



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW
ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

Henry Miller
General Manager
Liberty Recycling
2664 24th St
Tuscaloosa, Alabama 35401
Henrymiller1234@yahoo.com

Dear Mr. Miller:

On May 25, 2022, the U.S. Environmental Protection Agency Region 4 Air Enforcement Branch conducted a partial compliance inspection of Liberty Recycling, located in Tuscaloosa, Alabama. Enclosed is a copy of the final report generated by the U.S. Environmental Protection Agency's Region 4, North Air Enforcement Section.

Should you have questions regarding this inspection report, contact me at (404) 562-9177, or by email at Rieck.Stephen@epa.gov.

Sincerely,
STEPHEN
RIECK

Digitally signed by
STEPHEN RIECK
Date: 2022.07.20 07:40:17
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Stephen Rieck
Environmental Scientist
North Air Enforcement Section

Enclosure

cc: Jennifer Youngpeter, Alabama Department of Environmental Mangement

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report**

I. GENERAL INFORMATION

Facility Name: Liberty Recycling

Location (Address): 2664 24th St., Tuscaloosa, Alabama

Inspection Date: May 25, 2022

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation

PROGRAMMATIC ID: 01-125-00122

PERMIT NUMBER: Synthetic Minor Permit #413-0122-X001

EPA Region 4 Investigator(s)/Inspector(s):

1. David Lloyd, Environmental Engineer
2. Steve Rieck, Environmental Scientist
3. Brian Zhong, Environmental Engineer

State/Local Investigator(s)/Inspector(s):

1. Jackson Rogers, Environmental Engineer
2. JP Gravitt, Environmental Engineer

Person(s) Contacted at Facility (Name and Title):

1. Henry Miller, General Manager

Report Prepared by: Stephen Rieck

FACILITY INFORMATION
A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Metal Service Centers and Other Metal Merchant Wholesalers; Automobile and Scrap Metal Shredding and material recovery processes
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	ADEM SMOP #413-0122-X001
3. Air permit issuance date.	May 27, 2022
4. Air permit expiration date.	No Expiration Date
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Synthetic Minor
6. Major source pollutants (if applicable).	N/A
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	State Implementation Plan 40 C.F.R. Part 82
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Metal shredder mill
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Water spraying at the mill reduces internal temperatures and reduces particulate matter emissions.

B. Process Description

Liberty Recycling owns and operates a scrap metal recycling facility in Tuscaloosa, Alabama. The facility provides scrap metal recycling services for industrial businesses, small businesses, and individuals. The facility purchases scrap metal materials, including automobiles, appliances, all grades of steel, and industrial metal scrap.

After purchase, metal scrap is sorted and prepared for recycling, which can include cutting or shearing of metal. The facility operates a 6,300-horsepower metal shredder. The metal shredder is equipped with a water spraying system to prevent fires and minimize heat and particulate matter emissions. Scrap that has been shredded through the metal shredder is separated by downstream processing into ferrous, nonferrous, and automotive shredder residue (ASR). After the metal scrap has been processed it will be sold to recycled scrap metal buyers.

II. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	EPA Region 4 (R4) inspectors arrived at the facility on May 25, 2022, at 8:30 AM CST.
2. Credentials presented to facility personnel (include name and title).	Y	All inspectors presented their credentials to Henry Miller, General Manager.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	Inspectors held an opening meeting during which the purpose and objectives of the inspection were explained. EPA inspectors discussed the EPA July 2021 Enforcement Alert, “Violations at Metal Recycling Facilities Cause Excess Emissions in Nearby Communities.” The inspection team discussed intent to observe all accessible process areas at the facility and to understand how scrap was received and inspected to ensure material met facility and federal standards. The facility is planning to re-locate their shredder operation to an area further out of town. The facility is currently seeking authorization to operate at the new location.

Activity	Yes No NA	Comments
4. Discussed safety issues.	Y	Inspectors discussed facility-specific safety and emergency procedures and appropriate protective equipment.
5. Discussed which records to be reviewed.	N	The inspection team did not review records during the on-site inspection. The team indicated that records may be requested through use of a Section 114(a) information request.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	Inspectors were primarily interested in inspection of the metal shredder operation, scrap handling, and refrigerant handling procedures.
7. Discussed facility policy regarding photographs or video (if applicable).	Y	Region 4 inspectors indicated a digital camera would be used during the inspection. The team discussed facility policy regarding photography and videography. Inspectors indicated that copies of any videos or photographs taken at the facility would be sent to the company. A log of photographs taken at the facility is included in this report. See Appendix A.
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	
9. Discussed CBI.	Y	EPA inspectors indicated that any material claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.
Records Reviewed at the Facility		
10. The types of records reviewed, and the time period reviewed.	N	The inspection team did not review records during the inspection.
Facility Walk-Through Observations		

