



October 26, 2021

Clinton County Area Solid Waste Agency  
Attn: Brad Seward  
P.O. Box 996  
Clinton, IA 52732

Notice of Violation: Discarded Appliance Demanufacturing, 567 IAC 118.2(2)

SUBJECT: Appliance Demanufacturing Complaint; FOCD Complaint #30120  
ADP #23-ADP-02-03, Clinton County Area Solid Waste Agency, Clinton Co., IA

Dear Mr. Seward:

On October 20, 2021, this office received an anonymous complaint regarding improper appliance demanufacturing taking place at the Jackson County Regional Collection Center (RCC) at 25146 184<sup>th</sup> Street Maquoketa, Iowa. The complaint alleged that Clinton County Area Solid Waste Agency staff were demanufacturing appliances at the Jackson County RCC location and the proper permitting was not being followed.

I contacted you later that same day via phone and you confirmed that appliance demanufacturing was taking place at the Jackson County RCC and being conducted by Clinton County landfill staff. The appliance demanufacturing permit issued to Clinton County (ADP #23-ADP-02-03) does not contain a mobile provision and off-site demanufacturing is not allowed. The current ADP is only valid for the Clinton County landfill location at 4292 220th Street, Clinton, Iowa. The department recognizes that appliance demanufacturing operations, although not properly permitted at the Jackson County location, were reportedly being conducted by a certified staff in the same manner as the Clinton County landfill location.

A notice of violation is being issued for failure to comply with the appliance demanufacturing permitting requirements. Appliance demanufacturing operations are not allowed to be conducted at the Jackson County facility, under Clinton County Landfill's ADP, at this time. You have been in contact with Sue Johnson, ESS with the Iowa DNR Solid Waste Section, regarding potential permit modifications and/or proper handling of the Jackson County appliances. Please continue to direct any questions regarding proper permitting to her at this time.

If you have any questions or would like further explanation of any part of this letter, please contact me in this office at 319-653-2135 or at [brian.lee@dnr.iowa.gov](mailto:brian.lee@dnr.iowa.gov).

Sincerely,  
FIELD SERVICES & COMPLIANCE BUREAU

Brian Lee  
Environmental Specialist

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xc: Becky Jolly, IDNR Solid Waste Section, via email  
Tom McCarthy, Iowa DNR Field Office 1, via email  
Jackson County RCC, 25146 184<sup>th</sup> Street in Jackson County, Iowa  
Clinton County ADP file

