

DIRECTOR KAYLA LYON

February 3, 2022

RE: Inspection Prior to Permit Renewal Facility No. 57-ADP-06-12

Dear Mr. Huffman:

Enclosed is an inspection report prepared for the above referenced facility. I inspected the site on 01/31/2022.

I trust you will find the inspection report self-explanatory. Please refer to the requirements and reminders sections of this report. The requirements must be addressed and I encourage you to comply with the reminders.

During the inspection I found the facility to be in general compliance with the requirements of this department's regulations. It is recommended that your permit be renewed.

If you have any questions or would like further explanation of any part of this letter, please contact myself at tom.mccarthy@dnr.iowa.gov or 563-920-0923.

Sincerely,

TOM MCCARTHY Environmental Specialist Senior

Tom E. Mc Canthy

PRIP

lowa Department of Natural Resources
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Leading Iowans in Caring for Our Natural Resources.

Copies: DNR - Solid Waste Section - Susan Johnson and Becky Jolly - Des Moines

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Phone: 563-927-2640 <u>www.iowadnr.gov</u> Fax: 563-927-2075

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

Permit No.: 57-ADP-06-12	County: Linn
Facility Name: Reliable Battery & Electronic	Facility Address:
Recycling, Inc.	700 60th Avenue Southwest
, <u> </u>	Cedar Rapids
	-
Phone Number:319/363-6863	
Responsible Official:Richard (Scott) Huffman	Mailing Address:
	Reliable Battery & Electronic Recycling Inc.
Phone Number:319/363-6863	ATTN: Scott Huffman
	700 60th AVE SW
Person(s) Present:	Cedar Rapids, IA 52404
1)Scott Huffman	-
2)Brook Lane	
3)	
Date of This Inspection:01/31/2022	Date of Last Inspection: 01/04/12

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

	IAC 567 (Chapter 118.4: Appliance Storage & Handling Prior to Demanufacturing	Yes	No	NA
andling	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?	\boxtimes		
torage & H	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?	\boxtimes		
St	118.4(3)	Are less than 1,000 appliances being stored prior to demanufacturing?	\boxtimes		
	118.4(4)	Are appliances being demanufactured in 270 days or less?	\boxtimes		

Comments Most appliances are demanufactured within 24 hours and are picked up by recyclers within a day or two.

oerations	IAC 567 C	Chapter 118.7: Fixed Facility & Mobile Operations	Yes	No	NA
	118.7(1)	Is demanufacturing taking place on an impervious floor (including but not limited to concrete, ceramic tile, or metal)?	\boxtimes		
Opera	118.7(2)	Is the point of demanufacturing located 50 feet or more from a well and any water of the state?	\boxtimes		
Mobile	118.7(5)	Is a unique marking system (minimum of nine inches square) being applied to the appliances after demanufacturing?	\boxtimes		
W W	IAC 567 C	Chapter 64.4: Issuance of NPDES Permits	Yes	No	NA
ixed	64.4(2)	Is a copy of the Stormwater Discharge permit available if the facility is storing/processing appliances outside?			\boxtimes
4	64.4(2)	Has the facility developed and implemented a Stormwater Pollution Prevention Plan?			\boxtimes

Comments: Demanufacturing takes place on an impervious concrete floor.

5	IAC 567 C	Chapter 118.8: Training	Yes	No	NA
aining	118.8	Has at least one owner or employee completed a Department-approved training course?	\boxtimes		
Ļ	118.8	Is one trained person on site at all times when appliances are being demanufactured?	\boxtimes		

Comments: Scott Huffman and Brook Lane have attended training.

	IAC 567 C	hapter 118.6: Permit Application Requirements	Yes	No	NA
	118.6(8)	Is a copy of the EPA Refrigerant Recovery or Recycling Devise Acquisition Certification available onsite?	\boxtimes		
	608 CAA (CFR)	Is a copy of the EPA Refrigerant Reclaimer's Certification available onsite if reclamation (purification) is taking place at the facility?			\boxtimes
Recover	IAC 567 C	hapter 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?			\boxtimes
Refrigerant	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?	\boxtimes		
	IAC 567 C	hapter 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?	\boxtimes		
	118.13(3)" <i>a</i> "	Are bills of lading being kept as to where refrigerants are being shipped for disposal?	\boxtimes		

Comments: Refrigerants are removed on site. Refrigerants are taken to Republic for disposal as some oil remains in the refrigerants.

	IAC 567 C	hapter 118.9: Refrigerant Removal Requirements	Yes	No	NA
lio	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)	\boxtimes		

Comments: This facility removes and stores compressor oil onsite in a large plastic tank.

	IAC 567 Ch	napter 118.9: Refrigerant Removal Requirements	Yes	No	NA
a Gas	118.9(6)" <i>a</i> "	Is the ammonia gas being vented into water and is the resulting wastewater being properly disposed of?	\boxtimes		
Ammoni	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"?			
	118.9(6)" <i>g</i> "	Does the facility have an EPA ID number (RCRA)?			

