

**Michigan's
Resource Conservation
and Recovery Act**

Work Plan for Fiscal Year 2012



September 2011

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Resource Management Division
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1.0 INTRODUCTION

This Resource Conservation and Recovery Act of 1976, as amended (RCRA), Grant Work Plan for fiscal year (FY) 2012 (Work Plan) describes work the Michigan Department of Environmental Quality (MDEQ), Resource Management Division (RMD), is committing to accomplish during October 1, 2011, to September 30, 2012 (FY2012). This work fulfills the RMD's obligations in its role of administering the national Solid Waste Disposal Act in Michigan, as amended by the RCRA, as amended by the Hazardous and Solid Waste Amendments of 1984.

The Director of the MDEQ functions as the designated representative of the Administrator of the U.S. Environmental Protection Agency (U.S. EPA).

1.1 Organization of the Work Plan

This Work Plan is organized in five sections, as follows:

Introduction

This section consists of an overview of the Work Plan detailing its organization and the guidance used in its development.

Program Elements

This section identifies the U.S. EPA's FY2011 – 2015 national program goal associated with each of the RCRA Work Plan program elements and discusses the MDEQ goal, strategy, objectives and considerations, and work commitments established to meet the U.S. EPA goal. The narrative for each element includes a description of how the element coincides or varies from the U.S. EPA guidance, a description of state-specific initiatives, and any scheduled FY activities.

Waste Minimization

This section consists of a narrative describing how the MDEQ intends to encourage companies, communities, governmental organizations, and individuals to prevent pollution and waste before generation by implementing conservation techniques, promoting efficient re-use of materials, making production processes more sustainable, and promoting the use of safe substances.

Miscellaneous Activities

This section consists of a narrative describing other activities that the MDEQ intends to perform in support of the overall program goals.

1.2 Guidance Documents Used to Develop Work Plan

The U.S. EPA guidance documents used to develop this Work Plan are:

- *F 2011 – 2015 EPA Strategic Plan, Achieving Our Vision, September 10, 2010, U.S. Environmental Protection Agency*
- *FY2012 National Program Manager's Guidance, Final April 29, 2011, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency*

1.3 FY2012 RCRA Grant Work Year Distribution

The following table shows the distribution of full-time equivalent (FTE) work years among the various core elements of the Michigan Hazardous Waste Program and objectives of the Work Plan. There are FTEs included in this table that are not described in the Work Plan, but the activities conducted by these FTEs are essential to Michigan's Hazardous Waste Program (transporter registrations; user charge fee collections; Freedom of Information Act, 1976 PA 442, as amended, requests; etc.) This table represents the **total** number of FTEs it takes to run the core Hazardous Waste Program.

RCRA Work Plan Program Element	Whole Work Years
Authorization	1
Compliance Monitoring and Enforcement Inspections and/or Record Reviews Manifest Processing Waste Classification Biennial Report Reviews Laboratory Support Monitoring Performance Reviews and Inspections	24
Environmental Justice These work efforts are incorporated as part of the Administrative Controls and Corrective Action Program Elements	
Administrative Controls Operating Licenses/Postclosure Operating Licenses Closures/Postclosure Plans Orders/Legally Enforceable Agreements Public Participation	6
Corrective Action Planning and Priority Setting (GPRA and Non-GPRA) Public Participation Technical Reviews Oversight Enforcement Support Corrective Action Tracking	8
Financial Assurance	1
Management and Reporting Administrative Activities Information Management and Reporting Training Information Requests Laboratory Coordination	13
RCRA Total FTE Work Years	53*

*Note: The column "Work Years" was rounded to the closest whole number to eliminate the fractional time. The total includes 6 Senior Environmental Employee (SEE) Program FTEs and 3 vacancies that the MDEQ anticipates filling in FY2012.

2.0 PROGRAM ELEMENTS

In FY2012, the MDEQ will use seven elements in an effective state program to manage hazardous waste through a delegation of RCRA authorities.

The RCRA Work Plan program elements are as follows:

- State Authorization
- Environmental Justice
- Compliance and Enforcement
- Administrative Controls (operating licenses, postclosure operating licenses, clean-closure, postclosure plans, orders/legally enforceable agreements)
- Corrective Action
- Financial Assurance
- Management and Reporting

This section is organized into the following components:

- The U.S. EPA FY 2011 – 2015 Strategic Plan Goal and Objective associated with the program element
- The MDEQ goal for the program element
- The MDEQ program strategy, objectives and considerations, and any scheduled activities for the program element

In order for the Work Plan to be useful to the staff performing the work, the scheduled activities are grouped by RMD office and section, where appropriate, allowing staff to view FY2012 program commitments for their office.

2.1 State Authorization

U.S. EPA FY 2011 – 2015 Strategic Plan, Goal 3: Cleaning Up Communities and Advancing Sustainable Development

Objective 3.2: *Preserve Land.* Conserve resources and prevent land contamination by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products.

