



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

BASIC INFORMATION

Facility Name:

Industrial Container Services Co, LLC
(a.k.a., Mauser Packaging Systems)

RCRA ID:

COD983789066

Facility Location:

570 Baseline Road
Brighton, CO 80601

Facility Contact:

Debbie James, Facility Manager
303-659-5095 (o); 801-386-0446 (c)
debbie.james@mauserpackaging.com

Notification Status:

Very Small Quantity Generator

Date of Inspection: August 10, 2023

Arrival Time: 9:05 a.m.

Departure Time: 3:00 p.m.

Lead Inspector & Report Author: Kristin McNeill, U.S. EPA RCRA Inspector

Other Inspection Attendees:

1. Jackie Vega, U.S. EPA RCRA Inspector
2. David Foster, Colorado Department of Public Health and Environment (CDPHE) RCRA Inspector
3. Manuel Gonzalez, Maintenance Manager, Mauser Packaging Systems

Type and Purpose of Inspection: Compliance Evaluation Inspection
Compliance with RCRA Subtitle C

Facility Type: NAICS 81131 - Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance
NAICS 42384 - Industrial Supplies Merchant Wholesalers

Applicable Regulations: 6 CCR 1007-3 Parts 260-279

Inspection Type: Unannounced Inspection

EPA inspection with CDPHE accompanying

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

OPENING CONFERENCE

We met Ms. James at the door of the facility and explained the purpose of the inspection. We moved to her office, where Ms. Vega and I presented our credentials to Ms. James. We were not denied access to the facility and were allowed to inspect all areas that we selected for inspection. Ms. James and Mr. Gonzalez accompanied us throughout the inspection.

The following information was obtained verbally during the inspection from Ms. James or Mr. Gonzalez unless otherwise noted.

FACILITY DESCRIPTION

Regulatory Status

According to RCRAInfo, Industrial Container Services has been a very small quantity generator of hazardous waste since the last notification in 2007. During the inspection, Ms. James confirmed this generator status. Based on my observations of waste generation and the amount of waste onsite, the facility appeared to be a very small or small quantity generator of hazardous waste. The generator status would be based on the outcome of a number of waste streams requiring hazardous waste determinations.

General Facility and Process Description

Ms. James explained that the facility operates Monday through Thursday 5:00 a.m. – 3:30 p.m., with Friday hours from 6:00 a.m. – 3:00 p.m. on an as-needed basis. She said that the facility is comprised of two warehouses plus office space, and that only the first floor of the older south warehouse is used for processing. They also have a number of trailers on site, which are used to store clean drums. According to Ms. James, the facility has been operating at this location since 1993 and currently has under 20 employees.

Ms. James explained that the current owner is Mauser Packaging Systems, with a parent company of BWAY. She said that Mauser bought Industrial Container Services approximately five years ago, but the name had not yet been legally changed. The corporate headquarters for Mauser is in Illinois.

Mr. Gonzalez stated that this facility mainly reconditions closed-top steel drums, and also some closed-top poly drums. He described their process, explaining that most of their drums come from oil and gas companies, such as Shell or Mobil, and generally contain residual product oil, lubricants or antifreeze that have not been used. Ms. James also said that they receive drums from Mauser facilities in other states that contained those products. Mr. Gonzalez said that they collect the oil and Tri-State picks it up once a week, with approximately 400-500 gallons per shipment. He also said that Waste Management picks up their wastewater once a month, with 5,000-10,000 gallons per shipment, and that the facility does not discharge any process water to the sewer. Mr. Gonzalez stated that they have a CAA permit for their paint booth and sandblast dust collector.

Mr. Gonzalez explained that they also collect totes, but they do not have the capability to rinse them. He said that they keep the metal cages and replace the old plastic bottles with new ones. Ms. James explained that they cut up the plastic bottles, bale them and send them to a Mauser location in North Carolina that recycles resin. She also said that they receive new bottles from another sister company.

Ms. James said that they process approximately 400 drums and 90 – 110 totes per day.

