



Jolly, Becky <becky.jolly@dnr.iowa.gov>

Fwd: Proposed Garnavillo Solid Waste Transfer Station (22-SDP-11-25)

1 message

Stobbe, Chad <chad.stobbe@dnr.iowa.gov>
To: Becky Jolly <becky.jolly@dnr.iowa.gov>

Mon, May 5, 2025 at 8:54 AM

Becky - Please file this reply and attachments to my comments as received. Thanks

Chad A. Stobbe
Environmental Specialist Senior
Solid Waste and Contaminated Sites Section
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, IA 50321
515-201-8272
chad.stobbe@dnr.iowa.gov
www.iowadnr.gov



----- Forwarded message -----

From: **Jack O'Brien** <jobrien@kluesnerconstruction.com>
Date: Thu, May 1, 2025 at 3:04 PM
Subject: RE: Proposed Garnavillo Solid Waste Transfer Station (22-SDP-11-25)
To: Stobbe, Chad <chad.stobbe@dnr.iowa.gov>

Chad,

Attached is the updated application with Austin's contact information and the updated design plan.

I believe you were copied on communication with TJ Schissel (Winneshiek County Landfill) and Laurie Rasmus earlier today which should satisfy the requirements of subrule 101.13(7). Please let me know if I am mistaken or if you need anything additional on this.

The site is nearing completion and I think we should be able to schedule a time for Field Office #1 to visit. Let me know what timing would work best for the DNR on that. I still owe you photographs of the fence and sign.

Thanks,

Jack

From: Stobbe, Chad <chad.stobbe@dnr.iowa.gov>
Sent: Tuesday, April 29, 2025 4:21 PM
To: Jack O'Brien <jobrien@kluesnerconstruction.com>
Subject: Re: Proposed Garnavillo Solid Waste Transfer Station (22-SDP-11-25)

Jack - See my comments below in [blue](#). I will call you later this week to discuss and see if you have any additional questions. Thanks

Chad A. Stobbe
Environmental Specialist Senior
Solid Waste and Contaminated Sites Section
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, IA 50321
515-201-8272
chad.stobbe@dnr.iowa.gov
www.iowadnr.gov

On Wed, Apr 23, 2025 at 1:37 PM Jack O'Brien <jobrien@kluesnerconstruction.com> wrote:

Good afternoon Chad,

I apologize I should have sent an update that we were waiting the Winneshiek County Landfill to return documentation to us that that's required to allow us to haul there. You have good timing, though, as I just received this today. Please see below.

Thanks,
Jack

From: Stobbe, Chad <chad.stobbe@dnr.iowa.gov>
Sent: Tuesday, April 22, 2025 4:53 PM
To: Jack O'Brien <jobrien@kluesnerconstruction.com>
Subject: Fwd: Proposed Garnavillo Solid Waste Transfer Station (22-SDP-11-25)

Jack -

As some time has passed since I emailed the review comments, I thought I'd reach out and see if you had any questions. At your convenience.

Chad A. Stobbe**Environmental Specialist Senior**

Solid Waste and Contaminated Sites Section

Iowa Department of Natural Resources

6200 Park Avenue, Suite 200

Des Moines, IA 50321

515-201-8272

chad.stobbe@dnr.iowa.govwww.iowadnr.gov

----- Forwarded message -----

From: **Stobbe, Chad** <chad.stobbe@dnr.iowa.gov>

Date: Wed, Mar 26, 2025 at 4:35 PM

Subject: Proposed Garnavillo Solid Waste Transfer Station (22-SDP-11-25)

To: Jack O'Brien <jobrien@kluesnerconstruction.com>

Jack -

The DNR has conducted a review of the new XFR permit application submission ([Doc #112563](#), received 3-24-25) and has identified some issues that require further clarification/action. Rather than draft a formal comment letter, I thought an email outlining the issues would expedite the permit issuance process. The DNR's comments are as follows:

1) Section 1 of the permit application submission indicates that the facility phone number is the same as the Responsible Officials despite the differing locations. Will the proposed XFR have a direct phone number at the facility? Please clarify and if applicable, provide the phone number for Austin Stelken (Facility Operator). Please also clarify why the phone number for Craig K. is different in the application form then what was stated on page 1 of the submitted ERRAP. **The numbers are the same despite the differing locations because they are all the numbers to our main office in Farley. Craig's phone number differs because the number provided in the application for him is the office number and in the ERRAP is his cell (emergency) number. The proposed XFR will not have a direct phone number to the facility. Austin Stelken's phone number is 563-451-3885; this number is included in the ERRAP, but let me know if we should include it somewhere else.**

DNR Response: Please include Austin and his contact information on page 1 of the application form as the Facility Operator. I'd like a means of getting a hold of someone at the permitted site.

