



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Wellston Scrap Metal, St. Louis, Missouri

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

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

TO: File

BASIC INFORMATION

Facility Name: Wellston Scrap Metal

Facility Location: 6540 Dr. Martin Luther King Drive, St. Louis, Missouri 63133

Date of Inspection: September 21, 2023

EPA Inspector(s):

1. Tess Russell, Environmental Engineer
2. Karina Kuc, Environmental Engineer
3. Natalie Topinka, Environmental Scientist

Other Attendees:

1. Ramona Davis, Owner, Wellston Scrap
2. Laniece Davis, Employee, Wellston Scrap

Contact Email Address: wellstonscrapmetal@att.net

Purpose of Inspection: assess compliance with refrigerant safe disposal regulations

Facility Type: scrap metal recycler

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

Arrival Time: 10:40 AM

Departure Time: 11:30 AM

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Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

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

The following information was obtained verbally from Ramona Davis and Laniece Davis unless otherwise noted.

Process Description: Wellston Scrap has operated this single St. Louis location for approximately 11 years and is currently operating with about 7 employees. The facility accepts ferrous and non-ferrous scrap metals for recycling from members of the general public. The facility does not accept materials from any commercial accounts. Wellston Scrap accepts small appliances and vehicles.

Staff Interview: Laniece Davis stated that Wellston Scrap receives about 4 to 5 refrigerators per day and about 1 vehicle per week. Vehicles can be accepted intact which will be sent to a local shredder yard for proper processing. Wellston Scrap does not have refrigerant recovery equipment on-site and has a policy of not accepting small appliances containing refrigerant. Wellston Scrap does have a third party recoverer on hand to call if certain small appliances are discovered onsite and are in need of proper recovery. Wellston Scrap does not maintain any invoices or documentation of this recovery set-up, but Ramona Davis stated the third-party recoverer retrieves appliances to recover off-site approximately 1 or 2 times per month. General public customers do not sign a scale ticket, nor do they provide the name or address of any person who recovered the refrigerant or the date it was recovered, as is required by 40 C.F.R. § 82.155(b). The facility does not have any visible signage informing customers of the facility's refrigerant policy, although Ramona Davis stated that they used to have such signage.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations: We toured the scrapyard and observed numerous appliances in the scrap pile inside the garage, including approximately 6 refrigerators and 10 small air conditioning units. Two refrigerators still had visible compressors. We observed an area that appeared to be where appliances might be further processed or broken down, but Ramona Davis

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stated no further processing happens at Wellston Scrap. Finally, we observed the outdoor scrap pile which was stated to have contained overflow scrap from the pile in the garage.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. List of acceptable items at Wellston Scrap

CLOSING CONFERENCE

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

Compliance Assistance: We gave an overview of the requirements of 40 C.F.R Part 82, Subpart F as they pertain to scrap metal recyclers who accept small appliances and vehicles.

Concerns: Wellston Scrap is not requiring documentation of proper refrigerant recovery (e.g. signed statement) prior to delivery, as is required by 40 C.F.R. § 82.155(b). Wellston Scrap's practice of encouraging customers to deliver scrap with the refrigerant removed but without requiring documentation of proper refrigerant recovery prior to delivery may inadvertently incentivize customers to vent refrigerant. Items that still retain the compressor indicate that Wellston Scrap is not adequately inspecting its incoming materials in accordance with its current policy and some items may potentially still contain refrigerant. The compressors in the scrap pile are susceptible to damage (and release of refrigerant to the atmosphere) when being moved from one pile to another on-site. There was no signage to advise customers of the facility's refrigerant policy or of the requirements for proper refrigerant recovery.

DIGITAL SIGNATURES

Report Author: **TESS
RUSSELL**  Digitally signed by TESS
RUSSELL
Date: 2023.10.11
15:27:54 -05'00'

Section Supervisor: **BRIAN
DICKENS**  Digitally signed by BRIAN
DICKENS
Date: 2023.10.12
12:13:50 -05'00'

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APPENDICES AND ATTACHMENTS

- 1.* Appendix A: Digital Image Log

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Karina Kuc	2. Archival Record Location: <i>ERC (Enf_Wellston Scrap_MO_23_Inspection)</i>
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Image Number	File Name	Date and Time (Central time)	Description of Image
1	IMG_1575.JPG	2023:09:21 10:54:59	Scrap pile in the garage, containing numerous refrigerators and small appliances
2	IMG_1576.JPG	2023:09:21 10:55:41	Close-up of two refrigerators in the scrap pile, one with a visible compressor
3	IMG_1577.JPG	2023:09:21 10:55:54	Refrigerator from scrap pile with its compressor
4	IMG_1578.JPG	2023:09:21 10:58:25	Refrigerator with intact back panel
5	IMG_1579.JPG	2023:09:21 10:59:34	AC units next to scrap pile, which appeared to be in an area for further processing of materials
6	IMG_1580.JPG	2023:09:21 10:59:47	AC units next to scrap pile, which appeared to be in an area for further processing of materials (2)
7	IMG_1581.JPG	2023:09:21 11:00:06	Refrigerators in the scrap pile in the garage
8	IMG_1582.JPG	2023:09:21 11:01:07	AC units in the scrap pile in the garage