



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Calbag Metals, Tacoma, Washington

FROM: Daniel Heins, Environmental Scientist
AECAB (IL/IN)

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

TO: File

BASIC INFORMATION

Facility Name: Calbag Metals

Facility Location: 1602 Marine View Drive, Tacoma, WA 98422

Date of Inspection: August 26, 2022

EPA Inspector(s):

1. Daniel Heins, Environmental Scientist

Other Attendees:

1. Melody McPharlin, General Manager – Calbag Metals
2. Billy Pfaff, Operations Manager – Calbag Metals

Contact Email Address: melody.mcpharlin@calbag.com

Purpose of Inspection: Ozone depleting substances/refrigerants compliance inspection

Facility Type: Scrap Yard

Regulations Central to Inspection: 40 CFR Part 82 Subpart F

Arrival Time: 09:50

Departure Time: 10:45

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet (via email)
- ☐ Small Business Resource Information Sheet not provided.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Calbag Metals (“Calbag”) representatives unless otherwise noted.

Process Description:

Calbag Metals (“the Facility”) receives and processes scrap metal, including cars, from commercial sources, the general public, and scrap peddlers. The Facility has two balers and conducts torch cutting. The Facility receives the loads of scrap and separates out different metal types for re-sale. The Facility does not have a shredder or crusher. The Facility is oriented towards non-ferrous scrap but also does accept and sell ferrous scrap.

Staff Interview:

The Facility accepts small appliances such as refrigerators and standalone compressors. The Facility also accepts vehicles including motor vehicle air conditioner (MVAC) units. The Facility requires that all vehicles taken in must be fully drained of all fluids, including refrigerant, and Facility staff check to ensure this is done prior to acceptance. The Facility typically receives approximately 20 to 50 vehicles a month. The Facility only takes small appliances if the compressor is removed, and only accepts compressors that are drained of all refrigerants. Compressors must be drilled to show that they do not hold any refrigerant.

Sellers sign a statement saying that the scrap is not stolen and is free of all hazardous material and that where applicable refrigerants were properly removed, but they do not provide information about the date or location of the refrigerant reclamation.

The Facility has a relationship with the City of Tacoma where the City sends loads every 6 to 8 weeks of appliances drained of refrigerants. The Facility does not have a contract with the City to ensure proper refrigerant recovery.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

Daniel Heins observed the sign at the scale-house that stated that the facility did not accept “CFCs or HCFCs (Refrigerants)” but did not provide further information about ensuring proper recovery.

In the scrap pile Daniel Heins noted a refrigerator with the condenser removed.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

Melody McPharlin provided via email after the inspection a copy of a receipt for a customer selling 90 pounds of compressors and 85 pounds of “AL/CU radiators” with a signed statement that the property subject to the transaction was free of CFCs/HCFCs and that refrigerants had been recovered by a qualified technician. No information about the identity of the “qualified technician” or the date of recovery was included.

CLOSING CONFERENCE

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

Compliance Assistance:

Daniel Heins provided via email links to EPA resources on compliance with ozone depleting substances regulations and highlighted the most relevant provisions for the Facility’s operations. During the inspection Daniel Heins explained the requirements for safe disposal of appliances under Subpart F.

Concerns:

Daniel Heins identified that the Facility did not have the required documentation for ensuring individual and commercial sellers of MVACs and small appliances had properly recovered refrigerants prior to sale to the Facility. When Melody McPharlin provided the receipt with the signed statement after the inspection, Daniel Heins informed her that this did not have the requisite information about refrigerant recovery.

DIGITAL SIGNATURES

Report Author: _____

DANIEL HEINS
Digitally signed by DANIEL HEINS
Date: 2022.08.29 16:20:48 -07'00'

Section Supervisor: _____

Frank, Nathan
Digitally signed by Frank, Nathan
Date: 2022.09.07 16:37:18 -05'00'

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APPENDICES AND ATTACHMENTS

Appendix A: Digital Image Log

Facility Name: Calbag Metals

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Daniel Heins	2. Archival Record Location: R5 Electronic Records Center
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Image Number	File Name	Date and Time (PDT)	Description of Image
1	DSC02416.JPG	2022:08:26 09:55:24	Calbag entrance sign
2	DSC02417.JPG	2022:08:26 10:17:27	Scrap pile with fridge
3	DSC02418.JPG	2022:08:26 10:18:32	Refrigerator without condenser in pile
4	DSC02420.JPG	2022:08:26 10:23:19	"We Do Not Accept" sign at scale