



**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
Aurora Metal Recycling, Aurora, Illinois

FROM: Tess Russell, Environmental Engineer
AECAB (MN/OH)

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

TO: File

BASIC INFORMATION

Facility Name: Aurora Metal Recycling

Facility Location: 619 Spruce St. Aurora, Illinois, 60506

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. David Giordano, Owner

Contact Email Address: davidgiordano@icloud.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: 10:10 AM
Departure Time: 10:41 AM

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, David Giordano, unless otherwise noted.

Process Description:

Aurora Metal Recycling is a scrap facility that accepts white goods/appliances and cars for recycling from members of the general public and commercial suppliers. White goods/appliances will only be accepted if no refrigerant remains in them; the facility does not have on-site recovery equipment for white goods/appliances. Cars will be accepted with or without refrigerant as the facility has on-site recovery equipment for vehicles. Vehicle refrigerant that is recovered on-site is sold to Aspen Refrigerants, Inc.

Staff Interview: Aurora Metal Recycling has seven employees. The facility has been accepting white goods/appliances since it opened eight years ago, and began accepting vehicles about three to four years ago. White goods/appliances are accepted only if they do not contain refrigerant. When members of the general public (i.e. peddlers) drop off such appliances, they are not required to confirm proper recovery of refrigerants using a verification statement. The facility at one time used such verification statements, but the owner stated he would have to dig around for previous copies or examples. Commercial suppliers do not often drop off these types of white goods/appliances that once contained refrigerant, but rather the bulk of their business deals with solid steel. The facility does not have any written contracts with its commercial suppliers.

Vehicles are accepted regardless of whether they contain refrigerant, as long as they arrive with the proper Vehicle Identification Number paperwork. General public customers who deliver vehicles without refrigerant are not required to confirm proper refrigerant recovery using a verification statement. No commercial suppliers have contracts with the facility to deliver vehicles no longer containing refrigerant. Any accepted vehicles that still contain refrigerant are properly recovered on-site. The owner, David Giordano, is the only person on-site who is trained to properly recover refrigerant from vehicles. He stated his training was a one-time, online

course and that there is no annual refresher. The recovered refrigerant is then sold to Aspen Refrigerants, Inc.

Additional training for staff on recognizing proper recovery of refrigerants was not mentioned. The facility will accept cut or damaged refrigerant lines as long as no refrigerant remains in the white goods/appliances. When asked about the facility's protocol for when a white good/appliance makes its way onto site and still contains refrigerant, the owner stated that "no appliances sneak through." The owner stated there is no established segregated area for such white goods/appliances.

No estimates of quantities of appliances or vehicles accepted per day at the facility could be provided.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA observed the recovery equipment used for vehicles and confirmed that the equipment is in working condition. EPA viewed the main scrap pile containing white goods/appliances as well as the general areas for vehicles with and without refrigerant. EPA viewed the signage posted on the outside wall near the weigh station which indicates to customers what materials are not accepted at the facility. Among other rejected items, the signage stated: "NO FREON." EPA noted that a cart of air conditioning units was located away from the main pile, and some of the units appeared to be intact and containing refrigerant. When asked what the units were doing there, the owner could not provide a reason.

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:

- 5 examples of the historic verification statement used for dropping off appliances without refrigerant. We requested that one example be from the earliest date of its use, and at least one example be from the most recent date of use. The remaining three examples would ideally fall randomly within this time span.
 - a. Statement on the start and end dates of using this verification statement.
 - b. Statement explaining why the use of this verification statement was discontinued.
- Documentation of the training the owner completed to be a licensed refrigerant recoverer.

- Training that employees undergo to learn how to identify materials that should be rejected on-site.
- 3 most recent examples of transactions between Aspen Refrigerants, Inc. and Aurora Metal Recycling (i.e. receipts from selling the refrigerant).
 - a. A monthly or yearly estimate of how much refrigerant is recovered on-site and subsequently sold, or of how many vehicles are properly recovered.
- The inventory of vehicles accepted over the last 3 months.

Compliance Assistance: EPA mentioned to Aurora Metal Recycling that it is expected that facilities utilize verification statements to ensure the proper recovery of white goods/appliances and vehicles that arrive on-site not containing refrigerant, or that commercial suppliers enter into a contract with the scrap yard to deliver white goods/appliances or vehicles not containing refrigerant.

Concerns: The inspectors identified that the site is not using verification statements to ensure the proper recovery of white goods/appliances or vehicles that are accepted on-site not containing refrigerant. EPA is concerned that the site accepts cut or damaged refrigerant lines without verifying the refrigerant’s proper recovery.

DIGITAL SIGNATURES

Report Author: TESS RUSSELL Digitally signed by TESS RUSSELL
Date: 2021.09.13 13:09:57 -05'00'

Section Chief: Brian Dickens Digitally signed by Brian Dickens
Date: 2021.09.13 14:44:09 -05'00'

Facility Name: Aurora Metal Recycling
Facility Location: 619 Spruce St. Aurora, IL 60506
Date of Inspection: August 18, 2021

APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log

Facility Name: Aurora Metal Recycling
Facility Location: 619 Spruce St. Aurora, IL 60506
Date of Inspection: August 18, 2021

APPENDIX A: DIGITAL IMAGE LOG

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| 1. Inspector Name: Karina Kuc | 2. Archival Record Location: <i>C:\Users\trussell\OneDrive - Environmental Protection Agency (EPA)\Aurora Scrap Yards\Aurora Metal Recycling\Aurora Metal photos</i> |
|--------------------------------------|--|

| Image Number | File Name | Date and Time (incl. Time zone and DST) | Description of Image |
|--------------|--------------|---|---|
| 1 | IMG_7246.JPG | 2021:08:18 10:28:26 | Vehicle Recovery Equipment |
| 2 | IMG_7247.JPG | 2021:08:18 10:30:59 | Signage on site |
| 3 | IMG_7248.JPG | 2021:08:18 10:32:08 | Small appliance with removed compressor |
| 4 | IMG_7249.JPG | 2021:08:18 10:33:00 | Pile |
| 5 | IMG_7250.JPG | 2021:08:18 10:35:04 | Cart with appliances, segregated |
| 6 | IMG_7251.JPG | 2021:08:18 10:35:15 | Close up of lines (1) |
| 7 | IMG_7252.JPG | 2021:08:18 10:35:19 | Close up of lines (2) |
| 8 | IMG_7253.JPG | 2021:08:18 10:35:35 | Close up of lines (3) |
| 9 | IMG_7254.JPG | 2021:08:18 10:36:17 | Close up of segregated small appliance |
| 10 | IMG_7255.JPG | 2021:08:18 10:36:43 | Close up of lines (4) |