

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

# Fwd: Hamilton County Transfer Station Renewal - DNR Review Comments

1 message

Stobbe, Chad <chad.stobbe@dnr.iowa.gov> To: "Jolly, Becky" <becky.jolly@dnr.iowa.gov> Mon, Sep 30, 2019 at 4:19 PM

Becky -

Please file this email correspondence and their attached response under 40-SDP-06-01P as reviewed. This correspondence clarifies issues identified during the DNR's review of the permit renewal submittal (Doc #95818). As noted below, the issuance of this permit renewal will be withheld until March/April 2020. Given this delay, they will be required to submit a new IDALS scale certificate and an updated account balance statement from Iowa Falls State Bank prior to issuance (see highlighted below). Thanks



Chad A. Stobbe | Environmental Specialist Senior Iowa Department of Natural Resources P 515-725-8351 | F 515-725-8202 | 502 E. 9th St., Des Moines, IA 50319 www.iowadnr.gov

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

From: David Phillips <a href="mailto:com/dphillips@barkerlemar.com/">dphillips@barkerlemar.com/</a>

Date: Fri, Sep 27, 2019 at 10:40 AM

Subject: RE: Hamilton County Transfer Station Renewal - DNR Review Comments To: Stobbe, Chad <chad.stobbe@dnr.iowa.gov>, Jamie Lane <ilane@barkerlemar.com>

Cc: hamcosolidwaste@netins.net <hamcosolidwaste@netins.net>, Lauren Norland <lnorland@barkerlemar.com>

Chad: We have prepared the attached memo as a response to DNR comments regarding the permit renewal application for the transfer station. Also, regarding the draft permit documents from DNR, the only change is to edit the service area to conform to the NCIRSWA planning area in the permit.

Thank you.

DAVID PHILLIPS, P.E. | DESIGN ENGINEER

From: Stobbe, Chad <chad.stobbe@dnr.iowa.gov> Sent: Wednesday, September 04, 2019 2:52 PM

To: David Phillips <a href="mailto:com">dphillips@barkerlemar.com</a>; Jamie Lane <a href="mailto:jlane@barkerlemar.com">jlane@barkerlemar.com</a>;

Cc: hamcosolidwaste@netins.net

Subject: Hamilton County Transfer Station Renewal - DNR Review Comments

David & Jamie -

The DNR has conducted its review of the 2020 transfer station renewal submittal (Doc #95818 received 8-29-19) and has identified a couple issues that require further clarification/action. Rather than draft a formal comment letter, I thought an

email outlining the issues would expedite the renewal process. The DNR's comments are as follows:

- 1) Given the current permit does not expire until May 15, 2020, why has this renewal application been submitted to the DNR so far in advance? While the DNR can review and approve the renewal submittal, the issuance of the permit renewal will be withheld until March/April 2020. The reason for this is to mitigate any potential confusion that could arise if there were to be any enforcement issues that arise or if a permit amendment were to be requested before the current permit expires.
- 2) The service area expressed within the permit renewal application states, "Incorporated and unincorporated Hamilton County, IA, excluding the City of Stratford, lowa." Why has the City of Stratford been excluded? The current planning area description is "All cities and the unincorporated area in Webster County; all cities and the unincorporated area in Hamilton County; all cities and the unincorporated area in Humboldt County excluding the city of Bode; the City of Eagle Grove in Wright County; and the Cities of Rockwell City, Knierim, Pomeroy, and Manson and the North Central Correctional Facility in Calhoun County."
- 3) While the IDALS scale certificate is valid now until December 31, 2019, a new IDALS scale certificate will be needed prior to permit issuance in March/April 2020.
- 4) The 2020 renewal application indicates that the Site Design Plan requirements of 567 IAC 106 are addressed within Doc #64479. This referenced document is the 2010 permit renewal application. Section 3 of this document indicates that the Site Design Plan is Not Applicable (N/A). It's unclear why this was indicated because the provisions of 567 IAC 106.8(1)"j" are required. Going back further to the 2007 permit renewal submittal (Doc #16168), the Site Design Plan was also noted as N/A, but the Executive Summary stated that "The transfer station site design plan, applicable attachments and applicable documents were submitted with the original 2002 Operation Permit Application." While it appears that some of the required information was included within this original submittal, not all of the current requirements were addressed. Please compile the required information and submit a current Site Design Plan in compliance with 567 IAC 106.8(1)"j." This way we'll have a current plan with which to reference, instead of various documents spanning two prior decades.
- 5) The 2020 renewal application indicates that the Site Operation Plan requirements of 567 IAC 106 are addressed with Doc #64479. Section H of this submitted fails to address all of the requirements of 567 IAC 106.8(1)"k" (Rules 106.11 through 106.16). This plan appears to rework the 2001 Development & Operations Plan submitted as part of the original permit application. Please update the Site Operation Plan to ensure all requirements of Rules 106.11 through 106.16 are addressed.
- 6) Page 1 of the submitted ERRAP states in part, "This Plan is intended to meet the Unnumbered Permit Amendment and the Revision to Unnumbered Permit Amendment issued by the Iowa Department of Natural Resources (DNR) dated March 2, 2001 and April 5, 2001, respectively." Please note that these documents were issued with regard to the ERRAP requirements for the Hamilton County Sanitary Landfill (40-SDP-02-75), not the Transfer Station. Their inclusion within the XFR's ERRAP may be confusing to subsequent readers.
- 7) With regard to financial assurance, there are three primary components: (1) Submittal of an updated closure cost estimate certified by a P.E. licensed within lowa, (2) Documentation that an eligible financial instrument has been established, and (3) Proof of the selected instrument being maintained in an amount that covers the updated closure cost estimate.
  - a) The financial assurance documentation submitted within the XFR permit renewal application includes an updated P.E. closure cost estimate (\$35,425.07). No further action required.

