



JULY 7 2021

JENNIFER FRANK  
FRANKS SALVAGE  
3304 GYPSUM HOLLOW ROAD  
FORT DODGE IA 50501

Subject: Pre-Permit Appliance Demanufacturing Inspection – Frank's Salvage, Fort Dodge, IA

Dear Jennifer Frank:

David Miller, an Environmental Specialist with this office, conducted Pre-permit appliance demanufacturing (ADP) inspection of the subject facility on June 22, 2021. An inspection report was completed and is enclosed for your file.

As you know, the previous ADP permit was rescinded more than one year ago, and the purpose of this inspection was to determine if a new permit should be reissued. The inspector has recommended to DNR's Susan Johnson that the new permit be issued but, as of late June, Ms. Johnson was still awaiting some additional financial assurance information from you.

Should you have questions regarding this inspection or other matters, please feel free to contact Mr. Miller at [david.miller@dnr.iowa.gov](mailto:david.miller@dnr.iowa.gov) or 641-425-8474.

Sincerely,

FIELD SERVICES AND COMPLIANCE BUREAU

A handwritten signature in black ink, appearing to read 'Trent Lambert', is written over a horizontal line.

Trent Lambert  
Field Office Supervisor

TL/dlm

c: DNR Solid Waste Section – [becky.jolly@dnr.iowa.gov](mailto:becky.jolly@dnr.iowa.gov)

Enclosure – Appliance Demanufacturing Inspection Report

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

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

<b>Permit #: Rescinded</b>	<b>County: Webster</b>
<b>Facility Name: Frank's Auto and Truck Salvage</b> 515 955-4477	<b>Facility Address:</b> 3304 Gypsum Hollow Road Fort Dodge, IA 50501
<b>Responsible Official: Jen Frank</b>  <b>Phone Number: 515 955-4477</b>  <b>Person(s) Present:</b> 1) Dennis Frank – Owner 2) Jen Frank - Manager	<b>Mailing Address:</b> 3304 Gypsum Hollow Road Fort Dodge, IA 50501
<b>Date of This Inspection: 6/22/2021</b>	<b>Date of Last Inspection: New Permit</b>

<b>IAC 567 Chapter 118.4: Appliance Storage &amp; Handling Prior to Demanufacturing</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
<b>Storage &amp; Handling</b>	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 checked="" 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:** *This facility's ADP permit expired several years ago, but demanufacturing and other appliance violations were ongoing. The matter was referred to DNR Legal Services Bureau and has been resolved; the facility is trying to get a new ADP permit issued.*

<b>IAC 567 Chapter 118.7: Fixed Facility &amp; Mobile Operations</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>	
<b>Fixed &amp; Mobile Operations</b>	118.7(1) Is demanufacturing taking 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"/>	
	<b>IAC 567 Chapter 64.4: Issuance of NPDES Permits</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
	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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

**Comments:** *Failure to renew the Stormwater Discharge Permit #1 was also included in the legal referral. A new permit has been obtained, but the former SWPPP cannot be found. I directed Ms. Frank to the Iowa Waste Reduction Center for assistance.*



Training	IAC 567 Chapter 118.8: Training		Yes	No	NA
	118.8	Has 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: *Both Dennis Frank and Jen Frank have attended the course.*

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
118.13(3)"a"	Are bills of lading being kept as to where refrigerants are being shipped for disposal?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Comments: *The facility will not reclaim/purify refrigerant. Demanufacturing has not yet begun, but Ms. Frank is familiar with the tally sheet. The demanufacturing building is heated.*

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? (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)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: *Compressor oil will not be 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)"i"	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)"p"	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:** *This facility will not accept ammonia-containing or sodium chromate-containing appliances for demanufacturing.*

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:** *Demanufacturing has not yet begun, but the containers are present. I emailed Ms. Frank some images of the PCB and Universal Waste container labels.*

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>IAC 567 Chapter 118.13: Record Keeping &amp; Reporting</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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:** *Demanufacturing has not yet begun, but we discussed the 30 day inspection and recordkeeping requirements requirement.*

<b>Spills</b>	<b>IAC 567 Chapter 118.12: Spills</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
	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:** *Demanufacturing has not yet begun; a mercury spill kit was on hand.*

<b>Reporting</b>	<b>IAC 567 Chapter 118.13. Record Keeping &amp; Reporting</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
	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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:** *Ms. Frank is aware of the annual report requirement.*

IAC 567 Chapter 118.15: Shredding of Appliances		Yes	No	NA	
Processing	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: ***This facility does not shred appliances.***

<b>Inspector:</b> David Miller <b>Date:</b> July 7, 2021	<b>Reviewer:</b> Jeremy Klatt <b>Date:</b> 7/7/21
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