



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
RIMCO, Inc. St. Louis, Missouri

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

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

TO: File

BASIC INFORMATION

Facility Name: RIMCO, Inc.

Facility Location: 101 Bremen Avenue, St. Louis, Missouri

Date of Inspection: September 21, 2023

EPA Inspector(s):

1. Natalie Topinka, Environmental Scientist
2. Karina Kuc, Environmental Scientist
3. Tess Russell, Environmental Engineer

Other Attendees:

1. Adam Gubin, Owner
2. Andy Gubin, President

Contact Email Address: adam@rimcoscrap.com

Purpose of Inspection: assess compliance with refrigerant safe disposal regulations

Facility Type: scrap metal recycler

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

Arrival Time: 8:40 am

Departure Time: 9:40 am

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet – provided via email with inspection report
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Adam and Andy Gubin unless otherwise noted.

Process Description:

RIMCO operates the single St. Louis location with about 21-22 employees. The business accepts ferrous and non-ferrous scrap metals for recycling from members of the general public and commercial accounts. RIMCO accepts small appliances but vehicles are not really part of their business model. On occasion they will accept a vehicle hulk.

Staff Interview: Most of the scrap received from commercial accounts is industrial scrap which typically does not include appliances. Other scrap yards or accounts such as an HVAC contractor may have appliances in their materials but the majority of appliances received come from the general public. Adam Gubin estimated appliances are accepted on a weekly basis at least, and stated that in order for RIMCO to accept the small appliance, the sealed unit (compressor) must be removed. RIMCO does not (and has never) recovered refrigerant from intact appliances and does not require its customers to sign any type of documentation attesting to the recovery of refrigerant from small appliances delivered for recycling at the time of the transaction, nor does it require commercial customers to enter into contracts stating that the seller will recover refrigerant from items or verify proper recovery prior to delivery of materials. Customers are notified of RIMCO's small appliance acceptance policy via phone when they call to ask about it or about pricing.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

RIMCO's property is divided into two parcels with Bremen Avenue in between. The area south of Bremen Avenue includes the weigh scale and the drop-off area for members of the general public. The area north of Bremen Avenue includes the offices and non-ferrous processing warehouse and the industrial customer scrap area.

Signage at the scale entrance includes the statements “Materials we do not accept...Appliances or air conditioners that contain freon...” We observed the scrap pile on the south side of Bremen Avenue, which contained numerous small appliances. At least two refrigerators in this pile had the compressor still attached. Off to the side of the scrap pile was a large dumpster containing what appeared to be a large number of window air conditioning units and some larger air conditioners. Several of the window air conditioning units were still contained in their outer housing. Adam and Andy Gubin explained that scrap in this dumpster was awaiting processing by their employees to separate the non-ferrous materials.

We observed a customer delivering a pickup truck load of scrap that included two small appliances. During our inspection, RIMCO representatives instructed the customer to take back the appliances because they still contained the compressors.

There was at least one window air conditioning unit in the scrap area north of Bremen Avenue. This unit was still enclosed in the outer housing.

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

Compliance Assistance: We gave an overview of the requirements of 40 C.F.R Part 82, Subpart F as they pertain to scrap metal recyclers who accept small appliances. We discussed how RIMCO could recover refrigerant from intact appliances.

Concerns: RIMCO’s practice of requiring customers to deliver scrap with the compressor removed but without requiring documentation of proper refrigerant recovery prior to delivery may inadvertently incentivize customers to vent refrigerant. Items that still retain the compressor or which are still contained in outer housing indicate that RIMCO is not adequately inspecting its incoming materials and some items may potentially still contain refrigerant. RIMCO does not recover refrigerant from intact appliances, nor does it require signed statements or contracts from its customers attesting that the refrigerant had been properly recovered from small appliances prior to delivery of items to RIMCO for recycling. Signage at the weigh scale did not advise customers of the requirements for proper refrigerant recovery.

Facility Name: RIMCO, Inc.
Facility Location: 101 Bremen Avenue, St. Louis, Missouri
Date of Inspection: September 21, 2023

DIGITAL SIGNATURES

Report Author: NATALIE
TOPINKA  Digitally signed by
NATALIE TOPINKA
Date: 2023.09.28
13:35:17 -05'00'

Section Supervisor: NATHAN
FRANK  Digitally signed by
NATHAN FRANK
Date: 2023.09.28
16:57:47 -05'00'

Facility Name: RIMCO, Inc.
Facility Location: 101 Bremen Avenue, St. Louis, Missouri
Date of Inspection: September 21, 2023

APPENDICES AND ATTACHMENTS

1. Digital Image Log

Facility Name: RIMCO, Inc.
Facility Location: 101 Bremen Avenue, St. Louis, Missouri
Date of Inspection: September 21, 2023

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Karina Kuc	2. Archival Record Location: https://usepa.sharepoint.com/sites/R5_Work/r5erc/ecad/AECAB%20Library/Forms/AllItems.aspx?id=%2Fsites%2FR5%5FWork%2Fr5erc%2Fecad%2FAECAB%20Library%2FEnf%5FRIMCO%5FMO%5F23%2FEnf%5FRIMCO%5FMO%5F23%5FInspection%2FRIMCO%20Inspection%20photos&viewid=5f882290%2D049a%2D44b7%2D8ccd%2D595d38b04fcb
--------------------------------------	--

Image Number	File Name	Date and Time (CDT)	Description of Image
1	IMG_1557.JPG	2023:09:21 08:40:55	Facility sign
2	IMG_1558.JPG	2023:09:21 09:03:32	facility prohibited materials sign
3	IMG_1559.JPG	2023:09:21 09:05:28	large dumpster including scrapped air conditioners near scrap pile south of Bremen Avenue
4	IMG_1560.JPG	2023:09:21 09:08:43	refrigerators on scrap pile south of Bremen Avenue
5	IMG_1561.JPG	2023:09:21 09:09:55	refrigerators on scrap pile south of Bremen Avenue
6	IMG_1562.JPG	2023:09:21 09:10:35	refrigerators on scrap pile south of Bremen Avenue
7	IMG_1563.JPG	2023:09:21 09:10:58	refrigerator on scrap pile south of Bremen Avenue
8	IMG_1564.JPG	2023:09:21 09:11:44	large dumpster including scrapped air conditioners near scrap pile south of Bremen Avenue
9	IMG_1565.JPG	2023:09:21 09:12:04	refrigerators on scrap pile south of Bremen Avenue
10	IMG_1566.JPG	2023:09:21 09:14:07	window air conditioner in scrap area north of Bremen Avenue