



September 8, 2022

FRED RUNDE  
CLAYTON COUNTY RECYCLING  
11645 ECHO AVE  
MONONA, IA 52159

SUBJECT: Waste Tire Management Inspection  
**Permit Number: 22-WTM-02-13**

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,

A handwritten signature in cursive script, appearing to read 'Chris Gelner', written in black ink.

Chris Gelner  
Environmental Specialist Senior, Field Office # FO1

Cc: IDNR Solid Waste Section  
Efile: 22 WMT Clayton County Recycling 090622 cvltr cek

**IOWA DEPARTMENT OF NATURAL RESOURCES  
WASTE TIRE PROCESSOR (WTM) PERMIT INSPECTION FORM**

<b>Permit No.:</b> 22-WTM-02-13	<b>County:</b> Clayton
<b>Facility Name:</b> Clayton County Recycling	<b>Facility Address:</b> 11645 Echo Ave Monona, IA 52159
<b>Phone Number:</b> 563-539-4757	<b>Mailing Address:</b> Same
<b>Responsible Official:</b> Fred Runde	
<b>Phone Number:</b> 608-778-0328	
<b>Person(s) Present:</b> 1)Gina Roys 2)Justin Keehner 3)	
<b>Date of This Inspection:</b> 09/06/22	<b>Date of Last Inspection:</b> N/A

<b>IAC 567 Chapter 117.6: Waste Tire Processing Facility Operation</b>	
<b>Processing Description</b>	Describe the general processing equipment type/purpose: Tires are not received on a routine basis at this facility unless they are on a vehicle and at that point, are processed through the shredder with the car. This facility notifies its larger customers and feeder facilities of the specified days they will accept tires, typically about 3 days per quarter. Just before tires are received, the hammers are adjusted on the primary shredder (which routinely shreds metal) and larger grates are installed just for processing tires. Large loads are received on the "tire days" and are placed on a concrete staging area just in front of the shredder conveyor where they are processed immediately. On site records show that 310 tons of tires were received and processed from January 1 <sup>st</sup> to June 20 <sup>th</sup> of this year over a period of 9 days.
	Describe the hourly processing capacity of equipment: N/A
	Describe daily operating hours of the facility/equipment: Day Shift
	Describe the types of processed material being produced: Tires are shredded, mixed with shredder fluff, and used as alternative daily cover at permitted sanitary disposal projects. A landfill located in Watertown Wisconsin, Deer Track Landfill, accepts most of the mixed shredder fluff mixed with shredded tires.

<b>Requirement</b>	<b>IAC 567 Chapter 117.6(2): Waste Tire Processing Facility Requirements</b>			
	<b>Yes</b>	<b>No</b>	<b>NA</b>	
<b>117.6(2)"a"</b>	Is the site graded to prevent standing pools of water, and to limit run-on of precipitation in all areas where whole waste tire or processed tire materials are stored?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

117.6(2)"b"	Is the site secured by a fence or barrier of 6' or greater in height to impede unauthorized vehicle and personal access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.6(2)"b"	Are all gates and entry points secured and locked when the site personnel are not present?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.6(2)"c"	Is open burning of any type occurring on the property? <i>(Note: Open burning is prohibited.)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Facility Requirements	IAC 567 Chapter 117.6(2): Waste Tire Processing Facility Requirements (Cont'd)		Yes	No	NA
	117.6(2)"c"	Is all fueling of vehicles or equipment, and activities that may release sparks or flame, conducted at least 50' from any tire storage area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(2)"d"	Are signs posted every 100' for on-site visibility that state "Open burning on-site prohibited"?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	117.6(2)"d"	Are signs posted every 100' on the perimeter of the location, for off-site visibility that state "Highly flammable materials on-site. Burning in area not recommended"?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Comments:** Signs are not posted every 100 feet for "on site visibility" and on the perimeter location for "off site visibility". This facility does not routinely store tires on site and processing is an incidental part of their business. When tires are processed (about 12 days per year) they are only placed on a designated area in front of the shredder and processed immediately. It was reported that this facility has two used fire trucks (loaded with water) on site and also utilizes thermal cameras with alarm notification (cell phone/email) for fire and heat detection. If a temperature is detected above specified parameters, notifications are sent out regardless of working hours. After discussion, Ms. Roys agreed to place a couple of signs "on site" near/around the shredder where tires are processed, and near the shredder fluff pile that contains tire shreds. In addition, Ms. Roys will have a few signs placed on the perimeter of the facility.