Ms. James explained that generally they have routine customers who are familiar with their process, and that they provide an information sheet with emptiness requirements for the containers that they take. However, they have a process to deal with customers that send drums and totes that still contain a significant amount of liquid. She said that if over 50% of the containers in a shipment contain too much liquid, they will reject the entire load. If under 50% of the containers contain too much liquid, then they quarantine those that are not empty and send them back to the shipper.

Ms. James said that they do not do any vehicle maintenance, so do not generate used oil, and that they do generate universal waste lamps.

Mr. Gonzalez also noted that Mauser provides hazardous waste training, which he has taken.

TOUR INFORMATION

All photos described below are included in Attachment A – Photo Log.

Mr. Gonzalez explained the details of their process during the facility tour. He said that they take the bungs off the tight lid drums, which are flipped over and put onto a conveyor to drain. The conveyor has an open holding tank below to collect any residual oil. From the conveyor, the drums are put upside down on a rotating rack with nozzles, and they are rinsed four times with hot water. Mr. Gonzalez said that they sometimes add caustic (20% NaOH) to the first rinse to raise the pH to approximately 9, and then add HCl to lower the pH to 4-6 before the solution is sent off site. He said that the fourth rinse contains sodium nitrate to prevent the drums from rusting. He also explained that under the elevated rinse rack is an oil-water separator. Oil from the drums goes into the holding tank under the conveyor, and the water is held in two wastewater tanks outside the building.

Mr. Gonzalez explained that if the drums are rusty, they occasionally add an acid rinse to break up the rust, and then return the drums to the normal process. Ms. James added that they do not use the acid line very often. Mr. Gonzalez said that they use 20% HCl to lower the pH of the rinse. We observed a poly tank of acid that was lined with plastic and covered with plywood (photo 4). Mr. Gonzalez explained that the acid is used and then put back into the tank, where it is reused until it is spent. He said that they do not dispose of the acid as waste. At the request of the inspectors, Mr. Gonzalez tested the pH of the acid in the tank using a pH strip and it was approximately pH 2. Around the tank and the acid rinse area, we observed liquid on the ground, which had begun eating through the concrete floor of the warehouse (photo 5). Mr. Foster and I observed that it appeared that the acid rinse water was dripping out of the spray nozzle onto the floor. At the request of the inspectors, Mr.

Gonzalez tested the pH of the acid on the floor using a pH strip and it was approximately pH 3. The inspectors advised Ms. James to make a hazardous waste determination on the liquid on the ground. We explained that because the liquid is no longer being used for its intended purpose, it is a waste, and if the pH is below 2, it would be a D002 corrosive hazardous waste. The inspectors also recommended best management practices, such as adding secondary containment under the acid tank and rinse area.

Mr. Gonzalez then showed us the washer used to clean the bungs with a caustic cleaner of pH 9-10, which is neutralized before disposal. Mr. Foster recommended creating a logbook to record the results from the pH strip before and after neutralization to show that the pH was not above 12.5, at which point it would be a hazardous waste. The caustic product used was PELS caustic soda beads.

According to Mr. Gonzalez, after the insides of the drums are rinsed, a vacuum pipe is used to remove the water and steam. Then, the drums go through a car wash-type cleaner to clean the outsides and are sandblasted to remove the paint. He explained that the sandblast unit reuses the blast material until it is spent, at which point it is collected in a hopper outside the warehouse and shipped to a landfill. Ms. James said that they made a hazardous waste determination and the sandblast material is non-hazardous. Mr. Gonzalez said that they have a CAA filter system on the sandblast unit.

Mr. Gonzalez said that the drums are then leak tested, and an inspector looks for rust and the tightness of each drum. If the drums are rejected, they are crushed and recycled through Rocky Mountain Recycling in Commerce City, CO.

The drums are then painted in their paint booth, which Mr. Gonzalez explained was to paint the outside of each drum according to a color requested by the customer. He said that they use the paint booth on a daily basis. He explained that they use methylethyl ketone (MEK) to clean the paint spray gun tips, which is reused until it is gone. He said that they also use MEK rags to wipe and remove glue from the poly drums. At the time of the inspection, Mr. Gonzalez said that the Facility was collecting the MEK rags in three collection containers and disposing of the rags in the trash. Mr. Foster explained that MEK is a carcinogen, as well as a toxic and ignitable hazardous waste, so therefore, the MEK rags are hazardous waste and must be managed as such. He also mentioned that Cintas has a program to launder hazardous waste rags.