Objective 3.3: *Restore Land.* Prepare for and respond to accidental or intentional releases of contaminants and clean up and restore polluted sites.

MDEQ Goal

The MDEQ is committed to obtaining and maintaining the legal authorities needed to administer a quality state program that is consistent with RCRA regulations and to identifying opportunities to streamline the process. The MDEQ has 1 FTE devoted to State Authorization.

Strategy

Under federal environmental laws, the U.S. EPA and the states share responsibility for protecting human health and the environment. The MDEQ intends to work with the U.S. EPA to ensure that Michigan retains authorization to administer the Michigan

Hazardous Waste Program and to ensure that development and implementation of rules are consistent with the RCRA requirements.

Objective and Considerations

The MDEQ intends to initiate work on administrative rules associated with RCRA Clusters 18 to 20 and portions of RCRA Cluster 21. This rules package will likely include state-initiated revisions as well, depending on some legislative efforts currently underway at the state level.

The following factors will be a consideration as the MDEQ strives to meet their objective:

- The status of authorization activities indicated in the Work Plan.
- The effectiveness of communication with the U.S. EPA on authorization activities, including timeliness and sufficiency of responses to U.S. EPA comments.

Scheduled Activities

Authorization Schedule and Review Responsibilities

Event	Party	Time Frame
Provide the U.S. EPA with a copy of the proposed rules package	MDEQ	March 15, 2012
Provide the state with written comments on the proposed rules package	U.S. EPA	Within 60 days of receipt of proposed rules package
Provide the U.S. EPA with proposed rules package for public comment and public hearing public notice	MDEQ	No later than the time notice is provided to the public
Provide the U.S. EPA with a copy of the effective rules	MDEQ	Within 30 days of effective date of rules
Provide the U.S. EPA with a draft express authorization revision application (EARA)	MDEQ	Within 30 days of effective date of rules
Provide the state with written comments on the draft EARA	U.S. EPA	Within 60 days of receipt of draft express EARA
Provide the U.S. EPA with written response to comments on draft EARA and submit final EARA	MDEQ	Within 60 days of receipt of comments
Provide the state with written comments on final EARA	U.S. EPA	Within 60 days of receipt of final EARA
Provide the U.S. EPA with a written response to comments on final EARA	MDEQ	Within 60 days of receipt of comments

Schedule Adjustments

If a grant commitment will not be met, the MDEQ will take the following actions prior to that commitment date, except as noted otherwise:

- For delays of 30 days or less, provide verbal notification to the U.S. EPA regulatory specialist.
- For delays of more than 30 days, provide a written submittal to the U.S. EPA regulatory specialist that explains the reasons for the delay and includes a revised authorization activities schedule.

If the U.S. EPA requires time beyond the time frames outlined above to review submittals and the resulting delay impacts future grant commitments, the U.S. EPA will take the following actions:

- For delays that will impact commitments by 30 days or less, provide verbal notification to the MDEQ.
- For delays that will impact commitments by more than 30 days, provide a written submittal to the MDEQ that explains the reasons for the delay and includes a revised authorization activities schedule.

In such cases, the MDEQ will not be required to submit formal authorization activities or schedule extension requests.

Report on Authorized State Program Revisions (RASPR)

The MDEQ will submit a RASPR by January 15, 2012. The RASPR will include: the Federal Register (FR) title, date, and citation; the federal statutory basis for the revision; the associated RCRA cluster number; the associated RCRA revision checklist number; the date by which program revisions are required; the date appearing on the rules package; the effective date of the rules; the amendment number associated with the rules package in relation to the base program; the authorization FR citation and date; the date of authorization; a comments field; the codification FR citation and date; and the codification date.

2.2 Environmental Justice

U.S. EPA FY 2011 – 2015 Strategic Plan, Goal 3: Cleaning Up Communities and Advancing Sustainable Development

Objective 3.1: *Promote Sustainable and Livable Communities.* Promote sustainable, resilient, and livable communities by working with local, state, tribal, and federal partners to promote smart growth, emergency preparedness and recovery planning, Brownfield redevelopment, and the equitable distribution of environmental benefits.

Expanding the Conversation on Environmentalism and Working for Environmental Justice (EJ) is one of Administrator Lisa P. Jackson's top priorities for the U.S. EPA. Plan EJ 2014, named in recognition of the 20th anniversary of the issuance of Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, is the U.S. EPA overarching strategy for carrying out the Administrator's priority. Under Plan EJ 2014, the U.S. EPA is developing an implementation plan relating to 'Considering Environmental Justice and Permitting.' The U.S. EPA, Office of Resource Conservation and Recovery (ORCR), intends to use these recommendations to establish a mechanism for permitting authorities to meaningfully address EJ in their decisions. As emphasized in the U.S. EPA FY2011-2015 Strategic Plan, all U.S. EPA programs are to incorporate EJ into each

stage of the agency's regulation development process and in implementation of environmental regulations. In addition, under the federal Title VI of the federal Civil Right Act of 1964, recipients of federal funds are prohibited from discriminating on the basis of race, color, or national origin. Since the MDEQ is a recipient of federal funds for administration of its Hazardous Waste Program, the MDEQ needs to incorporate EJ into their RCRA program.