Preprocessed Waste Tire Storage	IAC 567 Chapter 117.6(3): Preprocessed Tire Storage Requirements		Yes	No	NA
	117.6(3)"a"	Is the quantity of whole waste tires present on site within the allowable three-day pre-processed quantity limitation? <i>(See "conditions of permit" for permitted quantity)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(3)"d"	Are all waste tires processed within 30 days of their deposit at the site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(3)"f"	Does the facility store pre-processed waste tires <b>Outdoors</b> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(3)"f"	If yes, are all pre-processed waste tire piles outdoors containing not more than 50,000 cubic feet of waste tires?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(3)"f"	If yes, is the vertical dimension of all waste tire piles within the 10' requirement?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	117.6(3)"f"	If yes, are all waste tire piles not more than 100' in length?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(3)"f"	If yes, is the surface area covered by a waste tire pile less than 5,000 square feet?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	117.6(3)"f"	If yes, are 50' fire lanes being maintained between any two tire piles?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	117.6(3)"f"	If yes, are 50' setbacks from any property line, street, public right-of-way, or building being maintained by waste tire piles onsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(3)"f"	If yes, are waste tire piles at least 200' from any well, lake, pond, river, stream, sinkhole, or tile line surface intake unless appropriate grading, or the construction of a barrier, dike, or berm, is completed to intercept surface water flows that may impact such interceptors. <i>(Note: This distance may then be reduced to 50'.)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(3)"f"	If yes, are trees and brush cleared within 50' of any tire pile?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

117.6(3)"f"	If yes, are all combustible materials or volatile chemicals stored more than 50' from any tire pile? <i>(Note: If not, they must be in approved, fire-resistant containers)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
117.6(3)"f"	If yes, is a 20 pound Class ABC dry chemical fire extinguisher available within 100' of any one portion of outdoor tire storage areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.6(3)"f"	If yes, are all waste tires stored in truck, trailers, or mobile containers at least 10' from any property line or building <i>(Note: These count toward total storage permitted for site; trucks unloading are exempted from setback requirement)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
117.6(3)"f"	If yes, are tire bales stored no greater than 10' in height, 25' in width, and 50' in length with a separation distance of 50' between piles of tire bales?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Comments:** There were no tires on site during this inspection. I was shown the staging area, just in front of the shredder. This area is a concrete base and the square footage is controlled by the size of the concrete pad in front of the shredder conveyor.

IAC 567 Chapter 117.6(3): Preprocessed Tire Storage Requirements (Cont'd)		Yes	No	NA	
Preprocessed Waste Tire Storage	117.6(3)"g"	Does the facility store pre-processed waste tires <b>Indoors</b> ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	117.6(3)"g"	If yes, are all tires stored indoors at least 20' from waste tire processing and handling equipment? <i>(Note: This does not apply to tires being actively unloaded from trucks or conveyors while process equipment is operating.)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	117.6(3)"g"	If yes, are all tires cleared away at least 20' from the processing equipment after the end of the last working shift of the day?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	117.6(3)"g"	If yes, are less than 25,000 passenger tire equivalents in total stored indoors?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	117.6(3)"g"	If yes, are all combustible materials or volatile chemicals stored at least 25' from any waste tire storage area indoors? <i>(Note: If not, they must be in approved, fire-resistant containers.)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	117.6(3)"g"	If yes, is a 20-pound Class ABC dry chemical fire extinguisher available within 50' of any one portion of indoor tire storage areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	117.6(3)"g"	If yes, is the tire processing and storage structure secure from unauthorized access during times when site personnel are not present?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Comments:** \_\_\_\_\_