According to Mr. Gonzalez and Ms. James, there were four waste streams from the paint booth: paint waste from flushing the lines when the paint color is changed, wastewater from pressure washing the paint booth, solids from the paint booth that are scraped out every two weeks, and paint booth filters. Mr. Gonzalez and Ms. James were not completely sure if the approximately eight colors of paint used at the facility were water-based, so were going to check on the Safety Data Sheets (SDSs) for each color. During the inspection, we reviewed one SDS for paint that had a flash point of 105° F which would be a D001 ignitable hazardous waste. However, the paint waste was mixed with water, which could render the paint waste non-hazardous.

We observed a 55-gallon drum near the paint booth that was used to collect paint waste. Mr. Gonzalez and Ms. James were not sure of the ratio of paint to water in the waste drum. Mr. Gonzalez said that

they regularly generate approximately two drums of paint waste per month. The inspectors advised Ms. James to make a hazardous waste determination on the paint waste. If the paint waste is hazardous, the facility would be a small quantity generator, based on the generation rate of two drums per month.

Mr. Gonzalez explained that the paint booth was pressure washed on a daily basis and that the wastewater was collected in a tote and disposed of in their wastewater tank along with the water from the oil-water separator. He said that solids are scraped out before pressure washing approximately every two weeks. According to Mr. Gonzalez, the solids are collected in a drum, but there is often liquid that accumulates on top of the solids. The inspectors advised Ms. James to make a hazardous waste determination on the wastewater, the solids, and any liquids that accumulate on the solids to ensure that it is not D001 ignitable hazardous waste.

Mr. Gonzalez said that the filters from the paint booth are collected in a drum and shipped off as non-hazardous waste. He said that their hazardous waste determination was based on the types of paint that they use; however, since there was uncertainty about whether the paint waste was hazardous, the inspectors advised Ms. James to make a hazardous waste determination on the paint booth filters. Ms. Vega also mentioned that if any of the hazardous waste determinations came back as non-hazardous, but were close to the limit, they should retest more frequently.

Next to the paint booth was a 5-gallon bucket that Mr. Gonzalez said was to contain any drippage from cleaning the paint lines with water between each color. He said that the bucket fills after two paint runs and is emptied into the 55-gallon drum of paint waste every night. The inspectors advised Mr. Gonzalez that if the paint waste is determined to be hazardous, this bucket would be a hazardous waste satellite accumulation container and should be managed according to the requirements for satellite accumulation.

Outside the warehouse were two wastewater tanks for the oil-water separator. Each tank was approximately 6,000 gallons and they were in secondary containment. We observed that water was present in the secondary containment and Ms. James said that Waste Management pumps out any water from the secondary containment when they pick up the wastewater.

Outside the warehouse, we observed a 55-gallon drum of product MEK that was on its side on a hand cart (photo 1). The drum had a spigot on the top and Mr. Gonzalez explained that this is where they fill a 5-gallon carboy to bring inside the warehouse for use. We observed that the spigot had a constant slow leak that was dripping onto the soil, leaving a stain (photo 2). During the inspection, Mr. Gonzalez had some workers put the drum upright onto a pallet and move it into a conex box with a forklift. He said that they would put the drum onto secondary containment and would start cleaning up the soil that day. The inspectors advised them to dig up the soil until there was no staining, and explained that the soil would be considered a U159 and D035 hazardous waste because the MEK was a commercial chemical product that had not yet been used, as well as a characteristic hazardous waste.

At the time of the inspection, the hazardous waste accumulation area was inside a trailer (photos 5 – 23). Mr. Gonzalez said that he had some workers move the drums into the trailer that morning and that he could not read the labels on all of the drums, so they relabeled them. I observed that some of the drums had rusty tops from being stored outdoors in the weather. Mr. Gonzalez said that when the drums were in their original location on the east side of the north warehouse, he would look at them on a daily basis to ensure they were not leaking.