MDEQ Goal

The MDEQ is committed to incorporating EJ into each stage of the RCRA Hazardous Waste Program.

Strategy

The MDEQ intends to incorporate EJ into each stage of the RCRA Hazardous Waste Program by achieving the objectives and work items discussed below.

Objective and Considerations

On November 21, 2007, the Governor of Michigan issued Executive Directive No. 2007-23 requiring the MDEQ to develop and implement a state EJ plan to promote EJ in Michigan. The directive required the MDEQ to establish an EJ working group to assist in the development of the state EJ Plan. The EJ working group convened their first meeting in July 2008 and, on December 17, 2010, the director of the Department of Natural Resources and Environment ([DNRE] now the MDEQ) finalized a plan, *Environmental Justice Plan for the State of Michigan and the Department of Natural Resources and Environment (EJ Plan)*. Upon the disbanding of the DNRE and the re-creation of the MDEQ, the EJ Plan was carried forward into the MDEQ and all aspects of the EJ Plan are to be incorporated into all MDEQ programs. The MDEQ intends to incorporate EJ into all phases of the RCRA regulatory process.

Scheduled Activities

The MDEQ intends to continue to encourage staff to become trained in EJ as new state and federal guidance is developed so that EJ principles are incorporated into all aspects of the RCRA decision-making processes. In FY2011, staff completed the following EJ activities. Key staff took the EJ online training course for permit-writers offered through the U.S. EPA's National Enforcement Training Institute (NETI). In addition, staff contacted the U.S. EPA, Region 5, and acquired the digital files that were used by the U.S. EPA, Office of Enforcement and Compliance Assurance (OECA), to map the areas in Michigan with potentially disproportionately high and adverse environmental and public health burdens. Staff spatially queried the data provided by the U.S. EPA, Region 5, to identify the RCRA facilities in Michigan that were within the highest priority EJ areas of concern and saved the information to a separate database. The database will serve as a tool to ensure that EJ is addressed when project work is done in the areas of highest concern. For FY2012, staff is committed to using available resources to ensure that EJ is addressed where applicable during all phases of RCRA activities.

2.3 Compliance and Enforcement

Comment [VLH1]: Awaiting input from Fred Sellers/Lonnie Lee

FY 2011 – 2015 Strategic Plan, Goal 3: Cleaning Up Communities and Advancing Sustainable Development

Objective 3.2: *Preserve Land.* Conserve resources and prevent land contamination by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products.

FY 2011 – 2015 Strategic Plan, Goal 5: Enforcing Environmental Laws

Objective 5.1: *Enforce Environmental Laws.* Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide.

MDEQ Goal

The MDEQ's goal is to ensure that hazardous wastes are managed in a manner that protects human health and the environment by attaining and maintaining a high level of compliance within the regulated community. This includes ensuring the safe management of hazardous and nonhazardous waste and the cleanup of hazardous and nonhazardous releases. The MDEQ intends to provide compliance assistance to newly-regulated facilities, facilities subject to new regulations, and other small businesses with compliance problems. The MDEQ will also encourage the regulated community to voluntarily discover, disclose, and correct violations before they are identified by regulatory agencies.

Strategy

Consistent with Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), the OECA, and MDEQ guidelines, the targeted inspection frequencies will be as follows:

Type of Facility/Level of Inspection	Targeted Frequency
Federal facilities	Annually
Active operating treatment, storage, and disposal (TSD) facilities	Annually at a minimum
Closed TSD facilities	Every other year
20 percent of the large quantity generators (LQGs)	Annually
An appropriate level of small quantity generators (SQGs)	Annually
An appropriate level of transporter evaluations	Annually

For FY2012, field compliance activities will focus on the following:

- The MDEQ inspection schedule for active TSDs usually meets or exceeds the OECA core program. The MDEQ will continue to conduct inspections at 20 percent of our LQGs and to inspect and conduct necessary follow-up at all categories of generators as resources allow.
- Improve our compliance and enforcement program through continued attention to inspection quality, identification of violations, and tracking responses to violations. That, coupled with a broader inspection emphasis, will allow staff to provide

compliance assistance, including pollution prevention and waste information, directly to the regulated community.

- Continue to review facility status in comparison to manifested waste data and follow up as appropriate.
- Continue to review manifest discrepancies that are identified.
- Continue to develop and implement a plan to address facilities that have not paid hazardous waste user charges.
- Continue to implement a program to collect manifest data from nonreporting sites.
- Continue efforts to identify hazardous waste transporters without a registration and permit and/or financial responsibility (i.e., fleet liability coverage for accidental occurrences arising from hazardous materials transportation activities) and follow up as appropriate.

