

October 15, 2024

Mr. Chad Stobbe
Environmental Specialist Senior
Iowa Department of Natural Resources
Wallace State Office Building
502 East 9th Street
Des Moines, Iowa 50319



**RE: ANNUAL INSPECTION – 2024
JONES COUNTY SOLID WASTE TRANSFER STATION
PERMIT NO. 53-SDP-06-07P-XFR
HLW P.N. 6038-23A.321**

In accordance with the General Provisions of the Sanitary Disposal Project Permit, the annual inspection of the Jones County Transfer Station was personally conducted the afternoon of October 7, 2024. Karl Taylor, Director, accompanied me on a portion of the inspection and the results of the inspection were discussed with Mr. Taylor upon completion. Conditions at the time of the inspection were clear with light winds and temperatures in the 60's.

GENERAL CONDITIONS

The hours of the Transfer Station are 8:00 to 3:00, Monday-Friday and 9:00 to 2:00 on Saturday.

Municipal wastes are brought to the Transfer Station, dumped onto the tipping floor, and then loaded by endloader into transport trailers for hauling and disposal at the Millennium Waste, Inc. Sanitary Landfill in Milan, Illinois, in accordance with the SDP Permit. Mr. Taylor reported that typically 2-3 loads are hauled to the landfill per day.

The loading pit was reviewed. Spilled litter had been swept into a pile. Mr. Taylor reported that staff typically clean the pit at the end of each day.

Source separated recyclables are also accepted at the Transfer Station. Recycled materials accepted include rigid and fiber recyclables, glass, white goods, household hazardous materials, tires, electronics and CRT's, lead acid batteries, and scrap metal. Recyclable materials appeared to be stored in the designated areas. The scrap metal roll off was full so a small amount of scrap metal was being stored on the ground during the inspection. Mr. Taylor reported that the recycler has been contacted to remove the roll off and also to provide two roll offs in the future to limit the amount of scrap metal that is stored on the ground.

Mr. Taylor reported that the Commission is considering constructing a concrete pad for recyclable storage. Signage will also be added.

Rigid and fiber recyclables are stored in the Transfer Station building. Accumulated material is stored in a roll off container when possible, with material stored outside of the roll off container, separated from the incoming waste, when the roll off is full. The roll off was full - Mr. Taylor reported that the roll off and the majority of the accumulated material being stored in the building would be removed on October 8, 2024.

The Jones County Solid Waste Management Commission has entered into an agreement with the Cedar Rapids/Linn County Solid Waste Agency Regional Collection Center (RCC) for the collection and storage of Household Hazardous Materials (HHM) at the Transfer Station. The Operations Plan and the Emergency Contingency Plan for the HHM Satellite Collection Site were updated in 2021 with the updated documentation included in the 2022 Transfer Station Permit Renewal Documentation dated June 14, 2022 (Doc #103406). Mr. Taylor said accumulated HHM was removed the week before the inspection. I viewed the interior of the HHM building and minimal material was noted. Staff temporarily store HHM customers drop off in the Transfer Station building prior to hauling it to the HHM. Very little material was being temporarily stored in the Transfer Station building during the inspection. Mr. Taylor reported that IDNR suggested customers drop off material outside of the HHM rather than in the Transfer Station building with staff placing the material in the building to eliminate staff hauling the material to the HHM. Mr. Taylor indicated that they would implement this practice.

The access road from the scale to the tipping floor was in excellent condition. Conditions on the tipping floor were observed during the inspection - Mr. Taylor indicated that the amount of waste on the floor would allow waste to be removed within 48 hours of deposition. Transfer Station employees retrieve litter as necessary - there was minimal litter noted around the Transfer Station.

PERMIT CONDITIONS

The SDP Permit for the Transfer Station expires on October 6, 2025. The Permit Certificate was posted. All permit conditions appear to be met or exceeded.

The Emergency Response and Remedial Action Plan (ERRAP) and Operations Plan were both posted. The ERRAP was updated in 2021 with the updated documentation included in the 2022 Transfer Station Permit Renewal Documentation dated June 14, 2022 (Doc #103406). Mr. Taylor reported that staff participates in training provided by the East Central Iowa Council of Governments.

FINANCIAL ASSURANCE

A closure cost estimate for the Transfer Station and associated financial assurance documentation was submitted with the 2022 Transfer Station Permit Renewal Documentation dated June 14, 2022 (Doc #103406) and approved in the SDP Permit covering the period October 6, 2022 to October 6, 2025. As per IDNR regulations, an updated closure cost estimate and financial assurance documentation will be submitted during each permit renewal.

ADDITIONAL COMMENTS

The Transfer Station was visited by IDNR Field Office (FO) #1 on June 11, 2024. The visit resulted in the Notice of Violation (NOV) dated June 24 2024. The NOV listed the Requirements below:

1. Cease storing HHM longer than 180 days. Mr. Taylor reported that accumulated HHM was hauled to the RCC the week prior to the inspection. Very little HHM was in the HHM building during the inspection
2. Cease storing solid waste for longer than 24 hours (excluding Sundays and national holidays). Mr. Taylor reported that the accumulated waste on the transfer station floor would be removed by the end of the day following the inspection.
3. Remove all HHM and take to Linn County Solid Waste Agency. Mr. Taylor reported that accumulated HHM was hauled to the RCC the week prior to the inspection.
4. Contact vendor and remove all bulbs and PCB's for proper disposal. Correctly label new DOT approved containers with the first date an item is placed inside. Mr. Taylor reported that he has ordered labels and will order PCB containment buckets.
5. Work with Linn County Solid Waste Agency/HHM vendor to get proper/approved HHM storage containers and PCB labels. Mr. Taylor reported that he has ordered labels and will order PCB containment buckets.

