



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

DATE: APR 15 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Cohen Recycling – Hamilton, Hamilton, Ohio

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

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

TO: File

BASIC INFORMATION

Facility Name: Cohen Recycling – Hamilton

Facility Location: 105 Black Street, Hamilton, Ohio

Date of Inspection: March 18, 2019

EPA Inspector(s):

1. Natalie Topinka, Environmental Scientist
2. Scott Connolly, Environmental Engineer

Other Attendees

1. Ryan Hill, Operations Manager, Cohen
2. Jason DeDario, Director of Safety, Cohen (via phone)

Contact Email Address: jdedario@cohenusa.com, rhill@cohenusa.com

Purpose of Inspection: Assess compliance with the safe disposal regulations for protection of stratospheric ozone

Facility Type: scrap metal recycler

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

Arrival Time: 9:30 am

Departure Time: 10:30 am

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Cohen representatives unless otherwise noted.

Process Description:

Cohen Recycling – Hamilton accepts ferrous and non-ferrous metals for recycling from the general public and commercial accounts. The facility accepts small appliances and receives approximately 200 cars per month. Although it had previously been done, no fluids removal from cars occurs at the Hamilton location. The cars undergo a “soft crush” before being moved to Cohen’s West Carrollton location for fluids processing.

Staff Interview: Mr. Hill stated that until this point, Cohen’s procedure for accepting appliances is that the compressor must be removed. He was not sure of any local entity to where customers could be referred to have the refrigerant properly recovered.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

A sign at Cohen’s front entrance listed items not accepted, which included “Appliances with Compressors.” We observed several refrigerators on the scrap pile. One that was accessible had its compressor attached but with cut refrigerant lines and no sign of refrigerant recovery.

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

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Requested documents:

- Copy of draft policy regarding refrigerant-related scrap (provided via e-mail March 18, 2019)

Compliance Assistance: We gave an overview of the regulatory requirements and compliance options in 40 C.F.R. Part 82, Subpart F. Via phone, Mr. DeDario stated that Cohen was in the process of implementing a new company-wide policy regarding the inspection, acceptance and handling of scrap that contains or once contained refrigerants. Cohen undertook this change after receiving a warning letter from EPA in late February regarding refrigerant handling at its Norwood yard. At the time of our visit, the new policy had not yet been rolled out to each of Cohen's yards.

Concerns: We described how requiring the compressor to be out of the appliance, or requiring that the refrigerant lines must be cut, effectively encourages customers to release the refrigerant to the atmosphere prior to bringing the item to Cohen.

SIGNATURES

Report Author: Natalie M. Tri Date: 4/8/19

Section Chief: [Signature] Date: 4/15/19

Facility Name: Cohen Recycling – Hamilton
Facility Location: 105 Black Street, Hamilton, Ohio
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APPENDICES AND ATTACHMENTS

1. Digital Image Log
2. Digital Images attached on CD

Facility Name: Cohen Recycling – Hamilton
Facility Location: 105 Black Street, Hamilton, Ohio
Date of Inspection: March 18, 2019

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Scott Connolly	2. Date(s) of Inspection: March 18, 2019
3. Company/Facility Name: Cohen Recycling – Hamilton	4. Street Address, City, State: 105 Black Street, Hamilton, Ohio
5. Number of Images: 7	6. Archival Record Location: CD-R labeled as Cohen – Hamilton Inspection photos, March 18, 2019

Image Number	File Name	Date and Time (CST)	Latitude and Longitude	Description of Image
1	RIMG0001.JPG	3/18/2019 8:50	N/A	Cohen Hamilton front entrance and signage
2	RIMG0002.JPG	3/18/2019 8:52	N/A	Wide-angle view of appliances on scrap pile
3	RIMG0003.JPG	3/18/2019 8:52	N/A	Pallet burning
4	RIMG0004.JPG	3/18/2019 8:54	39.406888, -84.558587	Refrigerator compressor with cut lines and R-134a label
5	RIMG0005.JPG	3/18/2019 8:56	39.4068, -84.558843	Another refrigerator compressor with cut lines and R-134a label
6	RIMG0006.JPG	3/18/2019 9:00	39.406173, -84.557662	Wide angle view of car processing station (fluids removal no longer active)
7	RIMG0007.JPG	3/18/2019 9:00	39.406165, -84.557657	Vehicles on-site