

June 12, 2024

CLINTON COUNTY AREA SOLID WASTE AGENCY
ATTN BRAD SEWARD
PO BOX 996 4292 220TH STREET
CLINTON, IA 52732

SUBJECT: Permit Renewal - Appliance Demanufacturing Permit (ADP)
Clinton County Sanitary Landfill; Permit #23-ADP-02-03

Dear Mr. Seward:

On June 7, 2024 I met with Brad Seward – Landfill Operator to conduct an inspection of the appliance demanufacturing permit (ADP) operations located at 4292 220th Street, Clinton, Iowa. I discussed with Mr. Seward during my inspection regarding any findings or concerns. Please reference the enclosed inspection report which includes observations made during my inspection.

If you have any questions or would like further explanation of any part of this report, please contact me in this office at 319-653-2135.

Sincerely,
FIELD SERVICES & COMPLIANCE BUREAU



Ryan Stouder
Environmental Specialist Senior

Encl. Inspection Report

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xc: Becky Jolly, IDNR Solid Waste Section, via email
FOCD – Ottumwa Wapello Co ADP SW

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

Permit No.: 23-ADP-02-03	County: Clinton
Facility Name: Clinton County Sanitary Landfill	Facility Address: 4292 220 TH Street Clinton, Iowa 52732
Phone Number: 563-242-3611	
Responsible Official: Brad Seward	Mailing Address: Same
Phone Number: 563-242-3611	
Person(s) Present: 1) Brad Seward	
Date of This Inspection: 06/07/2024	Date of Last Inspection: 06/20/2019

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

IAC 567 Chapter 118.4: Appliance Storage & Handling Prior to Demanufacturing		Yes	No	NA
Storage & Handling	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: I observed many appliances on-site, Jason Bahnson does most of the appliance demanufacturing which is done in batches. The appliances were mostly upright – except for a couple that came in that morning.

IAC 567 Chapter 118.7: Fixed Facility & Mobile Operations		Yes	No	NA
Operations	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"/>

Comment: "CC" is used as the unique marking, and used once the demanufactured appliances are placed in the scrap metal pile to be taken to Behr's Metal (owned by Alter's).

IAC 567 Chapter 118.8: Training		Yes	No	NA
Training	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: Clinton County Sanitary Landfill has two employees have taken the ADP course and only those two staff conduct any demanufacturing efforts.

IAC 567 Chapter 118.6: Permit Application Requirements		Yes	No	NA	
Refrigerant Recovery	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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Comments: The appliance building is heated or cooled through temperature controlling as needed. Refrigerant is being separated per the appliance label or placed into a labeled container. I did not see any issues with the appliance tracking system efforts.

IAC 567 Chapter 118.9: Refrigerant Removal Requirements		Yes	No	NA	
Oil	118.9(5)	If compressor oil is being removed from the refrigeration units, is it being stored in accordance with 567-119.5 (<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, & meet Ch. 567-135 & 136 if UST</i>)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: Any oils removed are stored in 55 gallon drums that are clearly labeled as oil drums. An oil spill kit and fair amount of oil-dri are available for emergencies.

IAC 567 Chapter 118.9: Refrigerant Removal Requirements		Yes	No	NA	
Ammonia Gas Refrigerant	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" & 118.9(6)"p"	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)"p"	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"/>
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Comments: The appliances received have not had sodium chromate contained material in years, if one comes in then they are shipped to Scott County Landfill for proper disposal.

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: Fluorescent bulbs are stored in cardboard containers. All mercury components are taken by Clean Harbors for proper disposal.

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 type="checkbox"/>	<input checked="" 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)"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"/>
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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" & 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: A properly labelled container with oil dri is for available for oil capacitors. Very few PCB capacitors have been seen in the last few years. Documentation is available for oil capacitors.

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: There have been no hazardous conditions to report from appliance components at this facility.

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)"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: Daily and annual records were observed and seem to be complete.

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 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: Shredding is not conducted on site, instead the metal is taken to Behrs (Alters) Metal for further processing.

Summary of Requirements:	Compliance Date:
1) Upright all appliances to reduce spills or releases.	Immediately
2) Ensure each container labels indicate the date of when the first item was placed into the container.	Immediately

Inspector: <u>Ryan Stouder</u> <i>Ryan Stouder</i>	Reviewer: <u>Kurt Levetzow</u> <i>Kurt Levetzow</i>
Date: <u>06/12/2024</u>	Date: <u>6/13/24</u>