



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

**DATE:** NOV 21 2018

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
National Metal Recycling, Houston, Texas

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

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

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** National Metal Recycling

**Facility Location:** 2401 Frick Road, Houston, Texas

**Date of Inspection:** November 7, 2018

**EPA Inspector(s):**

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

**Other Attendees**

1. Mary Fajardo, Scalehouse Operator, National Metal Recycling

**Contact Email Address:** nationalmetalrecycling2401@gmail.com

**Purpose of Inspection:** Assess compliance with the refrigerant disposal requirements

**Facility Type:** scrap metal recycler

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

**Arrival Time:** 1:55 pm

**Departure Time:** 2:15 pm

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Ms. Fajardo unless otherwise noted.

**Process Description:** National Metal Recycling accepts ferrous and non-ferrous materials, including small appliances, from members of the public. No vehicles are accepted. No refrigerant recovery is performed on-site and National Metal Recycling does not require any documentation regarding the fate of refrigerant contained in small appliances.

**Staff Interview:** We observed a cart of window air conditioning unit near the ferrous scrap pile and asked an employee why they were segregated. He said they were waiting to be "cleaned" (i.e. having the copper and non-ferrous components separated). We asked what happens to the refrigerants and the employee went looking for a refrigerant bottle but did not produce any recovery equipment. Ms. Fajardo was unaware of any company that might come to National Metal to recover or collect refrigerant. Per local law, customers selling larger air conditioning units, such as residential central or rooftop commercial units, must produce an air conditioning technician license in order to sell the material.

**TOUR INFORMATION**

**EPA toured the facility:** Yes

**Data Collected and Observations:** In addition to the cart of window air conditioning units, we observed several small appliances in the scrap pile, some with intact refrigerant lines and some with cut lines.

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

**Field Measurements:** were not taken during this inspection.

**CLOSING CONFERENCE**

**Compliance Assistance:** We gave an overview of the regulatory requirements and compliance options in 40 C.F.R. Part 82, Subpart F. We were instructed to contact the owner, Mr. Pedro Fajardo, who was not on-site at the time of our inspections, with additional questions or concerns.

SIGNATURES

Report Author: Natalie Th. Di Date: 11/19/18

Section Chief: [Signature] Date: 11/21/18

**Facility Name:** National Metal Recycling  
**Facility Location:** 2401 Frick Road, Houston, Texas  
**Date of Inspection:** November 7, 2018

**APPENDICES AND ATTACHMENTS**

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

**Facility Name:** National Metal Recycling  
**Facility Location:** 2401 Frick Road, Houston, Texas  
**Date of Inspection:** November 7, 2018

**APPENDIX A: DIGITAL IMAGE LOG**

|                                                              |                                                                                                                  |
|--------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| <b>1. Inspector Name:</b><br>Natalie Topinka                 | <b>2. Date(s) of Inspection:</b><br>November 7, 2018                                                             |
| <b>3. Company/Facility Name:</b><br>National Metal Recycling | <b>4. Street Address, City, State:</b><br>2401 Frick Road, Houston, Texas                                        |
| <b>5. Number of Images:</b><br>5                             | <b>6. Archival Record Location:</b><br>CD-R labeled National Metal Recycling Inspection photos, November 7, 2018 |

| Image Number | File Name    | Date and Time (CST) | Latitude and Longitude | Description of Image                                                                              |
|--------------|--------------|---------------------|------------------------|---------------------------------------------------------------------------------------------------|
| 6            | PB070006.JPG | 11/7/2018 16:06     |                        | National Metal Recycling – overview of ferrous scrap pile                                         |
| 7            | PB070007.JPG | 11/7/2018 16:06     | 29.922277, -95.453312  | National Metal Recycling –appliance with intact refrigerant circuitry on scrap pile               |
| 8            | PB070008.JPG | 11/7/2018 16:07     | 29.922283, -95.453487  | National Metal Recycling – label on refrigerator on scrap pile indicating presence of refrigerant |
| 9            | PB070009.JPG | 11/7/2018 16:08     | 29.922265, -95.45348   | National Metal Recycling – intact appliances on scrap pile                                        |
| 10           | PB070010.JPG | 11/7/2018 16:08     | 29.92227, -95.453447   | National Metal Recycling – appliance with cut refrigerant lines                                   |

