

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: On-site Inspection**

P096968309

<b>FACILITY:</b> Admiral Metals		<b>SRN / ID:</b> P0969
<b>LOCATION:</b> 41200 Mound Road, STERLING HTS		<b>DISTRICT:</b> Warren
<b>CITY:</b> STERLING HTS		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Michael Foon , General Manager		<b>ACTIVITY DATE:</b> 07/25/2023
<b>STAFF:</b> Adam Bognar	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On Tuesday, July 25, 2023, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I, Adam Bognar conducted an unannounced targeted inspection of Admiral Metals (the “facility”), 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 Environment, Great Lakes, and Energy, Air Quality Division (EGLE-AQD) rules.

I arrived at the facility at around 9:30 am.

I entered the main building near the facility entrance and introduced myself to an employee. I asked the employee if Mike Foon was available to show me around the facility. The employee said he would go look for a supervisor. A few minutes later, I met with Elliot Foon. I identified myself and stated the purpose of the inspection. Elliot gave me a tour of the facility.

Admiral Metals is a metal scrap yard. The facility receives scrap metals from various sources, separates the scrap based on the type of metal, and cuts the scrap into portions that can be easily shipped, melted, and recycled. The sorted metals are sold to customers who will melt down and recycle the metal.

Admiral Metals was targeted for inspection in FY2020 due to a violation notice issued to Admiral Metals on September 26, 2018. In that violation notice, the EGLE-AQD noted that Admiral Metals had installed and commenced operation of unpermitted torch cutting equipment at the facility. Torch cutting equipment at metal scrap yards can only be exempt from the requirement to obtain a permit to install if the torch cutting emissions are released only into the general in-plant environment and/or have externally vented emissions equipped with an appropriately designed and operated enclosure and fabric filter (EGLE-AQD Rule 285 (2)(j)(ii)). Torch cutting emissions at Admiral Metals were exhausted outdoors uncontrolled.

In response to the violation, Admiral Metals purchased an industrial shear to cut metal going forward.

The new shear has been able to completely replace torch cutting. As of November 2019, Admiral Metals is no longer torch cutting metals. The shear is a SHEARCORE brand FORTRESS 45-R. The shear is actuated by a mobile hydraulic excavator. The excavator operator can move the shear around 360 degrees, forward and backward, and up and down to cut pieces of metal pieces down to a size that can be melted/recycled. The excavator and shear together cost Admiral Metals approximately \$250,000.

The cutting blades on the shear must be maintained to retain their cutting ability. The cutting blades are sharpened daily and greased twice per day. The blades are double sided. Approximately every two months, the blades are flipped over to reveal the unused cutting edge. Approximately every four months, the blades must be replaced. Replacing the blades costs several thousand dollars.

The shear appears to have zero emissions. I observed the shear cut through various metal pieces during my inspection. I did not notice any smoke, sparks, dust, or smells coming from the shearing process. Nonetheless, it is conceivable that the shear “may” emit an air contaminant, thus the shear may be subject to Rule 201 requirements (the requirement to obtain a permit to install).

Based on my observations, the shear is exempt from Rule 201 requirements pursuant to Rule 291 (2)(a,b,c,d,e,f). I discussed the decision to consider this emission unit exempt under Rule 291 with AQD district supervisor Joyce Zhu. Joyce Zhu agreed that requiring Admiral Metals to demonstrate compliance with all provisions of Rule 291 would be unnecessarily burdensome at this time since the shear will have near zero emissions.

The potential emissions are metal particulate arising from both the workpiece being cut and from the shear blades themselves. After observing the shearing operation, I inspected the rest of the facility. There are two warehouses on-site. Both are used to store/process metals. There are several table-top sized cutters/saws in these warehouses. These table-top sized cutters/saws are exhausted into the general in-plant environment and are used on an as needed basis. Based on my observations, the tabletop cutters/saws are exempt from Rule 201 requirements pursuant to Rule 285 (2)(l)(vi).

I did not notice any evidence that torch cutting had recently taken place at Admiral Metals. I did not observe any torch cutting equipment. The material on the ground did not appear to have been torch cut. Elliot stated that they have lost considerable business since ceasing torch cutting.

I left the facility at around 10 am.

### **Compliance Determination**

Admiral Metals appears to be operating in compliance 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 Environment, Great Lakes, and Energy, Air Quality Division (EGLE-AQD) rules.

NAME Adam Bogner

DATE 7/25/2023

SUPERVISOR K. Kelly