

March 14, 2025

DON DE HEER
D & D RECYCLING
1175 220th STREET
PELLA, IA 50219

RE: Appliance Demanufacturing (ADP) Pre-Closure Inspection

D & D Recycling, 1175 220th Street, Pella, IA
Appliance Demanufacturing (ADP) Permit # 62-ADP-01-02

Dear Mr. De Heer:

Enclosed is the report completed by Brenda Smith of the Field Office #5 staff following the inspection of your facility in Mahaska County.

The report should be self-explanatory. Please take note of the reminder and recommendations listed near the end.

You may contact Ms. Smith (515-250-4094, brenda.smith@dnr.iowa.gov) or this office with any questions or comments. Thank you for your assistance during this inspection.

Sincerely,



Digitally signed by Bill Gross
Date: 2025.04.14 11:55:34 -05'00'

Bill Gross
Environmental Specialist Senior, Field Office #5

c: susan.johnson@dnr.iowa.gov, Land Quality Bureau, Iowa DNR (w/encl., via email)

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

Permit No.: 62-ADP-01-02	County: Mahaska
Facility Name: D & D Recycling	Facility Address: D & D Recycling 1175 220 th St. Pella, IA 50219
Phone Number: 641-780-9366	
Responsible Official: Donald D. DeHeer	Mailing Address: D & D Recycling 1175 220th St. Pella, IA 50219
Phone Number: 641-780-9366	
Person(s) Present: 1)Don D. DeHeer	
Date of This Inspection: 03/26/2025	Date of Last Inspection: 03/03/2011

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

Jessica Sheridan, with Iowa DNR Field Office 5, accompanied me on this inspection.

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

Comments: Mr. DeHeer is working on cleaning up his site and processing all remaining appliances for salvage. Mr. DeHeer intends to have his site fully cleaned up and all salvage metal removed by the time of his permit expiration. D&D Recycling permit expires March 4, 2026.

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 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: The closest shallow well is 150 feet to the southwest of the demanufacturing area. This well is used for washing/cleaning equipment and watering the lawn. Drinking water is supplied through a rural supply line.

Mr. DeHeer uses a "D & D" mark in black spray paint, unless it's a black appliance in which he uses white spray paint.

Training	IAC 567 Chapter 118.8: Training		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: Mr. De Heer was certified on November 9, 2010. He is the sole operator and owner of the facility.

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 checked="" type="checkbox"/>	<input 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"/>
Refrigerant Recovery	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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
118.13(3)"a"	Are bills of lading being kept as to where refrigerants are being shipped for disposal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Comments: Mr. DeHeer has an EPA Refrigerant Recovery letter dated from 12-14-2010. Mr. DeHeer maintains the required records inventory and count for each month. The previous three years' of records were reviewed at the time of this inspection.

Hudson Technologies out of Champaign, Illinois is the receiver of Mr. De Heer's recovered 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 <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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Mr. DeHeer removes and stores the compressor oil for use in a waste oil heater.

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)“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	
Ammonia Gas Refrigerant	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. DeHeer does not accept any appliances that are ammonia charged or may contain sodium chromate.

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 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
	IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA
Mercury Components	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 ladings being kept on the shipment of mercury-containing components?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Mr. DeHeer does not process items with mercury, if an appliance is determined to have possible mercury containing components Mr. DeHeer takes those appliances to Car Country in Newton for final processing. Mr. DeHeer also does not accept fluorescent tubes/lamps.

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

Comments: According to on-site records, no PCB's have been removed during the reviewed period.

IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA	
PCB Capacitors	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 checked="" type="checkbox"/>	<input 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: All PCB components are shipped to A-TEC, Des Moines, IA as needed.

IAC 567 Chapter 118.12: Spills		Yes	No	NA	
Spills	118.12(1)	Are spill records being kept and has the facility reported spills that resulted in a hazardous condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.12(2)	Is a mercury spill kit on hand?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Mr. DeHeer had no reported spills on-site. Mr. DeHeer had a well made stormwater pollution prevention plan within his record keeping binder.

IAC 567 Chapter 118.13. Record Keeping & Reporting		Yes	No	NA	
Reporting	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"/>

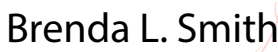

Comments: Mr. DeHeer has kept all records for appliances demanufactured, bills of lading, and copies of annual reports sent to the Iowa DNR central office were available for review. Records indicated that 524 appliances were processed in 2022, 310 appliances in 2023, 411 appliances in 2024, and 13 appliances so far in 2025.

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: All demanufactured appliances will be transported to Alter Metal Recycling, Des Moines, Iowa.

Summary of Reminders:
Submit an annual report to the Iowa DNR by January 31, 2026. If any additional appliances are processed in 2026, they will need to reported by January 31, 2027.

Summary of Recommendations:
1) Iowa DNR Field Office #5 recommends that D & D Recycling continues cleaning up the site and posts a sign to inform customers that new appliances are no longer accepted for demanufacturing and to discourage dumping.
2) If all material on-site is removed prior to the expiration of current permit (March 4, 2026), notify Sue Johnson to request rescission of the permit.

AUTHENTICATION	
INSPECTOR: Brenda L. Smith, Environmental Specialist  <small>Digitally signed by Brenda L. Smith Date: 2025.04.14 11:17:13 -05'00'</small>	DATE: 4/14/2025
REVIEWER: Bill Gross, Environmental Specialist Senior  <small>Digitally signed by Bill Gross Date: 2025.04.14 11:56:13 -05'00'</small>	DATE: 4/14/2025

Facility Photographs (left – Jan. 30, 2025; right- Mar. 26, 2025)



This photo was taken Jan 30, 2025, this area is located west of the driveway and used as a staging area for final disposal. Upon return to the site on March 26, this area was cleared of all crushed salvage metal.



This area is located in the north concrete lot near the crusher, all appliances have been processed and marked appropriately.



Crusher loaded and awaiting processing until temperatures warm



Crusher empty but many crushed blocks located throughout the property as Mr. DeHeer completes clean up and closure.



This area is west of the north lot, materials were sorted and lot cleared of previously crushed material



This area is now being used as a preliminary staging area when appliances are crushed prior to moving them to the concrete pad west of the driveway.