Objective and Considerations

The MDEQ intends to put forth efforts to prevent environmental harm by encouraging and helping the regulated community meet legal obligations through identification and correction of violations in order to foster program integrity and to deter future violations.

The following factors will be a consideration as the MDEQ strives to meet their objective:

- The effect of the MDEQ's planning and priority-setting activities .
- The effect of the MDEQ's compliance monitoring activities as measured by the status of the inspection/records review; the tools (e.g., inspection checklists) and techniques (e.g., sampling) used as part of the inspection; the accuracy and completeness of inspections and follow-up; U.S. EPA communications; and compliance assistance.
- The effect of the MDEQ's enforcement activities as indicated by the nature, timeliness, and appropriateness of enforcement actions; the degree of support afforded other enforcement officials; the nature of follow up to enforcement actions; and the effectiveness of enforcement communications with the U.S. EPA.

District and Field Offices Scheduled Activities

Inspection Focus

The MDEQ will continue to focus inspections on:

- All categories of facilities. Experience demonstrates that the frequency and magnitude of violations increases substantially if inspections are not completed regularly. The MDEQ inspects LQGs once every five years and transporters on a three-year frequency.
- Facilities that have an identification number. Staff has found that smaller generators have compliance issues that need to be resolved, and communications with these facilities provide meaningful opportunities to promote waste minimization. The MDEQ inspections afford effective opportunities to assist facilities to gain and maintain compliance status, to identify improved disposal options, and to consider waste minimization.

- The frequencies and objectives discussed herein. Current staffing levels and funding will impact the MDEQ's ability to maximize inspections, and decisions about which facilities to inspect will be based on target inspections, complaints, risk criteria, and management factors as outlined in the RMD and each respective district's neutral criteria plan.

The following factors will be a consideration when selecting facilities for inspections:

- Site status in comparison to manifested waste data;
- Sites with unpaid hazardous waste user charges;
- Necessity to collect manifest data from non-reporting sites;
- Necessity to investigate manifest discrepancies;
- Transporters not properly registered and/or permitted;
- Complaints.

The MDEQ will perform compliance evaluation inspections (CEIs) on TSD facilities that can accept waste under the Comprehensive Environmental Response, Compensation, and Liability Act, Title 42 of the United States Code, Section 9601 *et seq.* (CERCLA), at least twice per year along with the required annual comprehensive groundwater monitoring evaluation/operation and monitoring inspection (GME/O&Ms). Additionally, the MDEQ will perform CEIs on any federal TSD annually. Other TSD CEIs will be assessed individually to determine those for which inspections will provide the greatest environmental benefit. Certain TSD facilities, such as closed or inactive facilities awaiting postclosure licenses, may not be inspected annually.

Compliance Assistance and Compliance Incentives

The MDEQ will continue to provide compliance assistance and compliance incentives through several means, to include:

- Assistance, during inspections and through noninspection inquiries, to help the regulated community achieve compliance (i.e., providing written material on common compliance requirements such as secondary containment, manifest tracking, and universal waste).
- Presentations to trade associations and interest groups. The MDEQ, Office of Environmental Assistance (OEA), undertakes complex, detailed projects of compliance assistance/incentives. See also Section 3.0, Waste Minimization, for a discussion of other OEA compliance assistance and compliance incentive programs.
- The MDEQ Web site provides ready access to guidance documents and compliance information. Staff regularly educates members of the regulated community in the use of the MDEQ Web site and informational systems.
- The MDEQ continues to maintain and improve a browser-independent Web site on the Internet that allows the public to view compliance information regarding sites with hazardous waste activity manifest detail and site information.

Program Improvements

The MDEQ will continue to review and, where identified, improve the overall management and operation of the compliance and enforcement program to assist with meeting overall program goals. Staff continues to ensure data quality captured in the RMD database, Waste Data System (WDS). Consistency, timeliness of inspections, and inspection follow up continue to be emphasized. The use of template letters helps to achieve program consistency, and the template letters continue to be refined for improved effectiveness and efficiencies. One recent change includes a change in the database that provides for a preprinted Hazardous Waste Inspection Cover Sheet that includes previous violations. This allows for accurate identification of potential significant noncompliers (SNCs) and changes in processes and waste generation. Modifications to the Hazardous Waste Inspection Cover Sheet now include facility size, number of employees, hours of operation and a diagram of the facility. This was done to address concerns raised by the U.S. EPA regarding inspection completeness and allows for greater efficiency of limited staff resources. In addition staff continually review and receive written guidance to better assist in identification of SNCs. Training has also been provided to staff to emphasize the need to effectively and efficiently gather inspection-related documentation.

