



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Strong Steel – Ferrous Processing & Trading Co., Detroit, Michigan

FROM: Brittany Cobb, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Supervisor
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Strong Steel – Ferrous Processing & Trading Co.

Facility Location: 6464 Strong St, Detroit, MI 48211

Date of Inspection: 8/16/2022

EPA Inspector(s):

1. Brittany Cobb, Environmental Engineer
2. Natalia Vazquez, Environmental Engineer

Other Attendees:

1. Nick Milantoni, Manager

Contact Email Address: nick.milantoni@fptscrap.com

Purpose of Inspection: Determine compliance with the Clean Air Act

Facility Type: Recycling center

Regulations Central to Inspection: 40 C.F.R. Part 82, Subpart F, Recycling and Emissions Reductions

Arrival Time: 8:30 AM CT

Departure Time: 10:35 AM CT

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Nick Milantoni unless otherwise noted.

Company Ownership:

The facility was recently purchase by Cleveland Cliffs.

Process Description:

Strong Steel – Ferrous Processing & Trading Co. (Strong Steel) is a scrapyard that accepts post-consumer ferrous and non-ferrous metals. The facility accepts white goods/appliances, vehicles, and A/C radiators. Material is weighed and then shredded on site. The facility has one shredder with a water spray control system for dust.

Staff Interview:

Strong Steel has 27 employees at this location and operates Monday through Friday 6:30 AM to 4:30PM, and occasionally Saturdays.

Strong Steel has been accepting white goods/appliances for at least four years. The facility accepts 5 to 40 white goods/appliances per day and typically denies the goods if the lines are cut. The scale operator visually inspects for cut lines. The facility does not accept refrigeration components. Strong Steel mostly accepts white goods/appliances from individuals and other scrapyards, the only regular commercial costumer the facility accepts from is Tristar. Greg Maglocklen, a Strong Steel employee, is responsible for recovering the refrigerant. The facility keeps an inventory of the amount of refrigerant recovered but not the number of white goods/appliances accepted.

Strong Steel has been accepting vehicles and A/C radiators for approximately 20 years. The facility accepts 15 to 30 vehicles per day. The facility accepts vehicles from individuals and about 50 different commercial costumers regularly. Most vehicles come in crushed and therefore they don't contain refrigerant. If the vehicles and A/C radiators contain refrigerant, Strong Steel employees recover the refrigerant. The facility keeps a daily inventory of the vehicles accepted and amount of refrigerant recovered. The facility keeps an inventory of the amount of refrigerant recovered from the A/C radiators but not the number of A/C radiators accepted.

Strong Steel sends it recovered refrigerant to Golden Refrigerant and keeps a monthly inventory of the amount sent. The facility sends batteries to Earl's Battery & Charging Service and mercury switches to ELVS Mercury Switch Recycling Program.

Strong steel has a CFCs agreement form for white goods/appliances accepted from individuals. Strong steel does not have a CFCs agreement form for vehicles or A/C radiators accepted from individuals. Nick Milantoni was unsure if the facility has contracts for companies that bring vehicles or for Tristar.

Strong Steel shreds Monday through Friday 7:30 AM to 4:30 PM and occasionally Saturday if need be. The operators manually select a high, medium, or low setting for the water spray control system and then the water flow rate is automatically determined by amps.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA was led on a tour by Nick Milantoni. EPA requested Strong Steel pull refrigerators off the pile of material that was being shredded with a material handler machine. The machine operator pulled 11 refrigerators out of the pile. EPA looked at the condensers on the appliances where the refrigerant is stored. Three of the refrigerators clearly had cut lines. Six of the refrigerators appeared to still contain refrigerant, as the lines were not cut and there was no indication that the refrigerant was recovered. One of the refrigerators had a puncture hole in the condenser lines and a sticker on the refrigerator that indicated the refrigerant was recovered. One of the refrigerators contained refrigerant that Nick Milantoni vented when he broke one of the condenser lines.

EPA viewed smoke and steam coming from the shredder. EPA recorded Forward Looking InfraRed (FLIR) videos that show volatile organic compounds (VOCs) being released to the atmosphere. The water spray control system was running 35 gallons of water per minute.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Verification form for white goods/appliances

CLOSING CONFERENCE

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

Requested documents:

- Copy of the CFCs agreement form for white goods/appliances
- Amount shredded in 2020 and 2021 (tons/month)
- Invoices for refrigerant sent to Golden Refrigerant from January 1, 2020 to August 16, 2022
- Contractor verification forms
- Emission calculations

Concerns:

- EPA identified concern with white goods/appliances being shredded that contain refrigerant
- EPA identified concern with Strong Steel accepting white goods/appliances with condenser lines cut
- EPA identified concern with Strong Steel's verification statement form for appliances not containing required information from 40 C.F.R. §§ 82.150 – 82.169
- EPA identified concern with Strong Steel not having verification statements for vehicles or A/C radiators
- EPA identified concerns with smoke and VOCs being released to the atmosphere from the shredder