b) The XFR permit renewal submittal did not include documentation that an eligible financial instrument had been established. A review of DocDNA yielded a 2017 Resolution (Doc #89532) establishing a local government dedicated fund (LGDF) at Iowa Falls State Bank (Account #143934). This resolution has been added to the renewal submittal for completeness.

c) The last issue regarding financial assurance pertains to documenting the current value of the instrument(s) set aside to cover the updated closure cost estimate. The 2020 XFR renewal submittal includes an "Interest Payment Notice" from 11-9-18, which indicated the value of the fund at that time was \$34,741.43. Unfortunately, the value of the account on 11-9-18 is not sufficient to cover the updated closure cost estimate (\$35,425.07). In addition, the DNR requests that the account balance be no older than 3 months from the date of permit issuance to be considered "current"...to ensure sufficient funding has been set aside. Therefore, before the permit renewal is issued in March/April 2020, please submit a current account balance statement from Iowa Falls State Bank documenting funds equal to or greater than the current closure cost estimate (\$35,425.07) within Account #143934.

Lastly, to facilitate renewal, I've attached the draft XFR permit renewal documents and request your (Mr. Klaver & Mr. Phillips) timely review. This step is undertaken to ensure you have an understanding of the permit provisions/rule requirements, and to ensure that nothing has inadvertently been omitted by the DNR. Please let me know if you have any questions or suggested edits. Upon your approval of the draft renewal documents and the submittal of the required documentation, they will be set aside until March/April 2020 for issuance.

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 may conduct an inspection of the facility. Any needed corrective measures identified during the inspection must be completed prior to permit renewal issuance.

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

\*Please note that all ancillary services shall adhere to their applicable administrative chapter:

XFR: 567 IAC 106

ADP: 567 IAC 118

CRT: 567 IAC 122

Waste Oil: 567 IAC 119

Waste Tires: 567 IAC 117

HHM RCC: 567 IAC 123



Chad A. Stobbe | Environmental Specialist Senior Iowa Department of Natural Resources P 515-725-8351 | F 515-725-8202 | 502 E. 9th St., Des Moines, IA 50319 www.iowadnr.gov

Memo\_Response to 9\_4\_2019 DNR Comments w Att. DRAFT v2.pdf 1677K



# MEMO\_\_\_\_\_

TO | Chad Stobbe, Environmental Specialist Senior, DNR

FROM | David G. Phillips, P.E., BARKER LEMAR

**DATE | 9/26/2019** 

**SUBJECT |** Responses to 9-4-2019 DNR Comments: HAMSW Xfer Station Permit Renewal

The numbered responses below correspond to the Comment Numbers from the DNR, emailed to Terry Klaver, Hamilton County Solid Waste and to BARKER LEMAR on 9-4-2019.

- Response to Comment 1: Barker Leman acknowledges that the forthcoming permit will not be issued until March/April 2020.
- Response to Comment 2: A revised Form 50B, Section 2, is attached. (See Attachment A.)
- Response to Comment 3: Noted.
- Response to Comment 4: An updated Site Design Plan is attached. (See Attachment B.)
- Response to Comment 5: An updated Site Operation Plan is attached. (See Attachment C.)
- Response to Comment 6: The confusing language in the ERRAP, Section 106.19(2)b(1) was removed; an updated page is attached. (See Attachment D.)
- Response to Comment 7.
  - A) Noted.
  - B) Noted.
  - C) Noted. Before the permit renewal is issued in March/April 2020, a current account balance statement from Iowa Falls State Bank documenting funds equal to or greater than the current closure cost estimate (\$35,425.07) within Account #143934 will be submitted.

# ATTACHMENT A

Revised Form 50B, Section 2

# **SECTION 2. SITE INFORMATION**

∑ This facility is part of the following solid waste comprehensive planning area:	☐ This facility does not participate in a planning area within the state of lowa 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 state (515) 281-8499 for instructions and requirements for completing a comprehensive plan.				
	completing a comprehensive plan.			
Days and hours of operation of the facility:  Monday through Friday: 6:30 A M = 3:00 P M  Open to the publication of the facility:				
Monday through Friday: 6:30 A.M. – 3:00 P.M.	⊠ Yes □ No			
Saturday: 7:00 A.M. – 11:00 A.M.				
Service area of the facility <u>and</u> final disposal destination	(include unincorporated areas and out of state cities):			
Service Area:	u all aities and the unincorporated area in Hamilton			
All cities and the unincorporated area in Webster County	•			
County; all cities and the unincorporated area in Humbo Grove in Wright County; and the Cities of Rockwell City,				
Correctional Facility in Calhoun County.	Killeriili, Follieroy, and Manson and the North Central			
Correctional Facility in Camoun County.				
Disposal Facility:North Central Iowa Regional Solid Waste Agency in Webster County, Iowa.				
Type, source and expected weight (tons) of solid waste	to be handled per day, week and year at the facility:			
Mixed MSW, source-separated yard waste, source-se	parated recyclables, and wood waste from residential			
commercial, and industrial generators.				
49 per day				
269 per week				
14000 per year				
Description of the waste handling process to be used (e solid waste transport vehicle with front end loader):	.g., waste is unloaded onto tipping floor and loaded into			
Waste is unloaded onto the tipping floor of the transfer station building and loaded into solid waste transport vehicles with a rubber-tired front-end loader.				
Check all other materials accepted/activities at the facility	ty:			
Recyclables drop-off – glass, paper, plastic, metal	⊠ Scrap Metal Salvaging			
□ Lead Acid Batteries	☐ Appliance Demanufacturing			
⊠ Used Oil	☐ Electronics Demanufacturing			
	☐ Yard Waste Composting			
White Goods Collection	☐ Yard Waste Collection			
⊠ Tires	⊠ HHM/RCC			
⊠ Electronics Collection	⊠ Other Rubble			

# **ATTACHMENT B**

**Updated Site Plan** 

# SECTION G SITE DESIGN PLAN

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# **Attachments**

Attachment G-1: Floodplain Information Map

Attachment G-2: Plans and Specifications

# SECTION G: SITE DESIGN PLAN [IAC 567 106.8(1)"]"]

# I. <u>TRANSFER STATION SITING AND LOCATION REQUIREMENTS</u> [IAC 567 106.9 (455B)]

# 106.9(1) FLOODPLAIN INFORMATION

The Federal Emergency Management Agency has developed maps for some unincorporated areas of Hamilton County, Iowa. The location of the Hamilton County Transfer Station can be seen on the aerial map (Figure G.1). The map shows that the facility is not located within the 100-year floodplain.

