



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

Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Advantage Metals Recycling 2nd Street Facility
201 N. 2nd Street
Kansas City, KS 66105
FRS# 110041672767

Inspection Date(s):
June 22, 2023

LUKE
RODRIGUEZ

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Luke Rodriguez, Inspector, ECAD, Air Branch

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A Photo log (6 pages)

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of this unannounced full compliance evaluation (FCE) inspection was to determine compliance of the facility with the Clean Air Act (CAA). The inspection was part of the U.S. Environmental Protection Agency's (EPA) Creating Cleaner Air for Communities National Enforcement 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)
Christina Gallick	EPA, Region 7, ECAD, Air Branch	Field team member (Air)
Mark Weckwerth	Unified Government of Wyandotte County, Department of Air Quality	Field team member (Air)

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Serena Dehoney, EHS Director	(816) 804-5258	Serena.dehoney@advantagerecycling.com
Antionee Gladney, Transportation Manager	(913) 201-3432	Antionee.gladney@advantagerecycling.com

FACILITY OVERVIEW

Advantage Metals Recycling owns and operates several scrap metal recycling and shredding facilities in the Kansas City metropolitan area. The 2nd Street facility serves as administrative office and storage space in support of the other operations in the area.

FACILITY OPERATIONS SUMMARY

The Advantage Metals Recycling 2nd Street facility houses administrative staff and serves as parking location for trucks and trailers which are used to transport scrap. Five administrative employees and 12 drivers are based out of the 2nd Street office. Advantage Metals Recycling maintains a contract with a third party to conduct repairs on the tarps which cover the transport trailers.

FIELD ACTIVITIES SUMMARY

I arrived at the facility on June 22, 2023, and completed a drive by surveillance inspection at 2:30 PM. The inspection team made entry at the front gate and I introduced myself and members of the inspection team, presented my credentials, and provided my business card to Ms. Dehoney. The inspection team conducted an opening conference with the facility staff listed in Table 2, during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA. I explained that after asking for some general business information, I would look for equipment which might be subject to the CAA. I explained to Ms. Dehoney that the facility could make a claim of business confidentiality and provided her with a Confidential Business Information form. I did not request any records from Mrs. Dehoney regarding this facility.

I was given a facility tour by Ms. Dehoney. I entered all buildings on the property and looked for equipment that might be subject to the CAA. I conducted a closing conference with Ms. Dehoney.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions and activities were documented in field records. All photographs are attached as **Appendix A**. 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.

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.

I entered all buildings on the property. I did not see any equipment or processes that would be subject to a specific regulatory requirement in the CAA. There was a cage that was labeled “Tanks”, but it was empty. Ms. Dehoney told me that it had previously housed fuel tanks but that these had been removed several years previously. I saw no evidence that any equipment which might be subject to a specific regulatory requirement of the CAA was present on-site.