



Environmental Services Division
Land Quality Bureau
Iowa Department of Natural Resources

FILE MEMO

DATE: November 6, 2017
TO: FILE
FROM: Chad A. Stobbe, Environmental Specialist Senior
SUBJECT: Solid Waste Consolidation and Recycling

Any facility that receives solid waste from solid waste collection vehicles and deposits said waste on the ground or on a tipping floor for management and/or subsequent loading into solid waste transport vehicles, is subject to the permitting requirements of 567 IAC 106(455B,455D) for solid waste transfer stations.

A circumstance that illustrates this scenario is when waste haulers transport loads (e.g., municipal solid waste, construction and demolition debris) back to a central location to be picked through for recovery of materials. While the diversion of recyclable commodities from the solid waste stream is encouraged by the DNR, there are regulatory limitations upon where and by whom these activities can occur. The removal of recyclable materials from the municipal solid waste stream beyond that conducted by the individual waste generators, or that conducted at an SDP or facility whose primary purpose is recycling, is considered scavenging and is prohibited by Iowa law.

As a result, the practice of some waste haulers to stockpile, scavenge, and consolidate collected solid waste to maximize economies of scale for transport to a final disposal facility, outside of an SDP permit, is prohibited by Iowa law. The DNR will undertake an effort to identify where this is occurring, and will reach out to those entities to ensure they are aware of the regulatory requirements, and initiate the permitting process to operate as a solid waste transfer station or cease such waste management activity(s).

For persons interested in additional information, please visit the Transfer Stations and Citizen Convenience Center tab at <https://www.iowadnr.gov/environmental-protection/land-quality/waste-planning-programs/solid-waste>, or contact Chad A. Stobbe at (515) 201-8272-8351 or Chad.Stobbe@dnr.iowa.gov.