Iowa Waste Reduction Center

University of Northern Iowa

Storm Water Pollution Prevention Plan

NPDES General Permit # 1

for

Key City Recycling

Dubuque, Iowa 52003

6/5/2026

IOWA WASTE REDUCTION CENTER - UNIVERSITY OF NORTHERN IOWA
Business and Community Services, Suite 113 Cedar Falls, IA | 319-273-8905

Table of Contents

A. General Facility Information
B. Introduction
C. Facility Description
D. Objectives for the Stormwater Program
E. General Requirements of a SWPPP
F. Special Requirements of a SWPPP
G. Stormwater Pollution Prevention Team
H. Existing Environmental Management Plans or Permits
I. Facility Maps
J. Significant Materials, Potential Pollutants, Exposure to Stormwater, Past Spills and/or Leaks and Hazardous Conditions
K. Non-Stormwater Discharge Assessment and Certification Statement
L. Existing Monitoring Data
M. Facility Evaluation Summary and Existing and/or New Best Management Practice (BMP) Options
N. Additional Best Management Practices (BMPs)
O. Annual Report and SWPPP Compliance Evaluation
P. Certification of the SWPPP

List of Tables

Table 1 – Stormwater Pollution Prevention Team
Table 2 – Significant Materials, Potential Pollutants, Exposure to Stormwater, Past Spills and Leaks, and Hazardous Conditions
Table 3 – Non-Stormwater Discharge Assessment
Table 4 – Facility Evaluation and Existing and/or New Best Management Practices (BMPs) Options
Table 5 – Additional Best Management Practices (BMPs)

Attachments

Attachment 1 – Employee Training Record
Attachment 2 – Significant Spill Report
Attachment 3 – Annual Visual Inspection Forms
Attachment 4 – Annual Reports

A. General Facility Information

Name of Facility: Key City Recycling

Facility Address: 3260 Dodge St., Dubuque, IA 52003

County: Dubuque

Location: ¼ **Section:** SW **Section:** 27 **Township:** 89N **Range:** 2E

Owner: Jim Miller

Telephone: 563-590-3826

Emergency Contact: Jim Miller

Emergency Telephone: 563-590-3826

Mailing Address: 3260 Dodge St., Dubuque, IA 52003

Standard Industrial Classification Code (SIC): Primary - 5093 - Scrap and Waste Materials Secondary - 5015 - Motor Vehicle Parts, Used

Permit Information: NPDES General Permit #1

Permit Number: Pending

Number of Stormwater Outfalls: 1

Receiving Waters: Catfish Creek to the Mississippi River

B. Introduction

This stormwater pollution prevention plan (SWPPP) covers the operations at our facility. It has been developed as required under Iowa's National Pollutant Discharge Elimination System (NPDES) General Permit No. 1 for stormwater discharges. This SWPPP describes facility operations, identifies potential sources of stormwater pollution at the facility, lists best management practices (BMPs) or pollution control measures to reduce the discharge of pollutants in stormwater runoff, and provides a plan for periodic review of this SWPPP.

C. Facility Description

Key City Recycling buys and processes scrap metal and salvage vehicles from site pick-ups and public drop offs. They also provide scrap metal recycling programs, roll off containers and pickup services for commercial, industrial, agricultural, and residential customers.

D. Objectives of the Stormwater Program

The goal of the stormwater permit program is to improve the quality of surface water by reducing the number of pollutants potentially contained in the stormwater runoff being discharged. Industrial facilities subject to a NPDES permit must prepare and implement a SWPPP for their facility. The objective of the SWPPP is three-fold:

- Identify potential sources of pollution.
- Describe best management practices (BMPs) consistent with processes and activities.
- Provide other elements such as, but not limited to, a facility inspection program, a site compliance evaluation program, record keeping, and a reporting program that will help us comply with the terms and conditions of Iowa's stormwater discharge permit.

E. General Requirements of a SWPPP

All forms, including the proof of Public Notice, the Notice of Intent (NOI) form, the SWPPP, annual reports, certification forms and any information submitted to the Iowa DNR will be signed by the Owner or a designee. A copy of this SWPPP will be maintained at the facility and made available as appropriate.

F. Special Requirements of a SWPPP

The facility is *not subject* to special requirements associated with:

- Stormwater discharge through a Municipal Separate Storm Sewer System in a city with a population of 100,000 or more.
- Salt storage piles used for deicing or other commercial purposes.
- Storage, handling, processing or transfer of SARA Title III, Section 313 Water Priority Chemicals.

