IOWA DEPARTMENT OF NATURAL RESOURCES

GOVERNOR KIM REYNOLDS
LT. GOVERNOR CHRIS COURNOYER
DIRECTOR KAYLA LYON

MAY 6, 2026

JIM MILLER
3270 DODGE ST
DUBUQUE IA 52003

VIA EMAIL

ATTN: Jim Miller, Owner, jimmiller@keycityrecycling.com

SUBJECT: NPDES General Permit 1 for Key City Recycling, 3270 Dodge St., Dubuque, IA 52003
Notice of Violation: Issuance of NPDES permits – General Permits 60.4(2)

On May 5, 2026, a complaint investigation was completed at the above-referenced facility. Though the basis of the complaint was unfounded, it was determined that this facility is required to have a National Pollution Discharge Elimination System (NPDES) General Permit 1 (GP1) for stormwater discharge associated with industrial activity.

The definition of *stormwater discharge associated with industrial activity* listed in 40 CFR 122.26"b"(14) "vi" states that “facilities involved in the recycling of materials, including metal scrap yards, battery reclaimers, salvage yards, and automotive junkyards, including, but not limited to, those classified as Standard Industrial Classifications (SIC) 5015 and 5093.” You were unsure of the SIC code on the day of the investigation, but the primary SIC listed in the DNR’s Stormwater database for the business that you purchased in 2008 or 2009 (Roger’s Auto) had a SIC 5015 designation.

By August 6, 2026, this facility shall complete the steps, including a Notice of Intent, public notice, and development of a Stormwater Pollution Prevention Plan (SWPPP), to achieve authorization to discharge stormwater under a GP1. During the investigation, I provided you with the 40 CFR definition of stormwater discharge associated with industrial activity, DNR Form 542-1415 (How to File A Complete NOI along with a GP1 application), DNR Form 542-1416 (NPDES Stormwater General Permit Public Notice Template), a business card for the Iowa Waste Reduction Center, and Sue Schauls of the Iowa Certified Automotive Recyclers Environmental Program as a few options to aid you in completing a SWPPP.

The application may be submitted by visiting https://programs.iowadnr.gov/ Stormwater/pages/eAppIntro.aspx. More information regarding this permit can be found at https://www.iowadnr.gov/Environmental-Protection/Water-Quality/NPDES-Storm-Water/Online-Storm-Water-Application. If assistance is needed while filing this application, please contact Mark Lasnek at 515-204-9234 or mark.lasnek@dnr.iowa.gov. Once the authorization is granted, call the Field Office to schedule an inspection.

If you have any questions regarding this letter, please contact Matt Calvert at (563) 927-2640 ext. 314 or at matt.calvert@dnr.iowa.gov.

Sincerely,

Matt Calvert
Digitally signed by Matt Calvert
Date: 2026.05.06 13:27:19 -05'00'

Matt Calvert
Environmental Specialist

c: e-file – 31 STW Dubuque Key City Recycling 050526 nov mtc