



November 21, 2023

WEIKERT IRON AND METAL  
ATTN MIKE WEIKERT  
2240 SCHLEY AVENUE  
MUSCATINE, IA 52761

SUBJECT: Work Request# 5575 – Permit Renewal - Appliance Demanufacturing Permit (ADP)  
Weikert Iron and Metal; Permit #70-ADP-03-05

Dear Mr. Weikert:

On November 8, 2023 I met with Jeremy and Justin Weikert to conduct an inspection of the appliance demanufacturing permit for Weikert Iron and Metal located at 2240 Schley Avenue in Muscatine, Iowa. I spoke with you after my inspection regarding the findings. Please reference the enclosed inspection report which includes observations made during my inspection.

If you have any questions or would like further explanation of any part of this report, please contact me in this office at 319-653-2135.

Sincerely,  
FIELD SERVICES & COMPLIANCE BUREAU

A handwritten signature in black ink that reads 'Ryan Stouder'. The signature is written in a cursive, flowing style.

Ryan Stouder  
Environmental Specialist Senior

Encl. Inspection Report

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xc: Becky Jolly, IDNR Solid Waste Section, via email  
FOCD - Weikert ADP SW

**IOWA DEPARTMENT OF NATURAL RESOURCES  
APPLIANCE DEMANUFACTURING (ADP) PERMIT INSPECTION FORM**

<b>Permit No.:</b> 70-ADP-03-05	<b>County:</b> Muscatine
<b>Facility Name:</b> Weikert Iron and Metal	<b>Facility Address:</b> 2240 Schley Avenue Muscatine, IA 52761
<b>Phone Number:</b> 563-264-3031	
<b>Responsible Official:</b> Mike Weikert	<b>Mailing Address:</b>
<b>Phone Number:</b> 563-263-2203	Same
<b>Person(s) Present:</b> 1)Mike Weikert via phone 2)Jeremy Weikert 3)Justin Weikert	
<b>Date of This Inspection:</b> 11/08/2023	<b>Date of Last Inspection:</b> 03/10/2021

*\*Be advised your facility may require, due to either SIC code or onsite management practices, an NPDES General Permit #1 (Stormwater permit).*

<b>IAC 567 Chapter 118.4: Appliance Storage &amp; Handling Prior to Demanufacturing</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
<b>Storage &amp; Handling</b>	118.4(1) Are appliances being stored to prevent capacitors, refrigerant lines, compressors, and components containing mercury from being damaged and allowing a release into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.4(2) Are appliances being handled in a way which prevents damage, cuts, or breaks in refrigerant lines, compressors, capacitors and components containing mercury from being damaged and allowing a release into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.4(3) Are less than 1,000 appliances being stored prior to demanufacturing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.4(4) Are appliances being demanufactured in 270 days or less?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:**The appliances that I observed were kept in an upright normal, complete condition. The damaged appliances were lined up for final processing, and these were damaged prior to delivery or at the time of the drop by the city or public at the main gates. Most of the appliances are processed within the same day or within days after being received on site.

<b>IAC 567 Chapter 118.7: Fixed Facility &amp; Mobile Operations</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
<b>Operations</b>	118.7(1) Is demanufacturing taking place on an impervious floor (including but not limited to concrete, ceramic tile, or metal)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.7(2) Is the point of demanufacturing located 50 feet or more from a well and any water of the state?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.7(5) Is a unique marking system (minimum of nine inches square) being applied to the appliances after demanufacturing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:**"WR" is still used as the unique marking and this marking was observed on the demanufactured appliances in the scrap pile.



Training	IAC 567 Chapter 118.8: Training		Yes	No	NA
	118.8	Is at least one owner or employee completed a Department-approved training course?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.8	Is one trained person on site at all times when appliances are being demanufactured?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:** Almost all of the employees have taken the course and there is always a trained staffer on site at all times during demanufacturing process.

Refrigerant Recovery	IAC 567 Chapter 118.6: Permit Application Requirements		Yes	No	NA
	118.6(8)	Is a copy of the EPA Refrigerant Recovery or Recycling Device Acquisition Certification available onsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	608 CAA (CFR)	Is a copy of the EPA Refrigerant Reclaimer's Certification available onsite if reclamation (purification) is taking place at the facility?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	IAC 567 Chapter 118.9: Refrigerant Removal Requirements		Yes	No	NA
	118.9(2)	If refrigerant is removed at a location other than a permitted ADP facility, is there documentation that it was removed by a service or repair facility certified for the removal of refrigerant?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.9(3)	Is removal of refrigerant being done in an area where the temperature of the surrounding air and that of the appliance being demanufactured is 45 degrees Fahrenheit or greater?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA
	118.13(2)"a" & 118.13(2)"g"	Are the number and type of refrigerant containing appliances being tracked, as well as the amount of refrigerant removed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.13(3)"a"	Are bills of lading being kept as to where refrigerants are being shipped for disposal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:** Refrigerant is being separated per the appliance label or placed into a mixed container. Their permit allows for mobile demanufacturing, but that is not being conducted at this time. The shop is heated and temperature controlled as needed. I did not see any issues with the appliance tracking system efforts.

