



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

DATE: NOV 21 2018

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Gamtex Recycling, Houston, Texas

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

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

TO: File

BASIC INFORMATION

Facility Name: Gamtex Recycling

Facility Location: 3660 Schalker Drive, Houston, Texas

Date of Inspection: November 9, 2018

EPA Inspector(s):

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

Other Attendees

1. Jeff Davis, Manager, Gamtex

Contact Email Address: jeff@gachman.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: 9:53 am

Departure Time: 10:48 am

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Mr. Davis unless otherwise noted.

Process Description:

Gamtex Recycling's Houston location is one of five locations in Texas. It accepts scrap metal for recycling from members of the general public ("peddlers") and commercial entities. Among items accepted are appliances, such as refrigerators or window air conditioners. Gamtex does not accept vehicles at this location.

Staff Interview: Mr. Davis estimated that items supplied by peddlers comprised a small portion of Gamtex's incoming material, approximately 10%, which included approximately 12 small appliances per week. Mr. Davis stated that Gamtex has one large commercial customer that sends appliances to the facility, and the customer removes the refrigerant properly from the appliances prior to arrival at Gamtex. Ferrous material, including small appliances, is sent to a local shredder.

Gamtex does not recover refrigerant from appliances. It accepts items that once contained refrigerant if the compressor has been removed. Gamtex has a statement at the bottom of its scale ticket that states:

"Seller certifies that prior to entering Gamtex Industries company facility all CFC's [sic] have been properly removed to allow legal, safe and responsible recycling under Section 608(B)(1) of the Clean Air Act.

- ☐ that had not leaked previously has been recovered from the appliance or shipment of appliances delivered under this sale in accordance with 40 CFR Part 82.155(a). The refrigerant has been recovered by (name)_____.
- ☐ had "leaked out (as defined in 40 CFR Part 82.155(b)(2)(iii) of the appliance or shipment of appliances delivered under this sale prior to delivery and could not possibly be recovered.

Acknowledged By: _____"

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

EPA toured the scrap pile that contained items from the general public. We observed several small appliances, including refrigerators, in the pile. At least one refrigerator had intact refrigerant lines and another refrigerator had its back panel nearly entirely intact (indicating that the refrigerant lines had not been accessed). Mr. Davis stated that approximately 5 trucks worth of material from that pile was taken daily to the local shredder, meaning material usually is not on-site more than one day.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Example scale ticket

CLOSING CONFERENCE

Compliance Assistance: We gave an overview of the regulatory requirements and compliance options in 40 C.F.R. Part 82, Subpart F, including practical elements of recovering refrigerant at Gamtex. We left with Mr. Davis a copy of the regulatory text of 40 C.F.R. § 82.155 and a U.S. EPA Small Business Resources Information Sheet.

Concerns: We discussed with Mr. Davis our concern that Gamtex's statement on its scale ticket did not meet the requirements of 40 C.F.R. § 82.155(b)(2), which require inclusion of the name and address of the person who recovered refrigerant and the date the refrigerant was recovered. We also pointed out the intact refrigerator in the scrap pile and the inevitability that the refrigerant was going to be vented to the atmosphere because Gamtex did not have an effective system in place for recovering refrigerant or verifying proper refrigerant recovery from small appliances.

SIGNATURES

Report Author: Natalie M. Pri Date: 11/16/18
Section Chief: [Signature] Date: 11/21/18

Facility Name: Gamtex Recycling

Facility Location: 3660 Schalker Drive, Houston, Texas

Date of Inspection: November 9, 2018

APPENDICES AND ATTACHMENTS

1. Digital Image Log
2. Digital Images attached on CD
3. Sample scale ticket

Facility Name: Gamtex Recycling
Facility Location: 3660 Schalker Drive, Houston, Texas
Date of Inspection: November 9, 2018

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Scott Connolly	2. Date(s) of Inspection: November 9, 2018
3. Company/Facility Name: Gamtex Recycling	4. Street Address, City, State: 3660 Schalker Drive, Houston, Texas
5. Number of Images: 8	6. Archival Record Location: CD-R labeled Gamtex Recycling Inspection photos, November 9, 2018

Image Number	File Name	Date and Time (CST)	Latitude and Longitude	Description of Image
77	PB090077.JPG	11/9/2018 12:16		Gamtex – general view of scale
78	PB090078.JPG	11/9/2018 12:16	29.79982, -95.344792	Gamtex – decommissioned sweat furnace and burning trash barrel
79	PB090079.JPG	11/9/2018 12:18	29.800023, -95.344957	Gamtex – refrigerator, back panel nearly all intact
80	PB090080.JPG	11/9/2018 12:19	29.799978, -95.344963	Gamtex – appliances on scrap pile from members of the public
81	PB090081.JPG	11/9/2018 12:21	29.799983, -95.344863	Gamtex – intact refrigerant circuitry on a refrigerator in scrap pile
82	PB090082.JPG	11/9/2018 12:21	29.800013, -95.344855	Gamtex – intact refrigerant circuitry on a refrigerator in scrap pile
83	PB090083.JPG	11/9/2018 12:22	29.800012, -95.34485	Gamtex – refrigerator with cut refrigerant line
84	PB090084.JPG	11/9/2018 12:48	29.799722, -95.345556	Gamtex – sign at weigh scale directing removal (not recovery) of refrigerant from appliances