MDEQ District and Field Office Work Schedule:

For FY2012, the MDEQ District and Field Offices have an approximate work level of 11.5 FTEs devoted to field inspection activities. (Note: This number of FTEs does not include vacancies that may remain unfilled during the FY.) The work performed by these staff includes:

- inspections at TSD facilities
- inspections at fully regulated generators
- inspections at SQGs
- inspections at Conditionally Exempt Small Quantity Generators (CESQGs)
- inspections at other notifiers
- inspections at transporters
- follow-up inspections
- administrative and civil enforcement activities and support
- complaints
- compliance assistance presentations and development work
- construction inspections
- closure/postclosure in progress inspections
- corrective action in progress inspections
- closure inspections
- sampling inspections
- marketer/oil burner inspections
- waste characterization reviews
- joint U.S. EPA/MDEQ inspections
- record reviews
- waste minimization presentations
- community-based initiative participation

- criminal case development work/assistance (including criminal case development, prosecutor acceptance of criminal case, criminal complaint and summons issued, and pretrial and trial stages)
- program improvement activities
- O&M inspections
- inspections of used oil transporters, used oil transfer facilities, and used oil processor/re-refiners
- administrative case development/case preparation

Inspection Schedule

In FY2012, District and Field Office staff will perform the following activities. These activities represent 65 percent of the work effort that they perform.

CEI Category	No. of Inspections
TSD Facility	66
LQGs	120
Transporter	33 percent
SQGs	Greater than 300

TSD inspections will be conducted within the universe of 47 active TSD facilities (18 of which are actively accepting waste). A list of specific facilities and planned inspection quarters is provided below for information only and is not considered a commitment of the Work Plan. The proposed inspection activity is predicated on full staffing. FTE positions not filled will affect the ability to complete the projected inspections.

ACTIVE TSDs COMPLIANCE EVALUATION INSPECTIONS			
Site ID	Site Name for TSDF	Quarter(s)*	District
MID985568021	Chemical Analytics Inc	2 nd & 4 th	SEMI
MID091605972	Detrex Corp - Site A	2 nd & 4 th	SEMI
MID074259565	Dynecol Inc	1 st , 2 nd , 3 rd , & 4 th	SEMI
MIR000016055	Environmental Disposal Systems Inc	1 st , 2 nd , 3 rd , & 4 th	SEMI
MID980991566	EQ Detroit Inc	1 st , 2 nd , 3 rd , & 4 th	SEMI
MID060975844	EQ Resource Recovery Inc	2 nd & 4 th	SEMI
MID005338801	Gage Products Co	1 st & 3 rd	SEMI
MID050615996	General Motors LLC (Warren Technical Center)	2 nd & 4 th	SEMI
MID000724831	Michigan Disposal Waste Treatment	1 st , 2 nd , 3 rd , & 4 th	SEMI
MID980615298	Petro-Chem Processing Group of Nortru	1 st , 2 nd , 3 rd , & 4 th	SEMI
MID048090633	Wayne Disposal Inc - Site #2	1 st , 2 nd , 3 rd , & 4 th	SEMI
MID053343976	Michigan State University	1 st , 2 nd , & 3 rd	Lansing
MID980617435	Dow Chemical Co - Salzburg Landfill	1 st & 3 rd	Saginaw Bay
MID000724724	Dow Chemical Co	1 st & 3 rd	Saginaw Bay
MID000809632	Dow Corning Corp	2 nd	Saginaw Bay
MID000820381	Pharmacia & UpJohn Co LLC	3 rd	Kalamazoo
MID092947928	Drug & Laboratory Disposal Inc	2 nd & 4 th	Kalamazoo
MIR000001834	University of Michigan - Beck Road	1 st & 3 rd	Jackson

CLOSED TSDs COMPLIANCE EVALUATION INSPECTIONS			
MID057002602	Advanced Resource Recovery LLC	3 rd	SEMI
MID006523385	Backer Landscaping Inc	1 st	SEMI
MID061862926	Intertape Polymer (Central Products Co.)	1 st	SEMI
MID005356910	General Motors Liquidation Co (Former GMNA Property Mgmt Fiero Facility)	2 nd	SEMI
MID005378161	Michigan Chrome & Chemical Co	FY2013 - 1 st	SEMI
MID009708678	Solutia Inc	FY2013 - 1 st	SEMI
MID000810408	Woodland Meadows Landfill North	4 th	SEMI
MID980825632	DNR Roscommon Toxaphene Pit	4 th	Cadillac
MID005356712	Motors Liquidation Co (Former GMPT Flint North Site)	2 nd	Lansing
MID005356860	Motors Liquidation Co (Former Realm/Coldwater Road Landfill)	FY2013 - 3 rd	Lansing
MID005358130	MRP Properties Co LLC (Total)	1 st & 3 rd	Lansing
MID005356647	DPH DAS LLC (Delphi)	FY2013 - 2 nd	Lansing
MID082771700	Granger Land Development Co	3 rd	Lansing
MID980506265	Grand Blanc Landfill	FY2013 - 3 rd	Lansing
MID980568620	DPH DAS LLC (Delphi)	FY2013 - 2 nd	Lansing
MID041793340	General Motors Corp (Saginaw Metal Castings)	3 rd	Saginaw Bay
MID005513262	Metavation LLC	2 nd	Saginaw Bay
MI0571924760	US Dept/Defense (KI Sawyer)	3 rd	UP
MID005057005	Ford Motor Co (Monroe Plant)	FY2013 - 3 rd	Jackson
MID009305665	Automotive Components Holdings LLC	1 st	Jackson
MID006026793	Access Business Group LLC	4 th	Gr Rapids
MID017079625	GM Components Holdings LLC	1 st	Gr Rapids
MID006025217	Carlton Creek Ironworks LLC	3 rd	Gr Rapids
MID006014666	Lacks Industries Inc - Cascade	2 nd	Gr Rapids
MID080359433	Lacks Industries Inc - Saranac	2 nd	Gr Rapids
MID980995534	Michigan Environmental Recovery Inc	FY2013 - 3 rd	Gr Rapids
MID006013643	Warner Lambert Co LLC	FY2013 - 4 th	Gr Rapids
MID980499735	Mahle Engine Components USA Inc	FY2013-1 st	Gr Rapids
MID006014906	Occidental Chemical Corp	FY2013 - 2 nd	Gr Rapids