# 106.9(2) ADEQUATE SEPARATION

The transfer station is not located within 500 feet of any educational or health care facility or permanent residence.

# II. TRANSFER STATION DESIGN STANDARDS [IAC 567 106.10]

# 106.10(1)"a" ADEQUATE ENCLOSURES

The transfer building completely encloses the solid waste unloading, storage, and loading areas. The enclosure keeps precipitation out of the building, minimizes attraction of vectors, and also minimizes dust and litter generation at the site.

#### 106.10(1)"b-d" DUMPING OR HOLDING FLOORS OR PITS: CLEANING AND DRAINAGE

Surfaces that come into contact with solid waste or washwater are impervious to liquids. The floor in the facility is concrete. Separation is maintained between storm water and washwater. Most liquids generated through the transfer process will be absorbed by the waste processed through the facility. The tipping floor and the truck loading areas are equipped with floor drains that drain into a 1,300-gallon leachate storage tank.

#### 106.10(1)"e" UNLOADED SOLID WASTE STORAGE

Solid waste may remain inside the transfer building at the end of each day's operation. Any remaining solid waste is stored on the tipping floor or in a transfer trailer. The area where the solid waste is stored overnight has a fire detection system installed. Solid waste is not stored in the transfer building longer than 48 hours, excluding Sundays and national holidays.

# 106.10(1)"f" SURGE PIT: ODOR CONTROL MECHANISMS

No surge pit is used at this facility. This section is not applicable to the Hamilton County Transfer Station.

# 106.10(1)"g" SURGE PIT: SPRINKLER SYSTEM

No surge pit is used at this facility. This section is not applicable to the Hamilton County Transfer Station.

# 106.10(1)"h" SALVAGED MATERIALS

The transfer station will accept salvageable scrap metal and appliances in areas designated for such.

# 106.10(1)"i" ADEQUATE INDOOR AND OUTDOOR LIGHTING

The transfer station building has been designed to have adequate indoor and outdoor lighting that reduces the difference in lighting when entering or exiting the building.

### 106.10(1)"j" INGRESS / EGRESS

The transfer station building has been designed with a sufficient number of man doors throughout the facility to meet emergency egress requirements.

# 106.10(2)"a" PERIMETER FENCING

The entrance gate is locked when the transfer station is not in operation. The landfill property is fenced and the proposed transfer station will be located within the landfill property.

# 106.10(2)"b" SCALE

A scale is located onsite that is certified by the IDALS and is used to monitor incoming and outgoing waste quantities at the transfer station.

# 106.10(2)"c" QUEUING DISTANCE FOR VEHICLES

Adequate queuing distance for vehicles entering and exiting the property is provided such that lines of vehicles will not extend onto public streets during peak hours. If this should happen at some time in future, adjustment will be made to the queuing plan or appropriate approvals will be obtained from the local government authority.

# 106.10(2)"d" SIGNS/PAVEMENT MARKINGS

Signs or pavement markings indicating safe and proper on-site traffic patterns are provided at the facility.

#### 106.10(2)"e" PERMANENT SIGN

The entrance sign indicates the following:

- Name of operation
- Site permit number
- Hours and days the site is open
- · Categories of waste accepted
- Telephone number of emergency contact person(s)

# III. <u>TEMPORARY SOLID WASTE STORAGE TRANSFER STATIONS</u> [IAC 567 106.12]

# **106.12(1) STORAGE AREA**

Solid waste may remain inside the transfer building at the end of each day's operation. Any remaining solid waste is stored on the tipping floor or in a transfer trailer.

# **106.12(2) STORAGE TIME**

Solid waste is not stored longer than 48 hours, excluding Sundays and national holidays, unless shorter storage times are required by the Department or local government authority to prevent a nuisance or public health hazard.

# IV. <u>SOLID WASTE TRANSPORT VEHICLE CONSTRUCTION AND MAINTENANCE REQUIREMENTS</u> [IAC 567 106.15]

# 106.15(1,2) VEHICLE DESIGN AND REPAIR

The portion of the solid waste transport vehicle that contains solid waste is sufficient to prevent the accidental discharge of its contents, the attraction or harborage of vectors, and infiltration of precipitation. Transport vehicles with an open top have a suitable cover, which is not easily torn, shredded, broken, or breached under normal use.

Any transport vehicle that fails to meet the requirements of this rule is repaired before utilized in the transport or storage of solid waste.

# 106.15(3,4) VEHICLE CLEANING

Semi-tractor and trailer and loading equipment will be cleaned as necessary to control odor and excessive mud. Wastewater generated from the cleaning of the areas where the solid waste transport vehicles hold solid waste is considered washwater and is managed accordingly.

