



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

DATE: *July 27, 2021*

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Alter Metal Recycling, Cedar Rapids, Iowa

FROM: Natalie Schulz, Environmental Engineer
AECAB (MN/OH)

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

TO: File

BASIC INFORMATION

Facility Name: Alter Metal Recycling – Cedar Rapids

Facility Location: 6305 11th Street SW, Cedar Rapids, Iowa

Date of Inspection: 6/23/2021

EPA Inspector(s):

1. Natalie Schulz, Environmental Engineer
2. Natalie Topinka, Environmental Scientist

Other Attendees:

1. Michael Loeffelholz (via phone), Facility Manager
2. Patrick Kohlmeier (via phone), Regional Environmental Tech
3. Cale Sponsler (via phone), Regional Director of Operations
4. Fred Reiners

Contact Email Address: patrick.kohlmeier@altertrading.com

Purpose of Inspection: Determine compliance with the safe disposal of appliances regulations at 40 C.F.R. Part 82, Subpart F.

Facility Type: Scrap Metal Recycling Yard

Regulations Central to Inspection: 40 C.F.R. Part 82 Subpart F, Recycling and Emissions Reduction for the Protection of Stratospheric Ozone

Arrival Time: 2:40 p.m. CST

Departure Time: 4:00 p.m. CST

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 Michael Loeffelholz, Patrick Kohlmeier, Cale Sponsler, and Fred Reiners unless otherwise noted.

Company Ownership: Alter Metal Recycling is owned by Alter Trading Corporation.

Process Description:

Alter Metal Recycling – Cedar Rapids (the facility) accepts ferrous and non-ferrous metals for recycling from the public and commercial suppliers. The facility does not recover refrigerant from small appliances; the facility does not accept small appliances from the public, only from Iowa DNR-certified demanufacturers. The facility does accept vehicles from both the public and commercial suppliers for demanufacturing and recycling.

Staff Interview: The facility has approximately 9 employees; one staff member is responsible for refrigerant recovery. The staff is trained on proper appliance handling using videos and written materials developed by Alter. After the vehicle has had other fluids and components removed for the demanufacturing process and the vehicle has been determined to contain refrigerant, the vehicle is transported to the refrigerant recovery area. Recovered refrigerant is stored in a 100-pound tank. The vehicle is then moved to the shredder feed pile.

Any individual customer delivering a small appliance will be informed that the facility does not accept from the public small appliances that have not been previously demanufactured; they are directed to a nearby demanufacturer. A rejection log is kept at the weigh scale for these rejected small appliances. Alter does have a one-time verification statement for individuals delivering small appliances that have been previously demanufactured, but this circumstance is rarely encountered, if ever. For commercial suppliers delivering previously demanufactured appliances that do not have a Material Supplier Certification form on file with Alter, the facility will not

purchase small appliances from them until their Iowa DNR certification is verified and put on record with Alter and the supplier signs a Material Supplier Certification form. New suppliers are informed of acceptable and prohibited materials.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

Inspectors viewed the refrigerant recovery area in the facility's garage; recovery equipment for vehicles was observed. Inspectors also viewed the car processing rack, which was separate from the refrigerant recovery area. The car processing rack was located outside on a small concrete pad.

Inspectors viewed signage by the weigh scale, near the entrance to the facility. The signage stated unacceptable materials.

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

A photo log is contained in Appendix A.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

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

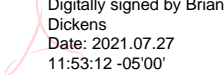
Requested documents:

- Records of any refrigerant recovered from vehicles and/or small appliances and sent to another company for reclamation for the past three years.
- Records of motor vehicles accepted for recycling submitted to NMVTIS for the month of May 2021.
- Sample copy of the "Individual Certification Form" that would be used if an individual customer wished to deliver an appliance that had previously been through a certified Demanufacturing process.
- A copy of the training materials that employees use when getting trained on the small appliance and/or vehicle demanufacturing process and the identification of non-conforming materials.

Concerns: Inspectors discussed the “Prohibited Materials” signage and its language, specifically that listing “refrigerants” on the sign may mislead customers to think they should vent the refrigerant in appliances before bringing them to the scrap yard in order for them to be accepted. The facility does not accept small appliances from the public regardless of if the small appliance contains refrigerant, but the facility does perform refrigerant recovery on cars that contain refrigerant. We suggested clarifying Alter’s signage to better communicate the small appliance and MVAC policies.

DIGITAL SIGNATURES

Report Author: NATALIE SCHULZ  Digitally signed by NATALIE SCHULZ
Date: 2021.07.27 11:44:33 -05'00'

Section Chief: Brian Dickens  Digitally signed by Brian Dickens
Date: 2021.07.27 11:53:12 -05'00'

Facility Name: Alter Metal Recycling – Cedar Rapids
Facility Location: 6305 11th Street SW, Cedar Rapids, Iowa 52404
Date of Inspection: June 23, 2021

APPENDICES AND ATTACHMENTS

- 1.* Photo Log

Facility Name: Alter Metal Recycling – Cedar Rapids
Facility Location: 6305 11th Street SW, Cedar Rapids, Iowa 52404
Date of Inspection: June 23, 2021

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Natalie Topinka	2. Archival Record Location: C:\Users\nschulz\Environmental Protection Agency (EPA)\Topinka, Natalie - Cedar Rapids
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_0906.JPG	3:41 p.m. CST, 6/23/2021	Prohibited Materials signage
2	IMG_0907.JPG	3:45 p.m. CST, 6/23/2021	Recovery Equipment
3	IMG_0908.JPG	3:49 p.m. CST, 6/23/2021	Scrap pile
4	IMG_0909.JPG	3:50 p.m. CST, 6/23/2021	Scrap pile
5	IMG_0910.JPG	3:52 p.m. CST, 6/23/2021	Car processing rack