Mr. Gonzalez told us that the drums held paint waste and that they generated approximately two drums per month. At the time of the inspection, I observed 23 drums in the hazardous waste accumulation area (photos 22 and 23). The way that they were placed into the trailer made it impossible to examine all of the drums without climbing over some of them, so I mentioned the aisle space requirement for small quantity generators. All 23 drums were closed, marked with accumulation start dates, and labeled with the words hazardous waste. I observed that none of the drums were marked with an indication of the hazard.

The accumulation start dates on the drums were:

9/16/22	11/4/22	1/6/23	3/3/23	5/5/23	6/30/23
9/20/22	11/18/22	1/20/23	3/17/23	5/19/23	7/14/23
10/7/22	12/1/22	2/3/23	4/7/23	6/2/23	7/28/23
10/21/22	12/16/22	2/17/23	4/21/23	6/16/23	

I observed that the 23 drums were marked as D006 hazardous waste for cadmium. Ms. James said that in the last year or so, they had switched hazardous waste vendors to Environmental Services, Inc, which uses Capitol as a transporter to pick up their hazardous waste. She said that the vendor had profiled their paint waste as containing highway paint that included cadmium, resulting in it being a D006 hazardous waste. Ms. James and Mr. Gonzalez explained that they had manifested shipments for an episodic generation in March 2022 of approximately 40 drums of paint waste as D006 based on that profile; however, they had internally questioned if that was correct because, to their knowledge, they do not manage any waste containing highway paint. They discussed that concern with us during the inspection. Ms. James also mentioned that they are planning to switch hazardous waste vendors to Republic Services.

CLOSING CONFERENCE

We held a closing conference with Ms. James and Mr. Gonzalez before leaving the facility. During the closing conference, I reviewed the records that I asked Ms. James to send:

- Hazardous waste determination for the sandblast grit
- Safety data sheets for the approximately eight types of commonly used paint
- Safety data sheet for the PELS caustic soda beads
- Hazardous waste profile that referenced highway paint
- Information sheet to customers regarding empty drum requirements

I also summarized the issues that we had observed during the inspection:

1. Hazardous waste determinations must be made on a number of waste streams:
 - Liquid on the floor from acid rinse
 - Paint waste
 - Paint booth pressure wash wastewater
 - Paint booth solids and any liquids that accumulate on the solids
 - Paint booth filters
2. The MEK rags were being disposed of in the trash; however, MEK is a hazardous waste. Therefore, the rags are also considered to be hazardous waste and must be properly disposed of or laundered according to the solvent wipes rule explained in CDPHE's Contaminated Shop Towels and Reusable Absorbents guidance.
3. Unused MEK was dripping from the drum outside the warehouse onto the bare ground. The soil must be cleaned up and managed as U159 and D035 hazardous waste. I requested that Ms. James submit the manifest after this waste is disposed.

Mr. Foster also stated that if the Facility is a very small quantity generator (VSQG) of hazardous waste, there is a requirement to re-notify with CDPHE every four years. This requirement began in 2017, so re-notification should have occurred in 2021.

SIGNATURES

KRISTIN MCNEILL Digitally signed by KRISTIN MCNEILL
Date: 2023.10.18 14:05:42 -06'00'

Kristin McNeill, Lead RCRA Inspector

JANICE PEARSON Digitally signed by JANICE PEARSON
Date: 2023.10.17 11:25:05 -06'00'

Janice A. Pearson, Manager
RCRA & OPA Enforcement Branch
Enforcement and Compliance Assurance Division

ATTACHMENTS

Attachment A: Photo log

ATTACHMENT A: PHOTO LOG

The photos are original and have not been modified in any way. All photos were taken by Jackie Vega, David Foster or Kristin McNeill on August 10, 2023, using a Nikon Coolpix A900 camera.

