



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

**DATE:** See Date of Section Chief Signature Below

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
S&S Metal Recyclers II, Aurora, Illinois

**FROM:** Karina Kuc, Environmental Engineer  
AECAB (IL/IN)

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

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** S&S Metal Recyclers II

**Facility Location:** 336 E Sullivan Rd, Aurora, IL 60505

**Date of Inspection:** 8/18/2021

**EPA Inspector(s):**

1. Tess Russell, Environmental Engineer
2. Karina Kuc, Environmental Scientist
3. Natalie Schulz, Environmental Engineer

**Other Attendees:**

1. Kevin Podraza, President

**Contact Email Address:** [kp@ssmr2.com](mailto:kp@ssmr2.com)

**Purpose of Inspection:** Determine compliance with safe disposal regulations at 40 C.F.R. Part 82, Subpart F.

**Facility Type:** Scrap metal recycler

**Regulations Central to Inspection:** 40 C.F.R. Part 82, Subpart F: Recycling and Emissions Reduction

**Arrival Time:** 11:10 AM

**Departure Time:** 12:00 PM

**Inspection Type:**

- Unannounced Inspection
- Announced Inspection

**OPENING CONFERENCE**

- Presented Credentials
- Stated authority and purpose of inspection
- Provided Small Business Resource Information Sheet: See attached document.
- Provided CBI warning to facility

The following information was obtained verbally from the owner, Kevin Podraza, unless otherwise noted.

**Process Description:** S&S Metal Recyclers (S&S) is a scrap facility that accepts white goods/appliances and other scrap metal for recycling from members of the general public and commercial suppliers. Mr. Podraza stated that only white goods/appliances with “open” lines are accepted. The facility has refrigerant recovery equipment on-site, but it has never been used at the facility. Cars are not accepted, however, vehicle air conditioning (A/C) radiators are accepted. A photo is taken of every load.

**Staff Interview:** S&S has 22 employees. The facility has been accepting white goods/appliances since it opened in 1994. An estimated two to three refrigerators are accepted per day from both peddlers and commercial suppliers. Mr. Podraza claims that his employees are trained to reject obviously cut lines.

When customers sell white goods/appliances, they are not required to confirm proper recovery of refrigerants by filling out and signing a verification statement. In the past, the receipt issued for the scrap metal purchase included a disclaimer at the signature line stating that refrigerant was properly recovered, however, it did not ask the name and address of the person who did the recovery, but an example of such a disclaimer could not be produced during the inspection. According to Mr. Podraza, approximately five months ago, their system crashed and restored to an older version that did not include the disclaimer. The period of time that the disclaimer was stated on the receipt is unknown. The facility does not have written contracts with the commercial suppliers that make up approximately 80% of the facility’s business, but these suppliers do have customer accounts.

Mr. Podraza stated that staff is trained on recognizing proper recovery of refrigerants and reject appliances with improperly cut lines. If an appliance containing refrigerant is inadvertently accepted, S&S uses Pillar to recover the refrigerant and take the refrigerant off-site, and the customer is subsequently back charged for the recovery cost. The facility does conduct torch cutting on site.

## TOUR INFORMATION

**EPA Tour of the Facility:** Yes

### **Data Collected and Observations:**

When EPA first arrived on site, a scrap pile was observed on the west side of the building, containing whole-house and large commercial AC units and an employee was torch cutting. EPA then conducted an opening conference and asked for a tour of the facility. The west-side scrap pile was observed but torch cutting was no longer taking place. EPA then observed another scrap pile to the northeast of the building which contained window unit ACs and whole-house ACs, as well as other scrap. EPA viewed a third scrap pile on the north side of the building which contained scrap but no appliances. EPA observed weathered signage posted next to the scale which read "Notice we do not accept items with refrigerant". EPA observed refrigerant removal equipment that was stored at the facility but has never been used at the facility.

**Photos and/or Videos:** were taken during the inspection. See Appendix A.

**Field Measurements:** were not taken during this inspection.

## CLOSING CONFERENCE

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

### **Requested documents:**

- 3 examples (including oldest and most recent period they were used) of the receipt with the "proper recovery" signature block disclaimer
- documentation of the training that employees undergo to learn how to identify materials that should be rejected on-site
- 5 examples of invoices from Pillar and subsequent back charge of customer

**Compliance Assistance:** EPA explained to S&S that they should utilize verification statements to ensure the proper recovery of white goods/appliances that arrive not containing refrigerant, or that commercial suppliers enter a contract with the scrap yard to deliver materials not containing refrigerant.

**Concerns:** S&S is not using verification statements to ensure the proper recovery of refrigerant from white goods/appliances that are accepted on-site. As a result, EPA is concerned that the site may accept improperly vented refrigerant lines by not verifying the refrigerant's proper recovery.

## DIGITAL SIGNATURES

Report Author: Kuc, Karina  
Digitally signed by Kuc, Karina  
Date: 2021.09.21 16:29:54 -05'00'

Section Chief: Frank, Nathan  
Digitally signed by Frank, Nathan  
Date: 2021.09.22 14:43:40 -05'00'

**Facility Name:** *Facility Name*

**Facility Location:** *Facility Address*

**Date of Inspection:** *Select date by clicking on the arrow*

**APPENDICES AND ATTACHMENTS**

1. Appendix A: Digital Image Log

**Facility Name:** *Facility Name*

**Facility Location:** *Facility Address*

**Date of Inspection:** *Select date by clicking on the arrow*

**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Karina Kuc	<b>2. Archival Record Location:</b> C:\Users\kkuc\OneDrive - Environmental Protection Agency (EPA)\Documents\S&S\photos
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<b>Image Number</b>	<b>File Name</b>	<b>Date and Time (CST)</b>	<b>Description of Image</b>
1	IMG_7256	08/18/2021 11:33 AM	Pile of AC units west of building
2	IMG_7257	08/18/2021 11:36 AM	Pile of AC units and other scrap northeast of building
3	IMG_7259	08/18/2021 11:37 AM	Pile of AC units and other scrap northeast of building
4	IMG_7260	08/18/2021 11:39 AM	Pile of scrap north of building
6	IMG_7262	08/18/2021 11:41 AM	Scale and sign
7	IMG_7263	08/18/2021 11:54 AM	Recovery equipment and tank