



DIRECTOR KAYLA LYON

June 3, 2022

CON 12-1-1 Doc # 103340

Kim Galbraith Galbraith Appliance Repair 216 E 2nd Street Spencer, IA 51301

SUBJECT: ADP Renewal Inspection: Permit #21-ADP-01-04, Clay County

Dear Mr. Galbraith:

Enclosed is a copy of an Appliance Demanufacturing Permit Inspection report from my visit to your facility on May 31st, 2022.

If you have any questions regarding these matters, please call me at 712-363-9041.

Sincerely,

Matt Jefferson, Environmental Specialist

Matthew.Jefferson@dnr.iowa.gov

Field Services and Compliance Bureau

Matthia W. Jefferson

MJ: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 (ADP) PERMIT INSPECTION FORM | | | |
|--------------------------------------|---|-------------|---------|---------------------------------------|
| Permit No.: | 21 -ADP- 01 - 04 County: Clay | | | |
| Facility Nam | e: Galbraith Appliance Repair Phone Number: | 712-26 | 2-8465 | |
| Facility Addr | ess: 401 East 1 st Streeet City/State/Zip: Spencer, IA 51301 | | | |
| Responsible | | | 2-8465 | |
| Mailing Add | ress: Galbraith Appliance, 216 E 2 nd , St City/State/Zip: Spencer, IA 51301 | | | |
| Person(s) Pro | | | 9 | · · · · · · · · · · · · · · · · · · · |
| | 2. Kim Galbraith | | | |
| | 3. | | | |
| Date of This | Inspection: 5/31/22 Date of Last Inspection: 8/3/2017 | | | |
| *Be advised y | our facility may require, due to either SIC code or onsite management practices, an NPDES Gener | al Perm | it #1 | |
| (Stormwater p | permit). | | | |
| Storage & Ha | andling | | | |
| IAC 567 Chap | oter 118.4: Appliance Storage & Handling Prior to Demanufacturing | Yes | No | NA |
| | Are appliances being stored to prevent capacitors, refrigerant lines, compressors, and components containing mercury from being damaged and allowing a release into the | | | 22/68840-6/3 |
| 118.4(1) | | | | |
| | | | | |
| 118.4(2) | \boxtimes | | | |
| 118.4(3) | allowing a release into the environment? Are less than 1,000 appliances being stored prior to demanufacturing? | | П | |
| 118.4(4) | Are appliances being demanufactured in 270 days or less? | | | |
| Comments: | | K | - Image | |
| Appliances a | re stored in an upright position, indoors. Facility has sufficient space to meet current nee | ds. | | |
| IAC 567 Chap | ter 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)? | | | |
| 118.7(2) | Is the point of demanufacturing located 50 feet or more from a well and any water of the state? | | | |
| 118.7(5) | Is a unique marking system (minimum of nine inches square) being applied to the appliances after demanufacturing? | \boxtimes | П | |
| Comments: Demanufactu Training | ring takes place indoors on a concrete floor. Facility uses stickers of appropriate size to r | nark ap | oplianc | es. |
| | ter 118.8: Training | Yes | No | NA |
| 118.8 | Is at least one owner or employee completed a Department-approved training course? | \boxtimes | П | |
| 118.8 | Is one trained person on site at all times when appliances are being demanufactured? | | 퓜 | |

Comments:

Kim Galbraith has completed DNR approved training and is the primary employee this business, which he owns.

| Re | efri | ge | ra | nt | Re | 2C | ov | en | , |
|----|------|----|----|----|----|----|----|----|---|
|----|------|----|----|----|----|----|----|----|---|

| IAC 567 Chapt | IAC 567 Chapter 118.6: Permit Application Requirements | | | NA |
|-----------------------------------|---|-------------|----|-------------|
| 118.6(8) | Is a copy of the EPA Refrigerant Recovery or Recycling Device Acquisition Certification available onsite? | | | П |
| 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 |
| IAC 567 Chapte | er 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 | | |
| 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 Chapte | er 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? | | | |
| 118.13(3)"a" | Are bills of lading being kept as to where refrigerants are being shipped for disposal? | \boxtimes | | |

Comments:

Records from the Spencer RCC (Regional Collection Center) are kept when applicable.

Oil

| IAC 567 Ch | apter 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) | | | |

Comments:

None.

