



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

DATE: *August 11, 2021*

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Alter Metal Recycling, Racine, WI

FROM: Tess Russell, Environmental Engineer
AECAB (MN/OH)

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

TO: File

BASIC INFORMATION

Facility Name: Alter Metal Recycling

Facility Location: 1339 17th Street, Racine, WI 53403

Date of Inspection: 06/18/2021

EPA Inspector(s):

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

Other Attendees:

1. Damon Hassell, Facility Manager
2. Darren Engbring, Regional Environmental Director (by phone)

Contact Email Address: Damon.Hassell@altertrading.com

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

Facility Type: Scrap metal recycler

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

Arrival Time: 9:30 AM

Departure Time: 12:00 PM

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 Damon Hassell and/or Darren Engbring unless otherwise noted.

Process Description:

Alter Metal Recycling (Racine) accepts ferrous and non-ferrous metals for recycling from members of the general public and commercial suppliers in the form of white goods/appliances and cars. On-site recovery equipment for both white goods/appliances and motor vehicle air conditioning (MVAC) units is used to properly recover any materials accepted that still contain refrigerant. A third-party company, Refrigerant Recovery, Inc., is contracted to occasionally assist the facility with large loads of on-site refrigerant recovery.

Staff Interview:

The Alter Metal Recycling facility in Racine, WI has 7 employees. The employees go through training to ensure proper inspections are conducted when materials arrive on-site and unacceptable materials are rejected. Alter accepts white goods/appliances without refrigerant from those who have a contract with the scrapyards. Alter accepts white goods/appliances with refrigerant when the customer is not under contract and the lines have not been tampered. The facility will automatically reject any cut lines, or reject materials from entities not under contract with the scrapyards that arrive without refrigerant. While the scrapyards have the choice of accepting material without refrigerant if the uncontracted entity or peddler can sign a verification statement verifying proper recovery, it is a rare occurrence for the facility to utilize such one-time, per-load, verification statements. The facility has done it only once before and did so only after contacting the recoverer directly. Overall, the facility accepts more “processed” or properly recovered material from contracted entities than “unprocessed” material. The facility accepts approximately 10 cars per day under contract.

While Alter will accept white goods/appliances and cars containing refrigerant with no signs of being tampered with, the facility does not compensate the customer for these materials.

There is no shredder, crusher, torch cutter, or baler at the facility.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA viewed the scrap pile containing recovered white goods/appliances in which appliances that had the refrigerant recovered before arriving at the facility were marked with a “D,” and those with refrigerant recovered on-site were marked with an “A”. EPA viewed the drop-off area for cars. EPA viewed the area designated for intact materials containing refrigerant, along with the equipment used to recover the refrigerant. EPA viewed the signage posted at the entrance to the facility near the weigh station, which indicates to customers what materials are not accepted.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. On-site Appliance Refrigerant Evacuation Record (copies obtained)
2. Daily Vehicle Dismantling Log (copies obtained)
3. Material Rejection Log (copy obtained)
4. CFC Spot Check (copy obtained)
5. Material Supplier Certification, FEMS 33 (examples obtained)
6. Refrigerant Scrap Management Program (copy obtained)
7. Summary of Proposed Changes to Refrigerant Scrap Management Program (copy obtained)
8. Receipt from Refrigerant Recovery, Inc. (copy obtained)

CLOSING CONFERENCE

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

Concerns: The inspectors did not identify any areas of concern.

SIGNATURES

X TESS
RUSSELL

Digitally signed by TESS
RUSSELL
Date: 2021.08.11 11:49:13
-05'00'

Tess Russell
Report Author

X Brian Dickens

Digitally signed by Brian
Dickens
Date: 2021.08.11 12:42:09
-05'00'

Brian Dickens
Section Chief

Facility Name: Alter Metal Recycling
Facility Location: 1339 17th Street, Racine, WI 53403
Date of Inspection: June 18, 2021

APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log

Facility Name: Alter Metal Recycling
Facility Location: 1339 17th Street, Racine, WI 53403
Date of Inspection: June 18, 2021

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Emma Leeds	2. Archival Record Location: <i>C:\Users\trussell\OneDrive - Environmental Protection Agency (EPA)\Alter Metals\Inspections\Racine\Inspection Photos</i>
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	P6180006.JPG	Friday, June 18, 2021, 11:11:18 AM		Customers notification about CFC removal
2	P6180007.JPG	Friday, June 18, 2021, 11:11:44 AM		Customers/Haulers/Contractors/Visitors sign
3	P6180008.JPG	Friday, June 18, 2021, 11:11:58 AM		Prohibited Materials sign
4	P6180009.JPG	Friday, June 18, 2021, 11:29:58 AM		Refrigerator in pile with "A"
5	P6180010.JPG	Friday, June 18, 2021, 11:30:54 AM		Refrigerator in pile with "D"
6	P6180011.JPG	Friday, June 18, 2021, 11:37:24 AM		Recovery Equipment