



June 29, 2020

DAVE RILEY
SHENANDOAH SANITATION
1207 W FERGUSON RD
SHENANDOAH IA 51601

SUBJECT: Shenandoah Sanitation
Appliance Demanufacturing Permit (ADP) Compliance Inspection
Permit No: 73-ADP-01-04
Shenandoah, Page County, Iowa

Dear Mr. Riley:

Enclosed please find a copy of the report resulting from a Department of Natural Resources (DNR) Appliance Demanufacturing Permit Compliance Inspection of your facility in Shenandoah, Iowa. The report should be self-explanatory.

As we discussed, this report should be helpful with respect to permit compliance. I included a copy of ADP rules for your information.

I enclosed a copy of your 2012 EPA Refrigerant Recovery or Recycling Device Acquisition Certification Form. If new refrigerant recovery or recycling equipment is obtained, submit a new EPA Refrigerant Recovery or Recycling Device Acquisition Certification form to Susan Johnson, SW Section, DNR SW Section, 502 East 9th Street, 4th Floor, Des Moines, Iowa 50329.

Also, no financial assurance (bond or letter of credit) was submitted under the new ownership. Contact Susan Johnson at 515-725-8317 to update that requirement.

If you have questions, please contact me at 712-250-8645 (cell).

Sincerely,

Holly Vandemark
Environmental Specialist Senior
Field Services & Compliance Bureau

Shenandoah051520.sw.ShenandoahSanitation.ADPinspectioncoverletter.vandemark.doc

Enc Appliance Demanufacturing Permit Compliance Report
567 Iowa Administrative Code 118, Discarded Appliance Demanufacturing
2012 EPA Refrigerant Recovery or Recycling Device Acquisition Certification Form

CC Becky Jolly, SW Section, DNR, Des Moines, IA via email
Susan Johnson, SW Section, DNR, Des Moines, IA via email
Facility ADP File, Page County

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

Permit No.: 73-ADP-01-04	County: Page
Facility Name: Shenandoah Sanitation, Inc.	Facility Address: 1207 W Ferguson RD Shenandoah, IA 51601
Phone Number: 712-246-3350	
Responsible Official: Dave Riley, Operations Mgr.	Mailing Address: 1207 W Ferguson RD Shenandoah, IA 51601
Phone Number: 712-246-3350	
Person(s) Present: 1) Dave Riley 2) 3)	
Date of This Inspection: 5-15-20	Date of Last Inspection: 3-16-17

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

IAC 567 Chapter 118.4: Appliance Storage & Handling Prior to Demanufacturing		Yes	No	NA
Storage & Handling	118.4(1) Are appliances being stored to prevent capacitors, refrigerant lines, compressors, and components containing mercury from being damaged and allowing a release into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.4(2) Are appliances being handled in a way which prevents damage, cuts, or breaks in refrigerant lines, compressors, capacitors and components containing mercury from being damaged and allowing a release into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.4(3) Are less than 1,000 appliances being stored prior to demanufacturing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.4(4) Are appliances being demanufactured in 270 days or less?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: Staff currently require incoming appliances be demanufactured. The facility has ordered new supplies and are not currently demanufacturing appliances.

IAC 567 Chapter 118.7: Fixed Facility & Mobile Operations		Yes	No	NA
Operations	118.7(1) Is demanufacturing taking place on an impervious floor (including but not limited to concrete, ceramic tile, or metal)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.7(2) Is the point of demanufacturing located 50 feet or more from a well and any water of the state?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.7(5) Is a unique marking system (minimum of nine inches square) being applied to the appliances after demanufacturing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: The facility mark will be 'SSI' in yellow paint. Although the facility is not currently demanufacturing, I observed the planned demanufacturing area.

IAC 567 Chapter 118.8: Training		Yes	No	NA
Training	118.8 Is at least one owner or employee completed a Department-approved training course?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.8 Is one trained person on site at all times when appliances are being demanufactured?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Mr. Riley attended the training course and will be on site during demanufacturing.

