Fields of Opportunities

STATE OF IOWA

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

DEPARTMENT OF NATURAL RESOURCES
ROGER L. LANDE, DIRECTOR

August 7, 2012

John Walters
Dickinson County Recycling Facility
2260 220th Street
Milford, IA 51351

SUBJECT: Initial ADP Inspection Work Request #1747

Dear Mr. Walters:

Enclosed is a copy of an Appliance Demanufacturing Permit Initial Inspection report from my visit to your facility on August 6, 2012 conducted in response to a work request from our Des Moines office. I will send a copy of this inspection report to our Des Moines office so they can consider your completed application and request to obtain a license to be an appliance demanufacting facility.

If you have any questions regard these matters, please call me.

Sincerely,

Bryon Whiting, Environmental Specialist Senior
Bryon.Whiting@dnr.iowa.gov
Field Service and Compliance Bureau

BW:lw

c: -Susan Johnson, PP&ES, E&WMB, ESD, DNR, Des Moines

enc: -Appliance Demanufacturing Permit Inspection report

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IOWA DEPARTMENT OF NATURAL RESOURCES
APPLIANCE DEMANUFACTURING PERMIT INSPECTION

Permit No.: Not Yet Permitted	**County:** Dickinson
Facility Name: Dickinson County Recycling Facility 2260 220th Street Milford, IA 51351 **Phone Number:** 712/338-2549	**Facility Address:** Dickinson County Recycling Facility 2260 220th Street Milford, IA 51351
Responsible Official: John Walters, Site Manger **Phone Number:** 712/338-2549 or 712/330-1006 cell	**Mailing Address:** Dickinson County Recycling Facility 2260 220th Street Milford, IA 51351
Date of Last Inspection: N/A	**Date of This Inspection:** August 7, 2012

Note: A violation is indicated by a "No" check.

STORAGE & HANDLING OF APPLIANCES PRIOR TO DEMANUFACTURING:

Item	Yes	No	NA
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? **118.4(1)**	☒	☐	☐
2. Are appliances being handled in a way which prevents damage, cuts, or breaks in refrigerant lines, compressors, and components containing mercury from being damaged and allowing a release into the environment? **118.4(2)**	☒	☐	☐
3. Are less than 1,000 appliances being stored prior to demanufacturing? **118.4(3)**	☒	☐	☐
4. Are appliances being stored less than 270 days without demanufacturing? **118.4(4)**	☒	☐	☐

Comments:
This facility has been collecting appliances for many years as it operates a HHHM RRC (30-SDP-04-06P). Storing these appliances in a proper manner is something they have been doing for some time now. Mr. Walters reported that this facility is currently authorized to store no more than 280 appliances on-site prior to demanufacturing.

FIXED FACILITIES & MOBILE OPERATIONS REQUIREMENTS:

Item	Yes	No	NA
1. Is demanufacturing taking place on an impervious floor (including but not limited to concrete, ceramic tile, or metal)? **118.5(1)**	☒	☐	☐
2. Is the point of demanufacturing located 50 feet or more from a well and any water of the state? **118.5(2)**	☒	☐	☐
3. Is a unique marking system (being a minimum of nine inches square) being applied to the appliances after demanufacturing? **118.5(3)**	☒	☐	☐
4. Is a copy of the Stormwater Discharge permit available if the facility is storing/processing appliances outside? **64.4(2)**	☒	☐	☐
5. Has the facility developed and implemented a Stormwater Pollution Prevention Plan? **64.4(2)**	☒	☐	☐

Comments:
This facility has a valid stormwater general permit number 1 (IA #21844-21606) that covers discharges through July 1, 2017.

TRAINING:

Item	Yes	No	NA
1. Is at least one owner or fulltime employee completed a DNR approved training course? **118.6**	☒	☐	☐
2. Is one trained person on site at all times when appliances are being demanufactured? **118.6**	☒	☐	☐

Comments:
John Walters completed the approved DNR training course on November 21, 2011.

REFRIGERANTS:

Item	Yes	No	NA
1. Is a copy of the EPA Refrigerant Recovery or Recycling Devise Acquisition Certification available? **118.7(1)h**	☐	☒	☐
2. Is a copy of the EPA Refrigerant Reclaimer's Certification available if reclamation is taking place at the facility? **608 CAA (CFR)**	☐	☐	☒
3. If refrigerant is removed at a location other than this facility, is there documentation for each appliance that certifies the refrigerant was removed properly? **118.9(2)**	☒	☐	☐
4. Is removal of refrigerant being done in an area where the temperature of the surrounding air and that of the appliance being demanufactured are 45 degrees Fahrenheit or greater? **118.9(3)**	☒	☐	☐
5. Are records being kept as to where refrigerants are being shipped to be reclaimed? (Name of the facility to which refrigerant was shipped, date of each shipment, amount shipped and name and address of the transporter?) **118.13(1)d**	☒	☐	☐
6. Are records being kept as to where refrigerants are being shipped for disposal? (Name of the facility to which refrigerant was shipped, date of each shipment, amount shipped and name and address of the transporter?) **118.13(1)e**	☒	☐	☐

Comments:
The EPA Refrigerant Recovery or Recycling Devise Acquisition Certification was applied for to EPA by Barker LeMar on March 15, 2012. To date, the certificate has not been received. I encouraged Mr. Walters to contact Barker LeMar and see if they have a copy of it.

