

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

DATE: MAR 15 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Tradewater Refrigerant Services, Elk Grove Village, Illinois

FROM: Charles Hall, Environmental Engineer *C. Hall*
AECAB (MN/OH)

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

TO: File, Tradewater Refrigerant Services, Elk Grove Village, Illinois

BASIC INFORMATION

Facility Name: Tradewater Refrigerant Services

Facility Location: 650 Morse Avenue, Elk Grove Village, Illinois

Date of Inspection: 08 March 2019

EPA Inspector(s):

1. Charles Hall, Environmental Engineer
2. Natalie Topinka, Environmental Scientist

Other Attendees:

1. Kameron Perry, Process Technician
2. Gabriel Plotkin, Chief Operating Officer by telephone during closing conference
3. Kevin Schwartzberg, Director of Engineering by telephone during closing conference

Purpose of Inspection: chlorofluorocarbon reclaimer

Facility Type: chlorofluorocarbon reclaimer

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

Arrival Time: 08:40 a.m. CST

Departure Time: 09:55 a.m. CST

Inspection Type:

- ☒ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from **ATTENDEE(S)**, unless otherwise noted.

Process Description:

Tradewater receives refrigerants including R-11, R-12, and R-134A in containers that range in capacity from 12 ounces to 1,000 pounds. The number and type of containers received is verified against the number and type of containers expected. The containers are added to Tradewater's inventory and placed in the appropriate storage area. A technician tests the refrigerants with an analyzer to make a preliminary assessment of the refrigerant type and purity. Refrigerant is filtered to remove particulate matter and moisture (water) and consolidated into larger containers including 1,000-pound cylinders, 10,000-pound bulk tanks, and 35,000-pound ISO tanks.

Tradewater samples the refrigerant and has it analyzed by an Air-Conditioning, Heating, and Refrigeration Institute (AHRI) -certified laboratory to determine its purity. Depending on the results of the analysis, Tradewater may further process the refrigerant by distillation, filtration, or use of a desiccant bed. Currently, Tradewater ships the refrigerant in 35,000-pound ISO tanks to a third-party-facility for destruction. In the future, Tradewater may also reclaim refrigerant to AHRI-700 specifications and offer it for sale.

TOUR INFORMATION

EPA toured the facility: Yes

Photos were taken during this inspection. **Videos** were not taken during this inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Requested Documents: The inspectors requested:

- A process flow diagram; and
- The potential to emit calculations for the Plasma Enhanced Melter

Compliance Assistance: The inspectors did not provide any compliance assistance.

Concerns: During the closing conference, the inspectors stated that they did not identify any concerns.

SIGNATURES

Lead Inspector: Charlie Hall Date: 13 March 2019

Section Chief: Brian DeLuca Date: 3/15/19

Appendix A: Log of Photographs

Photograph Number	Date and Time	Description
RIMG0001.jpg	03/22/2019 09:00 a.m.	Storage area for cylinders
RIMG0002.jpg	03/22/2019 09:02 a.m.	Large cylinder unloading area. Receiving Dock in background
RIMG0003.jpg	03/22/2019 09:04 a.m.	Analyzer
RIMG0004.jpg	03/22/2019 09:06 a.m.	Small cylinder and container unloading rack
RIMG0005.jpg	03/22/2019 09:17 a.m.	Waste drum storage area
RIMG0006.jpg	03/22/2019 09:20 a.m.	Plasma Enhanced Melter
RIMG0007.jpg	03/22/2019 09:20 a.m.	Consolidation cylinders
RIMG0008.jpg	03/22/2019 09:21 a.m.	Wet scrubber for Plasma Enhanced Melter

CONFIDENTIAL BUSINESS INFORMATION SECTION

Facility Name: Tradewater Refrigerant Services

Facility Location: 650 Morse Avenue, Elk Grove Village, Illinois

Date of Inspection: 08 March 2019

Photograph of Plasma Enhanced Melter taken on 03/22/2019 at 09:20 a.m.

Photograph of Consolidation cylinders taken on 03/22/2019 at 09:20 a.m.

Photograph of Wet scrubber for Plasma Enhanced Melter taken on 03/22/2019 at 09:21 a.m.

