



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

**DATE:** *August 6, 2021*

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Alter Trading Corporation, Green Bay, WI

**FROM:** Emma Leeds, Environmental Engineer  
AECAB (IL/IN)

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

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Alter Trading Corporation – Green Bay

**Facility Location:** 2175 Badgerland Drive, Green Bay, WI

**Date of Inspection:** 6/17/2021

**EPA Inspector(s):**

1. Emma Leeds, Environmental Engineer
2. Shilpa Patel, Environmental Engineer
3. Tess Russell, Environmental Engineer

**Other Attendees:**

1. Jacob Crowe, Facility Manager – Alter
2. Tom Vanderbush, Assistant Facility Manager – Alter
3. Darren Endbring, Environmental Health and Safety Manager – Alter (by phone)

**Contact Email Address:** [jacob.crowe@altermetalrecycling.com](mailto:jacob.crowe@altermetalrecycling.com)

**Purpose of Inspection:** To determine compliance with the Clean Air Act

**Facility Type:** Metal recycling yard with shredder

**Regulations Central to Inspection:** 40 C.F.R. Part 82, Subpart F: Recycling and Emissions Reduction

**Arrival Time:** 8:15 AM CT

**Departure Time:** 11:45 PM CT

**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

The following information was obtained verbally from Alter Trading Personnel unless otherwise noted.

**Process Description:**

The Alter Trading Corporation Green Bay facility (“Green Bay”) accepts and processes both ferrous and non-ferrous scraps. Approximately 45 employees work at Green Bay, which operates Monday – Friday from 7 AM to 3 PM, including the shredder. Scraps are accepted through two separate gate and scale systems depending on if the supplier is an industrial customer or a peddler. All cars are also received and weighed in the same gate used for industrial customers.

After moving through the gates, scales, and subsequent radiation detectors, scrap is inspected and sorted with the help of 14 cranes and 8 loaders. Scrap is then either pressed into blocks using balers or processed by the shredder, which is powered by two 2,500 horsepower electric engines. Downstream of the shredder, a metal separation process separates steel from the other shredder scrap, and a loader picks up the alternative shredding residue. Fluff is separated from metals and used as alternative daily cover at a nearby landfill.

**Staff Interview:**

First, EPA inspectors focused the staff interview with Mr. Crowe and Mr. Vanderbush on refrigerant-related questions. Inspectors asked about the facility’s practices and policies for accepting cars and small appliances with and without refrigerants and the documentation involved. The procedures are different at the two gates, so Gate 1 was discussed first, followed by Gate 3.

Gate 1 and Scale 1 are for industrial customers and cars. According to Mr. Crowe, at Gate 1, the scale operator verifies that each industrial customer has a valid Alter “FEMS-33 Material Supplier Certification” contract (FEMS-33 contract), and that each peddler who brings a car with

refrigerant removed prior to delivery signs a “FEMS-02 Verification of Refrigerant Removal” verification statement (FEMS-02R5 form). All auto-salvage companies that come to Green Bay are allegedly under FEMs-33 contracts. Along with ensuring the customer has the appropriate paperwork, the Gate 1 scale operator makes sure there are no liens on any motor vehicles, inspects the load using a downward-facing camera positioned above the scale, and weighs the load before it is brought into the yard.

Gate 3 and Scale 2 are for peddlers, who bring in the majority of the appliances received at Green Bay. At Gate 3, the scale operator inspects each load for appliances and requires each customer with appliances to fill out a FEMS-33 contract, regardless of if they are a first-time or returning customer. Green Bay accepts appliances that contain refrigerant free of charge and stores them in a designated area until a refrigerant recovery company picks them up as needed, about once a month. The company removes refrigerant off-site and then Green Bay often buys the appliances from the company after the refrigerant has been removed.