# ATTACHMENT G.1 FLOODPLAIN INFORMATION MAPS



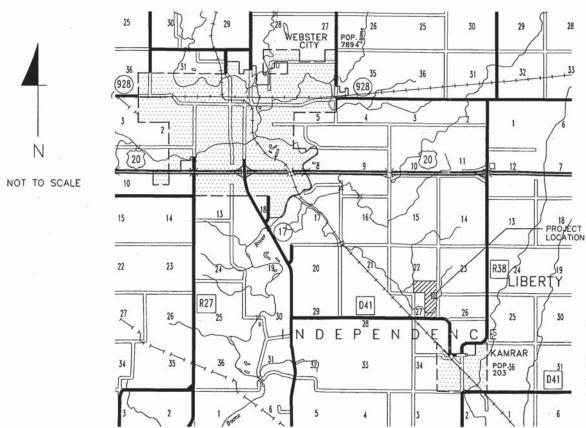
Figure G.1 - Floodplain Location

**0.2mi** -93.734 42.414 Degrees

# ATTACHMENT G.2 PLANS AND SPECIFICATIONS

# 2001 TRANSFER STATION PROJECT HAMILTON COUNTY, IOWA

HAMILTON COUNTY SOLID WASTE COMMISSION



File Name 40-1 SOP-06-01P-VFR C MAR 2010 Senders Initials

2001 OCT -1 A 10: 46

HAMILTON COUNTY SOLID WASTE COMMISSION PROPERTY

TRANSFER STATION PROJECT LOCATION

#### BENCHMARKS

ELEV. 1130.12 S.E. MONUMENT ELEV. 1115.52 S.W. MONUMENT



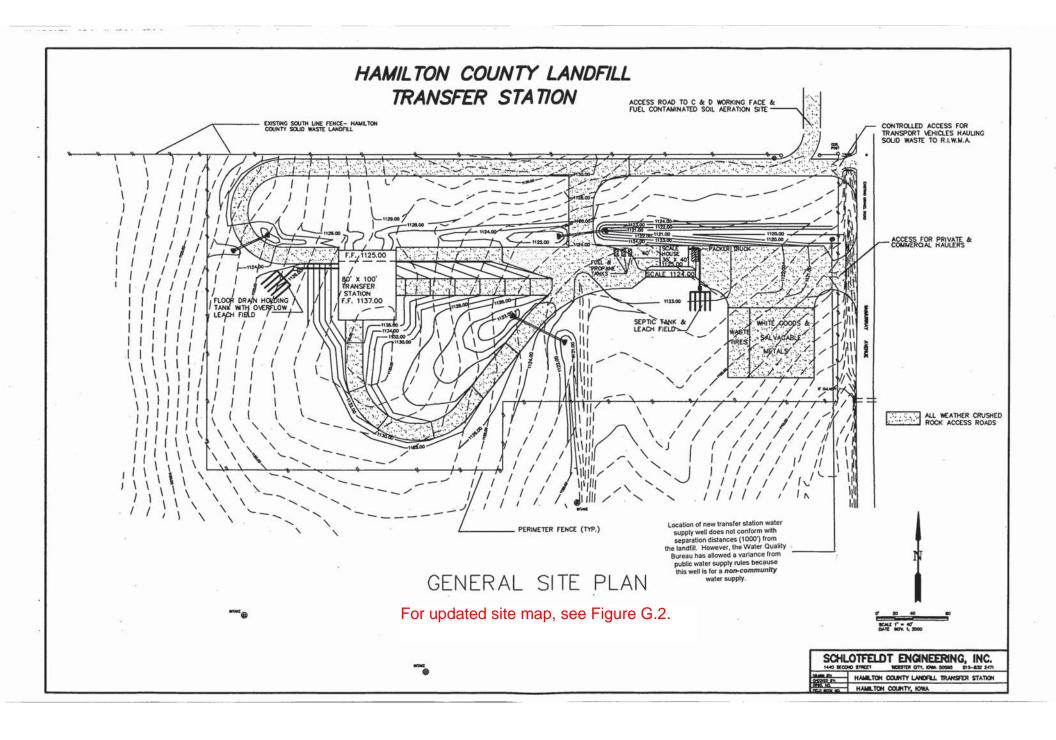
I HEREBY CERTIFY THAT THIS ENGINEERING DOCUMENT WAS PREPARED BY ME OR UNDER MY DIRECT PERSONAL SUPERVISION AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF IOWA.