G. Stormwater Pollution Prevention Team

The stormwater pollution prevention team is responsible for developing, implementing, maintaining, and revising this SWPPP. The members of the team are familiar with the management and operations of our facility. The members of the team and their primary responsibilities are listed in Table 1.

Table 1: Stormwater Pollution Prevention Team	
Name & Title	**Responsibility**
Jim Miller - Owner	Recordkeeping, Annual Compliance and Review of SWPPP, Employee Training, Facility Inspections, Oversight of Operations

H. Existing Environmental Management Plans or Permits

- NPDES General Permit:
  - General Permit #1- Pending

I. Facility Maps

Facility maps identify operations and storage areas. Our facility's sitemaps include the following information and features:

Facility Map 1:

- An aerial view of the facility and its property lines; structural and nonstructural controls, vegetated buffers; permeable and nonpermeable surfaces; anticipated stormwater flows and outfall(s).

Facility Map 2:

- Location of significant materials.

Facility Map 3:

- Receiving stream(s).

Facility Map 1: Property Lines, Controls, Surfaces, Anticipated Stormwater Flow and Outfall(s).



Anticipated Water Flow

Property Line

Vegetative Buffer

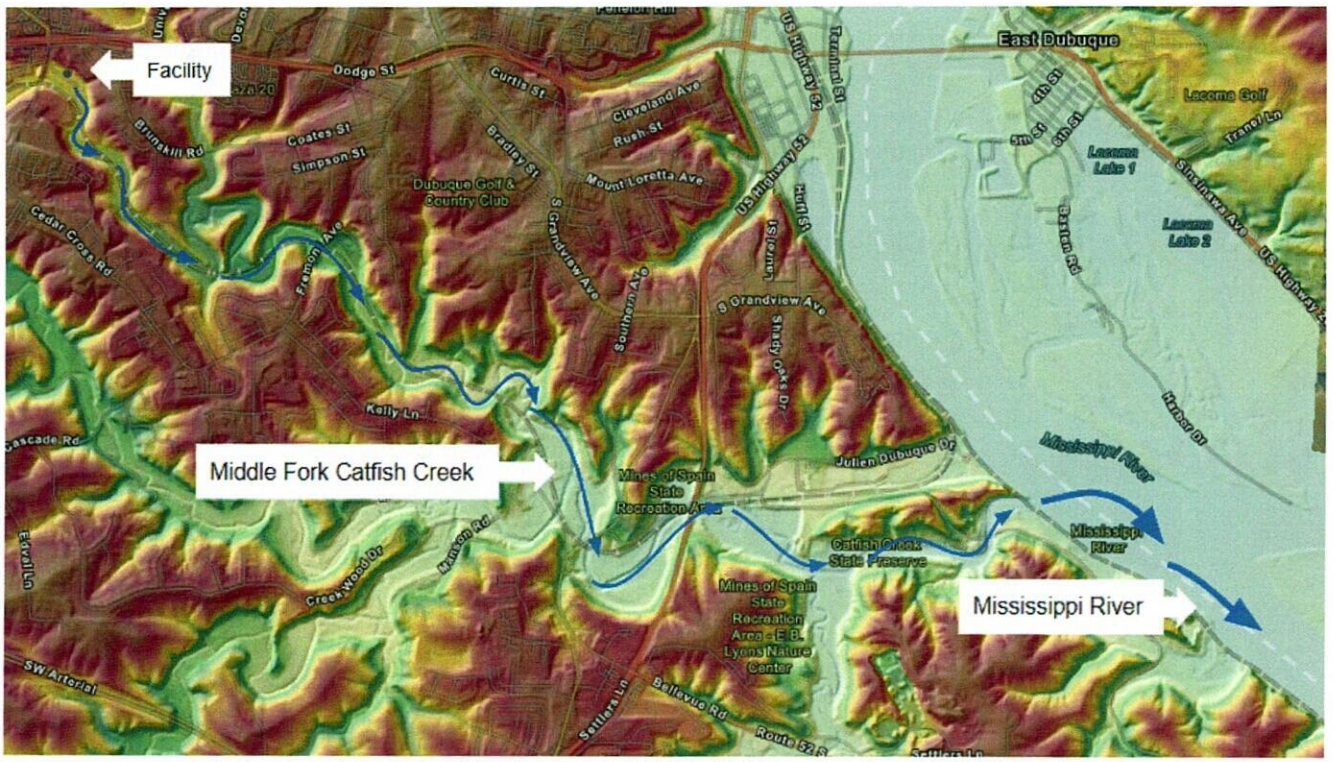
Outfall

Facility Map 2: Significant Materials



- Scrap Metal & Salvage Vehicle Storage
- Vehicle Draining & Dismantling
- Truck Scale
- Gasoline & Diesel Tanks
- Used Oil Tank