2) Section 2 of the permit application submission indicates that this proposed facility is part of the Winneshiek County Solid Waste Agency Comprehensive Planning Area. Please note the requirements in [567 IAC 101.13\(7\)](#) and submit the required documentation to the DNR to support this statement. **Please see attached from Winneshiek County.**

DNR Response: This requirement is part of the Solid Waste Comprehensive Planning obligation expressed within subrule 101.13(7). Therefore, please provide this approval from the Winneshiek County Area Solid Waste Agency to the DNR contact below to ensure all requirements have been satisfied.

Laurie Rasmus, Program Planner

Land Quality Bureau

Iowa Department of Natural Resources

515-474-4921

Laurie.Rasmus@dnr.iowa.gov

3) Section 2 of the permit application submission lists the communities that the proposed XFR will service. Please note that Winneshiek County Solid Waste Agency Comprehensive Planning Area is defined as:

"All cities in Clayton County, excluding Guttenberg, North Buena Vista and Strawberry Point, and the unincorporated portion of the county; all cities in Howard County, excluding Chester, Elma and Riceville and the unincorporated portion of the county; all cities and the unincorporated area of Winneshiek County; and the city of Postville (including those commercial accounts located in rural areas within Allamakee County and within two miles of the city limits of Postville, Iowa, that have contracted with the City of Postville) in Allamakee County."

Please review and confirm the proposed XFR's service area. The service area stated in the application form differs from that listed on page 1 of the submitted ERRAP. The ERRAP indicates that the facility will only service Clayton County. Please clarify.

Per [Iowa Code paragraph 455B.306\(7\)"e"](#) ... "a planning area shall not include a planning area or service area, any part of which is included in another comprehensive plan." Please refer to the attached waste flow fact sheet or the [DNR's website](#) for additional information regarding comprehensive planning.

I have updated the application. For clarity, the transfer station will only serve Clayton County, excluding the incorporated areas of Guttenberg, North Buena Vista, and Strawberry Point, i.e. the area of Clayton County that is in the Winneshiek County Planning Area.

DNR Response: Noted. Nothing further.

4) Section 2 of the permit application submission indicates that the proposed XFR will also accept "Recyclables" and "Scrap Metal" for management/recycling. Please note that the provided Clayton County Zoning letter states, "This zoning classification allows for the use of types of industrial businesses such as recycling and a transfer station if it is enclosed with no exterior storage other than vehicles." The submitted Site Operation Plan reiterates this in that "Any salvaged materials will be stored inside the building in clearly marked designated areas." **Noted, thank you.**

DNR Response: Noted. Nothing further.

5) Section C of the permit application pertains to the "Proof of Ownership." The submitted warranty deed for the property indicates the owner as "2372 180th Ave, LLC." Please clarify this business relationship to Kluesner Sanitation, LLC for which the permit application was submitted. According to the Iowa Secretary of State's Office, there is no business registered under this name (see attached). **2372 180th Avenue LLC is a separate LLC which owns real estate but has the same ownership as Kluesner Sanitation (Craig Kluesner is the ultimate owner of both entities). It is officially listed on the Secretary of State's site as 2372 180th Avenue, LLC (not abbreviated to Ave.). Let me know if we need to update the documentation to not have the abbreviated name.**

DNR Response: Noted. Nothing further.

6) Section F of the permit application states that an IDALS' certified scale is "Not applicable. Official records will be kept from landfill scale tickets." However, page 2 of the Site Design Plan states in part, "The transfer station has an IDALS-certified scale. It is located between the entrance and the building approximately 50 feet from the transfer station building." These two statements contradict each other. Please clarify and provide the current IDALS scale certificate, if applicable. **The first statement is correct. I apologize for the oversight. I've updated the design plan.**

DNR Response: No updated Site Design Plan was included with your comments. As part of the final application, please submit the updated Site Design Plan. Please also check each box in Section 3 of the permit application form for each required document that is attached.