Photo 1.
Product drum of
MEK with spigot
on hand cart in
outside yard
visibly dripping
onto soil.
(DSCN0723.JPG)



Photo 2.
Visible stain on
soil where MEK
product drum
was dripping,
after removal of
drum.
(DSCN0724.JPG)



Photo 3.
Liquid on
warehouse floor
near acid rinse
area. Acid tank is
visible in the
background.
(DSCN0725.JPG)



Photo 4.
Poly tank
containing acid
rinse solution.
Tank was
covered with a
plywood sheet as
a cover.
(DSCN0726.JPG)



Photo 5.
Drum in
hazardous waste
accumulation
area labeled
D006 hazardous
waste and dated
7/28/23.
(DSCN0727.JPG)



Photo 6.
Drums in
hazardous waste
accumulation
area labeled
D006 hazardous
waste and dated
9/16/22 and
9/20/22.
(DSCN0728.JPG)



Photo 7.
Same drums as
photo 6; zoomed
in on labels.
(DSCN0729.JPG)



Photo 8.
Same drums as
photo 6; zoomed
in on labels.
(DSCN0730.JPG)



Photo 9.
Drum in
hazardous waste
accumulation
area labeled
D006 hazardous
waste and dated
10/7/22.
(DSCN0731.JPG)



Photo 10.
Drum in
hazardous waste
accumulation
area labeled
D006 hazardous
waste and dated
10/21/22.
(DSCN0732.JPG)

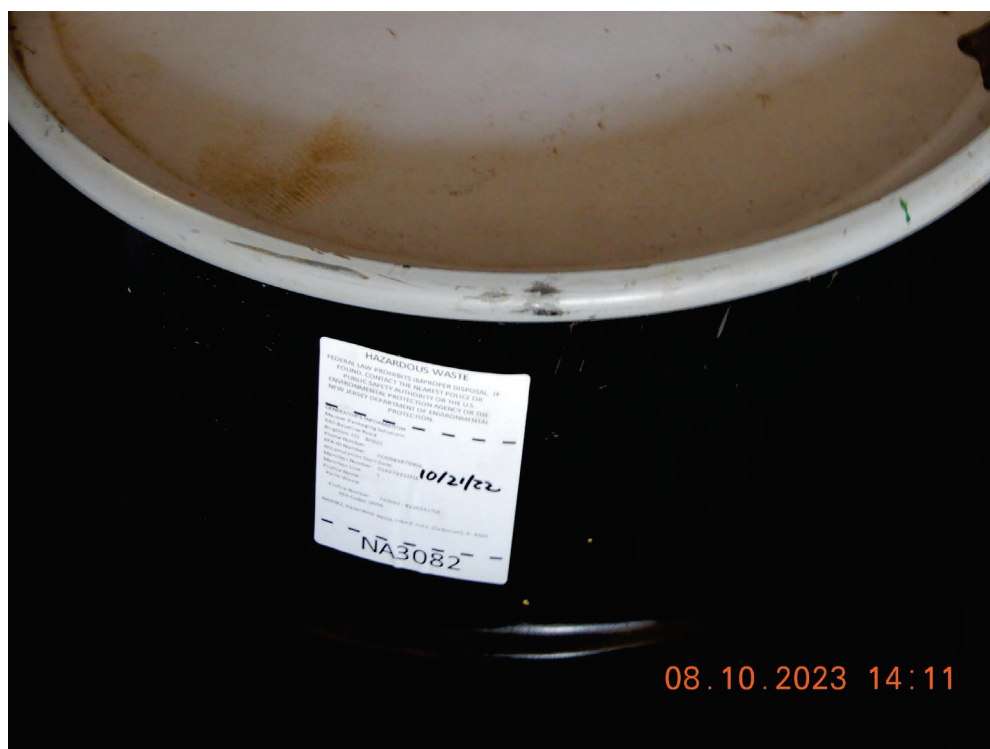


Photo 11.
Drum in
hazardous waste
accumulation
area labeled
D006 hazardous
waste and dated
11/18/22.
(DSCN0733JPG)



Photo 12.
Drum in
hazardous waste
accumulation
area labeled
D006 hazardous
waste and dated
11/4/22.
(DSCN0734.JPG)



Photo 13.
(accidental
photo)
(DSCN0735.JPG)



Photo 14.
Drum in
hazardous waste
accumulation
area labeled
D006 hazardous
waste and dated
12/16/22.
(DSCN0736.JPG)



Photo 15.
Drum in
hazardous waste
accumulation
area labeled
D006 hazardous
waste and dated
12/1/22.
(DSCN0737.JPG)



Photo 16.
(blurry photo)
(DSCN0738.JPG)



Photo 17.
(blurry photo)
(DSCN0739.JPG)