Facility Map 3: Topographical View & Receiving Stream(s)



J. Significant Materials, Potential Pollutants, Exposure to Stormwater, Past Spills and Leaks, and Hazardous Conditions

Table 2 is an inventory of "***significant materials***"[1] on site. For each significant material on site, an evaluation has been conducted to determine the potential for these materials to contaminate stormwater runoff being discharged from the facility and noted if they were exposed to stormwater in the past three years. Also recorded in Table 2 is information regarding our investigation into spills or leaks over the past three years and if such leaks constituted (in size and duration) a "***hazardous condition***"[2].

Table 2: Significant Materials, Potential Pollutants, Exposure to Stormwater, Past Spills and Leaks, and Hazardous Conditions

Location, Process or	*Significant*	Maximum	Exposed in the	Spills or	Hazardous

Activity	*Materials*	Quantity	Past 3 Years	Leaks: Date, Quantity	Condition *(Yes/No)*
Scrap Recycling	Heavy Metals, Fuel, Oil, Grease, Oxides, Other Residual Contaminants	N/A	Yes	No	No
Diesel & Gasoline Tanks	Diesel, Gasoline	**Diesel** -1000 gal tank diked **Gasoline** -1000 gal tank diked -300 gal tote -150 gal tank (2)	Yes	No	No
Salvage Vehicles – Disassembly, Processing and Storage Areas	Fuel, Oil, Hydraulic Fluids, Lubricants, Antifreeze, Transmission and Brake Fluids, Particulate Matter, Grease, Other Residual Contaminants, Heavy Metals	<250 Vehicles	Yes	No	No
Used Oil Tank	Oil	300 gal	Yes	No	No
Truck Scale	Fuel, Oil, Grease, Hydraulic Fluid, Lubricants, Antifreeze Transmission and Brake Fluids, Battery Acid, Lead Acid, Heavy Metals, Particulate Matter	N/A	Yes	No	No

K. Non-Stormwater Discharge Assessment

The permit requires that all discharge locations be evaluated for the presence of non-stormwater discharges. Examples of non-stormwater discharges that may require additional coverage under a NPDES permit include any water used in the manufacturing

process (process water/wastewater) and outside vehicle or equipment washing where detergent is used. Allowable non-stormwater discharges include:

- Uncontaminated groundwater discharge
- Wetlands
- Foundation or footing drains where flows are not contaminated with process materials
- Discharges from springs
- Routine exterior building wash down which does not use detergents or other compounds
- Air conditioning condensate
- Pavement wash waters where spills or leaks or hazardous materials have not occurred and where detergents are not used
- Discharges from firefighting activities
- Fire hydrant flushing
- Potable water sources including waterline flushing
- Irrigation drainage/Lawn watering

Any unauthorized non-stormwater discharges will be eliminated and contained with the resulting wastewater being captured, transported, and/or treated accordingly. Table 3 summarizes evaluation results. Subsequent assessments will be documented in the Annual Site Compliance Evaluation Form **(Attachment 3).**

Table 3: Yearly Non-Stormwater Discharge Assessment					
Date	**Outfalls**	**Assessment Method Used**	**Location, Process, or**	**Person Evaluating**	**Result of Assessment and Potential Significant Sources**

			Activity		
6/5/2026	001	Visual	Entire Facility Grounds and Outfalls	Jim Miller	No non-stormwater discharge observed

NON-STORMWATER DISCHARGE ASSESSMENT CERTIFICATION – I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations and that such notification will be kept on site and made available to the IDNR anytime, after 180 days from the discharge authorization date, if non-stormwater certification cannot be provided.

Jim Miller
Name

Owner
Official Title

563-590-3826
Area Code & Phone Number

6-15-26
Date

Signature

L. **Existing Monitoring Data**

No monitoring data is available to report. Based on operations at the facility, monitoring is not expected as a permit requirement.

Automobile Salvage yards that store more than 250 salvaged vehicles on-site are subject to the monitoring requirements of NPDES General Permit #1. The facility should maintain an accurate count of salvaged vehicles to determine when monitoring requirements apply and ensure compliance.