11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	EPA Region 4 inspectors conducted an inspection of process areas, including the metal shredder operations and scrap sorting piles, beginning at approximately 9:30 AM CST. Due to heavy rains, some parts of the facility were not accessible. The facility purchases scrap metal materials, including automobiles, appliances, and miscellaneous metal parts from industrial suppliers as well as the general public. The large majority of received scrap comes from commercial suppliers. These suppliers enter into verbal contracts with Liberty Recycling, agreeing that scrap does not contain material prohibited by the facility. The inspection team observed the scrap piles. The scrap consisted of crushed cars and miscellaneous metal parts. The crushed cars did not have any fluid or freon-containing equipment. The team did not observe any freon-containing appliances in the piles. Signage of materials the facility does not accept is posted in several locations near the facility entrance and adjacent to the scale. The facility loader operators review scrap for prohibited material before loading onto the shredder intake. The facility operates a 6,300-horsepower shredder. The shredder has one active engine and one backup engine. The facility is permitted to process up to 80 tons of scrap per hour but generally operates at 50 tons per hour. The shredder operates each weekday, usually from 8:00 AM – 2:30 PM. Scrap that has been shredded is separated
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Activity	Yes No NA	Comments
		by downstream processing into ferrous materials, nonferrous materials, and ASR. The inspection team observed shredder operations. A small amount of opacity (approximately 5%) was observed from the shredder outlet. The facility is permitted a general 20% opacity standard. Liberty Recycling does not provide ozone depleting substance recovery and recycling services on site, nor does the facility retain a contract with a certified technician. The inspection team went to the maintenance yard where approximately ten 6,300-horsepower engines are stored and maintained. These engines may be used as part of operations at the new shredder location. .

Activity	Yes No NA	Comments
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	

Activity	Yes No NA	Comments
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	The facility operates a water spraying system at the shredder. The primary function is heat reduction and preventing combustion, but it is also used to reduce particulate matter emissions.

Activity	Yes No NA	Comments
15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	

Activity	Yes No NA	Comments
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N	The inspection team discussed the 2021 Enforcement Alert with the facility. The Alert indicates shredding operations may have significant Volatile Organic Compound (VOC) emissions due to the high temperatures in the shredder. The facility has not conducted any testing to determine VOC emissions at the shredder.
20. Were any visible emissions observed? (if yes, identify the location and equipment).	Y	Approximately 5% opacity was observed at the shredder. The facility is subject to a 20% opacity standard.
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N	
22. Was the cause of the visible emissions investigated and the information documented?	Y	The observed opacity is a result of shredding operations.

Activity	Yes No NA	Comments
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N	EPA R4 inspectors did not use an infrared camera at the facility.
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	EPA R4 inspectors did not use a TVA at the facility.

Activity	Yes No NA	Comments
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N	EPA R4 inspectors did not use a PID at the facility.
Closing Meeting		
28. Conducted a closing meeting.	Y	EPA Region 4 inspectors conducted a closing meeting on May 25, 2022, at 10:50 AM CST with Mr. Miller.
29. Summarize any additional information needed, if applicable?	N/A	
30. Accept a declaration of CBI, if applicable?	N/A	
31. Discussed observations.	Y	Inspectors thanked facility personnel for their time and summarized inspection activities. The inspection team did not observe any scrap that appeared to contain refrigerants, petroleum products or other materials that are prohibited by the facility or federal standards.
32. Discussed next steps, if applicable?	Y	A final inspection report from EPA Region 4 will be sent to the company within a 60-day timeframe.
33. Date and time inspection concluded.		The inspection concluded on May 25, 2022, at 11:10 AM CST.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	

EPA Investigator/Inspector Signature:

STEPHEN
RIECK

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EPA Supervisor Signature & Title:

JASON
DRESSLER

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Chief, North Air Enforcement Section

APPENDICES AND ATTACHMENTS

1. Appendix A. Inspection Photograph log

Appendix A: Inspection Photograph Log

During the May 25, 2022, inspection, EPA Region 4 staff used a digital camera to take photographs at the Liberty Recycling, located in Tuscaloosa, Alabama. Below is an inventory of the images.

Table 1: Photographs taken during the May 25, 2022, inspection.

File Number	Image Description
P5250405.jpg	Scrap piles
P5250406.jpg	Car scrap and shredder intake
P5250407.jpg	Shredder loading operation
P5250408.jpg	Shredder operation
P5250409.jpg	Back end of shredder operation
P5250410.jpg	Back end of shredder operation
P5250411.jpg	Rotary scrap separator
P5250412.jpg	Rotary scrap separator
P5250413.jpg	Shredder operation
P5250414.jpg	Inaccessible area due to heavy rain
P5250415.jpg	6,300-horsepower EMD engine
P5250416.jpg	Prohibited material signage