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March 3, 2026

GREAT RIVER REGIONAL WASTE AUTHORITY
ATTN AUSTIN BANKS GENERAL MANAGER
2092 303rd AVENUE
FORT MADISON, IA 52627
Email - abanks@grrwa.com

RE: Compliance Inspection of the GRRWA Transfer Station (Keokuk) - Permit Renewal
SDP Permit No. 56-SDP-16-89P-XFR; Lee County, Iowa

Dear Mr. Banks:

On February 17, 2026 I met with Derek Hamm to conduct a compliance inspection of the GRRWA Transfer Station located in Keokuk. Attached you will find an inspection report including observations made during my visit.

If you have any questions or would like further explanation of any part of this report, please contact me at this office at 319-653-2135 or via email ryan.stouder@dnr.iowa.gov.

Sincerely,
FIELD SERVICES & COMPLIANCE BUREAU

Ryan Stouder
Environmental Specialist Senior

Encl. XFR Insp Report

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xc: IDNR Solid Waste Section, becky.jolly@dnr.iowa.gov and chad.stobbe@dnr.iowa.gov
File – GRRWA XFR File

**IOWA DEPARTMENT OF NATURAL RESOURCES
TRANSFER STATION (XFR) PERMIT INSPECTION FORM**

Permit No.: 56-SDP-16-89P-XFR	County: Lee
Facility Name: Great River Regional Waste Authority Transfer Station	Facility Address: 11 Carbide Lane, Keokuk, IA 52632
Phone Number: 319-524-6175	
Responsible Official: Austin Banks, General Manager	Mailing Address: Great River Regional Authority 2092 303 rd Avenue Fort Madison, IA 52627
Phone Number: 319-372-6140	
Person(s) Present: 1) Derek Hamm	
Date of This Inspection: 02/17/2026	Date of Last Inspection: 08/11/2021

IAC 567 Chapter 106.9: Transfer Station Siting & Location Requirements		Yes	No	NA
Siting Requirements	106.9(1) Is the transfer station building located within the 100-year floodplain?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	106.9(1) If yes, are there structures to prevent floodwater inundation from a 100-year flood of any area that comes into contact with solid waste or washwater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	106.9(2) Is the transfer station building within 500 feet of an educational facility, healthcare facility, or permanent residence?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	106.9(2) If yes, did construction of the educational facility, or healthcare facility, or permanent residence begin before the permit application was received by the Department?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	106.9(2) If yes, does the transfer station utilize screening to minimize noise and visibility of operations? <i>(Note: Screening shall utilize natural components to the maximum extent possible)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IAC 567 Chapter 106.10(1): Transfer Station Design Standards		Yes	No	NA
Transfer Station Design	106.10(1) Is the transfer station building sufficient to allow all solid waste to be unloaded from collection vehicles and loaded into transport vehicles indoors? <i>(Note: Rear-loading solid waste transport vehicles that have no other opening and that securely about the building so that minimal amounts of solid waste escape qualify as being inside the building)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(1)"a" Is the building sufficient to minimize dust and litter exiting the building?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(1)"a" Is the building sufficient to keep out precipitation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(1)"a" Is the building sufficient to prevent the attraction or harboring of vectors?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(1)"b" Are all surfaces that come in contact with solid waste or washwater impervious to liquids?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(1)"c" Does the transfer station building have a drainage system that maintains a separation between stormwater and washwater?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:All drains inside the transfer station building are connected to City of Keokuk sanitary sewer. Covered bays 1-4 are utilized for trash collection, bays 7 & 8 are primarily used for recycling material collection with bays 5 & 6 for overflow of recycling material. There are bays for electronics and appliances collection within the existing building.

