



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

DATE: APR 15 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Cohen Recycling – West Carrollton, Miamisburg, Ohio

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

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

TO: File

BASIC INFORMATION

Facility Name: Cohen Recycling – West Carrollton

Facility Location: 5101 Farmersville-West Carrollton Road, Miamisburg, Ohio

Date of Inspection: March 18, 2019

EPA Inspector(s):

1. Natalie Topinka, Environmental Scientist
2. Scott Connolly, Environmental Engineer

Other Attendees

1. Kyle Dean, District Operations Manager, Cohen

Contact Email Address: jdedario@cohenusa.com, kdean@cohenusa.com

Purpose of Inspection: Assess compliance with the safe disposal regulations for protection of stratospheric ozone

Facility Type: scrap metal recycler

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

Arrival Time: 11:20 am

Departure Time: 12:20 pm

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Cohen representatives unless otherwise noted.

Process Description:

Cohen Recycling – West Carrollton accepts ferrous and non-ferrous metals for recycling from the general public and from commercial accounts. The facility accepts small appliances and vehicles daily. Car processing began at the West Carrollton location approximately 9 months ago, which includes refrigerant recovery. The facility has a shredder, which is a Texas Shredder manufactured by Metso. The shredder is rated at 3000 HP with a capacity of approximately 400-500 tons net ferrous output. Cohen operates the shredder typically 7-8 hours per day. The shredder is not equipped with emissions capture or controls. Downstream material sorting occurs at another facility.

Staff Interview: Mr. Dean estimated that 30-50% of the shredder feed is vehicles, about 100 per day. Items including batteries, lead wheel weights, mercury switches, tires, gas tanks, antifreeze, oil, transmission fluid, catalytic converters, and air conditioning refrigerant were removed from the vehicles prior to shredding. Mr. Dean stated that the facility has not yet had to send a full cylinder of recovered refrigerant offsite for reclamation or disposal. To date, Cohen does not require documentation regarding the fate of the refrigerant contained in a small appliance delivered to the facility.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations: The shredder was not operating at the time of our inspection. We observed crushed vehicles awaiting shredding and appliances on the scrap pile. We were not able to get close enough to the appliances to determine what type they were.

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

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Compliance Assistance: We gave an overview of the regulatory requirements and compliance options in 40 C.F.R. Part 82, Subpart F

Concerns: Cohen should put in place a refrigerant recovery and verification program for small appliances. At our earlier visit to Cohen's Hamilton facility, we discussed the pending company-wide policy regarding the inspection, documentation, and handling of scrap that contains or once contained refrigerants.

SIGNATURES

Report Author: Natalie M. Perri Date: 4/11/17

Section Chief: Mathieu K. Date: 4/15/17

Facility Name: Cohen Recycling – West Carrollton

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APPENDICES AND ATTACHMENTS

1. Digital Image Log
2. Digital Images attached on CD

Facility Name: Cohen Recycling – West Carrollton

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Scott Connolly	2. Date(s) of Inspection: March 18, 2019
3. Company/Facility Name: Cohen Recycling – West Carrollton	4. Street Address, City, State: 5101 Farmersville-West Carrollton Road, Miamisburg, Ohio
5. Number of Images: 4	6. Archival Record Location: CD-R labeled as Cohen – West Carrollton Inspection photos, March 18, 2019

Image Number	File Name	Date and Time (CST)	Description of Image
1	RIMG0008.JPG	3/18/2019 10:42	Facility front entrance
2	RIMG0009.JPG	3/18/2019 10:47	Ferrous scrap pile with shredder in background
3	RIMG0010.JPG	3/18/2019 10:52	Refrigerant recovery equipment used on vehicles
4	RIMG0011.JPG	3/18/2019 10:53	Crushed vehicles awaiting shredding