COMPRESSOR OIL:

Item	Yes	No	NA
1. If compressor oil is being removed from the refrigeration units, is it being stored in accordance with 567-119.5? **118.9(5)**	☒	☐	☐

Comments:
None.

AMMONIA GAS OPERATED REFRIGERANTS AND AIR CONDITIONERS:

Item	Yes	No	NA
1. Is the ammonia gas being vented into water and is the resulting wastewater being properly disposed of? **118.9(6)a**	☒	☐	☐
2. Is sodium chromate being properly stored in containers labeled "chromium" or "hazardous waste"? **118.9(6)e**	☒	☐	☐
3. Does the facility have an EPA ID number (RCRA)? **118.9(6)g**	☒	☐	☐
4. Is asbestos insulation being removed and handled properly? **118.9(6)h,i**	☒	☐	☐
5. 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)? **118.13(1)c**	☒	☐	☐

Comments:
While this facility has not yet began demanufacturing appliances, it intends to demanufacture units with ammonia gas refrigerants. The sodium chromate will be collected, stored, and properly disposed of at the HHM RRC.

MERCURY CONTAINING COMPONENTS:

Item	Yes	No	NA
1. Are mercury components being stored in containers with a label of "mercury" or "hazardous waste"? **118.10(2)**	☒	☐	☐
2. Is the start date on the container label? Storage of mercury is limited to one year, after which, it must be transported to an EPA approved recycler/recovery facility. **118.10(2)**	☒	☐	☐
3. Are fluorescent tubes, lamps, bulbs, etc., being placed in a container and packaged to prevent breakage to an EPA approved recycler? **118.10(5)**	☒	☐	☐
4. Are records being kept on the shipment of mercury components (name of the facility to which components were shipped, including fluorescent bulbs, the date of each shipment, the number of components and number of tubes shipped and the name and address of the transporter)? **118.13(1)b**	☒	☐	☐

Comments:
None.

CAPACITORS:

Item	Yes	No	NA
1. Are PCB items being stored in a manner that provides adequate protection from the elements and adequate secondary containment? **118.11(5)a**	☒	☐	☐
2. Is storage taking place on impervious material? **118.11(5)a**	☒	☐	☐
3. Is the point of demanufacturing located above the 100-year flood water elevation? **118.11(5)b**	☒	☐	☐
4. Are PCB storage containers filled to two inches of absorbent material in the bottom? **118.11(5)c**	☒	☐	☐
5. Are PCB containers labeled with a 6" by 6" yellow label stating "PCBs"? **118.11(5)d**	☒	☐	☐
6. If a temporary storage area for small, non-leaking PCB capacitors is used, has the date of removal been placed on each PCB item? **118.11(5)f**	☐	☐	☒
7. Are records being kept on the shipment of PCB capacitors and ballasts (name and address of the facility that the items were shipped to, the date of the shipment, the weight of the times shipped and the name and address of the transporter)? **118.13(1)f**	☒	☐	☐
8. 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. **118.11(5)h**	☒	☐	☐

Comments:
EPA has issued this site a TSCA #000517011 on May 29, 2012. Mr. Walters indicated shipments of capacitors and mercury switches will be picked up periodically by Clean Harbors of Des Moines along with other HHM RCC waste generated at this facility.

SPILLS:

Item	Yes	No	NA
1. Are spill records being kept and has the facility reported spills that resulted in a hazardous condition? **118.12(1)**	☒	☐	☐
2. Is a mercury spill kit on hand? **118.12(2)**	☒	☐	☐

Comments:
None.

RECORDKEEPING AND REPORTING:

Item	Yes	No	NA
1. Are records being kept as to the facility to which demanufactured appliances were shipped (name and address, date of each shipment, the weight of the appliances, and name and address of the transporter)? **118.13(1)a**	☒	☐	☐
2. Are copies of annual reports (containing all the recordkeeping requirements) that have been sent to the DNR central office being retained for at least three years? **118.13(2)**	☒	☐	☐

Comments:
Demanufacturing of appliances is currently not being done at this facility until it obtains its demanufacturing permit and so no records are being kept. However, Mr. Walters has good records for his other operations at this facility and will keep adequate records to be able to send annual reports to the Des Moines office as required.

SHREDDING/PROCESSING:

Item	Yes	No	NA
1. Has fluff from shredding been tested at least quarterly for PCBs, mercury, and lead? **118.14(1)**	☐	☐	☒
2. Are appliances being demanufactured before shredding or processing? **118.14(2)**	☐	☐	☒
3. If appliances are being accepted from demanufacturers for recycle/disposal, have the appliances been demanufactured in accordance with Federal regulations and laws of the State from which the appliances were received? **118.14(2)**	☐	☐	☒

Comments:
This facility does not shred or process appliances.

RECOMMENDATIONS:
Contact Barker LeMar to inquire whether they have received a copy of your Recovery or Recycling Devise Acquisition Certification they applied for to EPA on your behalf on March 15, 2012.

Based on my observations and discussion with Mr. Walters during this August 6, 2012 initial ADP inspection (work request #1747), I recommend that an ADP be issued.

REQUIREMENTS:
None.

Inspector: Bryon Whiting **Date:** 8/7/2012 **Reviewed By:** Ken Hessenius **Date:** 8/7/2012