

March 11, 2026

Sent Via Electronic Mail
Receipt Confirmation Requested

ROBERT SIKES GENERAL MANAGER
LIBERTY TIRE RECYCLING
1914 EAST EUCLID AVENUE BUILDING A
DES MOINES IA 50313
rsikes@libertytire.com

RE: Letter of Noncompliance: Stockpile Size and Fire Lane Requirements [567 IAC 117.6(455B&D)]
Tire Processing Facility Inspection
Liberty Tire Recycling, 1914 E. Euclid, Des Moines, IA
Sanitary Disposal Project Permit #77-WTM-01-96P-PRT

Dear Mr. Sikes:

Enclosed is the report completed by Malia Schepers of the Field Office #5 staff following the inspection of your facility in Des Moines.

The report should be self-explanatory. Please take note of the requirements and reminders listed near the end. By April 11, 2026, submit a response to this office indicating that the deficiencies have been corrected.

You may contact Ms. Schepers (malia.schepers@dnr.iowa.gov, 515-250-1097) or this office with any questions or comments.

Sincerely,



Digitally signed by Bill Gross
Date: 2026.03.11 18:26:22 -05'00'

Bill Gross
Environmental Specialist Senior, FO5

c.: [Becky Jolly](#) / [Mel Pins](#), Land Quality Bureau, Iowa DNR (w/encl.)
Will Sikes, Liberty Tire, wsikes@libertytire.com (w/encl.)
Jose Ruesga, Liberty Tire, jruesga@libertytire.com (w/ encl.)

**IOWA DEPARTMENT OF NATURAL RESOURCES
WASTE TIRE PROCESSOR (WTM) PERMIT INSPECTION**

Permit No.: 77-WTM-01-96P-PRT	County: Polk
Facility Name: Liberty Tire Recycling	Facility Address: 1914 East Euclid Avenue, Building A Des Moines, IA 50313
Phone Number: 515-262-4900	
Responsible Official: Robert Sikes, Gen. Manager Person(s) Present: Will Sikes, Operations Manager, 919-770-7781 Jose Ruesga, Safety Coordinator, 515-414-6877	Mailing Address: 1914 East Euclid Avenue, Building A Des Moines, IA 50313
Date of This Inspection: 3-3-2026	Date of Last Inspection: 8-8-2022

I arrived unannounced to this inspection. The current operating permit has an June 30, 2026, expiration date. The property adjacent to the east is now being utilized by Liberty Tire for salvaged tires and crumb rubber storage. In addition, Liberty is utilizing a warehouse on Aurora Avenue for crumb rubber storage.

IAC 567 Chapter 117.6: Waste Tire Processing Facility Operation	
Processing Description	Describe the general processing equipment type/purpose: Used tires are hauled in to the site and stored in outside stockpiles. Usable tires are separated for re-sale. Tires are taken off wheels as necessary and conveyed into the building for processing. Processing equipment generally consists of cutters, shredders, magnets, and screens to produce various sizes of rubber products. Intermediate and final products are stored outdoors in fabric totes and concrete bunkers. Totes were being stored outside along the entire eastern perimeter of the site.
	Describe the hourly processing capacity of equipment: The shredders typically shred approximately 12 tons/hour.
	Describe daily operating hours of the facility/equipment: The facility operates 24 hours a day, six days a week with production on Sundays shut down, although some staff is still present.
	Describe the types of processed material being produced: Waste tires are processed into various sizes for use as landfill drainage, fuel for power plants, athletic tracks and fields, etc. Metal is recycled.

IAC 567 Chapter 117.6(2): Waste Tire Processing Facility Requirements		Yes	No	NA
Facility Requirements	117.6(2)"a" Is the site graded to prevent standing pools of water, and to limit run-on of precipitation in all areas where whole waste tire or processed tire materials are stored?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	117.6(2)"b" Is the site secured by a fence or barrier of 6' or greater in height to impede unauthorized vehicle and personal access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(2)"b" Are all gates and entry points secured and locked when the site personnel are not present?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(2)"c" Is open burning of any type not occurring on the property? <i>(Note: Open burning is prohibited.)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(2)"c" Is all fueling of vehicles or equipment, and activities that may release sparks or flame, conducted at least 50' from any tire storage area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(2)"d" Are signs posted every 100' for on-site visibility that state "Open burning on-site prohibited"?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	117.6(2)"d" Are signs posted every 100' on the perimeter of the location, for off-site visibility that state "Highly flammable materials on-site. Burning in area not recommended"?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: Recent snowmelt had resulted in water ponding along the northwest corner of the building where preprocessed tires are unloaded and stored. This has been an ongoing issue and a pump was set up in this area with a filter bag and stand to filter water prior to discharge in the adjacent stream. Mr. Sikes stated the filter bag is changed weekly when pooled water is being pumped and discharged. Pumping was not occurring during this visit.