*Note: FY2013 inspections are listed in the schedule for tracking, projection, and planning purposes only and are not FY2012 commitments. The table reflects a complete list of the facilities in the TSD universe, and it identifies the inspections to be completed in FY2012 and proposed for FY2013.

MDEQ Hazardous Waste Section Scheduled Activites

Corrective Action Monitoring and Maintenance (CAMM) Efforts

Recognizing the continued GPRA progress on corrective actions “completed with controls,” the MDEQ has identified to the U.S. EPA a very important need for long-term CAMM inspections. These inspections are to ensure that the approved institutional and engineering controls are being properly operated, maintained, and transferred (if property transactions occur) and are indeed effective. The FY2012 CAMM

commitments are included in the Corrective Action FY2012 Hazardous Waste Section Work Schedule.

Postclosure Final Cover Inspections

To ensure that TSD owners/operators comply with postclosure requirements to maintain the final cover on closed/capped units pursuant to the approved design specifications, Hazardous Waste Section (HWS) staff will conduct Postclosure Cap inspections as shown in the Compliance and Enforcement FY2012 Hazardous Waste Section Work Schedule, which follows this page.

GME/O&M) Schedule

To ensure that land disposal facility owners/operators comply with applicable groundwater monitoring requirements, HWS staff will conduct the GME/O&M inspections as shown in the Compliance and Enforcement FY2012 Hazardous Waste Section Work Schedule, which follows this page.

**COMPLIANCE AND ENFORCEMENT
FY2012 HAZARDOUS WASTE SECTION WORK SCHEDULE**

#	MET	FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	PROJECT MANAGER
CAMM Inspection in Q1						
1		Reichhold Inc - Ferndale	Reichhold Inc	Ferndale	MID 020 087 128	Dave/Clay
CAMM Inspection in Q3						
2		Ford Motor Co Allen Park Clay Mine LF	Ford Motor Co	Allen Park	MID 980 568 711	Joe/Ginny
CAMM Inspection in Q4						
3		KHI Inc	KHI Inc	Holland	MID 006 020 895	Dave/John
Enforcement Technical Support						
4		General Motors LLC - Technical Center	General Motors LLC	Warren	MID 050 616 996	Kimberly
Groundwater O&M Inspection in Q1						
5		Dow Chemical Co - Salzburg Landfill	Dow Chemical Co	Midland	MID 980 617 435	Joe/Ginny
6		Perma Fix of Michigan Inc	Perma Fix of Michigan Inc	Brownstown	MID 096 963 194	Dave/Clay
Groundwater O&M Inspection in Q2						
7		Granger Grand River LF	Granger Land Development	Grand Ledge	MID 082 771 700	Dale/Clay
8		Lacks Industries Saranac	Lacks Industries Inc	Saranac	MID 080 359 433	Dale/Clay
Groundwater O&M Inspection in Q3						
9		Dow Chemical Co Main PI - Regional Aquifer Monitoring Prog	Dow Chemical Co	Midland	MID 000 724 724	Al/Ginny
Groundwater O&M Inspection in Q4						
10		Chrysler Introl	Old Carco LLC	Dexter	MID 990 760 100	Joe/John
11		Wayne Disposal Inc	Wayne Disposal Inc	Belleville	MID 048 090 633	Joe/Ginny
Postclosure Cap Inspection in Q1						
12		Reichhold Inc - Ferndale	Reichhold Inc	Ferndale	MID 020 087 128	Dave/Clay
13		Michigan Seamless Tube - Surface Impoundment	Michigan Seamless Tube LLC	South Lyon	MID 082 767 591	Joe/John
Postclosure Cap Inspection in Q3						
14		Ford Motor Co Allen Park Clay Mine LF	Ford Motor Co	Allen Park	MID 980 568 711	Joe/Ginny
15		Wayne Disposal Inc - MC VII and IX	Wayne Disposal Inc	Belleville	MID 048 090 633	Joe/Ginny
16		Ford Motor Co - Monroe Plant	Ford Motor Co	Monroe	MID 005 057 005	Joe/Art
Post Closure Cap Inspection in Q4						
17		Dow Chemical Co - Poseyville Road	The Dow Chemical Co	Midland	MID 000 724 724	Al/Ginny
18		US Air Force K I Sawyer - Explosives Cell	US Dept/Defense	Gwinn	MIO 571 924 760	Dale/Clay
19		Lacks Industries Inc - Saranac	Lacks Industries Inc	Saranac	MID 080 359 433	Dale/Clay

