IOWA DEPARTMENT OF NATURAL RESOURCES

GOVERNOR **KIM REYNOLDS**

DIRECTOR **KAYLA LYON**

October 9, 2024

Aletha King
Palo Alto County Transfer Station
Box 271
Emmetsburg, IA 50536

SUBJECT: Solid Waste Transfer Station Inspection
Permit #74-SDP-01-76P-XFR, Palo Alto County

Dear Ms. King:

Enclosed is a copy of the report resulting from the October 3, 2024, inspection of the Palo Alto County Transfer Station.

If you have any questions, or feel the report does not represent the conditions at your facility, please call me at (712) 262-4177.

Sincerely,

Jennifer Christian

Jennifer Christian, Environmental Specialist Senior
jennifer.christian@dnr.iowa.gov
Field Services and Compliance Bureau

JC:lw

C: -Becky Jolly, PP&ES, E&WMB, ESD, DNR, Des Moines

Enc: -Inspection report

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IOWA DEPARTMENT OF NATURAL RESOURCES
TRANSFER STATION PERMIT INSPECTION

Permit No.: #74-SDP-01-76P-XFR	**County:** Palo Alto County
Facility Name: **Palo Alto County Transfer Station** Todd Ditch, manager/operator **Phone Number:** 712-852-2482	**Facility Address:** Palo Alto County Transfer Station Box 271 Emmetsburg, IA
Responsible Official: Aletha King **Phone Number:** 712-852-2482	**Mailing Address:** Palo Alto County Transfer Station Box 271 Emmetsburg, IA
Date of Last Inspection: 11/30/23	**Date of This Inspection:** 10/3/24

FACILITY SITING & LOCATION REQUIREMENTS [Rule 106.9]

Item	Yes	No	NA
1. If the transfer station is within the 100-year floodplain, then are there structures to prevent floodwater inundation from a 100-year flood of any area that comes into contact with solid waste or washwater?	☐	☐	☒
2. Is the facility within 500 feet of an educational facility, healthcare facility, or permanent residence? *If yes, go to question 2a.*	☐	☒	☐
2a. If yes, did construction of the educational or healthcare facility, or permanent residence begin before the permit application was received by the department? *If yes go to question 2b.*	☐	☐	☒
2b. Is screening (natural preferred but structural OK) utilized to minimize noise and visibility of operations?	☒	☐	☐

Comments:
This facility's tipping floor is located inside of a building which reduces noise and visibility of the operation. A row of tall shrubs have been established to provide natural screening to the north and northeast. The facility is located approximately 330 feet off 450th Avenue, which limits visibility and noise from passersby.

REQUIREMENTS FOR THE TRANSFER STATION BUILDING [Rule 106.10(1)]:

Item	Yes	No	NA
1.Is the transfer station building sufficient to allow all solid waste to be unloaded from collection vehicles and loaded into transport vehicles inside of it? *Note: Rear-loading transport vehicles that have no other opening and that securely abut the building so that minimal amounts of solid waste escape qualify a being inside the building.*	☒	☐	☐
2. Is the building sufficient to minimize dust and litter exiting the building?	☒	☐	☐
3. Is the building sufficient to keep out precipitation?	☒	☐	☐
4. Is the building sufficient to prevent the attraction or harboring of vectors?	☒	☐	☐
5. Are all surfaces that come in contact with solid waste or washwater impervious to liquids?	☒	☐	☐
6. Does the building have a drainage system that maintains a separation between stormwater and washwater?	☐	☐	☒
7. Does the building have a washwater collection system that directs washwater to a tank for later disposal, a sanitary sewer, or equivalent approved by the department? *If the collection system has tanks for later disposal go to question 7a.*	☐	☐	☒
7a. If washwater collection tanks are utilized for storage for later disposal, then do the tanks have high-level indicators or gauges?	☐	☐	☒
8. Does the transfer station store solid waste during non-operating hours? *If yes go to questions 8a and 8b.*	☐	☒	☐
8a. Is the solid waste storage area clearly marked (i.e. a sign, painted line, cones, etc)?	☐	☐	☒
8b. Does the solid waste storage area have a fire detection system?	☐	☒	☐

