

APRIL 15, 2025

KURT YEAROUS  
979 FAIRFIELD STREET  
ARLINGTON IA 50606

Subject: NOTICE OF VIOLATION- Appliance Demanufacturing Inspection, 567 IAC 118.12(2), Failure to have a Mercury Spill Kit and 118.13 Recordkeeping and reporting  
Permit #33-ADP-01-10

Enclosed is the report of the appliance demanufacturing inspection conducted on April 9, 2025, at the facility referenced above. During the inspection, multiple violations of the recordkeeping requirements were noted. It was also noted that the facility location has moved to a different building on the same street. Coordinate with Susan Johnson, Iowa DNR, to discuss the paperwork necessary to properly permit this location. At a minimum, a revised operation plan, schematic, zoning confirmation and stormwater permit determination should be submitted. You can reach Susan at 515-217-0872 to discuss the required paperwork. In addition, a mercury spill kit must be obtained and records of the 2022 refrigerant shipment. Please submit verification to this office by May 16, 2025 that these issues have been addressed.

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: Kurtyearous69@gmail.com  
Solid Waste Section (w/encl. via email: Becky Jolly, Susan Johnson)  
E File 33 SW Kurt Yearous ADP ins 040925 als

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

Permit No.: 33 -ADP- 01 - 10 County: Fayette  
 Facility Name: Kurt Yearous Phone Number: 319-238-0773  
 Facility Address: 966 Fairfield Street City/State/Zip: Arlington, IA 50606  
 Responsible Official: Kurt Yearous Phone Number: 319-283-0773  
 Mailing Address: 979 Fairfield Street City/State/Zip: Arlington, IA 50606  
 Person(s) Present Kurt Yearous

\*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 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:**

No appliances were on site, so I was unable to verify storage either prior to or after demanufacturing. It was noted during a follow-up phone call on April 10 that appliances are hauled on a trailer and brought into the building for demanufacturing on that trailer. They are then taken to a salvage yard once demanufactured.

It was noted that this site has not had a stormwater permit. Please verify that a stormwater permit is not required for this system. You can contact Iowa Water Reduction Center- UNI at 319-273-8905 for assistance in making this determination.

**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:**

The location of the demanufacturing moved to 966 Fairfield Street. This site is not permitted. Contact Susan Johnson, Iowa DNR, to discuss the necessary paperwork to reflect the address change. Necessary paperwork will include, at a minimum, zoning verification, submittal of an updated schematic, verification of stormwater permit determination, and verification that EPA has been notified of a change to the PCB activity for site ID IAW000514877.

This facility is approximately 80 feet from a nearby stream.

<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:**

Kurt Yearous is the certified staff person. He indicated that he oversees all demanufacturing activities. Mr. Yearous does have another individual who can assist with demanufacturing activities. It was recommended that this person also obtain certification.

**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"/>
<b>IAC 567 Chapter 118.9: Refrigerant Removal Requirements</b>		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"/>
<b>IAC 567 Chapter 118.13: Record Keeping &amp; Reporting</b>		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 checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Comments:**

During the previous report, it was noted that there were no records verifying the shipment and proper disposal of refrigerant. Mr. Yearous indicated that after the 2022 inspection, he delivered refrigerant to a company in Minnesota. However, there were no records to verify this. He also noted that the current refrigerant tank, which appears to be a 250# tank, was received at that time. Since then, he has not filled that tank. During this timeframe, he has demanufactured approximately 234 items containing refrigerant. He indicated that the majority of appliances received are reportedly dropped off at his property or picked up during salvage work.

We discussed that he should contact the company that received the refrigerant in 2022 and see if a copy of the receipt can be obtained. It was also noted that records of the amount of refrigerant removed are not being maintained. The importance of maintaining paperwork was discussed.

**Oil**

<b>IAC 567 Chapter 118.9: Refrigerant Removal Requirements</b>		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**

<b>IAC 567 Chapter 118.9: Refrigerant Removal Requirements</b>		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"/>

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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"/>
<b>IAC 567 Chapter 118.13: Record Keeping &amp; Reporting</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
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:**

These appliances are not demanufactured by Mr. Yearous.