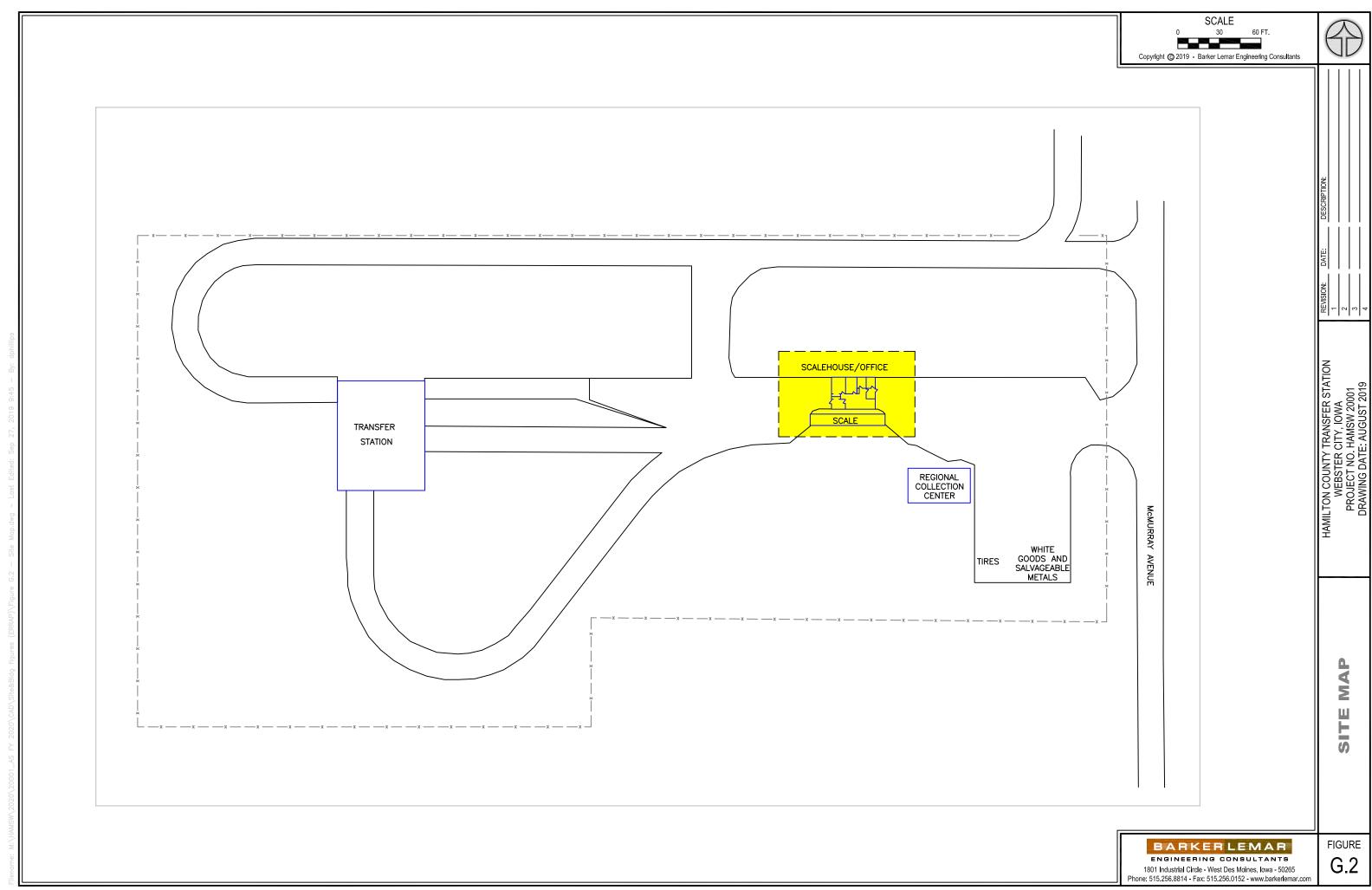
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10WA REG. NO. 9679

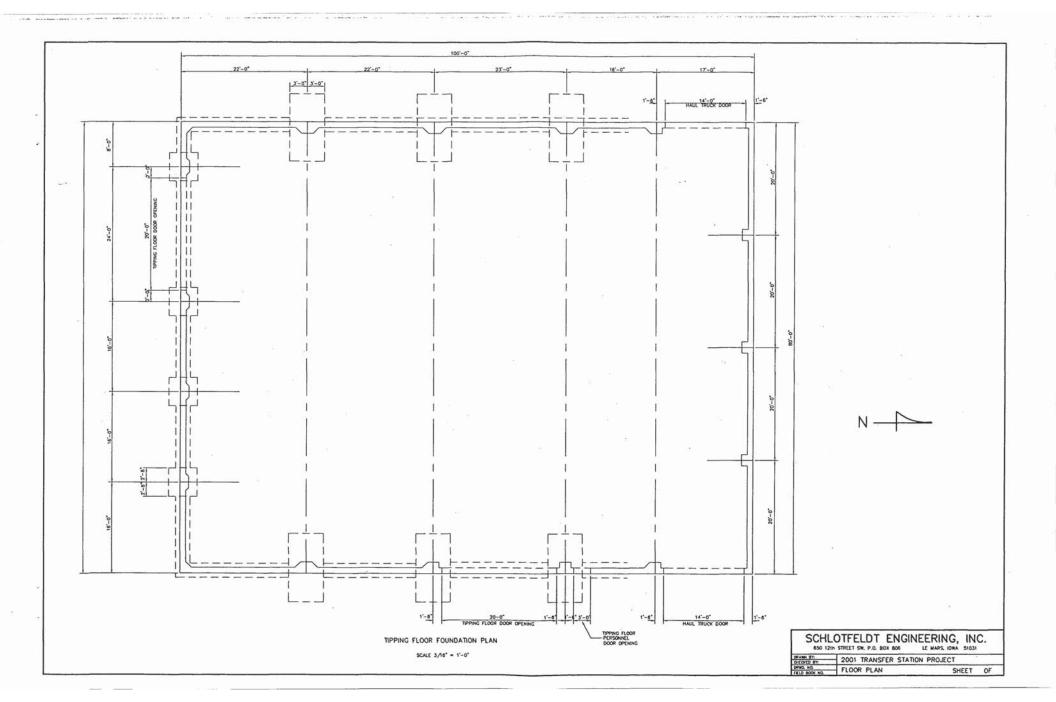
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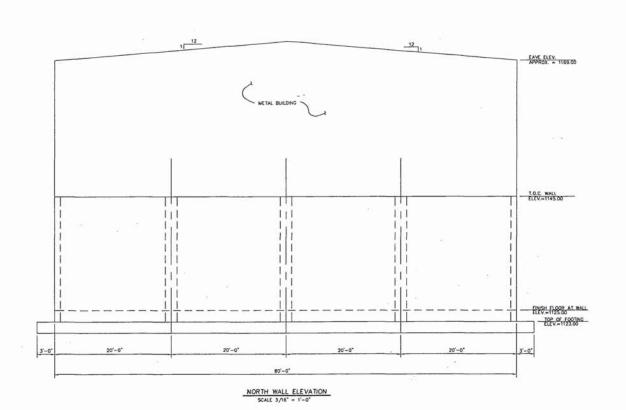


