

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection**

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| <b>FACILITY:</b> Admiral Metals                 | <b>SRN / ID:</b> P0969                   |
| <b>LOCATION:</b> 41200 Mound Road, STERLING HTS | <b>DISTRICT:</b> Southeast Michigan      |
| <b>CITY:</b> STERLING HTS                       | <b>COUNTY:</b> MACOMB                    |
| <b>CONTACT:</b> Michael Foon , General Manager  | <b>ACTIVITY DATE:</b> 09/07/2018         |
| <b>STAFF:</b> Adam Bognar                       | <b>COMPLIANCE STATUS:</b> Non Compliance |
| <b>SUBJECT:</b> Self-Initiated Inspection       | <b>SOURCE CLASS:</b> Minor               |
| <b>RESOLVED COMPLAINTS:</b>                     |  |

On Friday, September 7, 2018, Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) staff, I, Adam Bognar, and Shamim Ahammod conducted an unannounced self-initiated inspection of Admiral Metals, located at 41200 Mound Road, Sterling Heights, MI 48314. The purpose of this inspection was to determine the facility's compliance status with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) rules.

Shamim and I inspected this facility after investigating an odor complaint near this facility. During our odor investigation, we noticed a plume of black smoke that appeared to be coming from Admiral Metals.

We arrived at Admiral Metals at around 11:30 am. We met with Mr. Michael Foon, General Manager. We identified ourselves, provided credentials, and stated the purpose of the inspection. Mr. Foon explained that Admiral Metals is a metal scrap yard. They receive scrap metal (iron, aluminum, copper, ect.) from various sources, separate it based on the type of metal, and cut it into portions that can be easily melted and recycled. This crude separated product is sold to customers. No melting of metal takes place at this facility.

Cutting of the scrap metal is done by torch cutting. A mixture of oxygen and acetylene is used in the torch cutters. There are several employees whose main responsibility is to operate these torch cutters. Torch cutting is performed outdoors directly next to the scrap pile. This torch cutting appears to be the only emission source at this facility.

During this inspection, there was a burning piece of metal scrap next to the scrap pile that appeared to be the source of the black smoke that we had previously observed while standing in front of IMC. Mr. Foon stated that if a metal piece is found to have plastic in it, then it is separated into a bin and shipped to another facility that can deal with such waste. The problem is that some of these metal pieces occasionally have some smaller amount of plastic in them that is not identified before torch cutting. When these pieces are torch cut, the plastic tends to catch on fire.

Mr. Foon stated that they keep water near the torch cutting operation so that these parts can be extinguished when this occurs; however, he has difficulty getting his employees to extinguish these flames on a regular basis. It appears that this was the case with the burning metal piece during this inspection. The piece was set aside so that it could finish burning. I informed Mr. Foon that these pieces need to be extinguished as soon as possible when they catch fire.

Mr. Foon stated that there are no boilers, emergency generators, or cold cleaners at this Admiral Metals.

We left the facility at around 11:45 am.

On September 24, 2018, I advised Mr. Foon that torch cutting in this manner is a violation of MDEQ-AQD Rule 201. A permit to install is required for the torch cutting operation. MDEQ-AQD permit to install exemption rule 285 (2)(j)(ii) only exempts torch cutting that is performed at scrap metal recycling facilities if the torch cutting does not cause a nuisance, does not adversely impact surrounding areas, and is exhausted to the general in-plant environment or to an appropriately designed enclosure equipped with a fabric filter.

Admiral Metals performs this torch cutting outdoors with no enclosure or fabric filter. Admiral Metals must obtain a permit to install for this torch cutting operation. A violation notice was sent to the facility on September 26, 2018 seeking compliance with Rule 201 requirements.

Mr. Foon informed me that this facility has been torch cutting in this manner for over twenty years and has not heard of this air quality regulation. He also informed me that there are other metal scrap yards operating in this manner that have not been cited by the MDEQ-AQD. I advised him that if he gives me the name of any of these other metal scrap yards, then AQD will follow up on these claims.

#### Compliance Determination

Observations made during my inspection indicate that Admiral Metals is not operating in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules. A violation notice was sent to Admiral Metals on September 26, 2018 seeking compliance with Rule 201 requirements.

NAME Adam Foon DATE 9/27/2018 SUPERVISOR SK