MDEQ Law Enforcement Division, Environmental Investigation Section (LED-EIS) Activities

The LED-EIS will continue to provide law enforcement services for MDEQ hazardous waste regulatory programs. These services include transport vehicle patrols both in-state and at points of entry. In addition, the LED-EIS will provide investigative services to detect criminal violations of hazardous waste law and prepare cases for prosecution by local, state, or federal officials.

The LED-EIS will continue to participate with the U.S. EPA, Criminal Investigation Division, and U.S. Attorneys.

The LED-EIS activities are grouped into the following three categories:

- **TSD Facilities:** LED-EIS officers will investigate violations at TSD facilities in conjunction with RMD staff pursuant to a complaint or the findings of an RMD staff inspection. In addition, the LED-EIS may institute random patrols resulting in the inspection of waste hauling vehicles at TSD facilities and inspection of TSD records. Where warranted, the LED-EIS will compile cases for referral to a prosecuting official.
- **Hazardous Waste Transporters:** The LED-EIS will continue its program of inspecting waste transporters for compliance with hazardous waste transport and disposal regulations. Waste hauling vehicle inspections will occur either as random events or as scheduled efforts carried out at major points of truck concentrations (e.g., Michigan points of entry and major highway weigh stations). As an area of concentration, the LED-EIS and the RMD will work together to determine whether liquid industrial waste transporters are transporting properly characterized waste, i.e., not carrying hazardous wastes improperly characterized as liquid industrial waste.
- **Generators:** The LED-EIS will investigate generator/facility violations of suspected hazardous waste mismanagement or releases in conjunction with RMD staff pursuant to a complaint or the findings of an RMD staff inspection. Noncompliant generators may also be detected by LED-EIS officers during transporter and TSD audits. Where warranted, the LED will compile cases for referral to a prosecuting official. LED-EIS will investigate complaints of illegal disposals and abandonments.

2.4 Administrative Controls

U.S. EPA FY2011 – 2015 Strategic Plan, Goal 3: Cleaning Up Communities and Advancing Sustainable Development

Objective 3.2: Preserve Land. Conserve resources and prevent land contamination by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products.

GPRA 2020 Corrective Action Universe

Currently, there are 119 Michigan facilities in the GPRA 2020 Corrective Action (CA) Universe, and the MDEQ is the lead regulatory agency for CA at 90 of the facilities. Of these Michigan-lead facilities, it is important to note that Lear Corporation

(MID082859315) and Modineer (MIK367427523) are in actuality the same facility. In 2004, the MDEQ received an application for a new site identification number for the Modineer facility, and a new number was issued. It was later learned that Modineer was the same location as the Lear Corporation. The two facilities were merged into one, using the Modineer identification number, in our Waste Data System (WDS). Since the merge, any new activities for Lear Corporation have been tracked in WDS under the Modineer identification number. This same merge has not been done in the federal database (RCRAInfo) and, as such, the U.S. EPA still considers the facilities to be separate for GPR A reporting. It is also important to note that the MDEQ referred two state-lead facilities, (Lake States Wood Preserving [MID990687964] and Detroit Steel Company Trenton Plant [MID017422304]) to CERCLA in 2011. The MDEQ has received confirmation that the sites have been accepted by that program. Although Lear Corporation has essentially been removed from the RCRA universe and Lake States Wood Preserving and Detroit Steel are now being addressed through a federal counterpart, these facilities will remain on Michigan's GPR A 2020 CA Baseline list until such time as the U.S. EPA opens up a window for changes to the list. Based upon discussions with the U.S. EPA, Region 5, there may be an opportunity in the next couple of years for states to propose changes to the baseline list. Until that time, Michigan's CA progress is premised upon 119 facilities.

GPR A 2020 Permit Baseline

The cleanup of some of the facilities in the GPR A 2020 CA Universe is governed through enforceable administrative controls, i.e., issuance/renewal of an operating license/postclosure operating license, certification of clean closure, approval of a postclosure plan equivalent to a postclosure operating license, or entry into a consent order/legally enforceable agreement. Of the 119 Michigan facilities in the GPR A 2020 CA Universe, the U.S. EPA has identified 60 facilities that are subject to enforceable administrative controls. This subset of the GPR A 2020 CA Universe is referred to as the GPR A 2020 Permit Baseline.