118.9(6)" <i>h</i> " & 118.9(6)" <i>i</i> "	Is asbestos insulation being removed and handled properly?			\boxtimes
IAC 567 Ch	apter 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			\boxtimes
118.13(2)" <i>f</i> "	Are records being kept on the number of sodium chromate–containing appliances shipped to another demanufacturer			\boxtimes
118.13(3)" <i>a</i> " & 118.13(3)" <i>b</i> "	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)?			\boxtimes

Comments:

	IAC 567 C	hapter 118.10: Mercury-Containing Component Removal & Disposal	Yes	No	NA
	118.10(1)	Are all components containing mercury being removed?	\boxtimes		
S	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?	\boxtimes		
onen	118.10(3)	Is the date when the first mercury-containing component was placed in the container affixed to the container?			
. Components	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?	\boxtimes		
Mercury	118.10(8)	Are fluorescent tubes, lamps, bulbs, etc., being placed in a container and packaged to prevent breakage to an EPA-approved recycler?			\boxtimes
Me	IAC 567 C	hapter 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?	\boxtimes		
	118.13(3)	Are records or bills of ladings being kept on the shipment of mercury-containing components?	\boxtimes		

Comments: Facility gave one mercury switch to Linn Star for disposal. No records were kept. Facility understands records of mercury switch disposal needs to be kept even for small amounts of switches.

	IAC 567 Ch	napter 118.11: Capacitor Removal Requirements	Yes	No	NA
S	118.11(4)"a"	Does the facility have an EPA TSCA ID number for capacitor storage (required if facility has no RCRA ID #)?	\boxtimes		
Capacito	118.11(4)" <i>b</i> "	Are PCB items being stored in a manner that provides adequate protection from the elements and adequate secondary containment? (Note: Storage must take place on an impervious material above the 100-year floodwater elevation)			
m	118.11(4)"c"	Is the point of demanufacturing located above the 100-year flood water elevation?	\boxtimes		
PC	118.11(4)" <i>d</i> "	Are PCB storage containers filled to two inches of absorbent material in the bottom?			
	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?	\boxtimes		

118.11(4)" <i>g</i> "	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?			
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.			
IAC 567 Ch	napter 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? number of mercury thermocouples being removed?	Yes	No	NA
	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		No	NA

Comments: Facility has an EPA ID # and an appropriate storage container and label. PCB capacitors are stored for less than 30 days prior to shipping to the Linn County RCC

	IAC 567 (Chapter 118.12: Spills	Yes	No	NA
Spills	118.12(1)	Are spill records being kept and has the facility reported spills that resulted in a hazardous condition?	\boxtimes		
	118.12(2)	Is a mercury spill kit on hand?	\boxtimes		

Comments: A mercury spill kit is in place. No mercury spills have reportedly occurred.

	IAC 567 C	hapter 118.13. Record Keeping & Reporting	Yes	No	NA
ting	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?	\boxtimes		
Reporting	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?	\boxtimes		
	118.13(3)" <i>f</i> "	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?	\boxtimes		

Comments:

	IAC 567 (Chapter 118.15: Shredding of Appliances	Yes	No	NA
ng	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?			\boxtimes
rocessii	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?			
Δ.	118.15(3)	Are appliances being demanufactured before shredding or processing?			\boxtimes
	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?			\boxtimes

Comments: This facility does not shred appliances.

Summary of Requirements:	Compliar	nce Date:
1) In the event of a spill resulting in a hazardous condition alert the depa soon as possible, but within 6 hours at 515-725-8694.	rtment as Ongo	oing
2)Train staff in the use of mercury spill kits	Ongo	oing

Summary of Reminders:
1)Keep records of mercury switch disposal.
2)Mark each capacitor with the date of removal from the appliance to properly document storage time of less than 30 days
3)Maintain secure lids on mercury and PCB capacitor containers and ensure the containers are properly labeled

Summary of Recommendations:
1) It is recommended that an appliance demanufacturing permit be reissued to this facility.
2) A copy of the EPA Refrigerant Recovery or Recycling Devise Acquisition Certification is attached. Please keep this in your records.

Inspector: "

Tom McCarthy Tom E. McCanthy

Date:02/02/2022

Reviewer: Amber Sauser

Date:2/2/2022



Form Approved OMB No. 2060-0256 Expires: 07/31/2010



ENVIRONMENTAL PROTECTION AGENCY REFRIGERANT RECOVERY OR RECYCLING DEVICE **ACQUISITION CERTIFICATION FORM**

EPA regulations require establishments that service or dispose of refrigeration or air-conditioning equipment to certify that they have acquired recovery or recycling devices that meet EPA standards for such devices. To certify that you

ART 1: ESTABLISHMENT INFO	RMATION			
Name of Establishment		Street		
Reliable Battery & Electronics Re	cycling ,Inc	700 60th Av	e. SW	
(Area Code) Telephone Number		City	State	Zip Code
319-363-6863		Cedar Rapids	lowa	52404
Number of Service Vehicles Based at	Establishment	County		
2		LINN	ŀ	
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INSTRUCTIONS

Part 1: Please provide the name, address, and telephone number of the establishment where the refrigerant recovery or recycling device(s) is (are) located. Please complete one form for each location. State the number of vehicles based at this location that are used to transport technicians and equipment to and from service sites.