IAC 567 Chapter 117.6(3): Preprocessed Tire Storage Requirements		Yes	No	NA
117.3(6)"a"	Is the quantity of whole waste tires present on site within the allowable three-day pre-processed quantity limitation (750 tons)? (See "conditions of permit" for permitted quantity)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"d"	Are all waste tires processed within 30 days of their deposit at the site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	Does the facility store pre-processed waste tires outdoors?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, are all pre-processed waste tire piles outdoors containing not more than 50,000 cubic feet of waste tires?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, is the vertical dimension of all waste tire piles within the 10' requirement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, are all waste tire piles not more than 100' in length?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, is the surface area covered by a waste tire pile less than 5,000 square feet?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, are 50' 25' setbacks from any property line, street, public right-of-way, or building being maintained by waste tire piles onsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, are 50' fire lanes being maintained between any two tire piles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, are waste tire piles at least 200' 25' from any well, lake, pond, river, stream, sinkhole, or tile line surface intake unless appropriate grading, or the construction of a barrier, dike, or berm, is completed to intercept surface water flows that may impact such interceptors. (Note: This distance may then be reduced to 50'.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, are trees and brush cleared within 50' 25' of any tire pile?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, are all combustible materials or volatile chemicals stored more than 50' from any tire pile? (Note: If not, they must be in approved, fire-resistant containers)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, is a 20 pound Class ABC dry chemical fire extinguisher available within 100' of any one portion of outdoor tire storage areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, are all waste tires stored in truck, trailers, or mobile containers at least 10' from any property line or building (Note: These count toward total storage permitted for site; trucks unloading are exempted from setback requirement)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.3(6)"f"	If yes, are tire bales stored no greater than 10' in height, 25' in width, and 50' in length with a separation distance of 50' between piles of tire bales?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
117.3(6)"g"	Does the facility store pre-processed waste tires indoors?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
117.3(6)"g"	If yes, are all tires stored indoors at least 20' from waste tire processing and handling equipment? (Note: This does not apply to tires being actively unloaded from trucks or conveyors while process equipment is operating.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
117.3(6)"g"	If yes, are all tires cleared away at least 20' from the processing equipment after the end of the last working shift?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
117.3(6)"g"	If yes, are less than 25,000 passenger tire equivalents in total stored indoors?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
117.3(6)"g"	If yes, are all combustible materials or volatile chemicals stored at least 25' from any waste tire storage area indoors? (Note: If not, they must be in approved, fire-resistant containers.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
117.3(6)"g"	If yes, is a 20-pound Class ABC dry chemical fire extinguisher available within 50' of any one portion of indoor tire storage areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
117.3(6)"g"	If yes, is the tire processing and storage structure secure from unauthorized access during times when site personnel are not present?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: Rule variances issued in 2017 reduce some separation distances (as noted above). The preprocessed tire piles north of the building were within storage requirements. Inventory records reviewed for the current week indicated that the amount of tire material onsite was within storage limits.

IAC 567 Chapter 117.6(4): Processed Tire Storage Requirements		Yes	No	NA	
Processed Waste Tire Storage	117.6(4)“a”	Is the total volume of processed tire material stored on-site, at or less than the amount the facility produces within a consecutive 60-day period? <i>(Note: Sites are limited to no more than 5,000 tons (or 500,000 processed tires) of processed material to be stored on site at any one time.)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(4)“c”	Are processed tires that are shredded into 9” or smaller pieces stored in piles not more than 15’ in height, 100’ in length, and 50’ width with no more than 75,000 cubic feet of product by volume?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	117.6(4)“c”	Are processed tires that are cut into strips, sidewalls, or other pieces larger than 9” stored in piles that are no more than 10’ in height, 100’ in length, and 50’ in width with no more than 50,000 cubic feet of product by volume?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	117.6(4)“c”	Is a 50’ 25’ fire lane maintained between piles of processed material, with the base of the lane kept free from waste tire-derived residuals or other debris?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	117.6(4)“c”	Are all processed tire materials stored at least 50’ 25’ from any property line, street, public right-of-way or building?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(4)“c”	Are trees and brush at least 50’ 25’ from the storage of processed tire material?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(4)“c”	Is a 20 pound Class ABC dry-chemical fire extinguisher available within 100’ of any one portion of the processed tire storage area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(4)“c”	For indoor storage of more than 5,000 cubic feet of processed tire material, is the material stored on concrete floors, with all retaining walls, bins, barriers, and roofing material constructed of nonflammable materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Comments: There were two piles of shredded tires located north of the main building. One of the piles was approximately 20-25 feet tall. Fire lanes would have been adequate between the processed tire piles except there were preprocessed tires from large equipment stored between the piles. Preprocessed lawn tractor and small equipment tires were stored northwest and were being shipped to the Minnesota location to be processed. Rule variances issued in 2017 reduce some separation distances (as noted above), and require that adequate stormwater controls are installed and maintained along the stream to the south and the west along the property line. The silt fence along the stream was damaged and no longer installed correctly. We discussed replacing all of the stormwater controls along the stream. The processed tire piles south of the building had 25 foot fire lanes established, bunkers were in place and the pile size requirements were acceptable.

IAC 567 Chapter 117.6(6): Disposal of Solid Waste From Tire Processing		Yes	No	NA	
Disposal	117.6(6)“b”	Are tire bead rings, separated metal wire, synthetic fibers, cording, and “fluff” wastes being disposed of at least every 60 days at a permitted sanitary disposal project, scrap recycler, or location approved by the Department?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(6)“c”	Does the processor have records available on-site that note the most recent disposal date and location for these residuals/waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(6)“c”	Are three years of records being maintained by the processing facility with regard to the disposal of these residual wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: It was reported that metal was being sent to a steel mill in Wilton, Iowa and one in Nebraska. These records were not reviewed during this inspection.

Summary of Requirements:	Citation:
1) Ensure that the north processed tire pile is within the storage size requirements.	117.6(4)“c”
2) Ensure that required fire lanes are established and maintained.	117.6(4)“c”
3) Replace and maintain stormwater controls along the south and west perimeter.	117.4(6) & 2017 Variance

Summary of Reminders:
1) Have processing/storage records readily available at all times for state or federal inspectors.
2) The current permit expires June 30, 2026.

AUTHENTICATION		
INSPECTOR	Malia Schepers  Digitally signed by Malia Schepers Date: 2026.03.11 07:59:28 -05'00'	Date: 3-9-2026
REVIEWER	Bill Gross  Digitally signed by Bill Gross Date: 2026.03.11 18:26:46 -05'00'	Date: 3-10-2026