June 17, 2025

Mr. Chad Stobbe Environmental Specialist Senior Iowa Department of Natural Resources 6200 Park Avenue, Suite 200 Des Moines, Iowa 50321



RE: ANNUAL INSPECTION – 2025
JONES COUNTY SOLID WASTE TRANSFER STATION
PERMIT NO. 53-SDP-06-07P-XFR
HLW P.N. 6038-23A.321

In accordance with the General Provisions of the Sanitary Disposal Project Permit, the annual inspection of the Jones County Transfer Station was personally conducted the morning of June 5, 2025. Karl Taylor, Director, accompanied me on a portion of the inspection and the results of the inspection were discussed with Mr. Taylor upon completion. Conditions at the time of the inspection were clear with light winds and temperatures in the 60's.

GENERAL CONDITIONS

The hours of the Transfer Station are 8:00 to 3:00, Monday-Friday and 9:00 to 2:00 on Saturday.

Municipal wastes are brought to the Transfer Station, dumped onto the tipping floor, and then loaded by endloader into transport trailers for hauling and disposal at the Millennium Waste, Inc. Sanitary Landfill in Milan, Illinois, in accordance with the SDP Permit. Mr. Taylor reported that typically 2-3 loads are hauled to the landfill per day although additional loads are hauled as needed to keep the waste on the tipping floor to a manageable level. Staff was loading a trailer during the inspection. It appeared that one to two loads of solid waste were on the tipping floor.

The loading pit was reviewed. A truck was in the pit with minimal litter noted outside of the truck. Mr. Taylor reported that staff typically clean the pit at the end of each day. Pit cleanings are documented on the Daily Check List.

Source separated recyclables are also accepted at the Transfer Station. Recycled materials accepted include rigid and fiber recyclables (stored within the transfer station building), glass (stored in a covered bin), white goods (stored on a concrete pad), household hazardous materials (stored in a household hazardous materials building), tires (stored on a concrete pad), electronics and CRT's (stored in a trailer), lead acid batteries (stored in a shed), and scrap metal (stored on a concrete pad). Signage has been added to the respective storage areas. The designated storage areas outside of the transfer station are shown on the attached figure.

A 40' by 100' concrete pad with push wall was installed for the storage of white goods, tires, and scrap metal. The concrete pad has improved the conditions in the storage area. The scrap metal roll off was full so some scrap metal was also stored on the concrete pad next to the roll off in the designated area. One appliance was noted as not being stored upright during the inspection. The tire and scrap metal storage areas were nearing capacity and accumulated material should be removed from each to maintain adequate storage capacity in these areas.

Rigid and fiber recyclables are stored in the Transfer Station building. Accumulated material is stored in a roll off container when possible, with material stored outside of the roll off container, separated from the incoming waste, when the roll off is full. The roll off was full and the storage area was nearing capacity - Mr. Taylor reported that removal of the roll off and the accumulated material would start the week of June 9th.

The Jones County Solid Waste Management Commission has entered into an agreement with the Cedar Rapids/Linn County Solid Waste Agency Regional Collection Center (RCC) for the collection and storage of Household Hazardous Materials (HHM) at the Transfer Station. The Operations Plan and the Emergency Contingency Plan for the HHM Satellite Collection Site were updated in 2021 with the updated documentation included in the 2022 Transfer Station Permit Renewal Documentation dated June 14, 2022 (Doc #103406). The interior of the HHM storage building was reviewed during the inspection and adequate room for storage of materials was noted. As recommended in the Notice of Violation (NOV) from IDNR dated September, 20, 2024, staff directs customers to drop off material outside of the HHM building with staff placing the material in the building at the end of each day. Mr. Taylor reported that the majority of customers follow this procedure although occasionally some material is dropped off in the Transfer Station building which staff hauls to the HHM building.

The access road from the scale to the tipping floor was in excellent condition. Conditions on the tipping floor were observed during the inspection – Mr. Taylor indicated that the amount of waste on the floor would allow waste to be removed within 48 hours of deposition. Transfer Station employees retrieve litter as necessary – some litter was noted at the entrance to the loading pit due to the damaged door (note the door was repaired after the inspection).

PERMIT CONDITIONS

The SDP Permit for the Transfer Station expires on October 6, 2025. Permit renewal documentation was submitted to IDNR on June 6, 2025 (Doc #113216). The Permit Certificate was posted. All permit conditions appear to be met or exceeded.

The Emergency Response and Remedial Action Plan (ERRAP) and Operations Plan were both posted. The ERRAP was updated in 2021 with the updated documentation included in the 2022 Transfer Station Permit Renewal Documentation dated June 14, 2022 (Doc #103406). Mr. Taylor reported that staff participates in training provided by the East Central Iowa Council of Governments.

