



September 27, 2022

SCOTT JOHNSON  
FACILITY MANAGER  
ALTER METAL RECYCLING – COUNCIL BLUFFS  
2603 9<sup>TH</sup> AVE  
COUNCIL BLUFFS IA 51501

SUBJECT: Alter Metal Recycling – Council Bluffs  
Appliance Demanufacturing Permit Inspection  
Permit # 78-ADP-02-02  
Council Bluffs, Pottawattamie County, Iowa  
Staff Action # 162164

Dear Mr. Johnson:

Enclosed please find a copy of the report resulting from my appliance demanufacturing permit inspection of Alter Metal Recycling facility in Council Bluffs, Iowa. The report should be self-explanatory.

If you have any questions, please contact me at 712-249-9297 or by email at [wendy.wittrock@dnr.iowa.gov](mailto:wendy.wittrock@dnr.iowa.gov).

Sincerely,

Wendy S. Wittrock  
Environmental Specialist Senior  
Field Services & Compliance Bureau

CouncilBluffs092122.sw.Alter Metal Recycling ADP.inspectionreportcoverletter.wittrock

Enc. Iowa DNR ADP Inspection Form

CC Becky Jolly, SW Section, DNR, Des Moines, Iowa (EMAIL)  
Sue Johnson, SW Section, DNR, Des Moines, Iowa (EMAIL)  
Ryan Carpenter, Alter Metal Recycling (EMAIL)k  
Facility ADP File, Pottawattamie County

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

|  |   |
|--|---|
| <b>Permit No.:</b> 78-ADP-02-02                          | <b>County:</b> Pottawattamie  |
| <b>Facility Name:</b> Alter Metal Recycling Council      | <b>Facility Address:</b><br>2603 9 <sup>th</sup> Avenue<br>Council Bluffs, IA 51501 |
| <b>Phone Number:</b> 712-328-2601                        |   |
| <b>Responsible Official:</b> Scott Johnson               | <b>Mailing Address:</b><br>2603 9 <sup>th</sup> Avenue<br>Council Bluffs, IA 51501  |
| <b>Phone Number:</b> 402-214-3958                        |   |
| <b>Person(s) Present:</b><br>1)Scott Johnson<br>2)<br>3) |   |
| <b>Date of This Inspection:</b> 9/21/22                  | <b>Date of Last Inspection:</b> 8/3/18  |

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

| <b>IAC 567 Chapter 118.4: Appliance Storage &amp; Handling Prior to Demanufacturing</b> |   | <b>Yes</b>                          | <b>No</b>                | <b>NA</b>                |
|---|---|-------------------------------------|--------------------------|--------------------------|
| <b>Storage &amp; Handling</b>   | 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:** According to Mr. Johnson, the facility accepts appliances to be de-manufactured from residents and select businesses.

| <b>IAC 567 Chapter 118.7: Fixed Facility &amp; Mobile Operations</b> |  | <b>Yes</b>                          | <b>No</b>                | <b>NA</b>                |
|--|--|-------------------------------------|--------------------------|--------------------------|
| <b>Operations</b>  | 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:**"CO" is their designated unique mark

| <b>IAC 567 Chapter 118.8: Training</b> |  | <b>Yes</b>                          | <b>No</b>                | <b>NA</b>                |
|--|--|-------------------------------------|--------------------------|--------------------------|
| <b>Training</b>                        | 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:**Currently, Scott Johnson and 4 other staff are trained for de-manufacturing of appliances.



| IAC 567 Chapter 118.6: Permit Application Requirements  |   | Yes                                 | No                       | NA                                  |
|---|---|-------------------------------------|--------------------------|-------------------------------------|
| 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 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| IAC 567 Chapter 118.13: Record Keeping & Reporting      |   | Yes                                 | No                       | NA                                  |
| 118.13(2)"a"<br>&<br>118.13(2)"g"                       | Are the number and type of refrigerant containing appliances being tracked, as well as the amount of refrigerant removed?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 118.13(3)"a"  | Are bills of lading being kept as to where refrigerants are being shipped for disposal?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |

**Comments:** The facility provided documentation for records of appliance de-manufacturing and records of disposal to Veolia and Johnstone Supply.

| IAC 567 Chapter 118.9: Refrigerant Removal Requirements |   | Yes                      | No                       | NA                                  |
|---|---|--------------------------|--------------------------|-------------------------------------|
| Oil<br>118.9(5)   | If compressor oil is being removed from the refrigeration units, is it being stored in accordance with 567-119.4 <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, &amp; meet Ch. 567-135 &amp; 136 if UST)</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

| IAC 567 Chapter 118.9: Refrigerant Removal Requirements |  | Yes                                 | No                       | NA                                  |
|---|--|-------------------------------------|--------------------------|-------------------------------------|
| Ammonia Gas Refrigerant<br>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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 118.9(6)"h"<br>&<br>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: \_\_\_\_\_

| IAC 567 Chapter 118.10: Mercury-Containing Component Removal & Disposal |  | Yes                                 | No                       | NA                       |
|---|--|-------------------------------------|--------------------------|--------------------------|
| 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 118.13(3)   | Are records or bills of ladings being kept on the shipment of mercury-containing components?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Comments: According to Mr. Johnson, the facility had just shipped a bucket of mercury containing components and the new bucket was still in his office and had not been placed in the processing area yet.

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



|                                   |   |                                     |                          |                          |
|-----------------------------------|---|-------------------------------------|--------------------------|--------------------------|
| 118.11(4)"P"<br>&<br>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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|  | 118.13(3)"a"<br>&<br>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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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: The facility provided documentation showing disposal to Veolia.

| 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|  | 118.13(3)"P" | 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: The facility provided proper documentation.

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

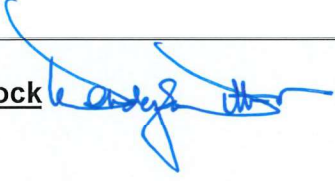

|           |  |                                     |                          |                          |
|-----------|--|-------------------------------------|--------------------------|--------------------------|
| 118.15(3) | Are appliances being demanufactured before shredding or processing?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Comments:** The facility provided documentation on shredder fluff testing.

| Summary of Requirements:           | Compliance Date: |
|------------------------------------|------------------|
| 1) Comply with permit requirements | ongoing          |
| 2)                                 |                  |
| 3)                                 |                  |
| 4)                                 |                  |
| 5)                                 |                  |

| Summary of Reminders: |
|-----------------------|
| 1)                    |
| 2)                    |
| 3)                    |
| 4)                    |
| 5)                    |

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

|   |  |
|---|--|
| Inspector: <u>Wendy S. Wittrock</u> <br>Date: <u>9/27/22</u> | Reviewer: <u>Jessica Montana</u> <br>Date: <u>9/27/22</u> |
|---|--|



*Facility Photographs (if applicable)*