Item	Yes	No	NA
9. Does the building have a surge pit to handle large volumes of incoming waste? *If yes go to questions 9a and 9b.* *Note: Surge pits are typically found in large transfer stations where a large number of trucks can overload the tipping floor. Surge pits provide more space for temporary storage during peak operating hours and may also allow for additional compaction of the solid waste before it is loaded into transport vehicles.*	☐	☒	☐
9a. Does the facility have effective odor control mechanisms?	☐	☐	☒
9b. Does the surge pit have a sprinkler system in case of fire?	☐	☐	☒
10. If the transfer station salvages materials, are the salvage storage areas clearly marked (i.e. signs, painted lines, cones, etc)?	☐	☒	☐
11. Is there sufficient indoor and outdoor lighting to minimize the difference in lighting (i.e. no temporary light blindness) when entering or exiting the building?	☒	☐	☐
12. Are their doors at each entrance and exit?	☒	☐	☐

Comments:
There is no washwater produced at this facility.
The tipping floor is cleaned at the end of each day.
The salvageable materials are clearly marked in their specific storage areas. Indoor lighting is sufficient and exhaust fans provide acceptable air quality inside the building. The interior of the transfer station was in orderly condition and very clean during the inspection.

OTHER DESIGN REQUIREMENTS [Rule 106.10(2)]

Item	Yes	No	NA
1. Does the facility have a secure perimeter fence with lockable gates?	☐	☒	☐
2. Does the facilility use an IDALS certified scale? *Note: The scale does not have to be on-site (i.e. nearby COOP, quarry, landfill etc).*	☒	☐	☐
3.Does the facility have adequate queuing distance for vehicles entering and exiting the property such that lines do not extend onto public streets? *If no go to question 3a.*	☒	☐	☐
3a. Does the facility have approval from the local government authority for lines to back-up onto public streets?	☐	☐	☒
4. Does the facility have signs or pavement markings indicating safe and proper on-site traffic patterns?	☐	☐	☒
5. Is there a sign at the primary entrance specifying: **a. The name and permit number of the facility;** **b. The operating hours;** **c. The materials accepted or the statement, 'All materials must have prior approval';** **d.The telephone number of an emergency contact person?**	☒	☐	☐

Comments:
There is not a secure perimeter fence surrounding the property, however there is a lockable gate (chain) at the entrance and security cameras are used. Wooden posts run parallel with the right-of-way to prevent any vehicles from entering the property.
The primary entrance sign contains the required information.

OPERATING REQUIREMENTS [Rule 106.11]

Item	Yes	No	NA
1. Is site access controlled and limited to a time when a transfer station operator is on duty that: **a. Has read, understands, and is able to implement the plan of operations?** **b. Has read, understands, and is able to implement the Emergency Response and Remedial Action Plan?** **c. Is able to visually recognize universal symbols, markings, and indicators of unacceptable materials such as hot loads, and hazardous, infectious, and radioactive wastes?**	☒	☐	☐

2. If the transfer station is permitted for 20,000 tons or more per year of solid waste, then is an operator on duty that has been certified in a SWANA Transfer Station Manager Course, or other course acceptable to the department?	☐	☐	☒
3. Is solid waste only being accepted from within the designated service area?	☒	☐	☐

This transfer station is permitted to accept waste from all cities, excluding West Bend, and the unincorporated areas in Palo Alto County. It is permitted to accept up to 5,000 tons of municipal solid waste annually.