Photo 18.
Clear photo for
photos 16 & 17.
Drums in
hazardous waste
accumulation
area labeled
D006 hazardous
waste and dated
1/6/23 and
1/20/23.
(DSCN0740.JPG)



Photo 19.
Drum in
hazardous waste
accumulation
area labeled
D006 hazardous
waste and dated
2/3/23.
(DSCN0741.JPG)

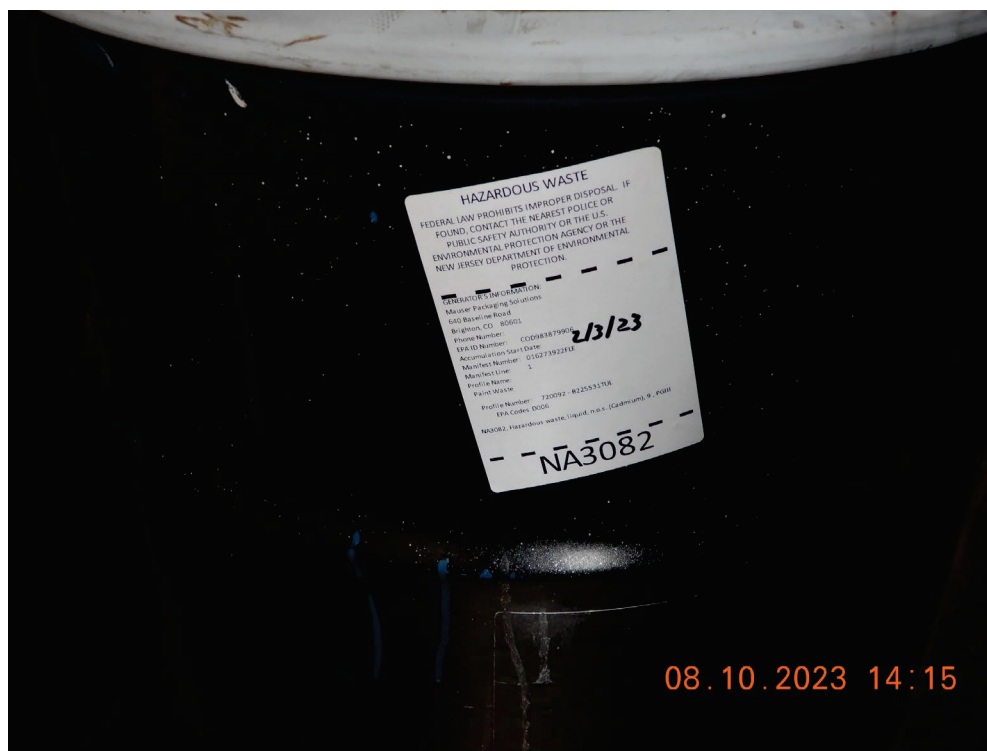


Photo 20.
Drum in
hazardous waste
accumulation
area labeled
D006 hazardous
waste and dated
2/17/23.
(DSCN0742.JPG)



Photo 21.
(accidental video)
(DSCN0743.JPG)



DSCN0743.MP4

Photo 22.
Overview of
drums on pallets
in hazardous
waste
accumulation
area.
(DSCN0744.JPG)



Photo 23.
Overview of
drums on pallets
in hazardous
waste
accumulation
area showing lack
of aisle space.
(DSCN0745.JPG)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region8

DATE: See date of Manager signature

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Andersen's Sales & Salvage Inc., Greeley, CO

FROM: Katelyn Bergl, Environmental Engineer
Enforcement and Compliance Assurance Division (ECAD),
Air and Toxics Enforcement Branch (ATEB)

THRU: Scott H. Patefield, Manager
Enforcement and Compliance Assurance Division,
Air and Toxics Enforcement Branch

TO: Andersen's Sales & Salvage, Inc.

BASIC INFORMATION

Facility Name: Andersen's Sales & Salvage Inc.