The Transfer Station operates under NPDES General Permit (GP) No. 1 Authorization Number 5963-5780. The annual inspection required by the permit is attached to this inspection. NPDES GP No. 1 expires on April 9, 2028. A Stormwater Pollution Prevention Plan (SWPPP) is being developed and is discussed later in this report.

FINANCIAL ASSURANCE

A closure cost estimate for the Transfer Station and associated financial assurance documentation was submitted with the 2022 Transfer Station Permit Renewal Documentation dated June 14, 2022 (Doc #103406) and approved in the SDP Permit. An updated closure cost estimate was included in the 2025 Transfer Station Permit Renewal Documentation submitted to IDNR on June 6, 2025 (Doc #113216). As per IDNR regulations, an updated closure cost estimate and financial assurance documentation will be submitted during each permit renewal.

ADDITIONAL COMMENTS

The Transfer Station received a Notice of Violation (NOV) dated May 29, 2025 related to NPDES General Permit No. 1. The NOV states "No later than June 30, 2025, this facility shall complete and begin implementing the SWPPP for this facility."

The Transfer Station was visited by IDNR Field Office (FO) #1 on November 19, 2024 as a follow up to the NOVs the facility received June 24 2024 and September 20, 2024. The November inspection report contained the following:

Summary of Requirements:

1. <u>Continue utilizing the daily checklist</u> Mr. Taylor is continuing to use the daily checklist provided by IDNR. The completed checklists are maintained in a binder in the Transfer Station office and were provided for review.

Summary of Recommendations:

1. <u>Create signage to direct customers to specific areas (HHM, Tires, Electronics, Appliances, Scrap metal, etc.).</u> New signage has been installed.

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2. <u>Continue taking 3-4 loads of solid waste to the landfill daily to keep the tipping floor from backing up.</u> Adequate space was available on the tipping floor for incoming solid waste. Mr. Taylor reported that additional loads of solid waste are hauled to the landfill as needed to maintain adequate space for waste on the tipping floor.

Two staff members have taken the HAZWOPER 24 hour training with the certificates posted at the Transfer Station. One staff member has taken the transfer station operator certification course with the certificate posted at the Transfer Station. Note due to the tonnage received at the Transfer Station, a certified person is not required to be on site.

The interior of the Transfer Station walls were washed in 2024 with an improved appearance in the interior of the Transfer Station noted during this inspection. Mr. Taylor reported that they plan to have the walls washed annually.

There are two diesel tanks on site, each with a capacity of approximately 1,000 gallons. It is unknown whether either tank is dual walled. Mr. Taylor and I discussed the need for the facility to have a Spill Prevention, Control, and Countermeasures (SPCC) plan due to the petroleum storage capacity on site.

CHAPTER 106 REQUIREMENTS

In accordance with IAC 567-106.14(2), the annual inspection report for transfer stations must address the requirements in IAC 567-106.10. The following summarizes compliance with IAC 567-106.10:

IAC 567-106.10(1) Transfer Station Building

- a. The waste unloading area and the transfer trailer loading area are fully enclosed to:
 - 1. Minimize dust and litter exiting the building.
 - 2. Keep precipitation out of the building.
 - 3. Prevent the attraction or harboring of vectors.
- b. The solid waste unloading area and the waste transfer trailer loading area are located on concrete floors.
- c. The grounds around the Transfer Station and access roads are graded away from the building entrances so stormwater flows or surface water do not typically enter the building.
- d. All washwater is contained within the Transfer Station building. The floor in the Transfer Station building is sloped toward floor drains that outlet into a washwater storage tank. The washwater tank is equipped with a high level alarm indicator, Mr. Taylor reported that the alarm was operational. The washwater tank inspection is included in the Daily Check List. The level of the storage tank was visually reviewed during the inspection and storage was available.
- e. All waste stored during non operating hours is stored in the interior of the Transfer Station building, which is locked and in a fenced area to control access to the building. Smoke alarms are located in the building. Mr. Taylor noted that

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the contractor was on site to check/renew the fire extinguishers and test the smoke alarms within the past two weeks.

- f. This facility does not utilize a surge pit.
- g. This facility does not utilize a surge pit.
- h. Salvaged materials are stored in the designated areas.
- i. Lighting is adequate in the Transfer Station building.
- j. The wall and door at the entrance to the loading pit were damaged by staff earlier this year. The wall had been repaired but the door had not been replaced as of the date of the inspection. Mr. Taylor reported that the door was replaced on June 7, 2025. All other access doors in the Transfer Station building are operable.

