



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

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Alter Trading Corp., South Beloit, Illinois

**FROM:** Sasha Letuchy  
AECAB (MI/WI)

**THRU:** Sarah Marshall, Section Supervisor  
AECAB (MI/WI)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Alter Trading Corp.

**Facility Location:** 201 South Wheeler Avenue, South Beloit, Illinois

**Date of Inspection:** July 18, 2022

**EPA Inspector(s):**

1. Sasha Letuchy, Environmental Engineer
2. Emma Leeds, Environmental Engineer

**Other Attendees:**

1. Patrick Kohlmeier, Regional Environmental Technician
2. Alex Bilse, Regional Director of Operations
3. Isaac Fry, Facility Manager
4. Warren Galyon, Assistance Facility Manager

**Contact Email Address:** Patrick.Kohlmeier@altertrading.com

**Purpose of Inspection:** Evaluate compliance with the Illinois State Implementation Plan and the Clean Air Act permits and investigate odor complaint.

**Facility Type:** Scrapyard with shredder

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

**Arrival Time:** 11:15 am  
**Departure Time:** 2:48 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.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Patrick Kohlmeier, Regional Environmental Technician; Alex Bilse, Regional Director of Operations; and Isaac Fry, Facility Manager unless otherwise noted.

**Process Description:**

Alter Trading Corp. (Alter) operates a hammermill shredder and z-box (metal separator system) at this South Beloit location. Scrap arrives onsite at the truck scale and is either hand unloaded (small load) and unloaded by crane (commercial load). Materials are visually inspected and stored in piles. Then the material is loaded into a feed chute which feeds a 2,500 horsepower hammermill shredder, installed initially in 1968, but recently rebuilt. The shredder throughput is appropriately 100 tons per hour, producing 50 – 60 tons per hour of ferrous material. Once the material is processed at the shredder, the co-mingled material consisting of ferrous metal, non-ferrous metal, and landfill waste is separated at the z-box separator which uses a magnetic drum shaker to separate out the ferrous and nonferrous metal and uses a cyclone to separate out light material, such as dirt and plastic.

The particulate matter emission control at the shredder consists of a smart water injection system which is linked to the hammermill horsepower. There are no particulate matter emission controls at the z-box. The cyclone system is self-contained and does not have an exhaust. There are no volatile organic compound emission controls at the facility.

**Staff Interview:**

Alter visually inspects the material coming into the facility to identify any units that contain refrigerants. The facility only buys “intact” appliances without cut lines from peddlers and requires commercial suppliers to maintain a material supplier certification which states that all appliances must be properly de-manufactured. De-manufactured units are free of refrigerants, gas tanks, and mercury switches. Alter operates equipment onsite to remove refrigerants from intact appliances brought in by peddlers but limits the number of refrigerators to one per load.

Alter only accepts vehicles with the refrigerant previously recovered and does not have the ability to recover vehicle refrigerant on-site. The facility estimates that of the material that it shreds, approximately 30% is automobiles and 5% is appliances. The percentage varies from day to day.

### **TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

**Data Collected and Observations:**

The shredder was not operating during the inspection. As detailed above, there is no capture system at the shredder. The shredder does not have an infeed conveyor; instead, materials are loaded straight into the feed chute.

Inspectors observed the appliance refrigerant recovery station. Refrigerant is recovered into different tanks based on the type of refrigerant.

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

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

### **CLOSING CONFERENCE**

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

**Requested documents:**

EPA requested the following documents during the inspection and followed up with an email summarizing the request on July 19, 2022.

- Shredder construction permit
- Previous 10 material certification statements
- Previous 10 FEMS-02 verification statements
- Material acceptance flow chart
- 2020 and 2021 Air Emission Reports and the supporting calculations (in Excel format if possible)

**Concerns:** EPA indicated that it is concerned with volatile organic compound emissions from shredders.

## **DIGITAL SIGNATURES**

Report Author: **ALEXANDR A LETUCHY** Digitally signed by  
ALEXANDRA LETUCHY  
Date: 2022.09.08  
11:55:30 -05'00'

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Section Supervisor: **SARAH MARSHALL** Digitally signed by  
SARAH MARSHALL  
Date: 2022.09.08  
13:16:38 -05'00'

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**Facility Name:** Alter Trading Corp.

**Facility Location:** 201 South Wheeler Avenue, South Beloit, Illinois

**Date of Inspection:** July 18, 2022

**APPENDICES AND ATTACHMENTS**

- 1.* Appendix A: Digital Image Log

**Facility Name:** Alter South Beloit

**Facility Location:** 201 South Wheeler Avenue, South Beloit, Illinois

**Date of Inspection:** July 18, 2022

**APPENDIX A: DIGITAL IMAGE LOG**

|                                         |                                                                              |
|-----------------------------------------|------------------------------------------------------------------------------|
| <b>1. Inspector Name:</b> Sasha Letuchy | <b>2. Archival Record Location:</b> EPA Region 5<br>Electronic Record Center |
|-----------------------------------------|------------------------------------------------------------------------------|

| <b>Image Number</b> | <b>File Name</b> | <b>Date and Time (incl. Time zone and DST)</b> | <b>Latitude and Longitude</b> | <b>Description of Image</b>           |
|---------------------|------------------|------------------------------------------------|-------------------------------|---------------------------------------|
| 1                   | IMG_0074         | 7/18/22, 2:05 PM                               |                               | Shredder                              |
| 2                   | IMG_0075         | 7/18/22, 2:06 PM                               |                               | Appliances with refrigerant recovered |
| 3                   | IMG_0076         | 7/18/22, 2:18 PM                               |                               | Refrigerant recovery station          |