



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

DATE: *August 6, 2021*

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Alter Trading Corporation, Waupaca, WI

FROM: Emma Leeds, Environmental Engineer
AECAB (IL/IN)

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

TO: File

BASIC INFORMATION

Facility Name: Alter Trading Corporation - Waupaca

Facility Location: 2080 Spindt Drive, Waupaca, WI

Date of Inspection: 6/17/2021

EPA Inspector(s):

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

Other Attendees:

1. Mark Derozier, Facility Manager – Alter
2. Darren Endbring, Environmental Health and Safety Manager – Alter (by phone)

Contact Email Address: mark.derozier@altermetalrecycling.com

Purpose of Inspection: To determine compliance with 40 CFR Part 82, Subpart F: Recycling and Emissions Reductions

Facility Type: Scrap metal recycling yard

Regulations Central to Inspection: 40 CFR Part 82, Subpart F

Arrival Time: 2:00 PM CT

Departure Time: 4:15 PM CT

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 Alter Trading Corporation personnel unless otherwise noted.

Process Description:

The Alter Trading Corporation Waupaca facility (Waupaca) predominantly receives material from other Alter facilities and mostly feeds to the nearby Waupaca Foundry. All incoming scrap is received through one gate and is weighed on a scale before being sorted. Some materials are sent through a sorting building where unwanted materials are separated using a vibrating conveyor belt and manual removed.

Approximately 95% of the 15,000 tons of scrap received per month come from other Alter facilities. The remaining 5% of the throughput comes from the public. Some of the scrap received from the public is sent to the Green Bay Alter facility to be shredded. Both ferrous and non-ferrous metals are accepted at the facility, as well as motor vehicles with and without refrigerant, and small appliances without refrigerant. Waupaca has recovery equipment for motor vehicles but not for small appliances

Staff Interview:

The Alter Waupaca facility has 11 employees and operates from 7:00 AM – 3:30 PM Monday – Friday.

Alter Waupaca rejects all small appliances that contain refrigerant, and all small appliances from one-time peddlers regardless of whether refrigerant is present or not. Alter personnel claimed that Waupaca accepts appliances with the refrigerant already removed in two scenarios: if the customer possesses a Wisconsin Department of Natural Resources (WDNR) issued refrigerant recovery certification, or if the customer can provide a completed WDNR “Documentation of Refrigerant Removal – Sample Form,” attached as Appendix B. Alter Waupaca maintains a list entitled “Refrigerant Removal Approved Dealers with Documentation” of customers who have

confirmed their possession of a WDNR-issued refrigerant recovery certification. Once on the list, these customers are not required to sign a new statement every time they bring a new load. Similarly, Alter personnel explained that Waupaca does not require any additional documentation from customers who provide the “Documentation of Refrigerant Removal” form. Upon reviewing Waupaca’s records, EPA inspectors observed that Waupaca also accepts small appliances from customers if the customer sends a refrigerant-related email statement. One customer has also created their own “Equipment Disposal Form” which Waupaca accepts as verification of refrigerant recovery.

Waupaca recently began recording information about the appliances that it rejects from one-time peddlers. If appliances are brought to the facility with cut refrigerant lines, but the customer possesses a WDNR-issued refrigerant recovery certification, Waupaca will accept the appliance.

The Alter Waupaca facility has always accepted motor vehicles with the refrigerant removed prior to delivery to the facility. Alter personnel estimated that approximately 95% of the motor vehicles accepted at Waupaca arrive without refrigerant (about 20 motor vehicles per month), and no documentation is required to verify proper refrigerant recovery. The remaining 5% of vehicles accepted still contain refrigerant, which is recovered by Alter using an on-site refrigerant recovery system.

Motor vehicles still containing refrigerant were first accepted between 2016 and 2017, and on-site refrigerant recovery began in mid-2019. The yard does not currently have anyone trained in properly recovering refrigerant. The only employee trained in refrigerant recovery ended their employment with Alter Waupaca during the week before the EPA inspection. In the past year and a half while Waupaca was still performing refrigerant recovery, less than two tanks of refrigerant were recovered which remain on-site. To date, no refrigerant has been sent away for disposal and no manifest has been initiated with a refrigerant disposal or recovery company. The facility does not keep evacuation records for motor vehicles.

