



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

Air Branch

Air Branch Inspection Report
Unannounced Partial Compliance Evaluation
Advantage Metals Recycling LLC (Grossman Iron and Steel)
5 North Market Street
St. Louis, MO 63102
FRS# 110003965479

Inspection Date:
June 8, 2022

LUKE
RODRIGUEZ

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Luke Rodriguez, Inspector, ECAD, Air Branch

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- A Confidential Business Information (1 page)
- B Field Photographs (6 pages)
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INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the multi-media partial compliance evaluation (PCE) inspection was to determine compliance of the facility with the Clean Air Act. The inspection was part of the U.S. Environmental Protection Agency's (EPA) Creating Cleaner Air for Communities National Compliance Initiative and the National Shredder 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)
Naji Ahmad	EPA, Region 7, ECAD, Water Branch	Lead Inspector (Stormwater)
Suzanne Lamb	MODNR, Air Branch	Field team member
Jena Adkisson	MODNR, Water Branch	Field team member
Sarah Wright	MODNR, Water Branch	Field team member

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Serena Dehoney, EHS Manager	(816) 804-5258	Serena.Dehoney@advantagerecycling.com
Mark Schaefer, VP/General Manager	(513) 478-6768	Mark.Schaefer@advantagerecycling.com
Joshua Jones, Regional Operations Manager	(816) 289-1981	Joshua.Jones@advantagerecycling.com

FACILITY OVERVIEW

Over the past 15 years, more than 25 emissions tests measuring volatile organic compounds (VOCs) have been conducted at scrap metal shredders. The historic test data shows that VOC emissions from shredding operations are at levels that can trigger regulatory applicability and the need for emission controls. The test data reveals that typical shredding operations emit VOCs at rates between 20 and 200 pounds (lbs) of VOCs per hour. Historically, State permitting agencies have not accounted for VOC emissions from shredders. Permit thresholds for VOC emissions vary depending on whether the shredder is in an area that meets the NAAQS for ozone or is in an ozone transport region. Major sources are subject to permitting requirements and facilities with VOC emissions above certain thresholds are required to undergo a New Source Review (NSR) or Prevention of Significant Deterioration (PSD) review for new and modified sources. Depending

on the location, existing facilities may be subject to Reasonably Available Control Technology (RACT) regulations at different emission thresholds. There are no federal regulations specifically applicable to shredders. This facility was issued an after the fact construction permit on April 29, 2015, which limits the facility to less than 15 tons of particulate matter (PM), specifically coarse PM (PM₁₀), in any consecutive 12-month period (Permit Number: 042105-07). The facility had previously been operating under a City of St. Louis Permit which was not federally enforceable.

Advantage Metals Recycling purchased the facility from Grossman LLC on September 29, 2021. A permit application requesting a throughput limitation which would make the facility a Synthetic Minor with respect to VOC emissions was submitted on the date of the sale closing.

The facility also operates a 500-gallon gasoline tank subject to 40 CFR 63, Subpart CCCCCC.

The Missouri Department of Natural Resources (MoDNR) issued a Letter of Warning (LOW) in May of 2021 for failure to record the water application on the haul roads.

Table 3. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR Part 63	Subpart CCCCCC National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

FACILITY OPERATIONS SUMMARY

Advantage Metals Recycling owns and operates a scrap metal recycling facility in St. Louis, Missouri. There are typically 35 production staff, and the facility operates 6:00 AM to 3:30 PM five days a week with an additional half day on Saturday when production allows. The facility consists of a shear, the shredder and associated handling, sorting and processing equipment. Feedstocks include pre-processed automotive and ‘white goods,’ an industry term which includes appliances and generic small domestic steel containing products and materials. Joshua Jones estimated that the facility processes roughly 20% autos and 80% white goods by weight. Drainage of oils, fuel and refrigerant from the autos is completed off-site by suppliers. There is no drainage rack on-site. The shredder is rated and permitted at 264.5 tons per hour but typically operates at 190 – 195 tons per hour; operation in June 2022 to date was 187 tons per hour. There is a water injection system on the shredder but no PM control efficiency is claimed by the facility.