Item	Yes	No	NA
4.Are all unloading, handling, processing, screening, open storage, loading, and similar activities or processes involving solid waste performed inside of the transfer station building? *Note: Rear-loading transport vehicles that have no other opening and that securely abut the building so that minimal amounts of solid waste escape qualify a being inside the building.* *Note: Salvaged materials that do not attract or harbor vectors may be stored outside of the building in a clearly marked, designated area.*	☒	☐	☐
5. Is the solid waste being at least visually screened by personnel capable of identifying hot loads and hazardous, infectious, radioactive, and other wastes not suitable for disposal in a sanitary landfill?	☒	☐	☐
6. Is salvaging only being performed by transfer station operators, and is scavenging prohibited?	☒	☐	☐
7. Is the operation of the facility being carried out in a manner that attempts to minimize litter, dust, odor, noise, vibration, and the attraction or harborage of vectors?	☒	☐	☐
8. Is the transfer station building being maintained at a level of cleanliness necessary to prevent a nuisance or public health hazard?	☒	☐	☐
9. Is on-site litter being maintained at a level of cleanliness necessary to prevent a nuisance or public health hazard?	☒	☐	☐
10. Is the exterior of all buildings being maintained in a reasonable aesthetic condition, that prevents the attraction or harborage of vectors, so as not to create a nuisance of public health hazard?	☒	☐	☐
11. Is the washwater management system kept from overflowing?	☐	☐	☒
12. Are all surfaces that prevent washwater from entering the ground and groundwater impervious? *If no go to question 12a.*	☐	☐	☒
12a. Has the breach noted in question 12 been fixed within 24 hours, or has the facility prevented any solid waste or washwater from coming into contact with the breached area until repaired?	☐	☐	☒

Comments:

Solid waste is visually screened by personnel which appear to be doing a fine job. Unacceptable materials are denied by the staff.

The property is kept in great condition and receives upkeep to maintain a respectable appearance.

There was no on-site or wind-blown litter observed during the inspection.

SOLID WASTE STORAGE [Rule 106.12]

Item	Yes	No	NA
1. If solid waste is stored at the transfer station, is it stored: a. Inside the transfer station building in a clearly marked, designated area; or b. Inside the transfer station building in a surge pit; or c. Inside a secure solid waste transport vehicle, protected from precipitation and vectors?	☒	☐	☐
2. Is solid waste being stored inside the transfer station building: a. In a designated area that is not a surge pit for not more than 48 hours, excluding Sundays and national holidays? b. In a surge pit for not more than seven days, including Sundays and national holidays?	☐	☐	☒
3. Is solid waste being stored in a transport vehicle designated to: a. Travel only via roadway for not more than 48 hours, excluding Sundays and national holidays; or b. Travel via rail or navigable waterway, including intermodal container systems, for not more than seven days, including Sundays and national holidays?	☒	☐	☐

RECORDKEEPING REQUIREMENTS [Rule 106.13]

Item	Yes	No	NA
1. Is a copy of the current permit on site?	☒	☐	☐
2. Is a copy of the operations plan on site?	☒	☐	☐
3. Is a copy of the emergency response and remedial action plan (Rule 106.19) on site?	☒	☐	☐
4. Is proof of financial assurance (Rule 106.18) on file?	☒	☐	☐
4. Is the transfer station maintaining records of the following information for a period of three calendar years, excluding the time before July 17, 2002: a.Tons of all solid waste disposed of quarterly; b.Destination of all outgoing solid waste; c.Washwater management system inspection log; d.Hot loads and hazardous, infectious, radioactive, or other unacceptable wastes found; e.Training received by transfer station operator(s) pursuant to rule 106.11(1)? (i.e. see OPERATING REQUIREMENTS questions 1 & 2)	☒	☐	☐

Comments:
All required documents are maintained by personnel and located on site.

REPORTING REQUIREMENTS [Rule 106.14]

Item	Yes	No	NA
1. Is the transfer station submitting quarterly tonnage reports to the department that include the following information: a.Tons of solid waste disposed of; b.Comprehensive planning areas from which the solid waste originated, and the tons of solid waste disposed from each county and comprehensive planning areas; c.Destinations of all outgoing solid waste?	☒	☐	☐
2. Is the transfer station being inspected annually by an Iowa-licensed professional engineer for compliance with rule 106.10 (i.e. see REQUIREMENTS FOR THE TRANSFER STATION BUILDING and OTHER DESIGN REQUIREMENTS) and submitting that report to the department and field office by the first workday of November each year?	☒	☐	☐

Comments:
All required reports that are to be submitted to the DNR central office have been done so in a timely manner.