**Mercury Components**

<b>IAC 567 Chapter 118.10: Mercury-Containing Component Removal &amp; Disposal</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
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>		<b>Yes</b>	<b>No</b>	<b>NA</b>
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 ladings 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 received.

A mercury device has never been received at this facility. Mr. Yearous was reminded that he should be familiar with appliances that could potentially contain mercury switches.

**PCB Capacitors**

<b>IAC 567 Chapter 118.11: Capacitor Removal Requirements</b>		<b>Yes</b>	<b>No</b>	<b>NA</b>
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"/>

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

**Comments:**

As the location of the demanufacturing has changed, Mr. Yearous will need to update the Notification of PCB Activity form submitted to EPA referencing TSCA ID# IAW000514877.

A PCB container was on site. However, Mr. Yearous indicated that he has never received a PCB capacitor nor does he accept capacitors that may contain PCBs. We discussed that the capacitor must be visually observed in order to ensure that it is non-PCB. While Mr. Yearous removes the compressors, which often allows for easier access to observe the capacitors, it does not verify that a determination has been made that they are non-PCB. In addition, it is unclear how non-refrigerant containing appliances with capacitors are verified as non-PCB. The operations plan [118.6(9)] should be reviewed and updated to ensure steps are identified for each type of appliance to ensure all refrigerant, PCB and mercury components are identified and removed.

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.

PCB storage area inspection records were maintained for a time and placed into a notebook after the previous inspection. As no capacitors are on site, Mr. Yearous noted he hasn't been recording these inspections. Mr. Yearous was reminded to resume documentation of the PCB storage area.

**Spills**

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

**Comments:**

A mercury spill kit was not on site, as it had not been moved over from the other building. He noted a new one would be ordered. Submit verification by May 16, 2025, that a mercury spill kit has been received.

**Reporting**

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

**Comments:**

DNR APPLIANCE DEMANUFACTURING (ADP) PERMIT INSPECTION

As was noted earlier, records are not being maintained on the number and type of appliances demanufactured. The only records are receipts from the salvage yard that note the number and type of appliances they received. However, this information doesn't include the refrigerant removed. It is unclear how the amount of refrigerant recovered is being determined for the annual report. In addition, the refrigerant shipment records are not available.

A daily log template is being provided with this report. Please utilize this template or send a copy of the template that will be utilized to ensure adequate information is being maintained.

Not all of the previous three years of annual reports were available. I was able to access these via department records. However, you are reminded to ensure these remain on site for at least 3 years.

**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:
Begin keeping records as required in 118.13 and verify that procedures are in place to ensure these records are maintained. This includes records of refrigerant removed.	May 16, 2025
Retain records of PCB storage area inspections per 118.11(4)	
Ensure that all appliances are assessed and any PBC, mercury-containing components and refrigerant are properly removed/evacuated. Update the operations plan to ensure adequate activities are identified for each type of appliance to ensure proper removal of all necessary components.	
Provide a copy of the disposal record from the 2022 shipment of refrigerant.	
Submit a form notifying EPA of the change of address for TSCA ID# IAW000514877.	
Verify if a stormwater permit is required at this location.	
Obtain a mercury spill kit.	
Verify that this address is properly zoned for demanufacturing.	
Submit a revised schematic and similar information to Susan Johnson, IDNR, to obtain a permit for the new location.	

Summary of Recommendations	Compliance Date:
Have another staff person attend demanufacturing training.	

Summary of Reminders	Compliance Date:
Ensure receipts are obtained from the RCC for any mercury or PCB components accepted.	
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.	

Inspector: Amber Sauser, Environmental Specialist Senior  
*Amber Sauser*  
 Date: 4/15/2025

Reviewer: Brian Jergenson, Environmental Specialist Senior  
*Brian Jergenson*  
 Date: 4/15/2025