The Transfer Station was visited by IDNR FO #1 on September 4, 2024 and September 11, 2024. The visits resulted in the Notice of Violation (NOV) dated September 20, 2024. The NOV listed the Requirements below:

1. Cease storing HHM longer than 180 days. Mr. Taylor reported that accumulated HHM was hauled to the RCC the week prior to the inspection. Very little HHM was in the HHM building during the inspection
2. Cease storing solid waste for longer than 24 hours (excluding Sundays and national holidays). Run four or more loads daily if needed. Mr. Taylor reported that the accumulated waste on the transfer station floor would be removed by the end of the day following the inspection. Three loads of waste were being hauled to the landfill the date of the inspection.

3. Remove all HHM and take to Linn County Solid Waste Agency. Do this every 180 days at a minimum. Mr. Taylor reported that accumulated HHM was hauled to the RCC the week prior to the inspection.
4. Create a daily checklist or utilize the template provided. Maintain these records for three years. Mr. Taylor has received the daily check list provided by IDNR. Staff has not had a time to customize the checklist for this facility to date. Pit and washwater tank inspection logs were posted in the Transfer Station office and were being used.
5. Turn away solid waste/recycling loads when this facility is over capacity. Adequate space was available for incoming solid waste. The recycling area in the Transfer Station was at capacity - Mr. Taylor reported that the roll off and the majority of the accumulated recyclable material in the Transfer Station would be hauled off on October 8, 2024.

Mr. Taylor submitted a letter to IDNR FO #1 via email documenting improvements that have been made as well as future planned improvements on October 10, 2024.

One staff member has taken the HAZWOPER 24 hour training although the 8 hour refresher is needed. The certificate was posted at the Transfer Station. Mr. Taylor reported that another staff member will most likely take the HAZWOPER training. Mr. Taylor reported that he will most likely take the transfer station operator certification course in the future. Note due to the tonnage received at the Transfer Station, a certified person is not required to be on site.

Mr. Taylor reported that a contractor has been retained to wash the interior of the Transfer Station walls. The work should be completed in October.

Load inspection and pit cleaning logs are posted in the Transfer Station office.

CHAPTER 106 REQUIREMENTS

In accordance with IAC 567-106.14(2), the annual inspection report for transfer stations must address the requirements in IAC 567-106.10. The following summarizes compliance with IAC 567-106.10:

IAC 567-106.10(1) Transfer Station Building

- a. The waste unloading area and the transfer trailer loading area are fully enclosed to:
 1. Minimize dust and litter exiting the building.
 2. Keep precipitation out of the building.
 3. Prevent the attraction or harboring of vectors.
- b. The solid waste unloading area and the waste transfer trailer loading area are located on concrete floors.

- c. The grounds around the Transfer Station and access roads are graded away from the building entrances so stormwater flows or surface water do not typically enter the building.
- d. All washwater is contained within the Transfer Station building. The floor in the Transfer Station building is sloped toward floor drains that outlet into a washwater storage tank. The washwater tank is equipped with a high level alarm indicator, Mr. Taylor reported that the alarm was operational. The washwater tank inspection log was posted in the office. The level of the storage tank was visually reviewed during the inspection and storage was available.
- e. All waste stored during non operating hours is stored in the interior of the Transfer Station building, which is locked and in a fenced area to control access to the building. Smoke alarms are located in the building. Mr. Taylor noted that the annual alarm test was completed about a month ago.
- f. This facility does not utilize a surge pit.
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- h. Salvaged materials are stored in the designated areas.
- i. Lighting is adequate in the Transfer Station building.
- j. Vehicular access doors in the Transfer Station building are operable.

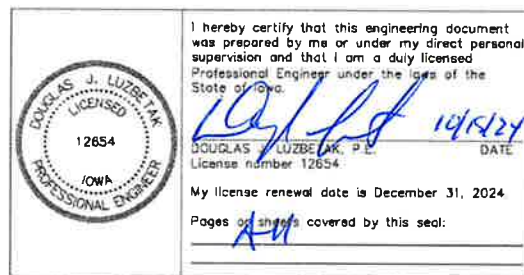
IAC 567-106.10(2) Other Transfer Station Design Requirements

- a. The facility is fenced and the access road equipped with a lockable gate.
- b. The scale at the Transfer Station is certified on a regular basis. A current scale certification is posted.
- c. The Transfer Station has an adequate queuing distance for vehicles entering and exiting the property. Queued vehicles do not extend into the public street.
- d. Signs have been provided to direct traffic and to maintain proper on-site traffic patterns. Mr. Taylor reported that additional signage would be placed in the recycling area. Staff also assist customers unfamiliar with the Transfer Station as needed.
- e. A sign is located at the facility containing the following information:
 - 1. Name and permit number of the facility
 - 2. Operating hours
 - 3. Material acceptance criteria
 - 4. Emergency contact number

This report is based on observations made at the site at the time of the inspection and the information sources referenced in the report. This report does not reflect typical variations experienced at the site throughout the year or variations in conditions that may be observed at the site at other times.

RECOMMENDATIONS

1. Store appliances upright.
2. Wash interior walls.
3. Continue to limit waste storage in the interior of the Transfer Station to 48 hours maximum (excluding Sundays and Holidays).
4. Continue the planned improvements listed in the October 10, 2024 email to IDNR FO #1.
5. Continue to operate in accordance with the SDP Permit.



cc: Karl Taylor, Director, Jones County Solid Waste Management Commission (electronic copy)