Before refrigerant recovery was performed on-site, the Waupaca facility would either send motor vehicles with refrigerant to the Alter Green Bay facility for refrigerant recovery or contract out the refrigerant recovery process. The refrigerant recovery contractor maintained evacuation records for each motor vehicle they processed.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA inspectors began touring the facility at 3:15 PM with Mr. Derozier. Inspectors observed a pile of car radiators and asked about who supplied the radiators and what Waupaca’s process was for accepting them. Mr. Derozier explained that approximately 7,000 lbs of radiators had been dropped off at the facility in 6 or 7 loads in the past month and a half from a single customer. The customer usually drops off radiators at the Alter Green Bay facility, but Green Bay asked Waupaca to temporarily accept the radiators instead. According to Mr. Derozier, Waupaca did

not receive any refrigerant recovery documentation from the customer, assuming that the Green Bay facility had already received any required paperwork.

EPA inspectors next observed Waupaca's motor vehicle refrigerant recovery system. A generator is required to power the system. EPA inspectors did not turn the generator on but did confirm that the system had the necessary wires and connections to connect to the generator.

Lastly, EPA inspectors viewed the sorting building, which was in operation. Mr. Derozier shared that the sorting building does not have a baghouse or any emissions controls, and emissions vent to the atmosphere.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

EPA inspectors reviewed Waupaca's refrigerant records, which were stored in a file and included:

1. Alter "Per Load Refrigerant Statement" forms
2. "Vehicle AC Evacuation Record" forms, which were last filled out in 2019
3. "Material Rejection Log" form, with only one entry from June 2021
4. An "Equipment Disposal Form" created by one of Waupaca's customers, and corresponding refrigerant recovery work orders
5. Approximately ten "Documentation of Refrigerant Removal" forms from customers
6. Copies of various WDNR-issued refrigerant recovery certifications and Wisconsin Department of Safety and Professional Services-issued HVAC Contractor Registration cards
7. Email correspondence records between Waupaca and customers selling small appliances

CLOSING CONFERENCE

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

Concerns: EPA inspectors explained that the Waupaca facility is required to receive either a signed statement or a contract from any customer who brings motor vehicles with refrigerant already removed, which they are not currently doing. EPA inspectors also expressed concerns about the Waupaca facility not having any documentation for the radiators that are typically delivered to the Green Bay facility and explained that this concern would be further investigated.

SIGNATURES

X Emma Leeds

Digitally signed by Emma
Leeds
Date: 2021.08.06
12:20:05 -05'00'

Emma Leeds
Report Author

NATHAN
X FRANK

Digitally signed by
NATHAN FRANK
Date: 2021.08.10
13:05:41 -05'00'

Nathan Frank
Section Chief

Facility Name: Alter Trading Corporation – Waupaca Scrap Yard

Facility Location: 2080 Spindt Drive, Waupaca, WI

Date of Inspection: June 17, 2021

APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log
2. Appendix B: Documentation of Refrigerant Removal – Sample Form

Facility Name: Alter Trading Corporation – Waupaca Scrap Yard

Facility Location: 2080 Spindt, Waupaca, WI

Date of Inspection: June 17, 2021

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Shilpa Patel	2. Archival Record Location: https://usepa.sharepoint.com/:f:/r/sites/R5_Work/r5erc/ecad/AECA B%20Library/Enf_Alter%20Metal%20Recycling%20- %20Waupaca_WI_21/Enf_Alter%20Metal%20Recycling%20- %20Waupaca_WI_21_Inspection/Inspection%20Photos?csf=1&w eb=1&e=2IMfra
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Image Number	File Name	Date and Time (CT)	Latitude and Longitude	Description of Image
1	IMG_3966	2:14 PM		Sample slip from refrigerant removal facility
2	IMG_3967	3:42 PM		Pile of motor vehicle radiators
3	Image_5041	3:44 PM		Motor vehicles awaiting on-site refrigerant recovery
4	Image_5541	3:48 PM		Refrigerant recovery system