

July 25, 2024

CBM Trading
Attn: Bret Schult
601 Ayres Progress Drive
Wilton, IA 52778

SUBJECT: Appliance Demanufacturing Inspection; FOCD Inspection #95633
SDP Permit No. 70-ADP-04-12, CBM Trading, Wilton, IA

Dear Mr. Schult:

On July 22, 2024 I conducted an inspection of the Appliance Demanufacturing Permit (ADP) at CBM Trading located in Wilton, Iowa. The enclosed report outlines various items discussed and observed during the course of my inspection. Ensure to review the comments section of the report.

Based on our discussion, CBM currently does not demanufacture appliances. Appliances are accepted, but will generally have the components removed already or are simply absent. The appliance numbers reported on the 2023 report were supposedly general appliances accepted, not specific to demanufactured appliances and components removed by CBM. I did not observe any removed components that were being stored or that need to be disposed of. One container of self-generated mercury bulbs/lamps, must be disposed of properly. The facility plans to dispose of them at the Scott Co ADP facility.

At this time, discontinuing the ADP is recommended. Be aware that an ADP is not needed to accept and move appliances. The ADP is only necessary if components will be removed from an appliance. Furthermore, be aware that accepting improperly demanufactured appliances may be a liability for your facility. Once accepted, you are responsible for the appliance and may be held accountable. Do not mark appliances accepted with your unique marking system (CBM) unless they have been properly demanufactured. You may continue to use a 3rd party to accept/haul appliances. This office strongly encourages utilizing a 3rd party/hauler that will properly handle and/or demanufacture appliances.

If you have questions or wish to discontinue the permit, contact Susan Johnson at susan.johnson@dnr.iowa.gov or at 515-217-0872. If you have any questions or would like further explanation of any part of this report, please contact me at this office at 319-653-2135 or at brian.lee@dnr.iowa.gov.

Sincerely,
FIELD SERVICES & COMPLIANCE BUREAU



Brian Lee
Environmental Specialist

Encl. SDP Inspection Report

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xc: Becky Jolly, IDNR Solid Waste Section, via email
FOCD - CBM ADP #70-ADP-04-12

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

Permit No.: 70-ADP-04-12	County: Muscatine
Facility Name: CBM Trading	Facility Address: 601 Ayres Progress Drive Wilton, IA 52778
Phone Number: 563-732-2304	
Responsible Official: Chris Mcalister	Mailing Address: Same
Phone Number: 563-732-2304	
Person(s) Present: 1)Bret Schult - Site Manager 2) 3)	
Date of This Inspection: 7/22/24	Date of Last Inspection: 5/25/12

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

Comments:Appliances are accepted, but no demanufacturing is taking place. Appliances accepted are left as is or the components have already been removed.

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.7(5) Is a unique marking system (minimum of nine inches square) being applied to the appliances after demanufacturing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:If demanufacturing was to take place, these items are compliant.

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:Mr. Schult has been trained/certified.

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 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"/>
	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 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: No refrigerant is current being stored and is not/will not planned to be removed from any future appliances accepted. Removal unit is available but unknown if it is operational. A heater is available if needed.

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 <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: _____

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.9(6)"h" & 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"/>
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Comments: Sodium chromate appliances are not accepted.

IAC 567 Chapter 118.10: Mercury-Containing Component Removal & Disposal		Yes	No	NA
Mercury Components	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 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 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: A mercury container was observed, but no removed/separate mercury components were being stored. The facility does not plan to remove any mercury components. A container of lamps/bulbs was observed. Those lamps were reportedly only from the facility itself. They plan to be disposed of at Scott Co ADP facility. No current documentation was had or made available.

IAC 567 Chapter 118.11: Capacitor Removal Requirements		Yes	No	NA
PCB Capacitors	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? (Note: Storage must take place on an impervious material above the 100-year floodwater elevation)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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)"p" & 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"/>
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PCB Capacitors	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 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: A PCB container was available, but no removed components were being stored. Inspections have not been conducted since there has been no demanufacturing taking place/no removed items stored.

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 known spills have occurred.

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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)"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 annual report incorrectly outlined appliances accepted, not appliances demanufactured. The facility must only report the actual number of appliances demanufactured on the annual report. Tracking appliances accepted/moved is still recommended.

Processi	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: Appliances accepted are reportedly moved on to another recycler.

Summary of Requirements:	Compliance Date:
1)The annual report for this permit must only convey the number of appliances demanufactured.	
2)Inspect the PCB storage area every 30 days. Inspections must be documented.	
3)	
4)	
5)	

Summary of Reminders:
1)You may accept appliances and move them to another recycler as long as no components are removed. An ADP is not needed to simply accept/move appliances.
2)
3)
4)
5)

Summary of Recommendations:
1)Discontinue the ADP and remove associated equipment.
2)
3)
4)
5)

Inspector: <u>Brian Lee</u> Date: <u>7/25/24</u> 	Reviewer: <u>Ryan Stouder</u> Date: <u>07/25/2024</u> 
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