Oil	IAC 567 Chapter 118.9: Refrigerant Removal Requirements		Yes	No	NA
	118.9(5)	If compressor oil is being removed from the refrigeration units, is it being stored in accordance with 567-119.5 <i>(Note: AST must be large enough and on an impermeable surface to prevent spills, meet API construction standards, have absorbent material available, have a gauge to monitor liquid level, &amp; meet Ch. 567-135 &amp; 136 if UST)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Comments:** The compressors are removed and the oil is not extracted or separated. Any spillage of oil is handled quickly and oil dry material applied accordingly. The oil dry material is disposed of accordingly.

Ammonia Gas Refrigerant	IAC 567 Chapter 118.9: Refrigerant Removal Requirements		Yes	No	NA
	118.9(6)"a"	Is the ammonia gas being vented into water and is the resulting wastewater being properly disposed of?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.9(6)"e"	Is sodium chromate being properly stored in DOT-approved containers labeled with a proper EPA-approved chromium label stating "chromium" or "hazardous waste"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

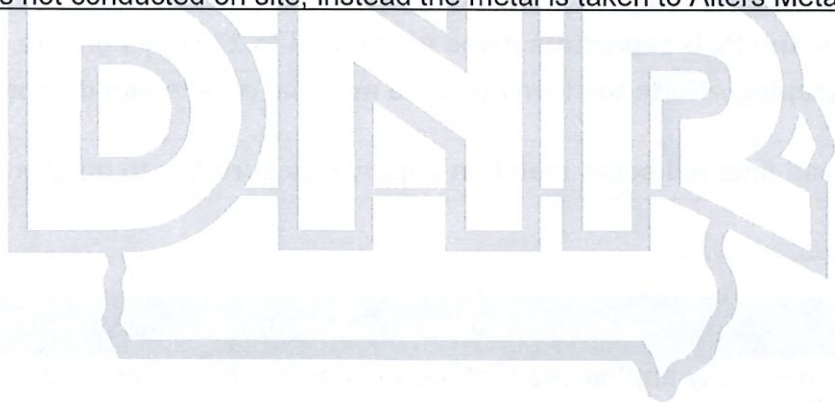


118.13(3)	Are records being kept on all hazardous waste manifest and bills of lading for shipments of refrigerant, mercury switches, PCB-containing material, and kept on site for a minimum of three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.13(3)"P"	Are copies of annual reports (containing all the record keeping requirements) that have been sent to the Department Central Office being retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:** Daily and annual records were observed and appeared to be accurate and complete.

IAC 567 Chapter 118.15: Shredding of Appliances		Yes	No	NA	
Processing	118.15(1)	Has fluff from shredding been tested at least quarterly for PCBs, and TCLP for heavy metals? Have these results being sent to the department within 30 days of the end of each quarter?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.15(1)	Have the results from fluff testing been submitted to the department within 30 days of the end of each quarter? And are these records being kept on site for a minimum of three years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.15(3)	Are appliances being demanufactured before shredding or processing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.15(3)	If appliances are being accepted from demanufacturers for recycle/disposal, have the appliances been demanufactured in accordance with Federal regulations and state laws from which the appliances were received?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>


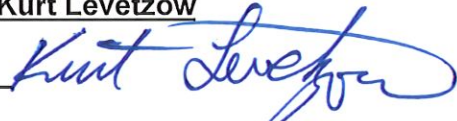
**Comments:** Shredding is not conducted on site, instead the metal is taken to Alters Metal for further processing.



Summary of Requirements:	Compliance Date:
1)Mercury component containers must have a label that specifically indicates "Mercury Containing" on the original label.	Immediately
2)Container labels must indicate the date of when the first item was placed into the container.	Immediately
3)Provide a larger, sealable container for mercury components.	Immediately
4)Upright appliances to reduce spills or releases.	Immediately
5)	

Summary of Reminders:
1)Keep the demanufacturing area above 45 degrees F. Keep doors closed as much as feasible during cold months to maintain temperature.
2)Storage of appliances and PCB capacitors items are limited to 270 days on site.
3)Take general housekeeping efforts to clean up loose material on site and dispose of the material accordingly.
4)Consider processing all finished scrap metal on impervious surfaces to ensure spills are eliminated.
5)

Summary of Recommendations:
1)Take pictures or document any appliances that are dismantled or damaged at the time of pick up or when the public drops them off.
2)Provide signage for specific areas where certain appliances or items are to be stored, both inside and outside.
3)Have all current certified employees retake the ADP training course and have all new employees take the course as soon as feasible or when a local course is available.
4)Review the procedure for handling asbestos material.
5)

Inspector: <u>Ryan Stouder</u> 	Reviewer: <u>Kurt Levetzow</u> 
Date: <u>11/27/2023</u>	Date: _____