M. Facility Evaluation Summary and Existing and/or New BMP Options

Table 4 is a description of activities that are currently in place or scheduled to be implemented to eliminate/minimize the occurrence of **Hazardous Conditions** at the facility.

Table 4: Facility Evaluation Summary and Existing and/or New Best Management Practices (BMP) Options

Location, Process or Activity	Stormwater Pollutant Source	Pollutant(s)	BMP	Date Implemented	Responsible Party
Scrap Metal Recycling	Leaks, Spills, Residual Contaminants	Heavy Metals, Oil, Grease, Oxides, Other residual contaminants	- Inspect piles periodically for leaks or spills -Maintain spill absorbent materials -If spills or leaks are observed, they are contained and cleaned up immediately -Regularly inspect scrap piles and keep clean of debris -Limit outdoor storage time to reduce weather exposure -Limit the amount of residual substances on materials prior to storage, including oil, grease, and other potential contaminants	In-Place	All Staff
Diesel & Gasoline Tanks	Leaks, Spills, Tank Integrity	Diesel, Gasoline	-Inspect for leaks and deterioration, replace tanks, parts, etc. that are not in sound condition (rusting, deteriorating, etc.) -Maintain spill absorbent materials	In-Place	All Staff

			-If spills or leaks are observed, they are contained and cleaned up immediately -Preventative maintenance -Keep fuel tanks on an impervious surface or concrete pad when possible -Maintain secondary containment and ensure discharge valves are closed -Ensure stormwater is without sheen before opening the containment release valve		
Salvage Vehicles-Disassembly Processing and Storage Areas	Leaks, Surface Contaminants, Deterioration and Corrosion of Materials	Fuel, Oil, Grease, Hydraulic Fluids, Lubricants, Antifreeze, Transmission and Brake Fluids, Battery Acid, Lead Acid, Heavy Metals, Particulate Matter	-Inspect periodically for leaks or spills -Maintain spill absorbent materials -If spills or leaks are observed, they are contained and cleaned up immediately -Fluids are drained on an impervious surface -Preventative maintenance -Keep hoods closed when possible -Recovered fluids and batteries are stored in dedicated, properly labeled containers -Confine storage of parts, equipment, and vehicles to designated areas	In-Place	All Staff
Used Oil Tank	Leaks, Spills, Container Integrity	Oil	-Inspect periodically for leaks or spills -Maintain spill absorbent materials -If spills or leaks are observed, they are contained and cleaned	In-Place	All Staff

			up immediately -Keep on impervious surface		
Truck Scale	Leaks, Spills	Fuel, Oil, Grease, Hydraulic Fluids, Lubricants, Antifreeze, Transmission and Brake Fluids, Battery Acid, Lead Acid, Heavy Metals, Particulate Matter	- Inspect periodically for leaks or spills -Maintain spill absorbent materials -If spills or leaks are observed, they are contained and cleaned up immediately	In-Place	In-Place

N. Additional Best Management Practices (BMPs)

In addition to the specific best management practices identified above, Table 5 lists general best management practices intended to reduce the amount of pollution entering surface waters from our facility.

Table 5: Additional Best Management Practices (BMPs)

Activity	Location, Process, or Activity	BMP	Frequency	Responsible Party
Good Housekeeping	Entire Facility	- Maintain clean areas throughout the facility's property and parameters - Clean up and properly dispose of any wastes, windborne wastes or spilled materials on facility grounds -Keep any solid waste containers closed or covered when not in use, especially in advance of a stormwater event	Continuous	All Staff
Preventative Maintenance	Entire Facility	-Inspect and service facility vehicles and yard equipment regularly -Service vehicles and equipment on a non-permeable surface under a roof or other cover -Promptly repair any leaks from vehicles or yard equipment -Regularly inspect and maintain outside storage containers	As Necessary	All Staff