IAC 567-106.10(2) Other Transfer Station Design Requirements

- a. The facility is fenced and the access road equipped with a lockable gate.
- b. The scale at the Transfer Station is certified on a regular basis. A current scale certification is posted.
- c. The Transfer Station has an adequate queuing distance for vehicles entering and exiting the property. Queued vehicles do not extend into the public street.
- d. Signs have been provided to direct traffic and to maintain proper on-site traffic patterns. Additional signage has been placed in the recycling area. Staff also assist customers unfamiliar with the Transfer Station as needed.
- e. A sign is located at the facility containing the following information:
 - 1. Name and permit number of the facility
 - 2. Operating hours
 - 3. Material acceptance criteria
 - 4. Emergency contact number

This report is based on observations made at the site at the time of the inspection and the information sources referenced in the report. This report does not reflect typical variations experienced at the site throughout the year or variations in conditions that may be observed at the site at other times.

RECOMMENDATIONS

- 1. Complete Stormwater Pollution Prevention Plan and notify IDNR upon completion.
- 2. Store appliances upright.
- 3. Remove accumulated recyclables from designated storage areas to maintain adequate storage capacity, primarily rigid and fiber recyclables, tires, and scrap metal.
- 4. Determine if the diesel fuel tanks on site are double walled and complete the EPA template required for the SPCC.
- 5. Continue to operate in accordance with the SDP Permit.



Karl Taylor, Director, Jones County Solid Waste Management Commission (electronic copy)

cc:



HLW Engineering Group 204 West Broad Street, P.O. Box 314 Story City, Iowa 50248 Phone: (515) 733-4144 FAX: (515) 733-4146

STORMWATER POLLUTION PREVENTION

JONES COUNTY SANITARY LANDFILL JONES COUNTY, 10WA

FIGURE: PLAN

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	o O N	PROJECT NO.	6038-25	
	REVISION	DRAWN	ЭСН	

Stormwater Industrial Routine Facility Inspection Report

General Information					
Facility Name	Jones County Transfer Station				
NPDES Tracking No.	Authorization # 5963-5780				
Date of Inspection	June 5, 2025 Start/End Time 10:30 AM/1:00		10:30 AM/1:00 PM		
Inspector's Name(s)	Douglas J. Luzbetak, P.E.				
Inspector's Title(s)	Project Manager				
Inspector's Contact Information	HLW Group, PO Box 314, Story City, IA 50248, (515)733-4144				
Inspector's Qualifications	Professional Engineer, project manager at the site since 2015				
	Weather Information				
Weather at time of this inspection?					
☑ Clear ☐ Cloudy ☐ Rain	□ Sleet □ Fog □ Snow □ High Winds				
☐ Other:	Temperature: 60's				
Have any previously unidentified discharges of pollutants occurred since the last inspection? ☐Yes ☐No					
If yes, describe: NA this is the initial SPPP inspection					
Are there any discharges occurring at the time of inspection? □Yes ⊠No If yes, describe:					

Areas of Industrial Materials or Activities exposed to stormwater

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Material loading/unloading and storage areas	⊠Yes □No □ N/A	⊠Yes □No	Solid waste is unloaded in the interior of the building.
2	Equipment operations and maintenance areas	⊠Yes □No □ N/A	⊠Yes □No	
3	Fueling areas	⊠Yes □No □ N/A	ĭ¥Yes □No	
4	White goods storage area	ĭYes □No □ N/A	⊠Yes □No	Appliances stored on a concrete base. Surface water is directed away from storage area.
5	Scrap metal storage area	ĭ Yes □ No □ N/A	⊠Yes □No	Scrap metal stored in a roll off on a concrete base. When the roll off is full the scrap metal is stored on the concrete pad adjacent to the roll off. Surface water is directed away from storage area.
6	Tire storage area	⊠Yes □No □ N/A	⊠Yes □No	Tires stored on a concrete base. Surface water is directed away from storage area.

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	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
7	Dust generation and vehicle tracking	⊠Yes □No □ N/A	⊠Yes □No	Dust was not noted during the inspection No tracked litter or mud was noted at transfer station entrance/exit
Doo	cribe any incidents of non-co	Non-Compliar		
In a		Notice of Violation (NOV)		2025, a Stormwater Pollution Prevention
Des	cribe any additional control i	Additional Control Measures needed to comply		requirements:
Nor	ne			
T.I.	Ali	Notes		
Use	this space for any additional	notes or observations from	n the inspection:	
		CERTIFICATION STA	ATEMENT	

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: Douglas J. Luzbe tale, PE

Signature: Date: 6/17/25

Stormwater Inspection 2