IAC 567 Chapter 118.6: Permit Application Requirements		Yes	No	NA
118.6(8)	Is a copy of the EPA Refrigerant Recovery or Recycling Device Acquisition Certification available onsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
608 CAA (CFR)	Is a copy of the EPA Refrigerant Reclaimer's Certification available onsite if reclamation (purification) is taking place at the facility?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IAC 567 Chapter 118.9: Refrigerant Removal Requirements		Yes	No	NA
118.9(2)	If refrigerant is removed at a location other than a permitted ADP facility, is there documentation that it was removed by a service or repair facility certified for the removal of refrigerant?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.9(3)	Is removal of refrigerant being done in an area where the temperature of the surrounding air and that of the appliance being demanufactured is 45 degrees Fahrenheit or greater?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA
118.13(2)"a" & 118.13(2)"g"	Are the number and type of refrigerant containing appliances being tracked, as well as the amount of refrigerant removed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.13(3)"a"	Are bills of lading being kept as to where refrigerants are being shipped for disposal?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: Although the facility is not currently demanufacturing, I observed the planned demanufacturing area. If new refrigerant recovery or recycling equipment is obtained, submit a new EPA Refrigerant Recovery or Recycling Device Acquisition Certification form to the DNR.

IAC 567 Chapter 118.9: Refrigerant Removal Requirements		Yes	No	NA
118.9(5)	If compressor oil is being removed from the refrigeration units, is it being stored in accordance with 567-119.4 <i>(Note: AST must be large enough and on an impermeable surface to prevent spills, meet API construction standards, have absorbent material available, have a gauge to monitor liquid level, & meet Ch. 567-135 & 136 if UST)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: The facility will obtain new totes for oil storage.

IAC 567 Chapter 118.9: Refrigerant Removal Requirements		Yes	No	NA
118.9(6)"a"	Is the ammonia gas being vented into water and is the resulting wastewater being properly disposed of?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.9(6)"e"	Is sodium chromate being properly stored in DOT-approved containers labeled with a proper EPA-approved chromium label stating "chromium" or "hazardous waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.9(6)"g"	Does the facility have an EPA ID number (RCRA)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.9(6)"h" & 118.9(6)"i"	Is asbestos insulation being removed and handled properly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA
118.13(2)"a"(2)	Are records being kept on the number of sodium chromate-containing appliances being demanufactured	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.13(2)"f"	Are records being kept on the number of sodium chromate-containing appliances shipped to another demanufacturer	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
118.13(3)"a" & 118.13(3)"b"	Are records being kept on the shipment of sodium chromate (name of the facility to which sodium chromate was shipped, the date of each shipment, the amount shipped and the name and address of the transporter)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: The facility does not plan to accept ammonia gas or sodium chromate units.

IAC 567 Chapter 118.10: Mercury-Containing Component Removal & Disposal		Yes	No	NA	
Mercury Components	118.10(1)	Are all components containing mercury being removed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.10(2)	Are mercury components being stored in containers with a proper EPA-approved label stating "Universal Waste-Mercury Containing Equipment", or Waste Mercury-Containing Equipment" in both English and the predominant language of any non-English-reading workers?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.10(3)	Is the date when the first mercury-containing component was placed in the container affixed to the container?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.10(4)	Storage of mercury is limited to one year, after which, it must be transported to an EPA-approved recycler/recovery facility. Has storage been under one year?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.10(8)	Are fluorescent tubes, lamps, bulbs, etc., being placed in a container and packaged to prevent breakage to an EPA-approved recycler?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA	
Mercury Components	118.13(2)	Are records being kept on the number of mercury-containing appliances being demanufactured, number of mercury switches removed, number of fluorescent tubes removed, as well as the number of mercury thermocouples being removed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.13(3)	Are records or bills of ladings being kept on the shipment of mercury-containing components?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: New totes are ordered, as are labels.

