video of shredder operations