Part 2: Check the appropriate boxes for the type of work performed by technicians who are employees of the establishment. The term "small appliance" refers to any of the following products tat are fully manufactured, charged, and hermetically sealed in a factory with five pounds or less of refrigerant: refrigerators, and freezers designed for home use, room air conditioners (including window air conditioners and packaged terminal air conditioners), packaged terminal heat pumps, dehumidifiers, under-the-counter ice makers, vending machines, and drinking water coolers.

Part 3: For each recovery or recycling device acquired, please list the name of the manufacturer of the device, and (if applicable) its model number and serial number.

If more that seven devices have been acquired, please fill out an additional form and attach it to this one. Recovery devices that are self-contained should be listed first and should be identified by checking the box in the last column on the right. Self-contained recovery equipment means refrigerant recovery or recycling equipment that is capable of removing te refrigerant from an appliance without the assistance of components contained in the appliance. On the other hand, system-dependent recovery equipment means refrigerant recovery equipment that requires the assistance of components contained in an appliance to remove the refrigerant from the appliance.

If the establishment has been listed as Type B and/or Type D in Part 2, then the first device listed in Part # must be a self-contained device and identifies as such by checking the box in the last column on the right.

If any of the devices are homemade, they should be identified by writing "homemade" in the column provided for listing the name of the device manufacturer. Type A or Type B establishments can use homemade devices manufactured before November 15, 1993. Type C or Type D establishments can use homemade manufactured anytime. If, however, a Type C or Type D establishment is using homemade equipment manufactured after November 15, 1993, then it must <u>not</u> use these devices for service jobs.

Form Approved OMB No. 2060-0256 Expires: 07/31/2010

EPA REGIONAL OFFICES

Send your form to the EPA office listed under the state or territory in which the establishment is located.

Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont

CAA 608 Enforcement Contact: EPA Region I; Mail Code SEA; JFK Federal Building; One Congress Street, Suite 1100; Boston, MA 02114-2023

New York, New Jersey, Puerto Rico, Virgin Islands

CAA 608 Enforcement Contact: EPA Region II; Mail Code 2DECA-AC; 290 Broadway; New York, NY 10007-1866

Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia

CAA 608 Enforcement Contact: EPA Region III-Wheeling Office; Mail Code 3AP12; 303 Methodist Building; 11th and Chapline Streets; Wheeling, WV 26003

Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee

> CAA 608 Enforcement Contact: EPA Region IV; Mail Code APT-AE; 61 Forsyth Street, SW; Atlanta, GA 30303-8960

Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin

CAA 608 Enforcement Contact: EPA Region V; Mail Code AE-17J; 77 West Jackson Blvd.; Chicago, IL 60604 Arkansas, Louisiana, New Mexico, Oklahoma, Texas

CAA 608 Enforcement Contact: EPA Region VI; Mail Code 6EN-AA; 1445 Ross Ave., Suite 1200; Dallas, TX 75202

Iowa, Kansas, Missouri, Nebraska

CAA 608 Enforcement Contact: EPA Region VII; Mail Code APCOARTD; 901 North Fifth Street; Kansas City, KS 66101

Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming

CAA 608 Enforcement Contact: EPA Region VIII; Mail Code 8ENF-T; 1595 Wynkoop Street, Denver, CO 80202-1129

American Samoa, Arizona, Califomia, Guam, Hawaii, Nevada

CAA 608 Enforcement Contact: EPA Region IX; Mail Code AIR-5; 75 Hawthome Street; San Francisco, CA 94105

Alaska, Idaho, Oregon, Washington

CAA 608 Enforcement Contact: EPA Region X; Mail Code OAQ-107; 1200 Sixth Ave.; Seattle, WA 98101

PUBLIC BURDEN

The purpose and need of this renewed collection request is to facilitate compliance with and enforcement of Section 608 of the Act by reducing emissions of class I and class II ozone-depleting refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances. EPA has used and will continue to use these records and reports to ensure that refrigerant releases are minimized during the recovery and recycling of ozone-depleting refrigerants during the service, maintenance, repair, and disposal of appliances. Collection of this information is mandated by EPA regulations, in accordance with 40 CFR 82.162. This information is not shared with parties outside of the Federal government. EPA's confidentiality regulations (40 CFR 2.201 et seq.) assure computer data security, disclosure prevention, proper handling, proper storage, and proper disposal of the submitted information.

The public reporting and recordkeeping burden for this collection of information is estimated to average one (1) hour per response per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. OAR-2003-0018, which is available for public viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the OAR Docket is (202) 566-1742. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at http://www.epa.gov/edocket. Use EDOCKET to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. (OAR-2003-0018) and OMB control number (2060-0256) in any correspondence.