

December 3, 2024

RUSS TRULSON  
RUSS' RECYCLING  
667 6<sup>TH</sup> STREET SW  
BRITT IA 50423

Subject: Appliance Demanufacturing Permit Renewal Inspection  
Permit #41-ADP-01-09

Dear Mr. Trulson:

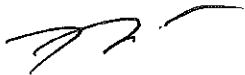
Enclosed is a report documenting the inspection of your appliance demanufacturing operation. The inspection was conducted on December 2, 2024, by Madelynn Austin, an Environmental Specialist with this office.

This facility was found to be in material compliance with applicable requirements. Please continue to run your operation in compliance with Chapter 567 IAC 118.

If you have any questions regarding this matter, please contact Ms. Austin at 641-424-4073 or [madelynn.austin@dnr.iowa.gov](mailto:madelynn.austin@dnr.iowa.gov).

Sincerely,

**FIELD SERVICES AND COMPLIANCE BUREAU**



Trent Lambert  
Field Office Supervisor

TL/ma

c: Becky Jolly, DNR ([becky.jolly@dnr.iowa.gov](mailto:becky.jolly@dnr.iowa.gov))



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

<b>Permit No.:</b> 41-ADP-01-09	<b>County:</b> Hancock
<b>Facility Name:</b> Russ' Recycling	<b>Facility Address:</b> 794 7TH ST SW Britt, IA 50426
<b>Phone Number:</b> 641-860-0315	
<b>Responsible Official:</b> Russ Trulson	<b>Mailing Address:</b> 667 6 <sup>th</sup> Street SW Britt, IA 50426
<b>Phone Number:</b> 641-860-0315	
<b>Person(s) Present:</b> 1) Russ Trulson 2) 3)	
<b>Date of This Inspection:</b> 12/2/2024	<b>Date of Last Inspection:</b> 9/11/2019

*\*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:** Appliances are stored and stacked appropriately on trailers. Typically, Mr. Trulson keeps the appliances in the shed he demanufactures in.

Fixed & Mobile 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"/>
	IAC 567 Chapter 64.4: Issuance of NPDES Permits		Yes	No	NA
64.4(2)	Is a copy of the Stormwater Discharge permit available if the facility is storing/processing appliances outside?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
64.4(2)	Has the facility developed and implemented a Stormwater Pollution Prevention Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

**Comments:** Appliances are being demanufactured inside and on an impervious floor. Mr. Trulson marks appliances with an "RR" when they are properly demanufactured. Appliances are stored inside or on trailers, no stormwater permit is required.

IAC 567 Chapter 118.8: Training		Yes	No	NA	
Training	118.8	Has 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. Trulson has completed the training and he personally demanufactures all appliances.

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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
Refrigerant Recovery	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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA	
Refrigerant Recovery	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: Mr. Trulson does not demanufacture appliances with refrigerant.

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? (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: None

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

Comments: Mr. Trulson does not accept appliances that contain sodium chromate.

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 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 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: Mr. Trulson keeps a tally of all appliances demanufactured and mercury components removed. Mr. Trulson disposes of mercury waste at the Landfill of North Iowa HHW center. The most recent trip to the landfill had just occurred the month prior to the inspection. Mr. Trulson had two mercury switches in his mercury bucket at the time of the inspection.

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"/>
<b>IAC 567 Chapter 118.13: Record Keeping &amp; Reporting</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.13(3)"a" & 118.13(3)"c"	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:** Mr. Trulson keeps a tally of all appliances demanufactured and PCB components removed. No PCB capacitors were on site at the time of the inspection. All PCB capacitors are properly disposed of at the Landfill of North Iowa HHW center. Monthly PCB storage area inspections are completed as required. Mr. Trulson recently moved where he demanufactures, which requires a new PCB ID number. As discussed, Mr. Trulson must email [orcrcpbs@epa.gov](mailto:orcrcpbs@epa.gov) and copy [murray.annah@epa.gov](mailto:murray.annah@epa.gov) to let them know the PCB ID number and where his new address is.

<b>Spills</b>	<b>IAC 567 Chapter 118.12: Spills</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
	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:** A spill kit is on site. Mr. Trulson reports that no spills have occurred.

<b>Reporting</b>	<b>IAC 567 Chapter 118.13. Record Keeping &amp; Reporting</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
	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:** Records are complete and maintained as required.

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: Mr. Trulson does not shred appliances.

**Reminders:**

As we discussed, there are a few things that need to be updated due to moving locations. Please contact Sue Johnson with any questions at 515-217-0872 or [susan.johnson@dnr.iowa.gov](mailto:susan.johnson@dnr.iowa.gov).

1. Update PCB ID number with the EPA. Email [orcrcpbs@epa.gov](mailto:orcrcpbs@epa.gov) and copy [murray.annah@epa.gov](mailto:murray.annah@epa.gov) to let them know the PCB ID number and the new address.
2. Update financial assurance instrument to the new location.
3. Proof of Ownership/Local Zoning Requirements/100 yr. flood elevation.

<p>Inspector: <u>Madelynn Austin</u></p> <p>Date: <u>12/13/24</u> <i>Madelynn Austin</i></p>	<p>Reviewer: <u>Jeremy Klatt</u></p> <p>Date: <u>12/14/24</u> <i>JKlatt</i></p>
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