



July 26, 2023

ALTER METAL RECYCLING
ATTN PATRICK KOHLMEIER
8500 OLD HIGHWAY ROAD
DUBUQUE IA 52202

EMAIL ONLY

Subject: Appliance Demanufacturing Inspection, *Appliance Recycling of Iowa*
Permit #31-ADP-03-08

Enclosed is the report of the appliance demanufacturing inspection conducted on July 19, 2023 at the facility referenced above.

We believe you will find the report self-explanatory and strongly encourage you to act on the requirements and recommendations listed. If you have any questions about the inspection or report, please contact me at 563-920-9297 or amber.sauser@dnr.iowa.gov.

The cooperation and assistance of Patrick Kohlmeier in completing this inspection was appreciated.

Sincerely,

A handwritten signature in blue ink that reads 'Amber Sauser'.

AMBER SAUSER
ENVIRONMENTAL SPECIALIST SENIOR, FIELD OFFICE #1

Enclosure: ADP Inspection

c: Dawne O'Meara, dawn.omeara@altertrading.com

Patrick Kohlmeier, Patrick.kohlmeier@altertrading.com

Solid Waste Section (w/encl. via email: Becky Jolly, Susan Johnson)
E File 31 SW Alter Metal Recycling ADP ins 071923 als

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

Permit No.: 31 -ADP- 03 - 08 County: Dubuque
 Facility Name: Alter Metal Recycling Phone Number: 563-583-1731
 Facility Address: 8500 Old Highway Road City/State/Zip: Dubuque, IA 52002
 Phone Number: 815-994-6689
 Mailing Address: 8500 Old Highway Road City/State/Zip: Dubuque, IA 52002
 Date of Last Inspection: 7/10/2018

*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:

This facility ceased demanufacturing appliances in early 2022 due to staffing. Within the last couple of weeks, they have started demanufacturing again.

Appliances are immediately stored inside upon arrival. The designated demanufacturing area has changed. An updated map was provided during this inspection and forwarded to Susan Johnson.

All appliances had been demanufactured prior to my arrival and were already marked and being stored for further metal processing.

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:

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:

Two staff have been certified as is Mr. Kohlmeier. It was noted that staff conduct periodic in-house training and quality control checks. This facility plans to have at least two onsite certified staff at all times.

Refrigerant Recovery

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

Comments:

Documentation is maintained for all customers certified to remove refrigerant. Appliances are not accepted if refrigerant is removed by unauthorized individuals.

The last time refrigerant was picked up, the contractor did not provide additional documentation beyond company letterhead that indicated what they collected. A new contractor has been hired. They provided smaller containers which will be shipped more frequently.

Oil

IAC 567 Chapter 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:**Ammonia Gas Refrigerant**

IAC 567 Chapter 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?	<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 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 lading being kept on the shipment of mercury-containing components?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Prior to 2023, no mercury containing components have been collected through demanufacturing.

I observed a single mercury switch had been placed in the Universal Waste bucket and the label dated 7/11/2023.

Veolia is the current contractor for lamps. No lamps have been shipped since 12/2019. No lamps were on site, but a box for storage was observed.

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"/>
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 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 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"/>

DNR APPLIANCE DEMANUFACTURING (ADP) PERMIT INSPECTION

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 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:

PCB capacitors are taken to the Scott County RCC. It was noted that staff will ensure documentation in the form of a receipt is provided by Scott County upon acceptance of PCB components.

The PCB storage container was properly equipped and labeled. The first PCB capacitor was placed into the container on 7/11/2023.

Spills

IAC 567 Chapter 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?	<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:

No spills have reportedly occurred since the initial permit was issued. Staff are aware of the spill cleanup and internal reporting requirements.

Reporting

IAC 567 Chapter 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?	<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)"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

IAC 567 Chapter 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? 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:

DNR APPLIANCE DEMANUFACTURING (ADP) PERMIT INSPECTION

Summary of Requirements	Compliance Date:
Ensure bills of lading are being kept for refrigerants being shipped for disposal.	Upon next shipment

Summary of Recommendations	Compliance Date:
Continue to work with staff to properly identify components requiring removal.	Ongoing

Summary of Reminders	Compliance Date:
Ensure receipts are obtained from the RCC for any PCB components accepted.	Upon next shipment

Inspector: Amber Sauser *Amber Sauser*
 Date: 7/26/2023

Reviewer: Chris Gelner *Chris Gelner*
 Date: 7/26/2023