IAC 567 Chapter 117.6(4): Processed Tire Storage Requirements		Yes	No	NA	
Processed Waste Tire Storage	117.6(4)"a"	Is the total volume of processed tire material stored on-site, at or less than the amount the facility produces within a consecutive 60-day period? <i>(Note: Sites are limited to no more than 5,000 tons (or 500,000 processed tires) of processed material to be stored on site at any one time.)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(4)"c"	Are processed tires that are shredded into 9" or smaller pieces stored in piles not more than 15' in height, 100' in length, and 50' width with no more than 75,000 cubic feet of product by volume?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	117.6(4)"c"	Are processed tires that are cut into strips, sidewalls, or other pieces larger than 9" stored in piles that are no more than 10' in height, 100' in length, and 50' in width with no more than 50,000 cubic feet of product by volume?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(4)"c"	Is a 50' fire lane maintained between piles of processed material, with the base of the lane kept free from waste tire-derived residuals or other debris?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	117.6(4)"c"	Are all processed tire materials stored at least 50' from any property line, street, public right-of-way or building?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(4)"c"	Are trees and brush at least 50' from the storage of processed tire material?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

117.6(4)“c”	Is a 20 pound Class ABC dry-chemical fire extinguisher available within 100’ of any one portion of the processed tire storage area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
117.6(4)“c”	For indoor storage of more than 5,000 cubic feet of processed tire material, is the material stored on concrete floors, with all retaining walls, bins, barriers, and roofing material constructed of nonflammable materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: \_\_\_\_\_

IAC 567 Chapter 117.6(5): Reporting Requirements		Yes	No	NA	
Reporting Requirements	117.6(5)	Is the waste tire processor submitting semi-annual reports to the Department that include:			
		a) Quantity of waste tires received by the facility during the reporting period?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		b) Quantity of waste tires received by the facility from in-state sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		c) Quantity of waste tires received by the facility from out-of-state sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		d) Quantity of unprocessed waste tires on hand at the facility at the time of reporting?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		e) Quantity of waste tires processed and delivered to end users during the reporting period, by product type, with determinations of quantities or product delivered to identified in-state and out-of-state markets or sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	f) Quantity of processed tire material currently stored at the facility, by product type?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Comments: \_\_\_\_\_

IAC 567 Chapter 117.6(6): Disposal of Solid Waste From Tire Processing		Yes	No	NA	
Disposal	117.6(6)“b”	Are tire bead rings, separated metal wire, synthetic fibers, cording, and “fluff” wastes being disposed of at least every 60 days at a permitted sanitary disposal project, scrap recycler, or location approved by the Department?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(6)“c”	Does the processor have records available on-site that note the most recent disposal date and location for these residuals/waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	117.6(6)“c”	Are three years of records being maintained by the processing facility with regard to the disposal of these residual wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: The primary business for this facility is processing scrap metal for recycling. Shredded tires mixed with shredder fluff is used as alternative daily cover at landfills and typically disposed of within 30 days per 117.6(1)b.

Other Materials Accepted/Activities On-Site			
Recyclables Drop-Off	<input type="checkbox"/>	Appliance Demanufacturing	<input checked="" type="checkbox"/>
Lead Acid Batteries	<input type="checkbox"/>	Electronics Demanufacturing	<input type="checkbox"/>
Used Oil	<input type="checkbox"/>	Yard Waste Collection	<input type="checkbox"/>
Antifreeze	<input type="checkbox"/>	Yard Waste Composting	<input type="checkbox"/>
Tires	<input checked="" type="checkbox"/>	HHM/RCC	<input type="checkbox"/>

Brown Goods Collection	<input type="checkbox"/>	Other:
Cathode Ray Tube Collection	<input type="checkbox"/>	
White Goods Collection	<input checked="" type="checkbox"/>	
Scrap Metal Salvaging	<input checked="" type="checkbox"/>	

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

Summary of Requirements:	Compliance Date:
1)	
2)	
3)	
4)	
5)	

Summary of Reminders:
1) Place "Open burning on site prohibited" signs around/near the shredder area and shredder fluff pile that contains the shredded tires.
2) Place signs on the perimeter fencing that state, "Highly flammable materials on site, burning in area not recommended".
3)
4)
5)

Summary of Recommendations:
1)
2)
3)
4)
5)

Inspector: <u>Chad Kehne</u>	Reviewer: <u>Chris Geben</u>
Date: <u>09/08/2022</u>	Date: <u>09/08/2022</u>