

APRIL 10, 2025

EMAIL ONLY sudolcollin@gmail.com

SUDOL AUTO PARTS DBA WILKEN AUTO SALVAGE  
1157 275<sup>th</sup> STREET  
NASHUA IA 50658

Subject: INSPECTION PRIOR TO STARTUP- Appliance Demanufacturing Inspection  
Permit #19-ADP-03-25

Enclosed is the report of the appliance demanufacturing inspection conducted on April 7, 2025, at the facility referenced above. Some recommendations and reminders are noted in the summary section of this report. All requirements were addressed prior to report completion.

We believe you will find the report self-explanatory and strongly encourage you to act on the recommendations listed. If you have any questions about the inspection or report, please contact me at 563-920-9297 or [amber.sauser@dnr.iowa.gov](mailto:amber.sauser@dnr.iowa.gov).

Your cooperation and assistance in completing this inspection was appreciated.

Sincerely,



AMBER SAUSER  
ENVIRONMENTAL SPECIALIST SENIOR, FIELD OFFICE #1

Enclosure: ADP Inspection

c: Collin Sudol, [sudolcollin@gmail.com](mailto:sudolcollin@gmail.com)  
Solid Waste Section (w/encl. via email: Becky Jolly, Susan Johnson)  
E File 19 SW Sudol Auto Parts ADP ins 040725 als

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

Permit No.: 19 -ADP- 03 - 25 County: Chickasaw  
 Facility Name: Sudol Auto LLC DPA Wilken and Son, Inc. Phone Number: 641-435-2515  
 Facility Address: 1157 275<sup>th</sup> Street City/State/Zip: Nashua, IA 50658  
 Responsible Official: Collin Sudol Phone Number: 641-257-8088  
 Mailing Address: 1157 275<sup>th</sup> Street City/State/Zip: Nashua, IA 50658  
 Person(s) Present Colling Sudol, Steve Sudol, Tami Sudol

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

**Storage & Handling**

<b>IAC 567 Chapter 118.4: Appliance Storage &amp; Handling Prior to Demanufacturing</b>		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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.4(3)	Are less than 1,000 appliances being stored prior to demanufacturing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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:**

No appliances had yet been set aside for demanufacturing.

**Operations**

<b>IAC 567 Chapter 118.7: Fixed Facility &amp; Mobile Operations</b>		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"/>

**Comments:**

<b>IAC 567 Chapter 118.8: Training</b>		Yes	No	NA
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:**

Collin Sudol is the certified staff person. He indicated that he will oversee all demanufacturing activities.

**Refrigerant Recovery**

<b>IAC 567 Chapter 118.6: Permit Application Requirements</b>		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 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
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:**

We discussed maintaining paperwork for devices received with refrigerant already removed. An example template is being provided with this report.

The tracking log for demanufactured appliances was not developed at the time of this announced inspection. It was noted that the form would be developed prior to demanufacturing. An example template is being provided with this report.

It is anticipated that Johnstone Supply will receive the evacuated refrigerant.

**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 (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:****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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.9(6)"h" & 118.9(6)"i"	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:**

The original operations plan included evacuating ammonia gas refrigerant. During this inspection, it was noted that staff no longer intended to accept these appliances. If received, they will be transported to another location for demanufacturing. The operations plan will be updated to reflect this change.

**Mercury Components**

<b>IAC 567 Chapter 118.10: Mercury-Containing Component Removal &amp; Disposal</b>		Yes	No	NA
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 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 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>IAC 567 Chapter 118.13: Record Keeping &amp; Reporting</b>		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 lading being kept on the shipment of mercury-containing components?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Comments:**

Obtain a container for fluorescent tubes in the event they are accepted.

This facility intends to take mercury switches to the closest regional collection center (RCC) within one year. You are reminded to keep documentation from the RCC that they accepted these devices.

**PCB Capacitors**

<b>IAC 567 Chapter 118.11: Capacitor Removal Requirements</b>		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 with 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 placed 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>IAC 567 Chapter 118.13: Record Keeping &amp; Reporting</b>		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 checked="" 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:**

The EPA Notification of PCB Activity letter was received on April 2, 2025 with authorization number IAW000518845.

No PCB labels were available at the time of this inspection. Verification that labels were ordered was received on April 9, 2025. Ensure the label and date are affixed to the container upon placing the first PBC capacitor inside.

This facility intends to take PCB capacitors to the closest RCC within 270 days. You are reminded to keep documentation from the RCC that they accepted these devices.

**Spills**

<b>IAC 567 Chapter 118.12: Spills</b>		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:**

A mercury spill kit was not on site, but was ordered, and verification that it would arrive on April 9, 2025 was submitted after this inspection.

**Reporting**

<b>IAC 567 Chapter 118.13. Record Keeping &amp; Reporting</b>		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 manifests 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) <i>"P"</i>	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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Comments:****Processing**

<b>IAC 567 Chapter 118.15: Shredding of Appliances</b>		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:**

There is no shredder at this location.

Summary of Requirements	Compliance Date:

Summary of Recommendations	Compliance Date:
Have another staff person attend demanufacturing training.	
Include the "ship by" date on the PCB and mercury containers.	

Summary of Reminders	Compliance Date:
Ensure receipts are obtained from the RCC for any mercury or PCB components accepted.	
Maintain documentation that refrigerant was removed prior to acceptance at this facility by a service or repair facility certified for the removal of refrigerant. 118.9(2)	
Obtain a container to store fluorescent tubes, lamps, bulbs, etc., being placed in a container and packaged to prevent breakage to an EPA-approved recycler.	

Amber Sauser, Environmental Specialist Senior

Brian Jergenson, Environmental Specialist Senior

Inspector: Amber Sauser

Reviewer: Brian Jergenson

Date: 4/10/2025

Date: 4/10/2025