



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Waukesha Iron & Metal, Inc., Waukesha, WI

FROM: Meaghan Pashen, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Waukesha Iron & Metal, Inc.

Facility Location: 1351 East Main Street, Waukesha, WI 53186

Date of Inspection: August 24, 2022

EPA Inspector(s):

1. Meaghan Pashen, Environmental Engineer
2. Karina Kuc, Environmental Engineer
3. Brittany Cobb, Environmental Engineer

Other Attendees:

1. Jaime Endrizzi, EHS Manager
2. John Kolstable, Shredder Supervisor

Contact Email Address: jamie@waukeshairon.com

Purpose of Inspection: Safe disposal of appliance regulations inspection

Facility Type: Scrap metal recycling yard

Regulations Central to Inspection: 40 C.F.R. Part 82, Subpart F: Recycling and Emissions Reduction for the Protection of Stratospheric Ozone, including the obligation of the final processor to recover any remaining refrigerant from the appliance or verify using a signed

statement or a contract that all refrigerant that had not leaked previously has been recovered appropriately from the appliance.

Arrival Time: 10:30 AM

Departure Time: 11:50 AM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided. Reason: Provided with Inspection Report
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Jamie Endrizzi unless otherwise noted.

Process Description:

Waukesha Iron & Metal Inc. (the Facility) accepts white goods/appliances and vehicles from the public and commercial partners. White goods/appliances and vehicles from Milwaukee Iron & Metal and Racine Auto & Scrap are sent to the Facility. Processing of refrigerant from items from Racine Auto & Scrap occurs at the Facility. Refrigerant is recovered from vehicles onsite and sent to a 3rd party contractor for disposal. White goods/appliances containing refrigerant are stockpiled in the “Non-Conforming Items” section of the Facility. Refrigerant is recovered from white goods/appliances onsite. This practice began about 1.5 years ago. After refrigerant is recovered from white goods/appliances and vehicles, it is disposed of by a 3rd party contractor. White goods/appliance and vehicles items are then put through the shredder after refrigerant is recovered. The Facility has a shredder, crusher, baler, and torch cutting operations. There is a fabric filter for particulate matter control at the shredder and water is sprayed during shredder operation.

Staff Interview:

The Facility has been in operation for approximately 6.5 years, and all policies have existed since then unless otherwise stated. The shredder operates Monday through Friday for 10 hours per day at approximately 60 tons per hour. Typically, about 4 to 5 employees are torch cutting for the first shift Monday through Friday. Refrigerant recovery training for Facility personnel is done verbally.

The Facility accepts approximately 10 to 20 vehicles per day and there is a daily inventory log for vehicles. Batteries are removed from vehicles prior to shredding. Sometimes when there are

excess white goods/appliances and vehicles that require refrigerant recovery, a 3rd party contractor recovers the refrigerant from these items. The Facility accepts approximately 0 to 10 appliances per day. The Facility maintains an inventory of the number of white goods/appliances from which the 3rd party contractor may sometimes recover refrigerant, but not the number of white goods/appliances accepted per day.

The Facility accepts white goods/appliances with cut lines, indicating refrigerant was not properly recovered. Jamie Endrizzi said that the Facility accepts appliances with cut lines from “qualified customers”. These white goods/appliances are put in the “Non-Conforming Items” section.

For each sale, clients sign a receipt in the Facility’s electronic signature system which includes a statement stating the Facility’s refrigerant acceptance policy for white goods/appliances and vehicles. They are prompted to read the policy upon first sale only. This policy is not read by clients on a per-transaction basis. The per-transaction electronic signature system became a Facility policy in 2018 or 2019. Contracts are signed by long term and commercial partners.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA observed visible emissions from torching area of the Facility. See Images 1 to 6 in Digital Image Log.

EPA observed white goods/appliances in the “Non-Conforming Items” section. EPA also observed the vehicle processing area, crusher, and vehicle refrigerant removal equipment. EPA requested the daily logs of cars accepted at the Facility for the past year and the log of 3rd party contractor refrigerant recovery for the past year.

EPA observed the Facility’s per-transaction electronic signature system. Clients are prompted to read the refrigerant acceptance policy upon first sale only. This policy is not read by clients on a per-transaction basis. 40 C.F.R. Part 82, Subpart F requires a signed verification statement that all refrigerant that had not leaked previously has been recovered appropriately from the appliance and it must include the name and address of the person who recovered the refrigerant and the date the refrigerant was recovered.

There are material acceptance boards for the public at the entrance to the Facility.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

- Example of annual contract

- Example of per-transaction electronic signature system

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the Facility

Requested documents:

- Log of 3rd party contractor refrigerant recovery for the past year (August 2021 – August 2022)
- Daily logs of cars accepted at the Facility for the past year
- Daily shredder throughput of scrap for the past year
- All long-term contracts for the past year

Compliance Assistance:

EPA cited safe disposal of appliance regulations with regards to the Facility's obligation to verify using a signed statement or a contract that all refrigerant that had not leaked previously has been recovered appropriately from the appliance.

Concerns:

EPA expressed concerns about the Facility receiving white goods/appliances with cut lines, indicating refrigerant was not properly recovered. EPA expressed concern that the Facility's current use of verification statements does not follow federal safe disposal of appliance regulations.

DIGITAL SIGNATURES

Report Author: **Pashen,
Meaghan**  Digitally signed by
Pashen, Meaghan
Date: 2022.10.17
12:51:23 -05'00'

Section Supervisor: **Brian
Dickens**  Digitally signed by Brian
Dickens
Date: 2022.10.17
13:25:39 -05'00'

Facility Name: Racine Auto & Scrap
Facility Location: 2035 S Memorial Drive, Racine, WI
Date of Inspection: August 24, 2022

APPENDICES AND ATTACHMENTS

Appendix A: Digital Image Log

Facility Name: Waukesha Iron & Metal
Facility Location: 1351 E. Main Street, Waukesha, WI
Date of Inspection: August 24, 2022

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Karina Kuc	2. Archival Record Location: R5 Electronic Records Center
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Image Number	File Name	Date and Time (EST)	Description of Image
1	P8240014.JPG	08/24/2022 10:06 AM	Emissions near torching operation
2	P8240015.JPG	08/24/2022 10:06 AM	Emissions near torching operation
3	P8240016.JPG	08/24/2022 10:06 AM	Emissions near torching operation
4	P8240017.JPG	08/24/2022 10:06 AM	Emissions near torching operation
5	P8240018.JPG	08/24/2022 *	Emissions near torching operation
6	P8240019.JPG	08/24/2022 *	Emissions near torching operation
7	P8240020.JPG	08/24/2022 *	Refrigerant recovery equipment
8	P8240021.JPG	08/24/2022 *	Scrap yard and scrap piles
9	P8240022.JPG	08/24/2022 *	Scrap yard and scrap piles
10	P8240023.JPG	08/24/2022 *	Appliances in “Non-Conforming” section
11	P8240024.JPG	08/24/2022 *	Shredder
12	P8240025.JPG	08/24/2022 *	Shredder

Facility Name: Waukesha Iron & Metal

Facility Location: 1351 E. Main Street, Waukesha, WI

Date of Inspection: August 24, 2022

13	P8240026.JPG	08/24/2022 *	Shredder
14	P8240027.JPG	08/24/2022 *	Shredder
15	P8240028.JPG	08/24/2022 *	Refrigerant recovery equipment for vehicles
16	P8240029.JPG	08/24/2022 10:38 AM	Refrigerant recovery equipment for vehicles

*Metadata from JPG file did not preserve in ERC