



February 3, 2021

CON 12-1-1
Doc # 99746

John Lyon
John Lyon Salvage
26213 570th Street
Palmer, IA 50571

SUBJECT: ADP Inspection, John Lyon Salvage, Pocahontas County
Permit #76-ADP-01-15

Dear Mr. Lyon:

Enclosed is a copy of an Appliance Demanufacturing Permit Inspection report from my visit to your facility on January 29, 2021.

If you have any questions regard these matters, please call me at 712-260-3554.

Sincerely,

Jennifer Christian, Environmental Specialist Senior
Jennifer.Christian@dnr.iowa.gov
Field Services and Compliance Bureau

JC:lw

c: - Susan Johnson, CHMM, LQB, ESD, DNR, Des Moines

enc: -Appliance Demanufacturing Permit Inspection report

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**IOWA DEPARTMENT OF NATURAL RESOURCES
APPLIANCE DEMANUFACTURING PERMIT INSPECTION**

Permit No.: #76-ADP-01-15	County: Pocahontas
Facility Name: John Lyon Salvage	Facility Address: John Lyon Salvage 26213 570 th Street Palmer, IA 50571
Phone Number:	
Responsible Official: John Lyon	Mailing Address: John Lyon Salvage 26213 570 th Street Palmer, IA 50571
Phone Number: 712-359-2311 home, 712-358-2548 cell	
Date of Permit Issued: November 18, 2020	Date of Permit Expiration: November 18, 2025
Date of Last Inspection: November 9, 2015	Date of This Inspection: January 29, 2021

Note: A violation is indicated by a "No" check.

STORAGE & HANDLING OF APPLIANCES PRIOR TO DEMANUFACTURING:

Item	Yes	No	NA
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? 118.4(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are appliances being handled in a way which prevents damage, cuts, or breaks in refrigerant lines, compressors, and components containing mercury from being damaged and allowing a release into the environment? 118.4(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are less than 1,000 appliances being stored prior to demanufacturing? 118.4(3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are appliances being stored less than 270 days without demanufacturing? 118.4(4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

During the inspection there were no appliances being stored on site. Mr. Lyon's 2020 annual report indicates that he demanufactures approximately 98 appliances per month which is equivalent to 1,180 per year. This facility has financial assurance to cover up to 80 un-demanufactured appliances.

FIXED FACILITIES & MOBILE OPERATIONS REQUIREMENTS:

Item	Yes	No	NA
1. Is demanufacturing taking place on an impervious floor (including but not limited to concrete, ceramic tile, or metal)? 118.5(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is the point of demanufacturing located 50 feet or more from a well and any water of the state? 118.5(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is a unique marking system (being a minimum of nine inches square) being applied to the appliances after demanufacturing? 118.5(3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is a copy of the Stormwater Discharge permit available if the facility is storing/processing appliances outside? 64.4(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Has the facility developed and implemented a Stormwater Pollution Prevention Plan? 64.4(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

A storm water permit is not required since all appliances are stored and demanufactured indoors on a concrete floor.

TRAINING:

Item	Yes	No	NA
1. Is at least one owner or fulltime employee completed a DNR approved training course? 118.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is one trained person on site at all times when appliances are being demanufactured? 118.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Mr. Lyon completed the DNR approved training in Des Moines on August 12, 2014.

REFRIGERANTS:

Item	Yes	No	NA
1. Is a copy of the EPA Refrigerant Recovery or Recycling Device Acquisition Certification available? 118.7(1)h	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is a copy of the EPA Refrigerant Reclaimer's Certification available if reclamation is taking place at the facility? 608 CAA (CFR)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. If refrigerant is removed at a location other than this facility, is there documentation for each appliance that certifies the refrigerant was removed properly? 118.9(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is removal of refrigerant being done in an area where the temperature of the surrounding air and that of the appliance being demanufactured are 45 degrees Fahrenheit or greater? 118.9(3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Are records being kept as to where refrigerants are being shipped to be reclaimed? (Name of the facility to which refrigerant was shipped, date of each shipment, amount shipped and name and address of the transporter?) 118.13(1)d	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Are records being kept as to where refrigerants are being shipped for disposal? (Name of the facility to which refrigerant was shipped, date of each shipment, amount shipped and name and address of the transporter?) 118.13(1)e	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Mr. Lyon demanufactures appliances with the refrigerant inside of his heated shop. He utilizes a refrigerant vacuum and complies with the refrigerant regulations as required. Records are being kept on site in an organized fashion.

