



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Wallach Iron & Metal, Inc., St. Louis, Missouri

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

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

TO: File

BASIC INFORMATION

Facility Name: Wallach Iron & Metal, Inc.

Facility Location: 6670 Dr. Martin Luther King Drive, St. Louis, Missouri

Date of Inspection: September 21, 2023

EPA Inspector(s):

1. Natalie Topinka, Environmental Scientist
2. Karina Kuc, Environmental Scientist
3. Tess Russell, Environmental Engineer

Other Attendees:

1. Preston Wilmoth, Manager
2. Robert Wallach, Manager

Contact Email Address: robert@wallachironandmetal.com

Purpose of Inspection: assess compliance with refrigerant safe disposal regulations

Facility Type: scrap metal recycler

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

Arrival Time: 11:55 am

Departure Time: 12:30 pm

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Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet – sent via email with inspection report
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Preston Wilmoth and Robert Wallach unless otherwise noted.

Process Description:

Wallach Iron & Metal, Inc. (Wallach) has been operating at its current location since 1981 and accepts ferrous and non-ferrous scrap metal for recycling. Its suppliers are commercial accounts, such as other scrap recyclers, manufacturers, and demolition contractors; Wallach does not accept material directly from the general public. Wallach does not accept vehicles for recycling but does accept small appliances.

Staff Interview: Mr. Preston and Mr. Wallach explained that the facility does not accept intact small appliances; they are only purchased if they have already been processed (i.e. the refrigerant has been recovered). For its approximately 30 commercial suppliers that may include small appliances in materials delivered for recycling, Wallach requires a signed contract that states the supplier will recover any remaining refrigerant from the appliances or verify that the refrigerant had been properly recovered prior to receipt by the supplier. Facility representatives stated that they have not had historical problems with contracted commercial suppliers dropping off materials that were unacceptable. Mr. Preston stated that several years back, he had attended a half-day presentation by the industry trade group regarding proper handling of refrigerant-containing appliances and EPA requirements.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

We reviewed Wallach's binder of signed contracts, titled "Appliance/Refrigerant/RTU Recycling guidelines." We toured the scrapyard and observed a window air conditioner marked with an "E" in the ferrous pile. We were not able to inspect the item closely due to its location in the scrap pile. The facility has a small shredder on-site.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Appliance/Refrigerant/RTU Recycling guidelines

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

DIGITAL SIGNATURES

Report Author: **NATALIE
TOPINKA**  Digitally signed by
NATALIE TOPINKA
Date: 2023.09.26
15:01:24 -05'00'

Section Supervisor: **NATHAN
FRANK**  Digitally signed by
NATHAN FRANK
Date: 2023.09.28
16:28:23 -05'00'

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APPENDICES AND ATTACHMENTS

1. Digital Image Log

Facility Name: Wallach Iron & Metal, Inc.
Facility Location: 6670 Dr. Martin Luther King Drive, St. Louis, MO
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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Karina Kuc	2. Archival Record Location: <i>https://usepa.sharepoint.com/sites/R5_Work/5erc/ecad/AECAB%20Library/Forms/AllItems.aspx?id=%2Fsites%2FR5%5FWork%2Fr5erc%2Fecad%2FAECAB%20Library%2Fenf%5FWallach%20Iron%20%26%20Metal%5FMO%5F23%2Fenf%5FWallach%20Iron%20%26%20Metal%5FMO%5F23%5FInspection%2FWallach%20inspection%20photos&viewid=5f882290%2D049a%2D44b7%2D8ccd%2D595d38b04fcb</i>
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_1583.JPG	9/21/2023; 12:10 CDT	Appliance/Refrigerant/RTU Recycling guidelines form
2	IMG_1584.JPG	9/21/2023; 12:17 CDT	Window air conditioner in scrap pile