

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

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| Permit No.: 20-ADP-01-05 | County: Clarke |
| Facility Name: Hauge's Salvage | Facility Address: 1318 225 th Avenue Osceola, IA 50213 |
| Phone Number: 641-344-0547 or 641-342-4268 | |
| Responsible Official: Kirk Hauge Phone Number: 641-344-0547 Person(s) Present: 1) Kirk Hauge 2) 3) | Mailing Address: 1318 225 th Avenue Osceola, IA 50213 |
| Date of This Inspection: 5/2/2022 | Date of Last Inspection: 12/20/2017 |

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

The current appliance demanufacturing permit has a January 30, 2023 expiration. The stormwater permit (No. 4093-3920) has a September 30, 2023 expiration date.

There was a waste burn pile on-site containing charred mattress springs and other miscellaneous items. There were also some batteries and tires scattered about.

| IAC 567 Chapter 118.4: Appliance Storage & Handling Prior to Demanufacturing | | Yes | No | NA |
|---|---|---------------------------------------|--------------------------|--------------------------|
| Storage & Handling | 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: There were only a few appliances on-site—mainly on the west side of the road. I was not able to determine how long they were there.

| IAC 567 Chapter 118.7: Fixed Facility & Mobile Operations | | Yes | No | NA |
|--|--|---------------------------------------|--------------------------|--------------------------|
| Operations | 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"/> |

Comments: The unique marker for Hauge's is "HS." There were no demanufactured appliances present, though I did find a bucket of capacitors near the building on the west side of the road.

| IAC 567 Chapter 118.8: Training | | Yes | No | NA |
|--|--|-------------------------------------|--------------------------|--------------------------|
| Training | 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: Mr. Hauge received training in 2005.

| IAC 567 Chapter 118.6: Permit Application Requirements | | Yes | No | NA | |
|--|---|---|-------------------------------------|-------------------------------------|-------------------------------------|
| Refrigerant Recovery | 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 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 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 2021 annual report indicates that only two appliances were processed. Two refrigerant recovery units were present as well as two compressed gas storage tanks. They did not appear to have been used in some time. Refrigerant recovery must be done during the warm season as the building is not heated.

| IAC 567 Chapter 118.9: Refrigerant Removal Requirements | | Yes | No | NA | |
|---|----------|---|--------------------------|--------------------------|-------------------------------------|
| Oil | 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: Mr. Hauge has not performed enough demanufacturing recently to evaluate this.

| IAC 567 Chapter 118.9: Refrigerant Removal Requirements | | Yes | No | NA | |
|---|---|--|--------------------------|-------------------------------------|-------------------------------------|
| Ammonia Gas Refrigerant | 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)"f" | 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: No ammonia or sodium chromate containing appliances are processed at this site.

| IAC 567 Chapter 118.10: Mercury-Containing Component Removal & Disposal | | Yes | No | NA | |
|---|--|---|-------------------------------------|-------------------------------------|--------------------------|
| Mercury Components | 118.10(1) | Are all components containing mercury being removed? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 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 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: Few appliances had been received for past several years. No mercury was being stored on-site. The storage bucket did need a new label as the current label was already dated.

| IAC 567 Chapter 118.11: Capacitor Removal Requirements | | Yes | No | NA | |
|--|-----------------------------------|---|-------------------------------------|-------------------------------------|-------------------------------------|
| PCB Capacitors | 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 checked="" 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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| IAC 567 Chapter 118.13: Record Keeping & Reporting | | Yes | No | NA | |
|--|-----------------------------------|--|--------------------------|-------------------------------------|-------------------------------------|
| PCB Capacitors | 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? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | 118.13(3)"a" & 118.13(3)"b" | 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 checked="" type="checkbox"/> | <input type="checkbox"/> |

Comments: I observed an unlabeled bucket of capacitors sitting outside on the west side of the road.

| 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? | <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:

| IAC 567 Chapter 118.13. Record Keeping & Reporting | | Yes | No | NA | |
|--|--------------|--|-------------------------------------|--------------------------|-------------------------------------|
| Reporting | 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: Mr. Hauge submitted an annual report showing only two appliances processed in 2021. No mercury, capacitors, or refrigerants were reportedly recovered. There were only a few appliances present. There was little evidence of demanufacturing activity (other than the bucket of capacitors).

| 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: Appliances are not shredded or baled on-site.

Summary of Requirements:

- 1) Store capacitors for no more than 270 days in properly labeled containers which contain absorbent material. [567 IAC 118.11(4)]
- 2) Place a new label on the mercury storage container. [567 IAC 118.10(3)]
- 3)

Summary of Reminders:

- 1) Store appliances in an orderly manner near the processing building.
- 2) Do not conduct improper open burning. [567 IAC 23.2(455B)] – guidance brochure enclosed
- 3)

Summary of Recommendations:

- 1) Ensure that the refrigerant recovery devices are operable.
- 2) Properly store or dispose of batteries and tires.
- 3)

AUTHENTICATION

INSPECTOR: Bill Gross

DATE: 5/12/2022

REVIEWER: Tom Atkinson

DATE: 5/12/2022



May 12, 2022

KIRK HAUGE
HAUGE'S SALVAGE
1318 225TH AVENUE
OSCEOLA, IA 50213

RE: Letter of Noncompliance: Capacitor Storage [567 IAC 118.11(4)]
Appliance Demanufacturing Facility Inspection
Hauge's Salvage, 1318 225th Avenue, Osceola, IA
Sanitary Disposal Project Permit No. 20-ADP-01-05

Dear Mr. Hauge:

Enclosed is the report completed by Bill Gross of the Field Office #5 staff following the inspection of your facility in Clarke County.

The report should be self-explanatory. Please take note of the requirements, reminders, and recommendations listed near the end. By **June 15, 2022**, submit proof that the capacitors have been properly disposed of.

You may contact Bill Gross (515-238-7871; bill.gross@dnr.iowa.gov) or this office with any questions or comments. Thank you for your assistance during this inspection.

Sincerely,

Ted Petersen
Supervisor, Field Office #5

c: Susan Johnson, Land Quality Bureau-Iowa DNR (w/encl., via email)

encl.: open burning brochure