COMPRESSOR OIL:

Item	Yes	No	NA
1. If compressor oil is being removed from the refrigeration units, is it being stored in accordance with 567-119.5? 118.9(5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Mr. Lyon stated that if compressor oil is drained it is collected and stored in a labeled waste oil barrel and recycled. All other compressor oil will be left in the units that are sent to the metal reclaimer.

AMMONIA GAS OPERATED REFRIGERANTS AND AIR CONDITIONERS:

Item	Yes	No	NA
1. Is the ammonia gas being vented into water and is the resulting wastewater being properly disposed of? 118.9(6)a	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Is sodium chromate being properly stored in containers labeled "chromium" or "hazardous waste"? 118.9(6)e	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Does the facility have an EPA ID number (RCRA)? 118.9(6)g	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is asbestos insulation being removed and handled properly? 118.9(6)h,i	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. 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)? 118.13(1)c	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

Mr. Lyon does not handle ammonia gas, sodium chromate, or asbestos at his facility due to the possible health hazards. He is fully capable of properly demanufacturing appliances that contain these substances but chooses not to.

MERCURY CONTAINING COMPONENTS:

Item	Yes	No	NA
1. Are mercury components being stored in containers with a label of "mercury" or "hazardous waste"? 118.10(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is the start date on the container label? Storage of mercury is limited to one year, after which, it must be transported to an EPA approved recycler/recovery facility. 118.10(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are fluorescent tubes, lamps, bulbs, etc., being placed in a container and packaged to prevent breakage to an EPA approved recycler? 118.10(5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are records being kept on the shipment of mercury components (name of the facility to which components were shipped, including fluorescent bulbs, the date of each shipment, the number of components and number of tubes shipped and the name and address of the transporter)? 118.13(1)b	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

All mercury components are being stored and labeled properly. Fluorescent tubes are also handled and stored to prevent any breakage. Records are being kept in an organized manner.

CAPACITORS:

Item	Yes	No	NA
1. Are PCB items being stored in a manner that provides adequate protection from the elements and adequate secondary containment? 118.11(5)a	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is storage taking place on impervious material? 118.11(5)a	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is the point of demanufacturing located above the 100-year flood water elevation? 118.11(5)b	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are PCB storage containers filled to two inches of absorbent material in the bottom? 118.11(5)c	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Are PCB containers labeled with a 6" by 6" yellow label stating "PCBs"? 118.11(5)d	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. If a temporary storage area for small, non-leaking PCB capacitors is used, has the date of removal been placed on each PCB item? 118.11(5)f	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Are records being kept on the shipment of PCB capacitors and ballasts (name and address of the facility that the items were shipped to, the date of the shipment, the weight of the times shipped and the name and address of the transporter)? 118.13(1)f	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. 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. 118.11(5)h	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Demanufacturing of all PCB items is done indoors with a concrete floor. All PCB component barrels are labeled and records are being kept as required.**SPILLS:**

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

Comments:

No spills have taken place at this facility. A mercury spill kit is located in the demanufacturing shop.**RECORDKEEPING AND REPORTING:**

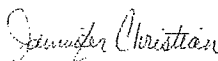
Item	Yes	No	NA
1. Are records being kept as to the facility to which demanufactured appliances were shipped (name and address, date of each shipment, the weight of the appliances, and name and address of the transporter)? 118.13(1)a	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are copies of annual reports (containing all the recordkeeping requirements) that have been sent to the DNR central office being retained for at least three years? 118.13(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

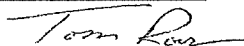
This facility is keeping very organized records and the annual reports are being submitted to Des Moines as required.**SHREDDING/PROCESSING:**

Item	Yes	No	NA
1. Has fluff from shredding been tested at least quarterly for PCBs, mercury, and lead? 118.14(1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Are appliances being demanufactured before shredding or processing? 118.14(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. If appliances are being accepted from demanufacturers for recycle/disposal, have the appliances been demanufactured in accordance with Federal regulations and laws of the State from which the appliances were received? 118.14(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

This facility does not shred or process appliances after they have been demanufactured.**RECOMMENDATIONS/REQUIREMENTS:**None.**SUMMARY**Mr. and Mrs. Lyon are operating this facility in an organized and safe manner. They are very conscientious of the proper handling and storage of hazardous materials and should be commended for their efforts. There were no violations observed during the inspection.

Inspector: Jennifer Christian _____

Date: 2/1/2021

Reviewed By: Tom Roos _____

Date: 2/1/2021