



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

**DATE:** NOV 21 2018

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Best American Iron & Metal, Houston, Texas

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

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

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Best American Iron & Metal

**Facility Location:** 5417 North McCarty Street, Houston, Texas

**Date of Inspection:** November 9, 2018

**EPA Inspector(s):**

1. Natalie Topinka, Environmental Scientist
2. Scott Connolly, Environmental Engineer

**Other Attendees**

1. Doris Rowell, Manager, Best American Iron & Metal
2. Anthony Powell, Yard Manager, Best American Iron & Metal

**Contact Email Address:** dbabestamerican@aol.com

**Purpose of Inspection:** Assess compliance with the refrigerant disposal requirements

**Facility Type:** scrap metal recycler

**Regulations Central to Inspection:** 40 C.F.R Part 82, Subpart F

**Arrival Time:** 12:05 pm

**Departure Time:** 12:58 pm

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Ms. Rowell and Mr. Powell unless otherwise noted.

**Process Description:**

Best American Iron & Metal accepts ferrous and non-ferrous metals for recycling from the general public. The facility accepts small appliances at least daily and on the order of 2-3 cars per day. No refrigerant recovery is performed on-site, and Best American does not require documentation of the fate of refrigerant in items delivered for recycling that previously contained refrigerant.

**Staff Interview:** Ms. Rowell and Mr. Powell stated that most items arrive at the facility empty of refrigerant and separated into their component parts to be sold at different price points for individual grades of metal. Ferrous material is sent to one of the local shredders. For cars, Best American Iron & Metal accept the vehicles as-is and takes responsibility for draining, collecting, and disposing of the fluids from the cars. In the past, they required cars to be empty of fluids but this resulted in customers illegally draining those fluids on the ground immediately prior to delivery of the item for recycling.

**TOUR INFORMATION**

**EPA toured the facility:** Yes

**Data Collected and Observations:**

We observed small appliances and vehicles in the scrap yard. We also observed Best American's vehicles dismantling station, which is under cover. We observed a very old refrigerant recovery machine and tank which Mr. Powell confirmed was not in use.

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

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

**CLOSING CONFERENCE**

**Compliance Assistance:** We gave an overview of the regulatory requirements and compliance options in 40 C.F.R. Part 82, Subpart F, and answered preliminary questions about the requirements and how a refrigerant recovery program might work in practice.

**Concerns:** We discussed with Ms. Rowell and Mr. Powell the need to put a program in place to either recover refrigerant from small appliances and vehicles or to verify the refrigerant's proper recovery prior to delivery to Best American.

**SIGNATURES**

Report Author: Natalie M. Di Date: 11/19/18

Section Chief: Pat A. R. Date: 11/21/18

**Facility Name:** Best American Iron & Metal

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**APPENDICES AND ATTACHMENTS**

1. Digital Image Log
2. Digital Images attached on CD

**Facility Name:** Best American Iron & Metal  
**Facility Location:** 5417 North McCarty Street, Houston, Texas  
**Date of Inspection:** November 9, 2018

**APPENDIX A: DIGITAL IMAGE LOG**

|                                                                |                                                                                                                    |
|----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| <b>1. Inspector Name:</b><br>Scott Connolly                    | <b>2. Date(s) of Inspection:</b><br>November 9, 2018                                                               |
| <b>3. Company/Facility Name:</b><br>Best American Iron & Metal | <b>4. Street Address, City, State:</b><br>5417 North McCarty Street, Houston, Texas                                |
| <b>5. Number of Images:</b><br>5                               | <b>6. Archival Record Location:</b><br>CD-R labeled Best American Iron & Metal Inspection photos, November 9, 2018 |

| Image Number | File Name    | Date and Time (CST) | Latitude and Longitude   | Description of Image                                |
|--------------|--------------|---------------------|--------------------------|-----------------------------------------------------|
| 86           | PB090086.JPG | 11/9/2018 14:11     |                          | Best American – reference photo of front entrance   |
| 87           | PB090087.JPG | 11/9/2018 14:27     | 29.81,<br>-95.260278     | Best American – appliances on scrap pile            |
| 88           | PB090088.JPG | 11/9/2018 14:30     | 29.810556,<br>-95.260278 | Best American – Freon recovery machine (not in use) |
| 89           | PB090089.JPG | 11/9/2018 14:34     | 29.810833,<br>-95.26     | Best American – scrap vehicles on-site              |
| 90           | PB090090.JPG | 11/9/2018 14:36     | 29.810556,<br>-95.26     | Best American – list of rejected items              |