Facility Location: 1490 East 8th Street, Greeley, Colorado 80631

Date of Inspection: June 22, 2022

EPA Region 5 Inspector(s):

1. Valeria Apolinario, Environmental Engineer, ECAD-AECAB-AECA(MN), Lead Inspector
2. Brianna Fenzl, Environmental Engineer, ECAD-AECAB-AECASII
3. Laura Steel, Environmental Engineer, ECAD-AECAB-AECA(MI)

EPA Region 8 Inspector:

1. Katelyn Bergl, Environmental Engineer, ECAD-ATEB

Other Attendees:

1. Mr. Dean Andersen, Vice President – Andersen's Sales & Salvage, Inc.
2. Ms. Sarah Willcutts, Environmental Manager – Andersen's Sales & Salvage, Inc.

Contact Email Address: swillcutts@andersensales.com

Purpose of Inspection: To determine Clean Air Act (CAA) compliance through a Partial Compliance Evaluation (PCE) including potential applicability of the CAA Title V Permit program and Volatile Organic Compound (VOC) control technology implementation requirements.

Facility Type: Scrap Metal Salvaging and Recycling Facility, NAICS code 423930

Facility Name: Andersen's Sales & Salvage, Inc.

Facility Location: 1490 East 8th Street, Greeley, Colorado 80631

Date of Inspection: June 22, 2022

Regulations Central to Inspection: CAA Title V Permit Applicability (Title 40, Code of Federal Regulations, Section 70.3) , Colorado VOC Regulations: Part A, Section II.C.1. of Regulation Number 7 of the Colorado Code of Regulations, 5 CCR 1001-9, and Construction Permit No. 07WE1136

Arrival Time: 11:05 MDT

Departure Time: 12:30 MDT

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: Provided as an attachment to this report.
- ☒ Provided CBI warning to facility

The following information was obtained from Andersen's Sales & Salvage, Inc. representatives. Please note that this report was generated by the EPA Region 8 office and only details EPA Region 8's inspection observations related to CAA Title V and Colorado VOC Regulation compliance. EPA Region 5, which leads EPA's CAA Title VI enforcement initiatives, will issue a separate report detailing CAA Title VI inspection findings.

Facility Overview:

Andersen's Sales & Salvage, Inc. (the Facility) is a scrap metal salvaging and recycling facility located in Greeley, Colorado. The facility provides scrap metal recycling services for industrial businesses, small businesses, and individuals. The facility purchases scrap materials, including automobiles, appliances, and tin scrap. Andersen's Sales & Salvage, Inc. owns two satellite feeder scrap yard facilities in Atwood, Colorado and Cheyenne, Wyoming. The Facility employs approximately 50 employees. Facility hours are M-F, 7 AM – 4:00 PM.

The Facility was issued Construction Permit No. 07WE1136 (Facility Permit) by the Colorado Department of Public Health and the Environment on February 14, 2008. The Facility operates a metal shredder with a maximum rated processing capacity of 165 tons per hour which is equipped with a water injection system to prevent fires and minimize heat and particulate matter emissions. Per the Facility Permit, the water injection rate is required to be operated at no less than 56 gallons per ton of feed scrap to maintain particulate matter emissions below 2.4 tons per year. The Facility Permit also limits shredder operations to 160,000 tons per year of production throughput.

Facility Name: Andersen's Sales & Salvage, Inc.

Facility Location: 1490 East 8th Street, Greeley, Colorado 80631

Date of Inspection: June 22, 2022

TOUR INFORMATION

EPA Tour of the Facility: EPA inspectors toured Facility operations with Mr. Andersen and Ms. Willcutts, including scrap intake and refrigerant recovery operations, sorting and feeding operations at the bulk scrap pile to the metal shredder inlet, metal shredder operations and downstream separation processes.

Photos and/or Videos: were not taken by EPA Region 8 inspectors during the inspection. No Attachment.

Field Measurements: were not taken during this inspection. No Attachment.

Description of Facility Operations:

Scrap materials are purchased by Andersen's Sales & Salvage, Inc. and enter the facility through the scale house. After scrap metal enters the facility, it is sorted and prepared for recycling at the facility through the use of the facility's torch cutter, metal shredder operations, and sorting equipment. The facility operates a 4,000 horsepower (HP) Riverside Engineering Megashredder® metal shredder. Scrap that has been shredded through the metal shredder is separated by downstream processing into ferrous, nonferrous, and automotive shredder residue (ASR). After the scrap metal has been processed it will be sold to recycled scrap metal buyers. ASR is disposed at a landfill. Table 1 provides further information on the Facility's metal shredder. Table 2 provides metal shredder scrap metal throughput data from June 1, 2019 – June 30, 2022.

