



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Atlas Metal & Iron, Denver, Colorado

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

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

TO: File

BASIC INFORMATION

Facility Name: Atlas Metal & Iron Corp.

Facility Location: 1100 Umatilla St., Denver, Colorado

Date of Inspection: June 23, 2022

EPA Inspector(s):

1. Natalie Topinka, Environmental Scientist
2. Valeria Apolinario, Environmental Engineer
3. Brianna Fenzl, Environmental Engineer

Other Attendees:

1. Michael Rosen, Owner, Atlas Metal & Iron Corp.

Contact Email Address: mrosen@atlasmetal.com

Purpose of Inspection: assess compliance with refrigerant safe disposal regulations

Facility Type: scrap metal recycler

Regulations Central to Inspection: 40 CFR Part 82, Subpart F

Arrival Time: 9:30 am

Departure Time: 10:30 am

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet – via email
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Mr. Rosen unless otherwise noted.

Process Description:

Atlas accepts ferrous and non-ferrous metal for recycling at its Umatilla Street location. Suppliers are mostly commercial entities but material is accepted from individuals (peddlers). The facility specializes in non-ferrous material and wire processing and has an aluminum baler onsite. Atlas's policy is to reject all motor vehicles and small appliances at this location. Atlas does not recover refrigerant from any items and has not done so in the past.

Staff Interview: Mr. Rosen stated that Atlas did not accept vehicles or small appliances at this location as a matter of practice. If a customer brought such an item, it would be rejected at the entry gate if noticed there, or if noticed at the scrap pile during unloading, the customer would be required to reload it onto their vehicle and the scale operator would be notified by radio that the customer would be weighing out with the item. On occasion Atlas may accept a large appliance from an HVAC company or a box of compressors from another scrap dealer, but this is rare. Mr. Rosen estimated that material received by peddlers at this location comprised 10% of the total scrap volume.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

We observed the peddler supplier unloading station, wire processing facility, aluminum/copper baling equipment, and various material piles. Via a follow-up email, Atlas provided to EPA contracts used for commercial suppliers which requires the supplier to attest that they will recover refrigerants and their substitutes in accordance with regulations prior to delivery of any items to Atlas. We observed a peddler customer delivering a window air conditioner that had been cut up into pieces.

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:

- A copy of Atlas's material acceptance policy for commercial accounts;

Compliance Assistance: We advised that if Atlas received from dealers appliance components that were not already crushed, dismantled, or otherwise demolished, these items should be covered by a contract with the supplier that states the supplier will be responsible for recovering refrigerant or ensuring its proper recovery before delivery to Atlas.

Concerns: We noted that one scrap peddler customer was delivering a window air conditioner that had been cut up into pieces. We discussed that this material is subject to the requirements to verify refrigerant was recovered properly beforehand via a signed statement from the customer, and that Atlas's acceptance of appliances with cut lines could inadvertently encourage venting of refrigerant by peddlers.

DIGITAL SIGNATURES

Report Author: **NATALIE
TOPINKA**  Digitally signed by NATALIE
TOPINKA
Date: 2022.07.29 15:16:00
-05'00'

Section Supervisor: **Frank,
Nathan**  Digitally signed by Frank,
Nathan
Date: 2022.08.02
17:12:47 -05'00'

Facility Name: Atlas Metal & Iron Corp.
Facility Location: 1100 Umatilla St., Denver, CO
Date of Inspection: June 23, 2022

APPENDICES AND ATTACHMENTS

1. Digital Image Log

Facility Name: Atlas Metal & Iron Corp.
Facility Location: 1100 Umatilla St., Denver, CO
Date of Inspection: June 23, 2022

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Valeria Apolinario	2. Archival Record Location: <i>"C:\Users\ntopinka\OneDrive - Environmental Protection Agency (EPA)\NTopinka\ODS COE\Denver 2022\Atlas Umatilla"</i>
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_0097.JPG	6/23/2022 9:47 MDT	Wide angle view of portion of yard
2	IMG_0098.JPG	6/23/2022 9:51 MDT	Area for peddler-supplied material
3	IMG_0099.JPG	6/23/2022 9:54 MDT	Second area for ferrous material