IAC 567 Chapter 118.11: Capacitor Removal Requirements		Yes	No	NA	
PCB Capacitors	118.11(4)"a"	Does the facility have an EPA TSCA ID number for capacitor storage (required if facility has no RCRA ID #)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.11(4)"b"	Are PCB items being stored in a manner that provides adequate protection from the elements and adequate secondary containment? <i>(Note: Storage must take place on an impervious material above the 100-year floodwater elevation)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.11(4)"c"	Is the point of demanufacturing located above the 100-year flood water elevation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.11(4)"d"	Are PCB storage containers filled to two inches of absorbent material in the bottom?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.11(4)"e"	Are PCB containers DOT-approved and labeled with a 6" by 6" yellow label stating "PCBs" as described in CFR part 761.45?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.11(4)"g"	Is the storage for non leaking small PCB capacitors that do not comply with the requirements in 118.11(4) "a" to "f" stored for less than 30 days from the date of removal and a notation places on the PCB capacitor indicating the date the item was removed from the appliance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.11(4)"f" & 118.11(4)"h"	Is the date when the first capacitor was placed in the storage container on the label? Storage of capacitors is limited to 270 days, after which they must be transported to an EPA-approved landfill or incinerator. This burial or incineration must be documented (within one year of the date on the container) and this record kept by the demanufacturer for three years from the date the PCB waste was accepted by the initial transporter.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: The facility's TSCA number is IAW00000751. Although the facility is not currently demanufacturing, I observed the planned demanufacturing area.

IAC 567 Chapter 118.13: Record Keeping & Reporting		Yes	No	NA	
PCB Capacitors	118.13(2)	Are records being kept on the number of PCB containing appliances being demanufactured, number of PCB capacitors and ballasts as well as the date the first PCB-containing item was placed in the storage drum that is in use on December 31? Number of mercury thermocouples being removed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.13(3)"a" & 118.13(3)"b"	Are records being kept on the shipment of PCB components and the documentation of destruction or receipt from a regional collection center for all PCB materials shipped?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.13(3)"c"	Are records being kept documenting inspections of the PCB storage area as required by 118.11(4)"h"?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: New containers will be used. 567 Iowa Administrative Code 118.11(4) "a" to "f" states:

- Facilities shall register with the US EPA and receive an EPA identification number.
- PCB-containing items must be stored in a manner that provides adequate protection from the elements and adequate secondary containment. This storage must take place on an impervious material above the 100-year floodwater elevation.
- The point of demanufacturing must be located above the 100-year floodwater elevation.
- All capacitors containing or suspected of containing PCBs must be placed in a DOT-approved container that shows no signs of damage. The bottom of the container must be filled to a depth of two inches with absorbent material such as sand, oil-dry, or kitty litter.
- All DOT-approved containers must be affixed with the large PCB mark (ML) as described in 40 CFR 761.45 and shown below.
- The date when the first PCB-containing item was placed in the container shall be placed on the container.

New totes are ordered, as are labels.

IAC 567 Chapter 118.12: Spills		Yes	No	NA	
Spills	118.12(1)	Are spill records being kept and has the facility reported spills that resulted in a hazardous condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	118.12(2)	Is a mercury spill kit on hand?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: A new mercury spill kit is to be obtained.

IAC 567 Chapter 118.13. Record Keeping & Reporting		Yes	No	NA	
Reporting	118.13(2)	Are records being kept on appliances demanufactured in separate categories, as well as the number of each component, amount of refrigerant, etc?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.13(3)	Are records being kept on all hazardous waste manifest and bills of lading for shipments of refrigerant, mercury switches, PCB-containing material, and kept on site for a minimum of three years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.13(3)"f"	Are copies of annual reports (containing all the record keeping requirements) that have been sent to the Department Central Office being retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: _____

IAC 567 Chapter 118.15: Shredding of Appliances		Yes	No	NA	
Processing	118.15(1)	Has fluff from shredding been tested at least quarterly for PCBs, and TCLP for heavy metals? Have these results being sent to the department within 30 days of the end of each quarter?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.15(1)	Have the results from fluff testing been submitted to the department within 30 days of the end of each quarter? And are these records being kept on site for a minimum of three years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.15(3)	Are appliances being demanufactured before shredding or processing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	118.15(3)	If appliances are being accepted from demanufacturers for recycle/disposal, have the appliances been demanufactured in accordance with Federal regulations and state laws from which the appliances were received?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: The facility does not plan to shred appliances.

Summary of Requirements:	Compliance Date:
1) Comply with operating and record keeping requirements of Appliance Demanufacturing Permit #73-ADP-01-04.	Ongoing

Summary of Reminders:
1) If new refrigerant recovery or recycling equipment is obtained, submit a new EPA Refrigerant Recovery or Recycling Device Acquisition Certification form to the DNR.

Inspector: <u>Holly Vandemark</u> Date: <u>6-29-20</u>	Reviewer: <u>Jessica Montana</u> Date: <u>6-29-20</u>
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