7) Section G of the permit application pertains to the Site Design Plan:

a) Page 2 of the plan states, "The site has a perimeter fence with a lockable gate." Per our discussion, this secure perimeter fence will need to be installed before the operating permit can be issued.

b) Page 2 of the plan also states that a sign will be posted at the entrance of the facility addressing the requirements of 567 IAC 106.10(2)"e." Please submit photographic evidence when this has been installed. The operating permit cannot be issued until this requirement is met.

Noted, I will send photographic evidence as soon as we have it (in the next few days).

DNR Response: Noted. DNR awaits your photos of the fence installation and the required sign. Please let me know when the site is nearing completion so that I can have the Field Office conduct the site inspection prior to issuing the operating permit.

8) Both the Site Design Plan and the Site Operation Plan indicate that there is no washwater collection tank or floor drains to a sanitary sewer system and that washwater will be managed by manually sweeping the floor as necessary. The DNR has the latitude in 567 IAC 106.10(1)"d" to allow this given the low annual tonnage to be managed by the facility. However, if washwater discharges are identified by the DNR during subsequent inspections, the facility could be required to install a collection tank to comply with this requirement. **Thank you, noted.**

DNR Response: Noted. Nothing further.

9) Section I of the permit application pertains to the ERRAP:

a) As stated above, please clarify the two different phone numbers provided for Craig K. **Explained in item 1, let me know if you'd like to see this differently.**

DNR Response: Noted. See comment above for requested edit.

b) Appendix F - Notification of Hazardous Conditions Rules was omitted from the submission. Please address. **This has been added.**

DNR Response: Noted. Nothing further.

c) The ERRAP states that the Alternative Landfill is the Dubuque Metropolitan Area Solid Waste Agency Landfill. Please note that this is outside of the Winneshiek County Solid Waste Agency Planning Area and for this to occur, the Winneshiek Landfill would need to allow that waste to be disposed of outside of the planning area. See the attached waste flow exemption request form. **Noted.**

DNR Response: Noted. Nothing further.

10) With regard to financial assurance, there are three primary components: (a) Submittal of an updated closure cost estimate certified by a P.E. licensed within Iowa, (b) Documentation that an eligible financial instrument has been established (e.g., LOC agreement), and (c) Proof of the selected instrument being maintained in an amount that covers the updated closure cost estimate.

a) The 2025 new permit application included a closure cost estimate (\$4,016) from a licensed P.E. in Iowa. No further action is required. **Thank you.**

DNR Response: Noted. Nothing further.

b) The email that accompanied the permit application stated that "Financial assurance will be sent by our bank." This has not yet been received by the DNR. Please submit the required documentation to meet one of the allowed financial assurance instruments. **I believe our bank sent this a few weeks ago, please let me know if this is not the case.**

DNR Response: Received from bank. Nothing further.

c) The last issue pertains to the amount of funds set aside for estimated closure expenses at the XFR. Compliance with the documentation submission requirements in (b) above will address this requirement. **Thank you.**

DNR Response: Noted. Nothing further.

We anticipate and appreciate your cooperation in addressing the items noted above. Upon completion of all requirements outlined in the permit application, the DNR's field office with jurisdiction will conduct an inspection of the facility. Any needed corrective measures identified during the inspection must be completed prior to permit issuance.

Thank you for your efforts to comply with Iowa's environmental requirements. Should you have any questions, please feel free to contact me.

Chad A. Stobbe
Environmental Specialist Senior
Solid Waste and Contaminated Sites Section
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, IA 50321
515-201-8272
chad.stobbe@dnr.iowa.gov
www.iowadnr.gov

2 attachments

 **Kluesner Garnavillo Application - Update.pdf**
204K

5/5/25, 9:25 AM

State of Iowa Mail - Fwd: Proposed Garnavillo Solid Waste Transfer Station (22-SDP-11-25)



Garnavillo Site Design Plan.pdf

133K

Section G

SECTION G. SITE DESIGN PLAN

The Site Location and Building Floor Plan are enclosed in this Section. Responses to the respective subrules follow:

106.9(1) 100-year floodplain

Comment: the transfer station is not located within a 100-year floodplain.

106.9(2) Located within 500 feet of an educational, health care facility, residence, etc.