IAC 567 Chapter 106.10(1): Transfer Station Design Standards (Cont'd)		Yes	No	NA	
Transfer Station Design	106.10(1)"d"	Does the transfer station building have a washwater collection system that directs washwater to a storage tank for later disposal, a sanitary sewer system, or equivalent as approved by the Department?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(1)"d"	If a storage tank(s) is used, does it have a high-level indicator or gauge?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	106.10(1)"e"	Does the transfer station store solid waste during non-operating hours?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(1)"e"	If yes, is the solid waste storage area clearly marked?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(1)"e"	If yes, does the solid waste storage area have a fire detection system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(1)"f"	Does the transfer station building have a surge pit to handle large volumes of incoming waste? <i>(Note: Surge pits are typically found in large transfer stations where a large number of trucks can overload the tipping floor. Surge pits provide more space for temporary storage during peak operating hours and may also allow for additional compaction of the solid waste before it is loaded into transport vehicles)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	106.10(1)"f"	If yes, does the transfer station building have an effective odor control mechanism? <i>(i.e. mist systems and air filters)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	106.10(1)"g"	If yes, does the transfer station building have a sprinkler system installed over the area where solid waste is stored?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	106.10(1)"h"	If the transfer station salvages materials, are the salvage storage areas clearly marked? <i>(Note: Salvaged materials that do not attract or harbor vectors may be stored outside the building in clearly marked designated areas.)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	106.10(1)"i"	Is there sufficient indoor and outdoor lighting to minimize the difference in lighting when entering or exiting the building?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(1)"j"	Does the transfer station building have doors at each entrance and exit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Floor drains inside the building direct any wastewater generated to the City waste water plant for treatment. A smoke detection system is equipped inside the building for fire detection. The transfer station has waste and recycling collection area for residents to utilize to reduce traffic congestion.

IAC 567 Chapter 106.10(2): Other Transfer Station Design Standards		Yes	No	NA	
Transfer Station Design	106.10(2)"a"	Does the transfer station have a secure perimeter fence w/lockable gate(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(2)"b"	Does the transfer station use an IDALS certified scale? <i>(Note: The scale does not have to be onsite)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(2)"c"	Does the transfer station have adequate queuing distance for vehicles entering and exiting such that lines do not extend onto public streets?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(2)"c"	If no, does the transfer station have approval from the local government authority for lines to back-up onto public streets?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	106.10(2)"d"	Does the transfer station have signs or pavement markings indicating safe and proper on-site traffic patterns?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.10(2)"e"	Is there a sign at the primary entrance specifying: 1) Facility name and permit number, 2) Operating hours, 3) Materials accepted or stating "All materials must have prior approval", 4) Telephone number of emergency contact person(s)?	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>

IAC 567 Chapter 106.11: Transfer Station Operating Requirements		Yes	No	NA
106.11(1)	Is site access controlled and limited to a time when a transfer station operator is on duty.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(1)"a"	If yes, is the site operator on duty able to read, understand and implement the Site Operation Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(1)"b"	If yes, is the site operator on duty able to read, understand and implement the Emergency Response and Remedial Action Plan (ERRAP)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(1)"c"	If yes, is the site operator on duty able to visually recognize universal symbols, markings, and indications of unacceptable materials? (e.g. hot loads, hazardous, infectious and radioactive wastes)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(1)"d"	Is the transfer station permitted for 20,000 tons or more per year of solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(1)"d"	If yes, is the site operator on duty certified by a training program approved by the Department? (e.g. Solid Waste Association of North America's Transfer Station Systems Training and Certification Course)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(2)	Is solid waste only being accepted from generators within the designated service area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(3)	Are all unloading, handling, processing, screening, open storage, loading, and similar activities or processes involving solid waste being performed inside the transfer station building? (Note: Truck-to-truck transfer of solid waste that is not incidental solid waste transfer is not allowed outside a transfer station building. A rear-loading solid waste transport vehicle that does not have any other open access and securely abuts the transfer station building so that minimal amounts of solid waste escape during loading shall qualify as being inside the building. Salvaged materials that do not attract or harbor vectors may be stored outside of the building in clearly marked, designated areas.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(4)	Is the solid waste being at least visually screened by personnel capable of identifying hot loads and hazardous, infectious, radioactive, and other wastes not suitable for disposal in a sanitary landfill?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(5)	Are transfer station operators segregating and managing unacceptable wastes and hot loads in accordance with applicable laws and in a manner as safe and responsible as practical?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(6)	Is salvaging only being performed by transfer station operators? (Note: Scavenging shall not be allowed.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
106.11(7)	Is the operation of the facility being carried out in a manner that attempts to minimize litter, dust, odor, noise, vibration, and the attraction or harborage of vectors?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(8)	Is the transfer station building being maintained at a level of cleanliness necessary to prevent a nuisance or public health hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(9)	Is on-site litter being maintained at a level of cleanliness to prevent a nuisance or public health hazard? (Note: Off-site litter shall be collected daily.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(10)	Is the exterior of all buildings being maintained in a reasonable aesthetic condition that prevents the attraction or harborage of vectors, so as not to create a nuisance or public health hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
106.11(11)	Is the washwater management system being inspected monthly and maintained in proper operating condition to prevent overflowing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
106.11(12)	Are all surfaces that prevent washwater from entering the ground and groundwater impervious?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
106.11(12)	If no, was the breach noted above fixed within 24 hours, or has the facility prevented any solid waste or washwater from coming into contact with the breached area until repaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
106.11(13)	Has the transfer station made adequate provisions for routine operational maintenance of the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Transfer Station Operating Requirements

