



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
EMR Northern Metal Recycling - Scrappy's Express, Minneapolis, Minnesota

FROM: David Sutlin, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: EMR Northern Metal Recycling - Scrappy's Express

Facility Location: 1803 N 2nd Street, Minneapolis, Minnesota 55411

Date of Inspection: May 6, 2025

EPA Inspector(s):

1. David Sutlin, Environmental Engineer
2. Emma Leeds, Environmental Engineer

Other Attendees:

1. Duane Pomerleau, Supervisor, EMR Minneapolis - Scrappy's Express
2. Brad Bryniarski, Lead, EMR Minneapolis - Scrappy's Express
3. Margaret Mosbeck-Morrison, Environmental Specialist, MPCA

Contact Email Address: duane.pomerleau@emrgroup.com

Purpose of Inspection: To investigate compliance with requirements for the protection of stratospheric ozone

Facility Type: Scrapyard

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Regulations Central to Inspection: 40 C.F.R. § 82.155 – Safe disposal of appliances, including the requirement to properly recover refrigerants or verify the proper recovery of refrigerants.

Arrival Time: 10:15 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
☒ Small Business Resource Information Sheet not provided. Reason: Not a Small Business
☒ Provided CBI warning to facility

Was any information collected during the inspection claimed as CBI?

☐ Yes ☒ No.

The following information was obtained verbally from Duane Pomerleau or Brad Bryniarski, unless otherwise noted.

Process Description:

EMR Northern Metal Recycling - Scrappy's Express (Scrappy's) receives ferrous and non-ferrous metal scrap for recycling from the general public and industrial suppliers. The facility accepts small appliances as well as refrigeration components. The scrap is received in trucks that are weighed at the scale house and then unload. Ferrous scrap from the general public is unloaded into one pile and scrap from industrial suppliers is unloaded into a separate pile in the yard. This scrap is checked for non-acceptable material by facility personnel as the scrap is being unloaded to each pile. Non-ferrous scrap is unloaded to a separate building. At the scale house, members of the public that supply appliances are routinely asked to fill out and sign a statement to certify that all the refrigerant from the appliance leaked out prior to delivery (Leaked Out Statement).

Staff Interview:

- The commercial suppliers that deliver to this facility generally do not include suppliers of scrap appliances.
- The facility is no longer set up to recover refrigerant from appliances although they do maintain their evacuation license in case they decide to resume recovery in the future.
- Duane Pomerleau could not recall receiving any intact appliances during his tenure at the facility.
- It is the facility's policy to not accept any appliances that still contain intact compressors. Suppliers routinely remove compressors from appliances and deliver the compressors at the

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non-ferrous building prior to unloading the appliance to the pile in the yard. Compressors command a higher price than the remaining appliance, pound for pound.

- Any receipt of appliances by the facility is recorded on a ticket (Yard Ticket).
- At the scale house, personnel showed us the Leaked Out Statement that they regularly give out to suppliers of appliances to fill out and sign. The staff person, Heather, indicated that just one form is filled out per supplier per day, regardless of the number of deliveries with appliances on a given day for a given supplier.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA observed the unloading of ferrous scrap by a member of the general public from their truck, including at least one refrigerator. EPA requested help from Scrappy's to inspect the refrigerator before it was placed in the scrap pile, but they stated they could not tell their customers to stop unloading or to set the refrigerator aside.

At the scale house, EPA observed a Leaked Out Statement form being given to a supplier to fill out, with no further explanation given to the supplier.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

CLOSING CONFERENCE

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

Requested documents:

- Past 30 days of Yard Tickets that include delivery of any appliances along with any corresponding Leaked Out Statements.

Concerns: EPA expressed concern at the number of Leaked Out Statements the facility accepts, and that it is not credible to have so many cases where the refrigerant escaped as a result of some unavoidable occurrence.

DIGITAL SIGNATURES

Report Author: DAVID SUTLIN Digitally signed by DAVID SUTLIN
Date: 2025.06.27 11:15:15 -05'00'

Section Supervisor: BRIAN DICKENS Digitally signed by BRIAN DICKENS
Date: 2025.06.27 11:26:37 -05'00'

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APPENDICES

Appendix A: Digital Image Log and Digital Video Log

Facility Name: EMR Northern Metal Recycling - Scrappy's Express

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APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: David Sutlin

Archival Record Location: ERC:\Enf_EMR NMR Scrappy's_MN_25\Enf_EMR NMR Scrappy's_MN_25_Inspection\Photos\

Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_0731.JPG	5/6/2025 10:34	Container of isolated refrigerator compressors in non-ferrous building
2	IMG_0732.JPG	5/6/2025 10:36	Containers of isolated refrigerator compressors in non-ferrous building
3	IMG_0733.JPG	5/6/2025 10:41	Container of copper lines in non-ferrous building
4	IMG_0734.JPG	5/6/2025 10:41	Container of copper lines/parts in non-ferrous building