Comment: the transfer station is not located within 500 feet of an educational or health care facility. The transfer station is located within 500 feet of a small number of mobile homes. There is a dense line of trees and other vegetation that will be utilized to minimize noise and visibility of operations.

106.10 Transfer station design standards.

a. The transfer station is a totally enclosed metal building with concrete floors and a steel push wall. Vehicle access to the tipping floor is through an overhead door located on the west side of the building. Vehicles back into the building through the overhead door and unload onto the tipping floor. A skid loader is used to pick up the refuse from the tipping floor and load into a walking floor trailer. The walking floor trailer is located on the south end of the building at a lower elevation. Access to the walking floor trailer is through a dedicated overhead door located in the southwest corner of the building. The total operation is in an enclosed building that can satisfactorily:

(1) Minimize dust and litter exiting the building.

(2) Keep precipitation out of the building.

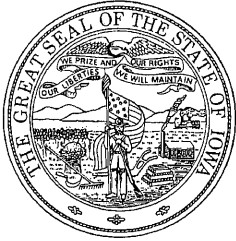
(3) Prevent the attraction or harboring of vectors.

b. Refuse is tipped onto a concrete floor which is impervious to liquids.

- c. Storm water drainage patterns do not come into contact with refuse.
- d. There are no floor drains or washwater system. The floor will be manually (sweeping) cleaned as necessary.
- e. The tipping floor is the solid waste storage area and includes a fire detection system.
- f. Storage pit - N/A.
- g. Surge pit – N/A.
- h. Salvage areas are clearly marked.
- i. Indoor/outdoor lighting is adequate.
- j. The transfer station has a door at each opening.

106.10(2) Other design requirements.

- a. The site has a perimeter fence with a lockable gate.
- b. The site does not have a scale.
- c. The site has adequate queuing distance and traffic control is not a problem.
- d. Signs directly traffic to the tipping area are adequate.
- e. The sign posted at the entrance includes: 1) the facility name and permit number (once issued); 2) operating hours; 3) materials accepted; 4) telephone number of emergency contact person.



IOWA DEPARTMENT OF NATURAL RESOURCES

SOLID WASTE TRANSFER STATION

PERMIT APPLICATION FORM 50B



☒ New Permit

☐ Permit Renewal (permit number) _____ -SDP- _____ - XFR

SECTION 1. FACILITY CONTACT INFORMATION

Facility

Name: Kluesner Sanitation Garnavillo Transfer Station Phone: 563-927-5977
Address: 25245 US 52 City, State, Zip: Garnavillo, IA 52049
County: Clayton

Responsible Official for the Facility

Name: Craig Kluesner Phone: 563-927-5977
Address: 501 Tahoe Ct Fax: _____
City, State, Zip: Farley, IA 52046 E-mail: office@kluesnersanitation.com

Owner of Site

Name: 2372 180th Ave LLC Phone: 563-927-5977
Address: 501 Tahoe Ct Fax: _____
City, State, Zip: Farley, IA 52046 E-mail: office@kluesnersanitation.com

Facility Operator

Name: Austin Stelken Phone: 563-451-3885
Address: 1005 1st Ave NW Fax: _____
City, State, Zip: Farley, IA 52046 E-mail: office@kluesnersanitation.com

Financial Assurance Engineer

Name: HLW Engineering - Doug Luzbetak Phone: 515-733-4144
Address: 204 West Broad Street Fax: 515-733-4146
City, State, Zip: Story City, IA 50248 E-mail: dluzbetak@hlwengineering.com
Iowa Engineer License #: 12654 Expiration Date: 12/31/2026

SECTION 2. SITE INFORMATION

☒ This facility is part of the following solid waste comprehensive planning area:

Planning Area: Winneshiek County Landfill Date of Last Approved Plan: _____

☐ This facility does not participate in a planning area within the state of Iowa other than its own.

*A solid waste comprehensive plan must be developed and approved by the department prior to issuance of a sanitary disposal project permit. Please contact the department's Solid Waste Comprehensive Planning staff at (515) 725-8319 for instructions and requirements for completing a comprehensive plan.

Days and hours of operation of the facility: Mon - Thurs 7:00 a.m. - 4:00 p.m. Fri 7:00 a.m. - 3:00 p.m.

