



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

**DATE:** NOV 15 2018

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Alter Metal Recycling, Eau Claire, Wisconsin

**FROM:** Scott Connolly, Environmental Engineer  
AECAB (IL/IN)

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

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Alter Metal Recycling

**Facility Location:** 3532 White Ave, Eau Claire, Wisconsin 54703

**Date of Inspection:** October 23, 2018

**EPA Inspectors:**

1. Scott Connolly, Environmental Engineer
2. Jason Schenandoah, Environmental Engineer

**Other Attendees**

1. Greg O'Leary, Regional Director of Operations, Alter Metal Recycling
2. Steve Nockerts, Facility Manager, Alter Metal Recycling
3. Jay Hasart, Operations Supervisor, Alter Metal Recycling
4. Kyle Erikson, Non-Ferrous Facility Manager, Alter Metal Recycling
5. Darren Engbring, Regional Environmental Manager, Alter Metal Recycling (phone)

**Contact Email Address:** Darren.engbring@altertrading.com

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

**Facility Type:** Metal Shredding and Recycling Facility

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

**Arrival Time:** 4:00 pm

**Departure Time:** 5:20 pm

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from inspection attendees unless otherwise noted.

**Process Description:**

The facility purchases processes scrap metal received by truck from feeder yards, industrial clients and from the general public. Scrap inspectors check the incoming metal items for non-conforming material during unloading into scrap piles, depending on material and available space. Then the shredder processes the piles postconsumer ferrous and non-ferrous scrap, industrial scrap, and vehicles. Cranes load scrap metal onto a conveyor, which feeds the metal into the hammermill shredder. The hammermill is equipped with an automatic water injection system, which sprays water into the shredder to reduce dust and to cool the metal. Shredded metal exits the shredder and is fed through a magnetic separator, which separates non-magnetics from ferrous metal. Fluff, including non-ferrous metals are collected and processed in the non-ferrous separation downstream to remove non-metallic components.

**Staff Interview:** Facility staff stated that suppliers bringing appliances and vehicles to the facility must sign a "Material Supplier Certification" contract prior to acceptance by Alter Metal Recycling. The facility typically recovers refrigerants from vehicles and appliances but Alter Metal Recycling will not pay suppliers for items that contain refrigerants. The facility operates a 4000-horsepower electric hammermill shredder that process about 30-40% vehicles.

**TOUR INFORMATION**

**EPA toured the facility:** Yes

**Data Collected and Observations:**

At least one intact air conditioner appliance was observed in the scrap pile. Several other appliances were observed that had not evidence of proper recovery. Appliances appeared to be from a roll of container that may have come from a feeder yard and facility staff confirmed this observation. In the refrigerant reclamation area, the facility separates refrigerants into R134a,

R12 and R22 containers. Several intact appliances were located in the reclamation area, ready for refrigerant recovery.

**Photos:** were taken during the inspection.

A photo log is attached in Appendix A.

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

#### CLOSING CONFERENCE

**Requested documents:**

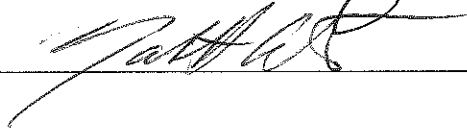
- Material Supplier Certification Contract (1 copy obtained)
- United Refrigeration Refrigerant Disposal Receipts from May, July and August 2018 (1 copy obtained)

**Compliance Assistance:** Alter Trading was informed that several appliances were accepted but showed evidence that proper recovery had not occurred.

**Concerns:** Several evacuated appliances had evidence that proper recovery did not occur, indicating that verification of proper recovery may not be occurring and the presence of intact appliances in the scrap pile indicates that venting of refrigerants is likely occurring during the disposal process.

#### SIGNATURES

Report Author:  Date: 11/5/2018

Section Chief:  Date: 11/15/18

**Facility Name:** Alter Metal Recycling

**Facility Location:** 3532 White Ave, Eau Claire, Wisconsin

**Date of Inspection:** October 23, 2018

**APPENDICES AND ATTACHMENTS**

*I.* Appendix A: Digital Image Log

**Facility Name:** Alter Metal Recycling  
**Facility Location:** 3532 White Ave, Eau Claire, Wisconsin  
**Date of Inspection:** October 23, 2018

**APPENDIX A: DIGITAL IMAGE LOG**

|                                                           |                                                                                                                                                           |
|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Inspector Name:</b><br>Scott Connolly               | <b>2. Date of Inspection:</b><br>October 23, 2018                                                                                                         |
| <b>3. Company/Facility Name:</b><br>Alter Metal Recycling | <b>4. Street Address, City, State:</b><br>3532 White Ave, Eau Claire, Wisconsin                                                                           |
| <b>5. Number of Images:</b><br>9                          | <b>6. Archival Record Location:</b><br>Photos are located on the attached CD labelled "Alter Metal Recycling Eau Claire, WI Inspection Photos 10/23/2018" |

| Image Number | File Name    | Date and Time    | Latitude and Longitude | Description of Image                                                                                                 |
|--------------|--------------|------------------|------------------------|----------------------------------------------------------------------------------------------------------------------|
| 1            | PA230012.JPG | 10/23/2018 16:23 | 44.835,<br>91.474444   | Non-accepted materials sign at scale house                                                                           |
| 2            | PA230013.JPG | 10/23/2018 16:27 | 44.835,<br>91.474444   | Intact air conditioning unit found in the scrap pile.                                                                |
| 3            | PA230014.JPG | 10/23/2018 16:31 | 44.835,<br>91.474444   | Shredder, infeed and outfeed conveyors.                                                                              |
| 4            | PA230015.JPG | 10/23/2018 16:34 | 44.835,<br>91.474444   | Partially crushed freezer unit refrigeration lines that appeared broken and had no evidence of refrigerant recovery. |
| 5            | PA230016.JPG | 10/23/2018 16:36 | 44.835,<br>91.474444   | Refrigerator with cut lines located in the scrap pile                                                                |
| 6            | PA230017.JPG | 10/23/2018 16:39 | 44.835,<br>91.474444   | Car depollution rack                                                                                                 |
| 7            | PA230018.JPG | 10/23/2018 16:39 | 44.835,<br>91.474444   | Refrigerant recovery equipment located at the car depollution area.                                                  |
| 8            | PA230019.JPG | 10/23/2018 16:44 | 44.835,<br>91.474444   | Appliance refrigerant recovery area                                                                                  |
| 9            | PA230020.JPG | 10/23/2018 16:46 | 44.835,<br>91.474444   | Refrigerant tanks next to refrigerant recovery area                                                                  |