SHEET 1 OF





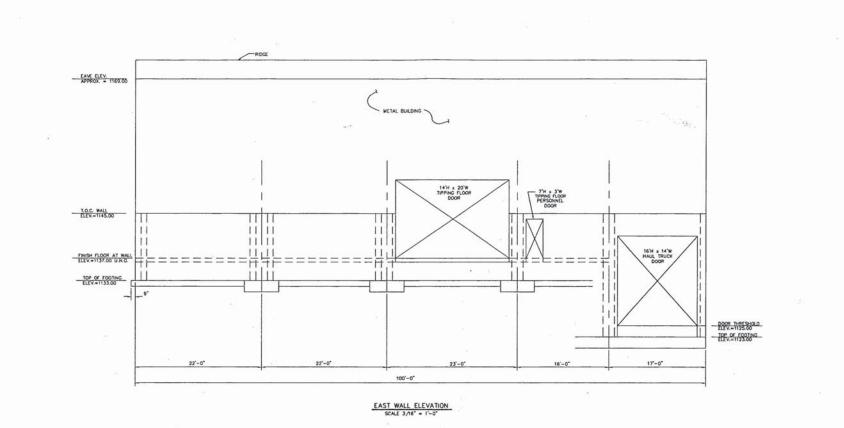




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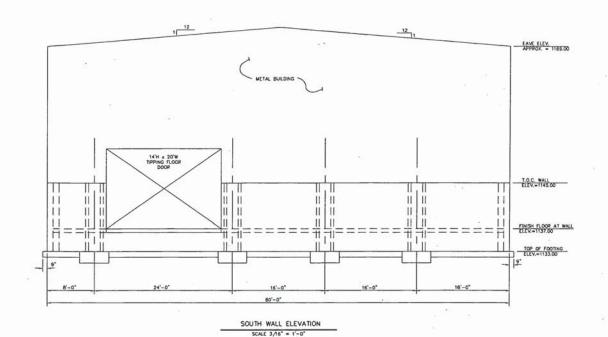
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650 12th STREET SW. P.O. BOX 806 LE MARS, IOWA 51031

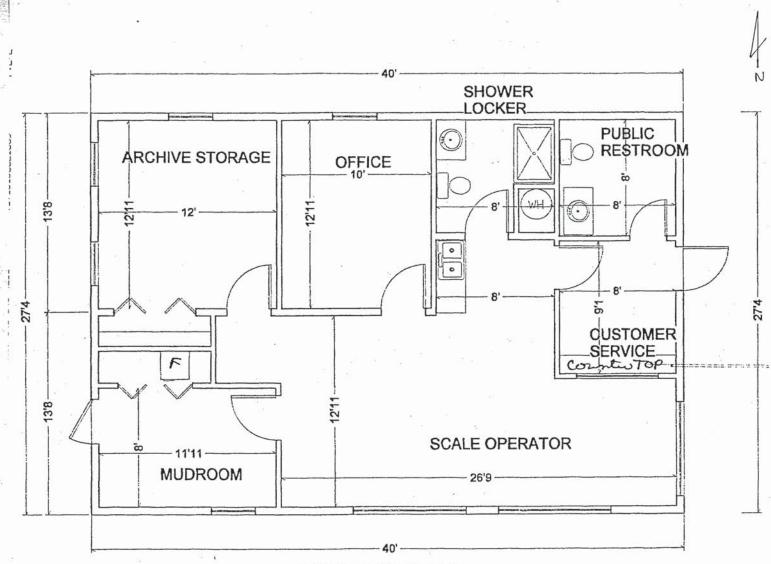
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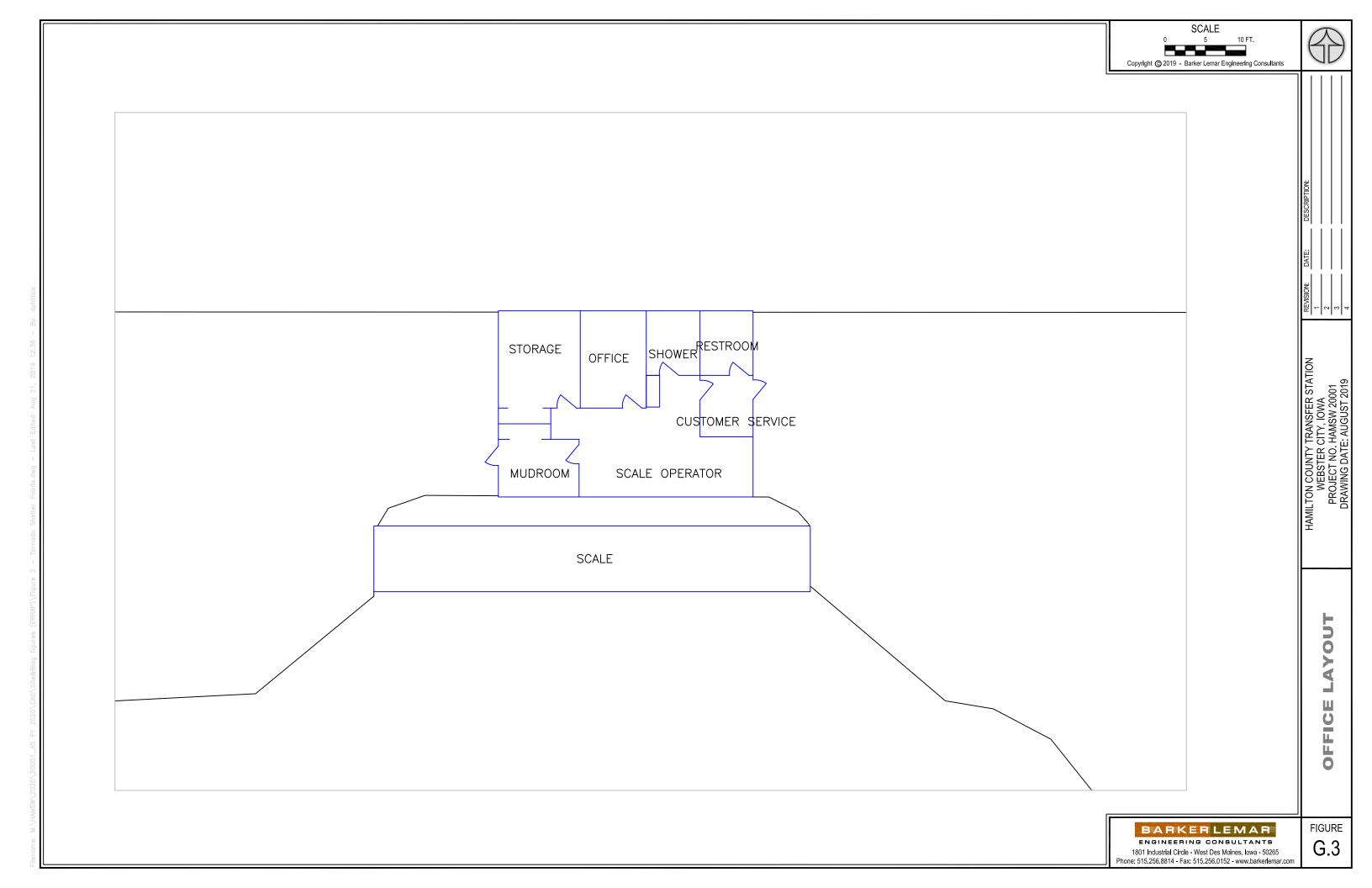
OCIDID BY: 2001 TRANSFER STATION PROJECT