Open to the public? ☒ Yes ☐ No

Service area of the facility and final disposal destination (include unincorporated areas and out of state cities):

Rural and urban areas of Clayton County, excluding the incorporated areas of Guttenberg, North

Service Area: Buena Vista, and Strawberry Point

Disposal Facility: Winneshiek County Landfill

Type, source and expected weight (tons) of solid waste to be handled per day, week and year at the facility:

per day 8 ton - MSW

per week 40 ton - MSW

per year 2,080 ton - MSW

Description of the waste handling process to be used (e.g., individuals unload trash into one of 3 roll-offs on site. Roll-offs are removed when full and replaced with empties.):

Individuals unload trash onto tipping floor. Trash is loaded into roll-offs.

Check all other materials accepted/activities at the facility:

☒ Recyclables drop-off - glass, paper, plastic, metal

☐ Lead Acid Batteries

☐ Used Oil

☐ Antifreeze

☐ White Goods Collection

☐ Tires

☐ Electronics Collection (including Cathode Ray Tubes)

☒ Scrap Metal Salvaging

☐ Appliance Demanufacturing

☐ Electronics Demanufacturing

☐ Yard Waste Composting

☐ Yard Waste Collection

☐ HHM/RCC

☐ Other _____

SECTION 3. PERMIT APPLICATION CHECKLIST

Checking the appropriate boxes below certifies that the documents submitted in conjunction with this application form are complete and in compliance with the applicable chapters of the Iowa Administrative Code. While some of the documents below may have been submitted previously, updated copies of each is required to be provided with each permit renewal application, unless a prior document remains current and is identified by Doc ID # below. If an application is found by the department to be incomplete, it may be denied and returned to the applicant.

Required Documents

☐ **Section A. Executive Summary (permit renewals only)**

- Summary of modifications, if any, to the facility that occurred during the current permit cycle.
- Summary of each special provision of the current permit to determine if it is to remain the same, be revised or be removed.
- Summary of each permit amendment, if any, that occurred during the current permit cycle to determine if it shall be included with the renewed permit, be revised or be removed.
- Provide documentation and certification as required for new permit amendment requests and new waiver requests from Iowa Administrative Code, if any.

☒ **Section B. Site Map or Aerial Photograph (IAC 567 106.8(1)“c”)**

No Revision Required - See Doc ID#: _____

☒ **Section C. Proof of Ownership/Local Zoning Requirements (IAC 567 106.8(1)“d”)**

No Revision Required - See Doc ID#: _____

☒ **Section D. Organizational Chart (IAC 567 106.8(1)“i”)**

No Revision Required - See Doc ID#: _____

☐ **Section E. Operator Certification (if permitted for 20,000 tons or more per year) (IAC 567 106.11(1)“d”)**

No Revision Required - See Doc ID#: _____

☐ Section F. IDALS Scale Certificate (IAC 567 106.10(2)“b”)

☒ Section G. Site Design Plan (IAC 567 106.8(1)“j”)

No Revision Required - See Doc ID#: _____

☒ Section H. Site Operation Plan (IAC 567 106.8(1)“k”)

No Revision Required - See Doc ID#: _____

☒ Section I. Emergency Response and Remedial Action Plan (IAC 567 106.8(1)“m”)

No Revision Required - See Doc ID#: _____

☒ Section J. Site Closure Plan (IAC 567 106.8(1)“l”)

No Revision Required - See Doc ID#: _____

☒ Section K. Proof of Financial Assurance (IAC 567 106.18)

SECTION 4. APPLICANT CERTIFICATION

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I further certify that the construction and operation of the above described facility will be in accordance with the plans, specifications, reports and related communications accepted by the Iowa Department of Natural Resources and on file in its office; and in accordance with conditions imposed in the permit issued by the Iowa Department of Natural Resources.

Signature of Permit Applicant: _____



Date: 5/1/2025

Printed Name: Jack O'Brien

Title: Controller

Application for a solid waste transfer station must be accompanied by the plans, specifications and additional information required by the applicable solid waste rules under Iowa Administrative Code 567 Chapter 106.

Send completed application with attached information to:

Iowa Department of Natural Resources
Land Quality Bureau
Solid Waste Section
502 E 9th St
Des Moines, IA 50319-0034

For questions concerning this application please contact the Department at (515) 201-8272.