118.9(6)"g"	Does the facility have an EPA ID number (RCRA)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.9(6)"h" & 118.9(6)"i"	Is asbestos insulation being removed and handled properly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>IAC 567 Chapter 118.13: Record Keeping &amp; Reporting</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
118.13(2)"a"(2)	Are records being kept on the number of sodium chromate-containing appliances being demanufactured	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.13(2)"f"	Are records being kept on the number of sodium chromate-containing appliances shipped to another demanufacturer	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.13(3)"a" & 118.13(3)"b"	Are records being kept on the shipment of sodium chromate (name of the facility to which sodium chromate was shipped, the date of each shipment, the amount shipped and the name and address of the transporter)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:** The presence of sodium chromate containing appliances are very few and typically held inside the building. Mike indicated that they will process roughly 25-30 sodium chromate appliances a year, and the sodium chromate material is taken to Scott County Landfill. Asbestos insulation has not been specifically identified and/or removed. We discussed the proper protocol if asbestos is identified.

<b>Mercury Components</b>	<b>IAC 567 Chapter 118.10: Mercury-Containing Component Removal &amp; Disposal</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
	118.10(1)	Are all components containing mercury being removed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.10(2)	Are mercury components being stored in containers with a proper EPA-approved label stating "Universal Waste-Mercury Containing Equipment", or Waste Mercury-Containing Equipment" in both English and the predominant language of any non-English-reading workers?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	118.10(3)	Is the date when the first mercury-containing component was placed in the container affixed to the container?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.10(4)	Storage of mercury is limited to one year, after which, it must be transported to an EPA-approved recycler/recovery facility. Has storage been under one year?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.10(8)	Are fluorescent tubes, lamps, bulbs, etc., being placed in a container and packaged to prevent breakage to an EPA-approved recycler?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>IAC 567 Chapter 118.13: Record Keeping &amp; Reporting</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
	118.13(2)	Are records being kept on the number of mercury-containing appliances being demanufactured, number of mercury switches removed, number of fluorescent tubes removed, as well as the number of mercury thermocouples being removed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.13(3)	Are records or bills of ladings being kept on the shipment of mercury-containing components?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:** Mercury components are placed into containers with a "Universal Waste" label and the facility has written "Mercury" on the label. The containers were partially or completely full and were not sealable containers. The container for the long bulbs did not have a start date and did not indicate "Mercury" on the label. Some small fluorescent bulbs are placed into a cabinet for storage. No breakage was observed, but the all waste bulbs must be placed into a secure container and the container must be labeled properly.

<b>Capaci</b>	<b>IAC 567 Chapter 118.11: Capacitor Removal Requirements</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
	118.11(4)"a"	Does the facility have an EPA TSCA ID number for capacitor storage (required if facility has no RCRA ID #)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



118.11(4)"b"	Are PCB items being stored in a manner that provides adequate protection from the elements and adequate secondary containment? <i>(Note: Storage must take place on an impervious material above the 100-year floodwater elevation)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.11(4)"c"	Is the point of demanufacturing located above the 100-year flood water elevation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.11(4)"d"	Are PCB storage containers filled to two inches of absorbent material in the bottom?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.11(4)"e"	Are PCB containers DOT-approved and labeled with a 6" by 6" yellow label stating "PCBs" as described in CFR part 761.45?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.11(4)"g"	Is the storage for non leaking small PCB capacitors that do not comply with the requirements in 118.11(4) "a" to "f" stored for less than 30 days from the date of removal and a notation places on the PCB capacitor indicating the date the item was removed from the appliance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.11(4)"f" & 118.11(4)"h"	Is the date when the first capacitor was placed in the storage container on the label? Storage of capacitors is limited to 270 days, after which they must be transported to an EPA-approved landfill or incinerator. This burial or incineration must be documented (within one year of the date on the container) and this record kept by the demanufacturer for three years from the date the PCB waste was accepted by the initial transporter.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA	
PCB Capacitors	118.13(2)	Are records being kept on the number of PCB containing appliances being demanufactured, number of PCB capacitors and ballasts as well as the date the first PCB-containing item was placed in the storage drum that is in use on December 31? number of mercury thermocouples being removed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.13(3)"a" & 118.13(3)"b"	Are records being kept on the shipment of PCB components and the documentation of destruction or receipt from a regional collection center for all PCB materials shipped?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.13(3)"d"	Are records being kept documenting inspections of the PCB storage area as required by 118.11(4)"h"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:** All of the capacitors are removed, even if they contain PCBs. The container with PCB capacitors had absorbent in the bottom and had the proper dated label. No spills or leaks were observed. A waste oil burner is available in the building for temperature control.

IAC 567 Chapter 118.12: Spills		Yes	No	NA	
Spills	118.12(1)	Are spill records being kept and has the facility reported spills that resulted in a hazardous condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.12(2)	Is a mercury spill kit on hand?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:** No spills have reportedly occurred. Mercury spill kit was observed. Pads and absorbent on site.

IAC 567 Chapter 118.13. Record Keeping & Reporting		Yes	No	NA	
Reportin	118.13(2)	Are records being kept on appliances demanufactured in separate categories, as well as the number of each component, amount of refrigerant, etc?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>