



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Atlas Metal & Iron Corp., Aurora, Colorado

FROM: Natalie Topinka, Environmental Scientist
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Atlas Metal & Iron Corp.

Facility Location: 2601 Chambers Road, Aurora, CO

Date of Inspection: June 21, 2022

EPA Inspector(s):

1. Natalie Topinka, Environmental Scientist
2. Valeria Apolinario, Environmental Engineer
3. Laura Steel, Environmental Engineer

Other Attendees:

1. Michael Rosen, Owner, Atlas Metal & Iron Corp.

Contact Email Address: mrosen@atlasmetal.com

Purpose of Inspection: assess compliance with refrigerant safe disposal regulations

Facility Type: scrap metal recycler

Regulations Central to Inspection: 40 CFR Part 82, Subpart F

Arrival Time: 9:55 am

Departure Time: 11:10 am

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet – via email
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Mr. Rosen unless otherwise noted.

Process Description:

Atlas accepts ferrous and non-ferrous metal for recycling at its Aurora location. Suppliers are primarily individuals (peddlers) with some commercial suppliers. The facility accepts small appliances at this location if the refrigerant and the compressor have been removed. No vehicles are accepted. Refrigeration components such as compressors are accepted separately. Atlas does not recover refrigerant from any items and has not done so in the past.

Staff Interview: Mr. Rosen stated that the Atlas Aurora facility's practices of accepting small appliances and appliance components and not accepting vehicles had been in place for at least the past five years. If an intact appliance arrives at Atlas, it is rejected. Loads are inspected for appliances at the scale and at the material piles. Mr. Rosen stated that the approximate number of appliances accepted by Atlas was consistent on a day-to-day basis but was not documented anywhere. Atlas's policy of rejecting intact appliances is communicated verbally to sellers at the time of the transaction. Mr. Rosen estimated that peddlers at this location comprised about 90% of the business.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

Via a follow-up email, Atlas provided to EPA contracts used for commercial suppliers which requires the supplier to attest that they will recover refrigerants and their substitutes in accordance with regulations prior to delivery of any items to Atlas. Individual peddler customers sign a scale ticket which does not include the name and address of the person who recovered refrigerant from the appliance and the date it was recovered.

Atlas's "Standard Operating Procedure for Refrigerant Removal Verification" states that for appliances, load inspectors will "verify that either, 1) The refrigerant line has been cut, 2) the

compressor has been removed, or 3) a 'CFCs Removed' sticker has been applied" before accepting appliances.

We observed at least one refrigerator on the scrap pile, which had evidence that the refrigerant lines had been cut.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents (via email):

- A copy of Atlas's material acceptance policy for commercial accounts;
- A copy of any form given to customers regarding refrigerant recovery from small appliances delivered to Atlas (and a date range that this has been in use);
- An estimate of the number of small appliances (the type that use refrigerant, e.g. fridges, freezers, dehumidifiers, vending machines, etc., NOT stoves/washers/dryers/dishwashers) delivered to Atlas in the month of May 2022 (and any documentation available to support this estimate).

Compliance Assistance: We discussed with Mr. Rosen the requirements for scrap recyclers accepting small appliances and how a refrigerant recovery program might be implemented at Atlas.

Concerns: Atlas does not recover refrigerant from small appliances. For peddler transactions, it does not verify with a signed statement meeting the requirements of 40 C.F.R. §82.155(b)(2) that refrigerants have been properly recovered from these items prior to delivery to Atlas. Requiring lines to be cut or compressors removed likely incentivizes suppliers to vent refrigerant from small appliances.

DIGITAL SIGNATURES

Report Author: **NATALIE TOPINKA**  Digitally signed by NATALIE TOPINKA
Date: 2022.07.29 15:06:38 -05'00'

Section Supervisor: **Frank, Nathan**  Digitally signed by Frank, Nathan
Date: 2022.08.02 17:01:16 -05'00'

Facility Name: Atlas Metal & Iron Corp.

Facility Location: 2601 Chambers Road, Aurora, Colorado

Date of Inspection: June 21, 2022

APPENDICES AND ATTACHMENTS

1. Digital Image Log.

Facility Name: Atlas Metal & Iron Corp.
Facility Location: 2601 Chambers Road, Aurora, Colorado
Date of Inspection: June 21, 2022

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Natalie Topinka	2. Archival Record Location: <i>"C:\Users\ntopinka\OneDrive - Environmental Protection Agency (EPA)\NTopinka\ODS COE\Denver 2022\Atlas Aurora"</i>
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_0026.JPG	6/21/22 11:01 AM MDT	Sign regarding sealed units at scale window
2	IMG_0027.JPG	6/21/22 11:51 AM MDT	Sign regarding prohibited materials at scale entrance
3	IMG_0028.JPG	6/21/22 11:53 AM MDT	Wide-angle view of ferrous material pile
4	IMG_0029.JPG	6/21/22 11:53 AM MDT	Refrigerator on ferrous material pile
5	IMG_0030.JPG	6/21/22 11:55 AM MDT	Back of refrigerator from photo IMG_0029.
6	IMG_0031.JPG	6/21/22 11:56 AM MDT	Cut refrigerant line on refrigerator from photo IMG_0029.
7	IMG_0032.JPG	6/21/22 11:56 AM MDT	Label from back of refrigerator from photo IMG_0029.
8	IMG_0033.JPG	6/21/22 11:59 AM MDT	Box of compressors ("sealed units") in warehouse