



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
ROGER L. LANDE, DIRECTOR

May 3, 2012

Kathryn Bell
B & B Iron and Metals
601 Patton Street
Rowan, IA 50470

Subject: Post-Permit Appliance Demanufacturing Facility Inspection
DNR Permit #99-ADP-01-12

Dear Ms. Bell:

Enclosed is a report documenting the post-permit inspection of your appliance demanufacturing operation. The inspection was conducted by David Miller, an Environmental Specialist with this office, on May 1, 2012.

No violations or material deficiencies were noted, although the last page of the report identifies three required actions.

The Permit is issued in the name of Recycle It All Metals. LLC and we understand that the name of the business is now B & B Iron and Metals. Please make written notification to DNR's Sue Johnson (email is fine, susan.johnson@dnr.iowa.gov) that the business name has changed, and she will issue a new Permit and request that USEPA transfer the name of your PCB registration number. If the financial assurance instrument also cites Recycle It All Metals. LLC, this must be changed as well.

If you have any questions regarding this matter, please contact Mr. Miller at 641 424-4073 or david.miller@dnr.iowa.gov.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU

A handwritten signature in black ink, appearing to read "Jeffrey B. Vansteenburgh", written over a horizontal line.

Jeffrey B. Vansteenburgh
Field Office Supervisor

JVB/dlm
scan copy -- DNR Solid Waste Section

**IOWA DEPARTMENT OF NATURAL RESOURCES
APPLIANCE DEMANUFACTURING PERMIT (ADP) INSPECTION FORM**

Permit No.: 99-ADP-01-12	County: Wright
Facility Name: B & B Iron and Metals	Facility Address: 601 Patton Street Rowan, IA 50470
Phone Number: 641 853-2207	
Responsible Official: Kathryn Bell	Mailing Address: Same as above
Phone Number: 641 853-2207	
Person(s) Present: 1) Kathryn Bell 2) Travis Bell 3)	
Date of This Inspection: May 1, 2012	Date of Last Inspection: March 14, 2012

**Be advised your facility may require, due to either SIC code or onsite management practices, an NPDES General Permit #1 (Stormwater permit).*

Storage & Handling	IAC 567 Chapter 118.4: Appliance Storage & Handling Prior to Demanufacturing		Yes	No	NA
	118.4(1)	Are appliances being stored to prevent capacitors, refrigerant lines, compressors, and components containing mercury from being damaged and allowing a release into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.4(2)	Are appliances being handled in a way which prevents damage, cuts, or breaks in refrigerant lines, compressors, capacitors and components containing mercury from being damaged and allowing a release into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.4(3)	Are less than 1,000 appliances being stored prior to demanufacturing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.4(4)	Are appliances being demanufactured in 270 days or less?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: None.

Fixed & Mobile Operations	IAC 567 Chapter 118.7: Fixed Facility & Mobile Operations		Yes	No	NA
	118.7(1)	Will the demanufacturing take place on an impervious floor (including but not limited to concrete, ceramic tile, or metal)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.7(2)	Is the point of demanufacturing located 50 feet or more from a well and any water of the state?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.7(5)	Is a unique marking system (minimum of nine inches square) being applied to the appliances after demanufacturing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	IAC 567 Chapter 64.4: Issuance of NPDES Permits		Yes	No	NA
	64.4(2)	Is a copy of the Stormwater Discharge permit available if the facility is storing/processing appliances outside?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	64.4(2)	Has the facility developed and implemented a Stormwater Pollution Prevention Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: The demanufacturing area has a concrete floor. The facility spray paints the numeral "7" inside a circle as its mark (i.e., "circle 7") This facility has a Storm Water Discharge General Permit #1 so they may keep undemanufactured appliances outside for up to 270 days.

Training	IAC 567 Chapter 118.8: Training		Yes	No	NA
	118.8	Is at least one owner or employee completed a Department-approved training course?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.8	Is one trained person on site at all times when appliances are being demanufactured?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Two employees have attended the training.

Refrigerant Recovery	IAC 567 Chapter 118.6: Permit Application Requirements		Yes	No	NA
	118.6(8)	Is a copy of the EPA Refrigerant Recovery or Recycling Device Acquisition Certification available onsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	608 CAA (CFR)	Is a copy of the EPA Refrigerant Reclaimer's Certification available onsite if reclamation (purification) is taking place at the facility?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	IAC 567 Chapter 118.9: Refrigerant Removal Requirements		Yes	No	NA
	118.9(2)	If refrigerant is removed at a location other than a permitted ADP facility, is there documentation that it was removed by a service or repair facility certified for the removal of refrigerant?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.9(3)	Is removal of refrigerant being done in an area where the temperature of the surrounding air and that of the appliance being demanufactured is 45 degrees Fahrenheit or greater?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA
	118.13(2)"a" & 118.13(2)"g"	Are the number and type of refrigerant containing appliances being tracked, as well as the amount of refrigerant removed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.13(3)"a"	Are bills of lading being kept as to where refrigerants are being shipped for disposal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: None.

Oil	IAC 567 Chapter 118.9: Refrigerant Removal Requirements		Yes	No	NA
	118.9(5)	If compressor oil is being removed from the refrigeration units, is it being stored in accordance with 567-119.5? <i>(Note: AST must be large enough and on an impermeable surface to prevent spills, meet API construction standards, have absorbent material available, have a gauge to monitor liquid level, & meet Ch. 567-135 & 136 if UST)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: Compressor oil is not currently being removed.