Visual Inspections	Entire Facility	-Regularly conduct and maintain a visual inspection procedure with a focus on the facility's stormwater drains and outfalls -Regularly conduct and maintain a preventative maintenance process or program	Continuous	All Staff
Spill Prevention & Response	Entire Facility	-Conduct fueling operations on an impervious or contained pad or under a roof or canopy where possible -Ensure the availability of spill kits and absorbent materials in accessible locations throughout the facility -Train staff in spill prevention, response and the proper disposal of cleanup materials	Continuous, as needed document using ***Significant Spill Report Form - Attachment 2***	All Staff
Sediment & Erosion Prevention	Facility Perimeter	-Upkeep of vegetated ground cover and elevated vegetated berms along the facility's perimeter	Continuous	All Staff
Run-On Control	Facility Perimeter	-Upkeep of vegetated ground cover and elevated vegetated berms along the facility's perimeter - Minimize run-on from adjacent properties using diversion dikes, berms, or equivalent structural controls where necessary	Continuous	All Staff
Employee Training	Entire Facility	-Instruct all employees of the provisions of this SWPPP & consequences for noncompliance -Instruct all employees on spill prevention, the location and use of spill kits, and response should any spills occur	Annually document using ***Attachment 1***	All Staff
Record Keeping & Internal Reporting	Entire Facility	-Complete annual site compliance evaluations and SWPPP narrative reports -Complete annual non-stormwater discharge assessment -Document annual staff training -Document any leaks/spills, report any significant spills as necessary	Annually and as needed, Document using ***Attachment 1-3***	All Staff

		-Modify this SWPPP as necessary -Retain all records for a minimum of three (3) years		
Site Compliance Inspection & Reporting	Entire Facility	-Regularly inspect facility for compliance with the existing SWPPP -Modify the SWPPP or facility operations as necessary	Annually, Document using ***Annual Site Compliance Evaluation Form - Attachment 3***	All Staff

O. Annual Report and SWPPP Compliance Evaluation

Each year a short report will be prepared. The report will recap the previous year's stormwater management activities, problems and successes. The annual Non-Stormwater Discharge Assessment will also be documented in this report. If changes are required to the plan, they will be recorded in the SWPPP annual report and changes will be made to the SWPPP within 14 days. The annual report must be signed by an authorized representative of the facility and kept with the SWPPP (Include your Annual Reports as **Attachment 4**) for at least three (3) years.

P. SWPPP Certification Statement

Certification of the SWPPP

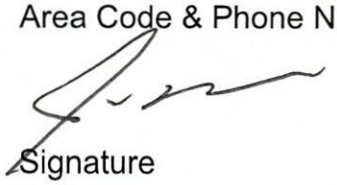
I certify under penalty of law that this SWPPP has been developed in accordance with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete. No unauthorized discharges were present at the time this plan was completed. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for known violations.

Jim Miller — Name

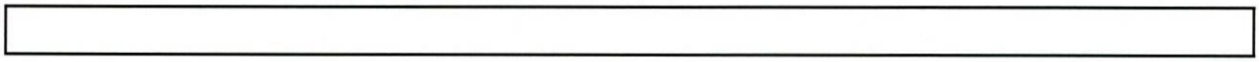
owner — Official Title

563-590-3826 — Area Code & Phone Number

6.05.24 — Date



Signature



1. "***Significant materials"*** are defined as: "Raw materials, fuels, materials such as solvents, detergents, and plastic pellets, finished materials such as metallic products, raw materials used in food processing or production, hazardous substances designed under Section 101(14) of CERCLA, any chemical the facility is required to report pursuant to EPCRA Section 313, fertilizers, pesticides and waste products such as ashes, slag and sludge that have the potential to be released with stormwater discharges [40 CFR 122.26(b)(12)]."

2. A ***"Hazardous Condition"*** is defined as: "... any situation involving the actual, imminent, or probable spillage, leakage, or release of a hazardous substance on to the land, into a water of the state, or into the atmosphere, which creates an immediate or potential danger to the public health or safety or to the environment. Iowa Code 455B.381(4)."

3. **"Leachate"** is defined as any contaminated liquid that is generated from water percolating through a solid waste disposal site, accumulating contaminants, and moving into subsurface areas.

4. **"Hazardous Substance"** means any substance or mixture of substance that presents a danger to the public health or safety and includes, but is not limited to, a substance that is toxic, corrosive, or flammable, or that is an irritant or that, in confinement, generates pressure through decomposition, heat, or other means. The following are examples of substances which, in sufficient quantity, may be hazardous: acids; alkalis; explosives; fertilizers; heavy metals such as chromium, arsenic, mercury, lead, and cadmium; industrial chemicals; paint thinners; paints; pesticides; petroleum products; poisons; radioactive materials; sludges; and organic solvents. "Hazardous substances" may include any hazardous waste identified or listed by the administrator of the United States Environmental Protection Agency under the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act of 1976, or any toxic pollutant listed under Section 307 of the federal Water Pollution Control Act as amended to January 1, 1977, or any hazardous substance designated under Section 311 of the federal Water Pollution Control Act as amended to January 1, 1977, or any hazardous material designated by the secretary of transportation under the Hazardous Materials Transportation Act (49 CFR 172.101