



## ADMIRAL METALS

[www.admiralscrapmetals.com](http://www.admiralscrapmetals.com)

Toll Free 1-888-428-1117 | Fax 586-254-1108 | E-Mail [admiralmetals@gmail.com](mailto:admiralmetals@gmail.com)

October 18, 2018

Mr. Adam Bognar  
Environmental Quality Analyst  
Air Quality Division  
Michigan Department of Environmental Quality  
S. E. Michigan District  
27700 Donald Court  
Warren, Michigan 48092

Re: Admiral Metals, 41200 Mound Road, Sterling Heights, MI 48314

Dear Mr. Bognar:

I am writing in response to your Violation Notice dated September 28, 2018. As you are aware, torching to dismantle and resize large pieces of scrap metal is essential in our industry to allow for further processing prior to recycling. We are performing not only a necessary service, but an essential service. Michigan's steel industry relies on scrap metal to make much of the new steel produced. Unfortunately, safe, viable alternatives to outdoor torching are somewhat limited, especially to small business such as ours. Completely eliminating torching for us is not a viable solution. We have ongoing obligations to clients, including contractors to the federal government where we need to dismantle and destroy certain highly sensitive and proprietary defense equipment. We do not have out of state facilities we can transfer business to and would lose the business to competitors if we simply stopped. Nonetheless, we understand we need to make some changes and in order to address your violation notice we are taking several actions to develop a solution. These include:

- We are reviewing the cited regulations to better understand the Part 201 requirements and exemptions and are consulting with technical advisors.
- We are reaching out to others in our industry regarding best management practices and considering the possibility of applying for a permit to allow continued torching whether at current levels or at reduced levels by implementing some of the other strategies listed below. To assist in evaluating this strategy, we would also request copies of any permits you have issued to date for outdoor torching so that we could better evaluate what conditions we might have to meet.



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- We are looking into purchasing shearing equipment that will eliminate the need to torch much of the large metal pieces we receive, although such equipment is costly and we need to carefully consider the financial implications on our business.
- We are reaching out to customers to see if any of the large materials can be re-sized on-site prior to delivery to us.

Upon completion of our evaluations, we will implement one or more of the above strategies. In the meanwhile, we will torch only as necessary and will implement best management practices to reduce or eliminate problematic emissions from limited torching such as ensuring scrap to be torched is free of oils and burnable materials, is kept up off the ground or kept on clean surfaces, employees are trained and re-sizing scrap by other means as possible. We appreciate your patience as we work through our options and develop a solution that not only works for us, but is compliant with regulations and protective of the environment.

Very truly yours,

Admiral Metals

Michael Foon, Managing Member

Cc: Ms. Jenine Camilleri, DEQ