Ammonia Gas Refrigerant	IAC 567 Chapter 118.9: Refrigerant Removal Requirements		Yes	No	NA
	118.9(6)"a"	Is the ammonia gas being vented into water and is the resulting wastewater being properly disposed of?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.9(6)"e"	Is sodium chromate being properly stored in DOT-approved containers labeled with a proper EPA-approved chromium label stating "chromium" or "hazardous waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.9(6)"g"	Does the facility have an EPA ID number (RCRA)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.9(6)"h" & 118.9(6)"p"	Is asbestos insulation being removed and handled properly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA
118.13(2)"a"(2)	Are records being kept on the number of sodium chromate-containing appliances being demanufactured?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.13(2)"f"	Are records being kept on the number of sodium chromate-containing appliances shipped to another demanufacturer?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.13(3)"a" & 118.13(3)"b"	Are records being kept on the shipment of sodium chromate (name of the facility to which sodium chromate was shipped, the date of each shipment, the amount shipped and the name and address of the transporter)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: The facility has a TSCA registration number, but not a RCRA registration number. This facility does not accept ammonia-containing or sodium chromate-containing appliances.

Mercury Components	IAC 567 Chapter 118.10: Mercury-Containing Component Removal & Disposal		Yes	No	NA
	118.10(1)	Are all components containing mercury being removed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.10(2)	Are mercury components being stored in containers with a proper EPA-approved label stating "Universal Waste-Mercury Containing Equipment", or Waste Mercury-Containing Equipment" in both English and the predominant language of any non-English-reading workers?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.10(3)	Is the date when the first mercury-containing component was placed in the container affixed to the container?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.10(4)	Storage of mercury is limited to one year, after which, it must be transported to an EPA-approved recycler/recovery facility. Has storage been under one year?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.10(8)	Are fluorescent tubes, lamps, bulbs, etc., being placed in a container and packaged to prevent breakage to an EPA-approved recycler?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA
	118.13(2)	Are records being kept on the number of mercury-containing appliances being demanufactured, number of mercury switches removed, number of fluorescent tubes removed, as well as the number of mercury thermocouples being removed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.13(3)	Are records or bills of lading being kept on the shipment of mercury-containing components?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: The facility has demanufactured a number of appliances, but they report that no mercury-containing components have yet been encountered; therefore no mercury ADP wastes have been generated.

PCB Capacitors	IAC 567 Chapter 118.11: Capacitor Removal Requirements		Yes	No	NA
	118.11(4)"a"	Does the facility have an EPA TSCA ID number for capacitor storage (required if facility has no RCRA ID #)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.11(4)"b"	Are PCB items being stored in a manner that provides adequate protection from the elements and adequate secondary containment? <i>(Note: Storage must take place on an impervious material above the 100-year floodwater elevation)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.11(4)"c"	Is the point of demanufacturing located above the 100-year flood water elevation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.11(4)"d"	Are PCB storage containers filled to two inches of absorbent material in the bottom?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.11(4)"e"	Are PCB containers DOT-approved and labeled with a 6" by 6" yellow label stating "PCBs" as described in CFR part 761.45?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

118.11(4)"g"	Is the storage for non leaking small PCB capacitors that do not comply with the requirements in 118.11(4) "a" to "f" stored for less than 30 days from the date of removal and a notation places on the PCB capacitor indicating the date the item was removed from the appliance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.11(4)"f" & 118.11(4)"h"	Is the date when the first capacitor was placed in the storage container on the label? Storage of capacitors is limited to 270 days, after which they must be transported to an EPA-approved landfill or incinerator. This burial or incineration must be documented (within one year of the date on the container) and this record kept by the demanufacturer for three years from the date the PCB waste was accepted by the initial transporter.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA
118.13(2)	Are records being kept on the number of PCB containing appliances being demanufactured, number of PCB capacitors and ballasts as well as the date the first PCB-containing item was placed in the storage drum that is in use on December 31?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.13(3)"a" & 118.13(3)"c"	Are records being kept on the shipment of PCB components and the documentation of destruction or receipt from a regional collection center for all PCB materials shipped?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.13(3)"d"	Are records being kept documenting inspections of the PCB storage area as required by 118.11(4)"h"?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: Records are being kept, but no PCB-containing components have been disposed.

Spills	IAC 567 Chapter 118.12: Spills		Yes	No	NA
	118.12(1)	Are spill records being kept and has the facility reported spills that resulted in a hazardous condition?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.12(2)	Is a mercury spill kit on hand?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: No spills have occurred.

Reporting	IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA
	118.13(2)	Are records being kept on appliances demanufactured in separate categories, as well as the number of each component, amount of refrigerant, etc?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.13(3)	Are records being kept on all hazardous waste manifest and bills of lading for shipments of refrigerant, mercury switches, PCB-containing material, and kept on site for a minimum of three years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.13(3)"f"	Are copies of annual reports (containing all the record keeping requirements) that have been sent to the Department Central Office being retained for at least three years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: No wastes have yet been disposed.

Processing	IAC 567 Chapter 118.15: Shredding of Appliances		Yes	No	NA
	118.15(1)	Has fluff from shredding been tested at least quarterly for PCBs, and TCLP for heavy metals? Have these results being sent to the department within 30 days of the end of each quarter?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

118.15(1)	Have the results from fluff testing been submitted to the department within 30 days of the end of each quarter? And are these records being kept on site for a minimum of three years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.15(3)	Are appliances being demanufactured before shredding or processing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.15(3)	If appliances are being accepted from demanufacturers for recycle/disposal, have the appliances been demanufactured in accordance with Federal regulations and state laws from which the appliances were received?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: No appliance shredding takes place.

Summary of Requirements:	Compliance Date:
1) Make written request to DNR's Sue Johnson to change the permitted name	5/31/12
2) Remove all mercury-containing components and date container.	When encountered
3) Send PCB wastes off site within 270 days of the start date	12/24/2012
4)	
5)	

Inspector: David Miller Date: May 3, 2012	Reviewer: Glenn Carper Date: 5/3/12
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