Next, inspectors inquired about Green Bay’s on-site refrigerant recovery system, their refrigerant disposal practices, and their work with refrigerant recovery contractors. Mr. Vanderbush claimed that the facility began accepting vehicles with refrigerant approximately six years ago after acquiring their refrigerant recovery system, but had been accepting vehicles with the refrigerant already removed for more than 40 years. About 10 – 15 vehicles with refrigerant are brought to Green Bay every day. A refrigerant disposal company will pick up the refrigerant cannisters once four cannisters are full.

Lastly, EPA inspectors inquired about the shredder. The shredder was installed at the facility five years ago and has two to three times the capacity of the previous shredder that it replaced. According to Mr. Crowe, the shredder processes around 90 tons of scrap per hour (tons/hr), with the goal of reaching 92 tons/hr. A belt scale monitors the processing speed and the only air emissions control on the shredder is a water spray on a shredder box. Mr. Endbring believed that the same volatile organic compound (VOC) emission factor from the Alter Milwaukee shredder performance test was used during permitting for the Green Bay shredder.

Mr. Crowe explained that scrap that is sent to the shredder is separated into three grades: sheet iron, clean sheet, and clip grade. Sheet iron includes appliances and motor vehicles and makes up about 60% of the total processed materials. Clean steel and industrial grade metal make up the remaining 40%. In the past few years, the amount of sheet iron processed by the facility has remained constant, but the other metal types have increased.

Fluids, tires, batteries, catalytic converters, and mercury switches are allegedly removed from motor vehicles and gas tanks are allegedly punctured before shredding. Mr. Crowe claimed that explosions occur at the shredder approximately every six months. The most recent explosion was due to a motor vehicle’s fuel pump handle still containing gasoline. Explosions have also occurred due to gasoline tanks going through the shredder.

## **TOUR INFORMATION**

**EPA Tour of the Facility: Yes**

**Data Collected and Observations:**

EPA inspectors toured the facility with Mr. Crowe and Mr. Vanderbush, beginning at Gate 1. Julie Naug, the scale operator at Gate 1, explained that she asks customers for the title of each car and makes sure there are no liens. For “whole” cars where the refrigerant has been removed, she either checks that the customer has a FEMS-33 contract, or requires the customer to sign a FEMS-02 verification statement. The FEMS-33 contracts are valid for 3 years, and Green Bay has an automated system that notifies the scale operators when a contract is expired. A rejection log is maintained for any car that is sent away due to, for example, liens on the car or the car not passing the radiation inspection.

Next, EPA inspectors went to Gate 3 and spoke with scale operator Traci Szymanski. Ms. Szymanski said she requires each peddler to sign a FEMS-33 contract and keeps a log of each appliance that is accepted without refrigerant. Ms. Szymanski inspects each load for appliances and sends away appliances with cut lines from first-time customers. Appliances with cut lines are accepted from customers who already have accounts with Green Bay as long as the customer fills out another FEMS-33 contract.

EPA inspectors next observed the sorting area for appliances, which was sectioned off with cinder blocks. Mr. Crowe explained that the area labeled “Acceptable Appliances” is used to store any appliances that contain refrigerant that will be picked up by the refrigerant removal company, and also stores appliances without refrigerant where the customer couldn’t provide any documentation of proper recovery. EPA inspectors observed at least one fridge with cut lines in this bin, as seen in Image Numbers 7 and 9.

Lastly, EPA inspectors observed the refrigerant recovery system for vehicles, turning the machine on to ensure it was in operation, and then observed the shredder. The shredder was in operation at the time of the tour, with the belt scale reading 103 tons/hr. Mr. Crowe shared that the maximum speed is 130 tons/hr, and that the new shredder has an 80-inch mill, while the old shredder had a 74-inch mill. Visible emissions were observed coming out of the mill.

After completing the tour and closing conference, EPA inspectors noticed Alter signage at the entrance of Gate 1 that listed materials that the facility does not accept, seen in Image Number 11. The sign claimed that the facility does not accept refrigerants, listing “Freeon/Substitutes (e.g. R-134a), Cars, Compressors, Air Conditioners.”