TRANSPORT VEHICLE CONSTRUCTION & MAINTENANCE REQUIREMENTS [Rule 106.15]

Item	Yes	No	NA
1. Is the portion of the solid waste transport vehicle that contains solid waste sufficient to: a. Prevent the accidental discharge of its contents; b. Prevent the attraction or harborage of vectors; and c. Prevent the infiltration of precipitation?	☒	☐	☐
2. If the transport vehicle has an open-top, then does it have a suitable cover that is not easily torn, shredded, broken, or otherwise breached under normal use?	☐	☐	☒
3. Is the transport vehicle clean enough to prevent a nuisance or vector attraction?	☒	☐	☐
4. Is wastewater generated from any cleaning of the areas of the solid waste transport vehicle that hold solid waste being managed as washwater?	☐	☐	☒

Comments:
The solid waste transport vehicle is washed at the Palo Alto County shed.

TRANSPORT VEHICLE OPERATION REQUIREMENTS [Rule 106.16]

Item	Yes	No	NA
1.Are the solid waste transport vehicle's openings securely closed before transport so as to prevent the loss of solid waste?	☒	☐	☐
2.Are the solid waste transport vehicle's openings securely closed during storage so as to prevent the loss of solid waste?	☒	☐	☐
3.If solid waste is spilled from a solid waste transport vehicle during loading, is it collected as often as necessary to minimize litter, dust, or other fugitive debris?	☒	☐	☐

SUMMARY

- The transfer station permit was issued March 2, 2022, and will expire on March 2, 2025. The current responsible official is Aletha King, the full-time operator/manager is Todd Ditch and the truck driver is Kevin Malm. All solid waste is hauled to Northern Plains Regional Landfill for final proper disposal at approximately seven loads per week. Ms. King stated that the application for the permit renewal is complete and will soon be submitted.

- The fire that took place in March 2023 destroyed the transfer station building and the contents inside. Since then, the building has been replaced and the facility has been fully operational since August 2024.

- In June of 2024, this region experienced a major flood which closed the gravel road that the transfer station is located on for three weeks.

- During the inspection, the interior of the transfer station building was in orderly condition and the tipping floor was relatively clean with no odors detected.

- The exterior of the building also appeared to be in great condition. There was no wind-blown litter issues and the property is kept very clean. The required sign at the entrance was posted and there is a lockable gate (chain). The security cameras that were installed in 2019 send alarms to the staff members' cell phones. This has worked effectively when people enter the property after hours. The cameras also provide live footage of customers on the property that are not visible from the transfer station office.

- The semi and transport trailer are both in good shape and receive regular maintenance. A new trailer has been purchased and is expected to be in use by December. A new 520 John Deere tractor and John Deere mower were also recently purchased.

- The new IDALS certified scale is located to the east of the building and expires on December 31, 2024.

- The contents of the HHM building are hauled to the RCC at the Spencer Transfer Station once per year or as needed.

- Used oil is stored in the shop and contained nearly 150 gallons. J&J Waste Oil out of Minneapolis, MN, picks up when full. The storage capacity is 200 gallons.

- There are three recycling receptacles located in Emmetsburg, and one located in Ruthven, Ayrshire, Rodman and at the Palo Alto Transfer Station. There are two mobile trailers that are used by the community to collect glass, tin, plastics, paper and cardboard. Shamrock Recycling picks up the recyclables every other week.

- The scrap metal roll off container had approximately 1,000 pounds of metal during the inspection. This container is hauled to Shine Brothers in Estherville, Iowa, about once per month.

- Approximately 100 tires were in the storage containers during the inspection. Habben Enterprises picks up the tires as needed.

- There were two totes of electronics in storage during the inspection. Retrofit picks up the electronics approximately once every two months.

- During the inspection there were approximately ten appliances located in the storage area to the west of the building. A walk-in trailer is utilized for the storage and hauling of the appliances. This location is monitored by security cameras in the office and appears to be in a manageable location. Corey Climber is the permitted appliance demanufacturer. Appliances are hauled to Mr. Climber on a monthly basis.

CONCLUSION

Overall, Todd Ditch and staff continue to operate the Palo Alto County Transfer Station in a professional and successful manner and should be commended for their efforts. The facility is clean, well organized, properly managed and was in compliance with DNR regulations during the inspection.

Inspector: Jennifer Christian Date: 10/09/2024

Reviewed By: Tom Roos Date: 10/09/2024