IAC 567 Chapter 106.12: Temporary Solid Waste Storage at Transfer Stations		Yes	No	NA	
Temporary Solid Waste Storage	106.12(1)	If solid waste is stored at the transfer station, is it stored: 1) Inside the transfer station in a clearly marked, designated area; or 2) Inside the transfer station building in a surge pit; or 3) Inside a secure solid waste transport vehicle, protected from precipitation and vectors?	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
	106.12(2)"a"	If solid waste is being stored inside the transfer station in a designated area that is not a surge pit or similar operational structure, is it being stored for not more than 48 hours, excluding Sundays and national holidays?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.12(2)"b"	If solid waste is being stored inside the transfer station building in a surge pit, is it being stored for not more than seven days, including Sundays and national holidays?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	106.12(2)"c"	If solid waste is being stored in a transport vehicle designated to travel only via roadway, is it being stored for not more than 48 hours, excluding Sundays and national holidays?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	106.12(2)"d"	If solid waste is being stored in a transport vehicle designated to travel via rail or navigable waterway, including intermodal container systems, is it being stored for not more than seven days, including Sundays and national holidays?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IAC 567 Chapter 106.13: Transfer Station Record-Keeping Requirements		Yes	No	NA	
Record-Keeping Requirements	106.13(1)"a"	Is a copy of the current permit(s) on site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.13(1)"b"	Is a copy of the current Site Operation Plan onsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.13(1)"c"	Is a copy of the current Emergency Response and Remedial Action Plan (ERRAP) onsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.13(1)"d"	Is proof of current financial assurance on file?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.13(2)"a"	Are three years of records being maintained by the transfer station with regard to the tons of all solid waste disposed of quarterly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.13(2)"b"	Are three years of records being maintained by the transfer station with regard to the destination of all outgoing solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.13(2)"c"	Are three years of records being maintained by the transfer station with regard to the washwater management system inspection log?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	106.13(2)"d"	Are three years of records being maintained by the transfer station with regard to hot loads and hazardous, infectious, radioactive, or other unacceptable wastes found?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	106.13(2)"e"	Are three years of records being maintained by the transfer station with regard to training received by transfer station operator(s) pursuant to 106.11(1).?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IAC 567 Chapter 106.14: Transfer Station Reporting Requirements		Yes	No	NA
Reporting Requirements	<p>106.14(1) Is the transfer station submitting quarterly tonnage reports to the Department that include:</p> <p>1) Tons of solid waste disposed of;</p> <p>2) Comprehensive planning area from which the solid waste originated, and the tons of solid waste from each county and comprehensive planning area; and</p> <p>3) Destinations of all outgoing solid waste?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>106.14(2) Is the transfer station being inspected annually by an Iowa-licensed professional engineer for compliance with IAC 567 Chapter 106.10 and submitting said annual inspection report to the Department and Field Office by the first workday in November each year?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IAC 567 Chapter 106.15: Transport Vehicle Construction & Maintenance		Yes	No	NA