DIGITAL SIGNATURES

Report Author: _____

Brittany Cobb

Digitally signed by
Brittany Cobb
Date: 2022.09.27
09:00:50 -05'00'

Section Supervisor: _____

SARAH
MARSHALL

Digitally signed by
SARAH MARSHALL
Date: 2022.09.27
09:07:48 -05'00'

Facility Name: Strong Steel

Facility Location: 6464 Strong St, Detroit, MI

Date of Inspection: August 16, 2022

APPENDICES AND ATTACHMENTS

- A. Digital Image Log
- B. FLIR Video Log

Facility Name: Strong Steel
Facility Location: 6464 Strong St, Detroit, MI
Date of Inspection: August 16, 2022

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Brittany Cobb	2. Archival Record Location: https://usepa.sharepoint.com/:f:/r/sites/R5_Work/r5erc/ecad/AE/CAB%20Library/Enf_Strong%20Steel%20Products_MI_22/Enf_Strong%20Steel_MI_22_Inspection/Photos?csf=1&web=1&e=fUWNLv
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_0126.JPG	2022:08:16 08:34:18	Company sign at entrance
2	IMG_0127.JPG	2022:08:16 08:45:53	Sign at scales stating "All fluids must be drained from vehicles"
3	IMG_0128.JPG	2022:08:16 08:46:12	Signs at scales
4	IMG_0129.JPG	2022:08:16 08:46:27	Sign at scales stating refrigerants (CFCs) must be removed from A/C units
5	IMG_0130.JPG	2022:08:16 08:47:36	Sign at scales stating "All fluids must be drained from vehicles"
6	IMG_0131.JPG	2022:08:16 08:47:46	Signs at scales
7	IMG_0132.JPG	2022:08:16 08:48:04	Sign at scales stating refrigerants (CFCs) must be removed from A/C units
8	IMG_0133.JPG	2022:08:16 09:16:44	Refrigerator with refrigerant that was not recovered
9	IMG_0134.JPG	2022:08:16 09:19:48	Refrigerator with refrigerant that was not recovered
10	IMG_0135.JPG	2022:08:16 09:20:13	Refrigerator with refrigerant that was not recovered
11	IMG_0136.JPG	2022:08:16 09:31:46	Refrigerator with puncture hole where CFCs was properly recovered
12	IMG_0137.JPG	2022:08:16 09:33:01	Sticker on refrigerator (from IMG_0136.JPG) indicating the refrigerant was properly recovered

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13	IMG_0138.JPG	2022:08:16 09:33:09	Refrigerator with lines cut
14	IMG_0139.JPG	2022:08:16 09:33:20	Refrigerator with lines cut
15	IMG_0140.JPG	2022:08:16 09:34:35	Refrigerator with refrigerant that was not recovered
16	IMG_0141.JPG	2022:08:16 09:35:35	Refrigerator with lines intact and refrigerant still in the unit
17	IMG_0142.JPG	2022:08:16 09:36:14	Refrigerator (from IMG_0141.JPG) after Nick Milantoni broke the lines and released refrigerant (white foam can be seen)
18	IMG_0143.JPG	2022:08:16 09:36:30	Refrigerator with lines cut
19	IMG_0144.JPG	2022:08:16 09:37:35	Refrigerator with refrigerant that was not recovered
20	IMG_0145.JPG	2022:08:16 09:38:50	Refrigerator with refrigerant that was not recovered
21	IMG_0146.JPG	2022:08:16 09:39:56	Refrigerator with lines cut
22	IMG_0147.JPG	2022:08:16 09:42:05	Refrigerator with lines cut
23	IMG_0148.JPG	2022:08:16 09:50:55	Shredder with steam and smoke
24	IMG_0149.JPG	2022:08:16 09:54:01	Shredder with steam and smoke
25	IMG_0150.JPG	2022:08:16 09:55:20	ERROR
26	IMG_0151.JPG	2022:08:16 10:00:24	Shredded material pile
27	IMG_0152.JPG	2022:08:16 10:05:20	CFC recovering equipment
28	IMG_0153.JPG	2022:08:16 10:09:26	CFC recovery equipment
29	IMG_0154.JPG	2022:08:16 10:09:47	CFC recovery cylinder

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APPENDIX B: FLIR VIDEO LOG

1. Inspector Name: Brittany Cobb	2. Archival Record Location: <i>https://usepa.sharepoint.com/:f:/r/sites/R5_Work/r5erc/ecad/AE/CAB%20Library/Enf_Strong%20Steel%20Products_MI_22/Enf_Strong%20Steel_MI_22_Inspection/FLIR?csf=1&web=1&e=mpkg3</i>
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Video Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	MOV_2781.mp4	2022:08:16 09:41:06	Shredder behind building
2	MOV_2782.mp4	2022:08:16 09:42:34	Shredder behind building
3	MOV_2783.mp4	2022:08:16 09:49:26	Shredder
4	MOV_2784.mp4	2022:08:16 09:52:50	Shredder
5	MOV_2785.mp4	2022:08:16 09:55:12	Shredder