SOUTH ELEVATION SHEET OF



28 X40 HAMILTON CO. LANDFILL/OFFICE BUILDING

For updated office layout, see Figure G.3.



# ATTACHMENT C Updated Operation Plan

# SECTION H SITE OPERATION PLAN

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# SECTION H: SITE OPERATION PLAN [IAC 567 106.8(1)"k"]

# I. TRANSFER STATION OPERATING REQUIREMENTS [IAC 567 106.11]

#### 106.11(1)"a-d" OPERATOR CERTIFICATION

Site access is controlled and limited to a time when a transfer station operator who has met the proper training requirements is on duty. The training requirements include the reading, understanding, and implementation of this document and the reading, understanding, and implementation of the ERRAP. This also includes the ability to visually recognize universal symbols and markings, and indications of unacceptable materials pursuant to subrule 106.11(4). Since the transfer station receives less than 20,000 tons per year, the operator is not required to be certified by a training program approved by the lowa Department of Natural Resources (DNR).

# **106.11(2) SERVICE AREA**

The Hamilton County Transfer Station is a part of the North Central Iowa Regional Solid Waste Agency Comprehensive Plan. The service area is described as follows:

All cities and the unincorporated area in Webster County; all cities and the unincorporated area in Hamilton County; all cities and the unincorporated area in Humboldt County excluding the city of Bode; the City of Eagle Grove in Wright County; and the Cities of Rockwell City, Knierim, Pomeroy, and Manson and the North Central Correctional Facility in Calhoun County.

The solid waste is transferred by semi tractor and trailer to the receiving facility. The entrance sign indicates the site is restricted to only specifically approved waste haulers, as designated in 106.8(1)"f".

#### 106.11(3) OPERATION ENCLOSURE

The transfer building completely encloses the unloading, storage and loading areas. The enclosure keeps precipitation out of the building, minimizes attraction of vectors, and also minimizes litter generation at the site. Salvaged materials, such as lumber, metal, tires, and appliances do not attract or harbor vectors and are stored outside.

#### 106.11(4) VISUAL INSPECTION

The transfer station operator, at a minimum, visually inspects all solid waste accepted by the transfer station for hot loads and hazardous, infectious, radioactive, and other wastes not accepted for disposal in a sanitary landfill.

#### 106.11(5) SEGREGATION AND MANAGEMENT OF UNACCEPTABLE WASTES

To the extent practicable, transfer station operators segregate and manage identifiable unacceptable wastes and hot loads in accordance with applicable laws, and in a safe and responsible manner.

#### **106.11(6) SCAVENGING**

Transfer station operators may salvage materials in a safe and controlled manner. Scavenging is not permitted.

# 106.11(7,9) CONTROLLING LITTER AND VECTORS

Unloading, handling, and transferring waste inside the transfer building limits the generation of litter. During each day of operation, litter is picked up from the outside of the transfer building on an as-needed basis. Periodic cleaning prevents litter accumulation inside the building.

Vectors and vermin will be controlled by removing waste from the building, by baiting, by using regular insecticide spray schedules, and by regular cleaning of floors, equipment, and other areas of the building as required. The practice of "first-in" is "first-out" for waste handling minimizes the time waste is present at the facility, and especially putrescible loads are given priority in loading so as to minimize the time they are present at the site.

#### 106.11(8,10) EQUIPMENT AND SITE CLEANING

Semi-tractor and trailer units and loading equipment will be cleaned as necessary to control odor and excessive mud. The tipping floor within the transfer building is cleaned as necessary to control odor, vectors, and vermin. The semi-bay is checked once per week and cleaned out as needed. This practice helps not only to control odors, vectors, and vermin, but also helps alleviate flat tires. The tipping floor within the transfer station is cleaned as needed to prevent a nuisance or public health hazard.

#### 106.11(11,12) WASHWATER COLLECTION

Floor drains are installed in the floor of the transfer station at the trailer loading bay and tipping floors. These drains are connected to a 1,300-gallon leachate storage tank. A high water visual alarm has been installed. Periodic inspection, cleaning, and repairs of the floor drains are performed to maintain proper operating conditions. If repairs are needed, surfaces in the waste handling and wash-down areas will not be used for waste handling unless the area is repaired to maintain a surface impermeable to liquids. Repairs to any breach of an impervious surface will be performed within 24 hours.

# 106.11(13) ROUTINE OPERATIONAL MAINTENANCE

Routine operational maintenance of the facility will be conducted in an adequate manner.