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

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

**RECORDS REVIEW**

1. Sample blank FEMS-33 contracts and FEMS-02 forms
2. FEMS-33 contracts for peddlers at Gate 3
3. Gate 3 Rejection Log

## CLOSING CONFERENCE

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

### **Requested documents:**

- All FEMS-33 and FEMS-02 documents signed on June 17<sup>th</sup> and the previous 4 business days in 2021 and 2020
- All FEMS-33 and FEMS-02 documents signed on June 17<sup>th</sup> – June 22<sup>nd</sup>, 2019
- Previous three manifests for refrigerant disposal
- Previous two semi-annual fluff tests
- Alter Milwaukee shredder performance test
- Records demonstrating tons of materials shredder in previous year (provided on-site)

**Concerns:** EPA inspectors expressed concerns about the refrigerator found with cut lines in the “Acceptable Appliances” bin.

## SIGNATURES

**X Emma Leeds** Digitally signed by Emma Leeds  
Date: 2021.08.06 11:56:23 -05'00'

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Emma Leeds  
Report Author

**X NATHAN FRANK** Digitally signed by NATHAN FRANK  
Date: 2021.08.10 12:44:17 -05'00'

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Nathan Frank  
Section Chief

**Facility Name:** Alter Trading Corporation – Green Bay Scrap Yard

**Facility Location:** 2175 Badgerland Drive, Green Bay, WI

**Date of Inspection:** June 17, 2021

**APPENDICES AND ATTACHMENTS**

1. Appendix A: Digital Image Log
2. Sample blank FEMS-33 contract
3. Sample blank FEMS-02 form

**Facility Name:** Alter Trading Corporation – Green Bay Scrap Yard

**Facility Location:** 2175 Badgerland Drive, Green Bay, WI

**Date of Inspection:** June 17, 2021

**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Shilpa Patel	<b>2. Archival Record Location:</b>  <a href="https://usepa.sharepoint.com/:f:/r/sites/R5_Work/r5erc/ecad/AECAB%20Library/Enf_Alter%20Metal%20Recycling%20-%20Green%20Bay_WI_21/Enf_Alter%20Metal%20Recycling%20-%20Green%20Bay_WI_21_InspRep/Photos?csf=1&amp;web=1&amp;e=WSwzFs">https://usepa.sharepoint.com/:f:/r/sites/R5_Work/r5erc/ecad/AECAB%20Library/Enf_Alter%20Metal%20Recycling%20-%20Green%20Bay_WI_21/Enf_Alter%20Metal%20Recycling%20-%20Green%20Bay_WI_21_InspRep/Photos?csf=1&amp;web=1&amp;e=WSwzFs</a>
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<b>Image Number</b>	<b>File Name</b>	<b>Date and Time (CT)</b>	<b>Latitude and Longitude</b>	<b>Description of Image</b>
1	P6170001.JPG	6/17/21, 10:50 AM		Example FEMS-33 #1
2	P6170002.JPG	6/17/21, 10:50 AM		Example FEMS-33 #2
3	P6170003.JPG	6/17/21, 10:50 AM		Example FEMS-33 #3
4	P6170004.JPG	6/17/21, 10:51 AM		Example FEMS-33 #4
5	P6170005.JPG	6/17/21, 10:51 AM		Example CFC Removal License
6	IMG_3960.jpg	6/17/21, 10:51 AM		Gate 3 Rejection Log
7	IMG_3961.jpg	6/17/21, 10:56 AM		Cut lines on refrigerator
8	IMG_3962.jpg	6/17/21, 10:57 AM		Refrigerant circuitry on refrigerator
9	IMG_3963.jpg	6/17/21, 10:58 AM		Cut lines on refrigerator
10	IMG_3964.jpg	6/17/21, 11:06 AM		Full MVAC refrigerant cylinders
11	IMG_3965.jpg	6/17/21, 11:47 AM		Signage at front of facility