Table 1. Metal Shredder Operation Details

Make	Model	Engine HP	Maximum Rated Processing Capacity	Maximum Permitted Hours of Operation	Maximum Permitted Shredder Throughput
Riverside Engineering Megashredder®	M-88	4,000 HP	165 tons of scrap per hour	8760 hours per year (no permitted limit)	160,000 tons of scrap per year

Table 2. Metal Shredder Throughput, June 1, 2019 – June 30, 2022.

Year	Shredder Throughput, Short Tons	Reported Percentage of MVAC or MVAC-like scrap
June 1 - December, 2019	28,610	10.6%
January - December, 2020	81,090	9.5%
January - December, 2021	91,819	12.2%
January – June 30, 2022	43,401	10.8%

Inspection Observations:

Over the past 15 years, more than 25 emissions tests measuring VOCs have been conducted at scrap metal shredders. The quality of the emissions data for these tests varies, with capture

Facility Name: Andersen's Sales & Salvage, Inc.

Facility Location: 1490 East 8th Street, Greeley, Colorado 80631

Date of Inspection: June 22, 2022

efficiency of the test equipment playing the biggest role in data quality. Despite this, the test data shows that VOC emissions from shredding operations are at levels that can trigger regulatory applicability and the need for emission controls. Currently available test data obtained by the EPA reveals that typical shredding operations emit VOCs at rates between 0.2 and 0.5 pounds of VOCs per ton of scrap shredded. Rates of uncontrolled VOC emissions correlate to the size of the shredder and the type of material shredded. Emission rates are generally reduced if the shredder has an enclosure and existing controls such as a cyclone or scrubber. Emission rates are also generally reduced where the facility removes contaminants before shredding (known as "depolluting").

At the time of this report, the portion of Weld County in which the Facility is located is considered a severe ozone nonattainment area. As a result of the area's ozone nonattainment status, sources which have the potential to emit 50 tons per year or more of VOCs are considered major sources and are subject to the requirements of the CAA Title V program. The severe ozone nonattainment designation also triggers reasonably available control technology (RACT) implementation requirements for major sources in severe ozone nonattainment areas in addition to the Title V program requirements.

EPA inspectors observed that the Facility's metal shredder was not enclosed or equipped with controls such as a cyclone or scrubber which would mitigate VOC emissions. EPA inspectors observed that the Facility engages in depollution practices, including the draining of fluids from motor vehicles and other like appliances. Based on the Facility's historical throughput, permit limits, and depollution practices, the Facility's potential to emit VOCs does not equal or exceed 50 tons per year. At this time, the Facility is not subject to CAA Title V requirements or the RACT requirements of Colorado VOC Regulations: Part A, Section II.C.1. of Regulation Number 7 of the Colorado Code of Regulations, 5 CCR 1001-9.

RECORDS REVIEW

The following documents were provided via email communication after the inspection:

- Metal Shredder Specification Sheet and additional information regarding shredder installation, design, and operation.
- Daily metal shredder throughput records (June 1, 2019 – June 30, 2022)
- Copy of Construction Permit No. 07WE1136

Enforcement Actions Taken in the past 5 years:

No enforcement actions with respect to the Facility Permit or other CAA Regulations were taken against the Facility in the past 5 years.

CLOSING CONFERENCE

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

Compliance Assistance: N/A

Areas of Concern:

EPA expressed no concerns at the time of the inspection concerning CAA Title V provisions or Colorado VOC Regulations.

Facility Name: Andersen's Sales & Salvage, Inc.

Facility Location: 1490 East 8th Street, Greeley, Colorado 80631

Date of Inspection: June 22, 2022

DIGITAL SIGNATURES

Katelyn Bergl, Report Author

SCOTT PATEFIELD Digitally signed by SCOTT PATEFIELD
Date: 2022.09.07 13:52:12 -06'00'

Scott H. Patefield, Manager