Ammonia Gas Refrigerant

| Allillollia Gas I | Kenigerant | T | 1 | 1 |
|-----------------------------------|---|-----|----|-------------|
| IAC 567 Chapte | r 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? | | | \boxtimes |
| 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)"g" | Does the facility have an EPA ID number (RCRA)? | | | |
| 118.9(6)"h" & 118.9(6)"i" | Is asbestos insulation being removed and handled properly? | | | |
| IAC 567 Chapte | IAC 567 Chapter 118.13: Record Keeping & Reporting | | | |
| 118.13(2)"a"(2) | Are records being kept on the number of sodium chromate—containing appliances being demanufactured | | | \boxtimes |
| 118.13(2)"f" | Are records being kept on the number of sodium chromate—containing appliances shipped to another demanufacturer | | | \boxtimes |
| 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)? | | | \boxtimes |

Comments:

Galbraith Appliance and Repair does not accept these items for demanufacturing.

Mercury Components

| IAC 567 Ch | IAC 567 Chapter 118.10: Mercury-Containing Component Removal & Disposal | | | | |
|-------------|--|-------------|----|----|--|
| 118.10(1) | Are all components containing mercury being removed? | | | | |
| 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 | | | |
| 118.10(3) | Is the date when the first mercury-containing component was placed in the container affixed to the container? | | | | |
| 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 | | | |
| 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 | | | |
| IAC 567 Cha | apter 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? | | | | |
| 118.13(3) | Are records or bills of ladings being kept on the shipment of mercury-containing components? | \boxtimes | | | |

Comments:

None of these items were present at the time of inspection. These items are boxed and sent to the RCC.

PCB Capacitors

| IAC 567 Chap | pter 118.11: Capacitor Removal Requirements | Yes | No | NA |
|-----------------------------------|---|-------------|----|----|
| 118.11(4)" <i>a</i> " | Does the facility have an EPA TSCA ID number for capacitor storage (required if facility has no RCRA ID #)? | | | |
| 118.11(4)"b" | 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) | \boxtimes | | |
| 118.11(4)"c" | Is the point of demanufacturing located above the 100-year flood water elevation? | | | |
| 118.11(4)"d" | 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? | | | |
| 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? | | | |
| 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. | \boxtimes | | |
| IAC 567 Chap | IAC 567 Chapter 118.13: Record Keeping & Reporting | | | 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? | | | |
| 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? | \boxtimes | | |
| 118.13(3)"d" | Are records being kept documenting inspections of the PCB storage area as required by 118.11(4)"h"? | | П | |

Comments:

PCB storage is emptied 9 months after first dated item is stored. No temporary storage needed - all stored together.

| DNR APPLIAN Spills | CE DEMANUFACTURING (ADP) PERMIT INSPECTION | | | |
|-----------------------------------|--|---------------------------|----------|----|
| IAC 567 Cha | pter 118.12: Spills | Yes | No | NA |
| 118.12(1) | Are spill records being kept and has the facility reported spills that resulted in a hazardous condition? | | | |
| 118.12(2) | Is a mercury spill kit on hand? | | | |
| Comments: No spill ever Reporting | nts have occurred at this facility. | • | | |
| For All Alactic Michigan Control | pter 118.13. Record Keeping & Reporting | Yes | No | NA |
| 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? | 10 A Sec. 10 1 2 A 44 A 5 | П | |
| 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 bee sent to the Department Central Office being retained for at least three years? | n 🗵 | | |
| Processing IAC 567 Chap | oter 118.15: Shredding of Appliances | Yes | No | NA |
| 118.15(1) | Has fluff from shredding been tested at least quarterly for PCBs, and TCLP for heavy metals? | | | |
| 118.15(1) | Have these results being sent to the department within 30 days of the end of each quarter? Have the results from fluff testing been submitted to the department within 30 days of the | | | |
| 118.15(3) | end of each quarter? And are these records being kept on site for a minimum of three years Are appliances being demanufactured before shredding or processing? | | | |
| 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? | n 🔲 | | |
| Comments: No shredding | g occurs at this facility. Appliances are taken to Shine Brothers in Spencer for shreddin | ıg. | 1 | |
| Summary of | Requirements | Compliance Date: | | |
| All requireme | All requirements are being met at this facility | | | |
| | | | | |
| | | | | |
| Summary of | Reminders | Complian | ce Dat | e: |
| Three years o | of annual reports are required to be stored onsite. Older reports may be discarded. | 5/31/202 | 2. | |

| Summary o | of Recommendations | | | Compliance Date: |
|--------------|--|-----------------|--------------------|------------------|
| Receipts fro | om RCC should be organized if to be used as reco | ords for applia | nce shipping. | 5/31/2022 |
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| Attach facil | ity photos (if applicable) on page 6. | | | |
| Inspector: | Matthew Jefferson Matthe W. Jefferson | _ Reviewer: | Jennifer Christian | uifer (hristian |
| Date: | 5/31/2022 | Date: | 6/2/2022 | |
| Date. | 3/31/2022 | _ Date: | 6/2/2022 | |

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DNR APPLIANCE DEMANUFACTURING (ADP) PERMIT INSPECTION Facility Photographs (if applicable)