



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

DATE: NOV 15 2018

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Alter Trading Corporation, Madison, Wisconsin

FROM: Scott Connolly, Environmental Engineer
AECAB (IL/IN)

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

TO: File

BASIC INFORMATION

Facility Name: Alter Trading Corporation

Facility Location: 4400 Sycamore Ave, Madison, Wisconsin

Date of Inspection: October 23, 2018

EPA Inspectors:

1. Scott Connolly, Environmental Engineer
2. Jason Schenandoah, Environmental Engineer

Other Attendees

1. Seth Wood, Operations Manager, Alter Trading Corporation
2. Jamie Wilson, Director of Capital Projects, Alter Trading Corporation
3. John Spigel, Vice President of Operations, Alter Trading Corporation
4. Darren Engbring, Regional Environmental Manager, Alter Trading Corporation
5. Chris Barry, Environmental Technician, Alter Trading Corporation

Contact Email Address: Darren.engbring@altertrading.com

Purpose of Inspection: To determine compliance with the Clean Air Act

Facility Type: Metal Shredding and Recycling Facility.

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

Arrival Time: 10:30 am

Departure Time: 1:00 pm

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from inspection attendees unless otherwise noted.

Process Description:

The facility purchases processes scrap metal received by truck from feeder yards, industrial clients and from the general public. Scrap inspectors check the incoming metal items for non-conforming material during unloading into scrap piles, depending on material and available space. Then the shredder processes the piles postconsumer ferrous and non-ferrous scrap, industrial scrap, and vehicles. Cranes load scrap metal onto a conveyor, which feeds the metal into the hammermill shredder. The hammermill is equipped with an automatic water injection system, which sprays water into the shredder to reduce dust and to cool the metal. Shredded metal exits the shredder and is fed through a magnetic separator, which separates non-magnetics from ferrous metal. Fluff, including non-ferrous metals are collected and sent to another facility for further processing.

Staff Interview: Facility staff stated that suppliers bringing appliances and vehicles to the facility must sign a "Material Supplier Certification" contract prior to acceptance by Alter Trading. The facility recently started recovering refrigerants from vehicles and has not sent refrigerants to a reclaimer in the past two years. Facility staff stated that the scale operator sometimes directs incoming intact appliances to a local refrigerant recovery company. The facility operates a 4000-horsepower electric hammermill shredder that process about 30% vehicles

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

Several appliances, including several refrigerators and a freezer, were observed in the scrap pile that had no evidence that refrigerants were recovered properly. At least the refrigerators had

evidence that the units still contained refrigerants and two appliances had evidence of improper removal of refrigerants. Smoke and a burning odor were observed originating from the shredder. The facility has four full refrigerant tanks from its vehicle recovery processes.

Photos: were taken during the inspection.

A photo log is attached in Appendix A.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

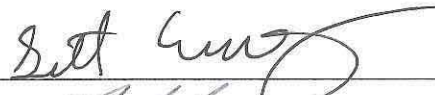
Requested documents:

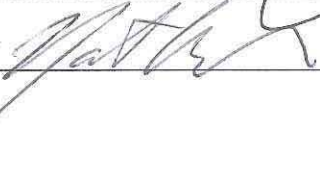
- Material Supplier Certification Contract (1 copy obtained)
- Documentation of Refrigerant Removal verification statement (1 copy obtained)

Compliance Assistance: Alter Trading facility staff were informed that several appliances were accepted but showed evidence that proper recovery had not occurred

Concerns: Several empty appliances had no evidence of recovery, indicating that verification of proper recovery may not be occurring and that venting of refrigerants is likely occurring during the disposal process. The facility's verification statement does not contain all of the required information.

SIGNATURES

Report Author:  Date: 11/5/2018

Section Chief:  Date: 11/15/18

Facility Name: Alter Trading Corporation

Facility Location: 4400 Sycamore Ave, Madison, Wisconsin

Date of Inspection: October 23, 2018

APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log

Facility Name: Alter Trading Corporation
Facility Location: 4400 Sycamore Ave, Madison, Wisconsin
Date of Inspection: October 23, 2018

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Scott Connolly	2. Date of Inspection: October 23, 2018
3. Company/Facility Name: Alter Trading Corporation	4. Street Address, City, State: 4400 Sycamore Ave, Madison, Wisconsin
5. Number of Images: 11	6. Archival Record Location: Photos are located on the attached CD labelled "Alter Trading – Madison Inspection Photos 10/23/18"

Image Number	File Name	Date and Time	Latitude and Longitude	Description of Image
1	PA230001.JPG	10/23/2018 11:34	Data Not Available	CFC Sign next to scale
2	PA230002.JPG	10/23/2018 11:34	Data Not Available	Prohibited Material sign next to scale
3	PA230003.JPG	10/23/2018 11:39	Data Not Available	Cut and removed lines on freezer in scrap pile
4	PA230004.JPG	10/23/2018 11:41	Data Not Available	Mini fridge with cut refrigerant lines
5	PA230005.JPG	10/23/2018 11:42	Data Not Available	Black Intact refrigerant (back panel still bolted on)
6	PA230006.JPG	10/23/2018 11:47	43.114773, -89.306297	White intact refrigerator (back panel still attached)
7	PA230007.JPG	10/23/2018 11:51	43.114722, -89.306111	Vehicle refrigerant recovery equipment
8	PA230008.JPG	10/23/2018 11:51	43.114747, -89.30605	Vehicle depollution station
9	PA230009.JPG	10/23/2018 11:53	43.114785, -89.306033	Shredder infeed conveyor and tower
10	PA230010.JPG	10/23/2018 11:56	43.115556, -89.305556	Smoke exiting the shredder during operations
11	PA230011.JPG	10/23/2018 12:13	43.115278, -89.305833	Shredder out feed and steam cloud