



AUGUST 5, 2022

BRIAN ADAMS, OWNER  
ADAMS RECYCLING  
730 WEST AIRLINE HWY.  
WATERLOO, IA 50703

SUBJECT: Appliance Demanufacturing Inspection – Linn CSG  
**Permit Number: 07-ADP-11-20**

Enclosed is the report of the recent survey of the above system conducted by Chad Kehrli of this office.

We believe you will find the report self-explanatory. If you have any questions about the inspection or report, please contact Mr. Kehrli or this office at 563-927-2640.

Sincerely,

*Tom E. McCarthy*

Tom McCarthy  
Environmental Specialist Senior, Field Office # FO1

Cc: IDNR Solid Waste Section –  
Efile: 07 ADP Adams Recycling 080222 cvltr cek

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

Permit No.: 07 -ADP- 11 - 20 County: Black Hawk  
 Facility Name: Adams Recycling Phone Number: 319-215-7872  
 Facility Address: 512 Almond Street City/State/Zip: Waterloo, Iowa 50701  
 Responsible Official: Brian Adams Phone Number: 319-215-7872  
 Mailing Address: 730 West Airline Hwy City/State/Zip: Waterloo, Iowa 50703  
 Person(s) Present: 1. Brain Adams  
 2.  
 3.  
 Date of This Inspection: August 1, 2022 Date of Last Inspection: September 5, 2017

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

**Storage & Handling**

IAC 567 Chapter 118.4: Appliance Storage & Handling Prior to Demanufacturing		Yes	No	NA
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:****Operations**

IAC 567 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)?	<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:**

At the time of my inspection there were no demanufactured appliances on site, only furnaces on site waiting to be stripped down and parted out. Mr. Adams indicated that he does apply his unique mark on each appliance once he has demanufactured them.

**Training**

IAC 567 Chapter 118.8: Training		Yes	No	NA
118.8	Is 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:**

**Refrigerant Recovery**

<b>IAC 567 Chapter 118.6: Permit Application Requirements</b>		Yes	No	NA
118.6(8)	Is a copy of the EPA Refrigerant Recovery or Recycling Device Acquisition Certification available onsite?	<input type="checkbox"/>	<input checked="" 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"/>
<b>IAC 567 Chapter 118.9: Refrigerant Removal Requirements</b>		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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
<b>IAC 567 Chapter 118.13: Record Keeping &amp; Reporting</b>		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:**

Mr. Adams indicated that although he has equipment to recover refrigerant that was obtained when he purchased the business, he has no need to use it since he is no longer removing refrigerant. He indicated that he is only accepting appliances from Heating and Cooling Companies and they have already removed the refrigerant. Mr. Adams showed me documentation from these companies. He obtains documentation each time he picks up a load of appliances. These documents indicate that the refrigerant was removed and the number and type of each appliance. These documents are signed by a company representative. Mr. Adams indicated that he primarily accepts newer hot water heaters (with no mercury thermocouplers, and home heating furnaces. His primary business is removing parts off of the furnaces and selling these parts online.

**Oil**

<b>IAC 567 Chapter 118.9: Refrigerant Removal Requirements</b>		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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Comments:****Ammonia Gas Refrigerant**

<b>IAC 567 Chapter 118.9: Refrigerant Removal Requirements</b>		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)"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:

### Mercury Components

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 ladings being kept on the shipment of mercury-containing components?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

Mr. Adams stated that given the type of appliances that he takes in he does not encounter mercury containing components or fluorescent tubes. A container is available for mercury components if any were ever encountered. In addition, a mercury spill kit is on hand.

### PCB Capacitors

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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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"/>

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

**Comments:**

Mr. Adams indicated that he does remove capacitors but the ones he's come across only say Non PCB and he throws them away. He agreed to keep some on hand for future inspections to document that he removed them. In addition, Mr. Adams stated that he tests the furnaces before removing components and if it's working he keeps the capacitor and the motor together when he sells them online.

**Spills**

<b>IAC 567 Chapter 118.12: Spills</b>		Yes	No	NA
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:**

**Reporting**

<b>IAC 567 Chapter 118.13. Record Keeping &amp; Reporting</b>		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?	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments:**

**Processing**

<b>IAC 567 Chapter 118.15: Shredding of Appliances</b>		Yes	No	NA
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:**

None

Summary of Requirements	Compliance Date:
None	

Summary of Reminders	Compliance Date:
None	

Summary of Recommendations	Compliance Date:

Attach facility photos (if applicable) on page 6.

Inspector: Chad Kehne  
 Date: 08/05/2022

Reviewer: Tom E. McCarty  
 Date: 08/05/2022

**Facility Photographs (if applicable)**