# II. TEMPORARY SOLID WASTE STORAGE AT TRANSFER STATIONS [IAC 567 106.12]

#### **106.12(1)** STORAGE AREA

Solid waste may remain inside the transfer building at the end of each day's operation. Any remaining solid waste is stored on the tipping floor or in a transfer trailer. The area where the solid waste is stored overnight has a fire detection system installed.

#### **106.12(2) STORAGE TIME**

Solid waste is not stored longer than 48 hours, excluding Sundays and national holidays, unless shorter storage times are required by the DNR or local government authority to prevent a nuisance or public health hazard.

# III. TRANSFER STATION RECORD-KEEPING REQUIREMENTS [IAC 567 106.13]

# 106.13(1) PERMIT AND PLANS

Copies of the following documents are kept at the transfer station at all times.

- Current permit(s).
- Plan of operation.
- Emergency response and remedial action plan.
- Proof of financial assurance.

# 106.13(2) RECORD MAINTENANCE

Records of the following information are kept in the transfer station for three calendar years:

- Tons of all solid waste disposed of quarterly.
- Destination of all outgoing solid waste.
- Washwater management system inspection log.
- Hot loads and hazardous, infectious, radioactive, or other unacceptable wastes found.
- Training received by transfer station operator(s) pursuant to 106.11(1).

# IV. TRANSFER STATION REPORTING REQUIREMENTS [IAC 567 106.14]

# 106.14(1) REPORTING REQUIREMENTS

The following information will be reported to the DNR on a quarterly basis:

- Tons of solid waste disposed.
- Comprehensive planning areas from which the solid waste originated and the corresponding tonnages of solid waste disposed from each county and planning area.
- Destination of all outgoing solid waste.

# 106.14(2) ENGINEERING INSPECTIONS

The transfer station is inspected annually by an lowa-licensed professional engineer (P.E.). The inspection, at a minimum, covers the design standards pursuant to rule 106.10(455B). The inspection report reflects the facility's compliance with respect to the DNR-approved design and construction. The annual report is submitted to the DNR and DNR field office with jurisdiction over the facility.

#### 106.15(1,2) VEHICLE DESIGN AND REPAIR

The portion of the solid waste transport vehicle that contains solid waste is sufficient to prevent the accidental discharge of its contents, the attraction or harborage of vectors, and infiltration of precipitation. Transport vehicles with an open top have a suitable cover, which is not easily torn, shredded, broken, or breached under normal use.

Any transport vehicle that fails to meet the requirements of this rule is repaired before utilized in the transport or storage of solid waste.

#### 106.15(3,4) VEHICLE CLEANING

Semi-tractor and trailer and loading equipment are cleaned as necessary to control odor and excessive mud. Wastewater generated from the cleaning of the areas where the solid waste transport vehicles hold solid waste is considered washwater and will be managed accordingly.

# V. SOLID WASTE TRANSPORT VEHICLE OPERATION REQUIREMENTS [IAC 567 106.16]

### 106.16(1) SECURE CLOSURE OF TRANSPORT VEHICLES

The transfer truck driver tarps the trailer prior to leaving the site. Due to operations, the tarp is generally placed on the MSW trailers when the vehicle is still in the building.

# 106.16(2) LOADING OPERATION

Solid waste transport vehicles are loaded with solid waste inside the transfer station building in a manner that minimizes the spilling of materials. Solid waste spilled from a solid waste transport vehicle during loading is collected as often as necessary to minimize litter, dust, or other fugitive debris.

### 106.16(3) SOLID WASTE SPILL

If solid waste is spilled from a solid waste transport vehicle during transport that is not on transfer station property, the spilled solid waste is collected as soon as possible. The transfer station will immediately report the spill to the DNR and the DNR field office with jurisdiction over the transfer station and spill location.

# ATTACHMENT D

Updated ERRAP, Section 106.19(2)b(1)

# EMERGENCY RESPONSE AND REMEDIAL ACTION PLAN

# A. EMERGENCY RESPONSE AND REMEDIAL ACTION PLANS [567 IAC - 106.19 (455B)]

# 106.19(2)a Facility Information

Hamilton County Solid Waste (Agency) owns and operates the Hamilton County Transfer Station (Transfer Station), the Household Hazardous Materials Regional Collection Center (HHM-RCC) for temporary storage of household hazardous material, and the closed landfill.

# 106.19(2)A(1) PERMITTED AGENCY

Hamilton County Solid Waste

# 106.19(2)A(2) DNR PERMIT

40-SDP-06-01P-XFR

#### 106.19(2)A(3) FACILITY DESCRIPTION

The facility consists of a Transfer Station, a Household Hazardous Materials Regional Collection Center (HHM-RCC) for temporary storage of household hazardous materials, and a closed landfill. See Attachment A for a site evacuation map.

The facility serves the area as described in the North Central Iowa Regional Solid Waste Agency's Solid Waste Comprehensive Plan Update.

#### 106.19(2)A(4) RESPONSIBLE OFFICIAL

The responsible official for the facility will be the Site Manager.

# 106.19(2)A(5) SITE & ENVIRONS MAP

The site evacuation plan map provides the location of the Transfer Station, the HHM-RCC, emergency evacuation routes, and the emergency assembly locations (EAP). Employees should be familiar with the evacuation routes (See Attachment A).

#### 106.19(2)B REGULATORY REQUIREMENTS

#### 106.19(2)B(1) IOWA CODE SECTION 455B.306(6)"D"

This Emergency Response and Remedial Action Plan (Plan) is designed to meet the requirements of Iowa Code paragraph 455B.306(6)d that requires the submission of a Plan by all sanitary disposal projects.

#### This plan is intended to:

- Identify possible occurrences that may endanger human health and environment.
- Establish provisions to minimize the possibility of fire or explosion.
- Establish provisions to minimize any releases to air, land, or water of pollutants that could threaten human health and the environment.