Trucks delivering materials are weighed when entering and leaving the facility. Scrap is inspected upon receipt. A belt scale on the feed conveyor is used to track the throughput of the shredder. Following the shredder, scrap is sorted by material and then shipped off-site to primarily affiliated Nucor Steel facilities.

FIELD ACTIVITIES SUMMARY

I arrived at the facility on June 8, 2022 and completed a drive by surveillance inspection around 8:45 AM. The shredder was not in operation at that time. I made entry at the front office at 9:00 AM and Mr. Ahmad introduced himself and members of the inspection team. Mr. Ahmad and I presented our credentials to Mr. Barcal, the interim Site Manager, who notified the relevant personnel that we had arrived and then took no further part in the inspection. Mrs. Dehoney, Mr. Jones and Mr. Schaefer arrived at the facility a short time later and I conducted an opening conference during which I explained that the purpose of the visit was to conduct a multi-media inspection to determine compliance with the Clean Air Act and Clean Water Act. I explained that after asking for some general business information, I would observe emission units and review associated records demonstrating compliance with the permit conditions and regulations as well as evaluate the facilities VOC emissions and any possible applicable regulations for the facility. I explained to Mr. Jones that the facility could make a claim of business confidentiality and provided him with a Confidential Business Information form (**Appendix A**). Mr. Jones did not make a claim of confidentiality.

I was given a facility tour by Mr. Jones. I wore Steel toed boots, a hard hat and safety glasses during the facility tour per my site health and safety plan.

I conducted a closing conference with Mrs. Dehoney, Mr. Jones and Mr. Schaefer. Mr. Ahmad provided the facility with a copy of the Small Business Resources information sheet.

INSPECTION 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. Inspection was conducted and photographs in **Appendix B** taken in accordance with SOP 2312.01E.

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.

VOC Emissions

As noted above, facilities which operate shredders now have the obligation to determine their potential and actual VOC emissions and, depending on the results of those determinations, take any regulatorily required steps including the submission of permit applications as applicable.

Advantage Metals Recycling submitted an application to MoDNR on the date of its acquisition of Grossman Iron and Steel which requested a federally enforceable limit on the facility's VOC emissions. The permit will require the facility to track the weight of automotive and white good scrap and apply a separate VOC emission factor to each when reporting emissions. The permit has been finalized but not yet issued.

Compliance with Special Conditions of Permit 042105-07

A MoDNR Inspection was conducted on May 18, 2022. This inspection evaluated records required by Permit 042105-07. The MoDNR inspector found that the facility was recording the information required by Special Condition 1.A and 1.B. and Special Condition 2 in accordance with Special Condition 3- Record Keeping and Reporting Requirements. The inspector noted that Advantage Metal Recycling had addressed the issues noted in its May 2021 LOW. See **Appendix C** for the May 18, 2022, MoDNR Inspection Report.

Other Equipment and Requirements

There is a 500-gallon gasoline tank at the facility subject to 40 CFR 63 Subpart CCCCCC. Throughput is less than 10,000 gallons per month. The facility keeps purchase invoices from the supplier which I reviewed on-site. The gasoline tank is noted in the facility's Spill Prevention Control and Countermeasures (SPCC) Plan which contains protocols for the minimization and quick clean-up of spills.

Permit 042105-07 noted a diesel engine associated with the screen. Mr. Jones told me that the screen and the associated engine were removed prior to Advantage Metals Recycling's acquisition of the property. There is no other stationary combustion equipment on-site.

The facility does not have any refrigerant containing units with greater than 5 lbs of refrigerant on-site.

The facility does not do any painting or coating of equipment on-site.

Opacity

There were no visible emissions at the time of the inspection.