Transport Vehicles	<p>106.15(1) Is the portion of the solid waste transport vehicle(s) that contains solid waste sufficient to:</p> <p>1) Prevent the accidental discharge of its contents;</p> <p>2) Prevent the attraction or harborage of vectors; and</p> <p>3) Prevent the infiltration of precipitation?</p> <p><i>(Note: Any solid waste transport vehicle that fails to meet the requirements of IAC 567 Chapter 106.15 shall be repaired before it is utilized in the transport or storage of solid waste.)</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>106.15(1) If the solid waste transport vehicle(s) has an open-top, does it have a suitable cover that is not easily torn, shredded, broken, or otherwise breached under normal use?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>106.15(3) Is the transport vehicle(s) being cleaned at intervals frequent enough to prevent a nuisance or vector attraction?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>106.15(4) Is wastewater generated from any cleaning of the areas of the solid waste transport vehicle(s) that hold solid waste being managed as washwater?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IAC 567 Chapter 106.16: Solid Waste Transport Vehicle Operation Requirements		Yes	No	NA
Transport Vehicle Operation	<p>106.16(1) Are the solid waste transport vehicle's openings securely closed before transport and during solid waste storage so as to prevent the loss of solid waste?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>106.16(2) Is solid waste being loaded into the solid waste transport vehicle inside the transfer station building and in a manner that minimizes the spilling of materials? <i>(Note: Truck-to-truck transfer of solid waste that is not incidental solid waste transfer is not allowed outside a transfer station building. A rear-loading solid waste transport vehicle that does not have any other open access and securely abuts the transfer station building so that minimal amounts of solid waste escape during loading shall qualify as being inside the building.)</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>106.16(2) If solid waste is spilled from a solid waste transport vehicle during loading, is it collected as often as necessary to minimize litter, dust, or other fugitive debris?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>106.16(3) If solid waste was spilled from a solid waste transport vehicle not on transfer station property, was the solid waste collected as soon as possible and was the spill immediately reported to the Department and the Field Office with jurisdiction?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Other Materials Accepted/Activities On-Site			
Recyclables Drop-Off	<input checked="" type="checkbox"/>	Appliance Demanufacturing	<input type="checkbox"/>
Lead Acid Batteries	<input checked="" type="checkbox"/>	Electronics Demanufacturing	<input type="checkbox"/>
Used Oil	<input checked="" type="checkbox"/>	Yard Waste Collection	<input checked="" type="checkbox"/>
Antifreeze	<input checked="" type="checkbox"/>	Yard Waste Composting	<input type="checkbox"/>
Tires	<input checked="" type="checkbox"/>	HHM/RCC	<input checked="" type="checkbox"/>
Brown Goods Collection	<input checked="" type="checkbox"/>	Other:	
Cathode Ray Tube Collection	<input checked="" type="checkbox"/>		
White Goods Collection	<input checked="" type="checkbox"/>		
Scrap Metal Salvaging	<input checked="" type="checkbox"/>		

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

Comments: The transfer station has outside collection area for shingles, metal material, yard waste, trees & tree trimmings. The transfer station has a requirement that all vehicle loads are either covered or secured. The scale operator and transfer station staff are monitoring loads as drivers unload.

Inspector: <u>Ryan Stouder</u> Date: <u>03/03/2026</u>	Reviewer: <u>Terry Jones</u> Date: <u>03/03/2026</u>
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Facility Photographs (if applicable)