MDEQ Goal

For the 60 facilities in Michigan's GPR A 2020 Permit Baseline, the U.S. EPA has established the following goal for state performance:

Page 61 of the *FY2012 National Program Manager's Guidance, Final April 2011, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency*, states:

"Regions should work with the states toward achieving the FY 2015 national strategic target of preventing releases at 500 RCRA hazardous waste management facilities by implementing initial approved controls or updated approved controls. This includes removing facilities from interim status by issuing an initial RCRA permit, and updating controls at additional facilities, for a total of 500 facilities between FY 2011 and FY 2015. "

Page 50 of the U.S. EPA FY2011-2015 Strategic Plan establishes the following strategic measure:

“By 2015, prevent releases at 500 hazardous waste management facilities with initial approved controls or updated controls resulting in the protection of an estimated three million people living within a mile of all facilities with controls. (Baseline: At the end of FY2009, it was estimated that 789 facilities would require these controls out of the universe of 2,468 facilities with about 10,000 process units. The goal of 500 represents 63 percent of the facilities needing controls.)”

Strategy

The MDEQ intends to process new or expansion applications, to issue/renew operating licenses and postclosure operating licenses, to clean close regulated units, to approve postclosure plans, to process major license modifications, or to enter into CA consent orders/legally enforceable agreements at a pace that will ensure that these administrative controls are maintained for at least 75 percent of the 60 facilities in the GPRA 2020 Permit Baseline. This exceeds the national goal established by the U.S. EPA to achieve 63 percent controls in place by FY2015. The MDEQ anticipates that they will be able to achieve this higher milestone by the end of FY2012.

GPRA 2020 Permit Baseline by Facility Table

The GPRA 2020 Permit Baseline by Facility table shows the actual and projected accomplishment dates for each MDEQ-lead facility, alphabetically. An explanation of the abbreviated column headings is shown at the top of each page of the table. The table follows this page.

GPRA 2020 Permit Baseline By Facility

For the GPRA 2020 Permit Baseline, shows the actual/projected accomplishment dates for each facility alphabetically. National Goals: 63% of facilities have approved controls in place by 2015

	Site Specific Name	Facility Legal Name	City	MID #	Exp	Who	TSD Op License Issued	TSD Op License Major Mod.	TSD Op License Renewal Submitted	TSD Op License Projected	TSD Exp App Submitted	PC Op License Issued	PC Op License Renewal Submitted	PC Op License Projected	PCP Approved	Order/LEA Issued	Voluntary Corr. Action Agreement	CC Accepted
1	Access Business Group LLC	Access Business Group LLC	Ada	MID006026793		PQ												7/23/2010
2	Alma Facility	MRP Properties Co LLC	Alma	MID005358130		PQ										1/30/2003		
3	Anchor Danly Components	Anchor Lamina America Inc.	Bellaire	MID006017966														7/21/1998
4	Automotive Components Holdings LLC Saline	Automotive Components Holdings LLC	Saline	MID009305665		PQ									5/18/2007			
5	Bayer CropScience LP	Bayer CropScience LP	Muskegon	MID080358351		RC										11/20/2003		12/30/2003
6	Beck Road Facility	University of Michigan	Belleville	MIR000001834		RB	3/2/2010			3/2/2020								
7	Rothbury Steel	Rothbury Steel	Rothbury	MID006025217		PQ									7/16/2009			
8	Chemical Analytics Inc	Chemical Analytics Inc	Romulus	MID985568021		RC	9/30/2002			9/30/2012								
9	Chrysler Introl Division	Old Carco LLC	Dexter	MID990760100		JR									9/30/2003			
10	Cyanokem-Detroit	Le Petomane VII Custodial Trust	Detroit	MID098011992		DD												12/19/2002
11	Cytec Industries (Past TSD)	Cytec Industries	Kalamazoo	MID005360680		DD												5/11/1999
12	Detrex Corp Site A	Detrex Corp	Detroit	MID091605972		DD	1/31/2001		8/10/2010	9/30/2013								
13	Detroit Steel Company-Trenton Plant	Detroit Steel Company	Trenton	MID017422304		RC										12/17/1999		
14	Dow Chemical Company-Salzburg Landfill	The Dow Chemical Co	Midland	MID980617435		CH	3/18/2009	11/3/2010		3/18/2019					12/23/1986			
15	Dow Chemical Co Main Plant & Incinerator Complex	The Dow Chemical Co	Midland	MID000724724		CH	6/12/2003	11/3/2010		6/12/2013								
16	Dow Corning Midland Plant	Dow Corning Corp.	Midland	MID000809632		KT	9/29/2000		3/25/2010	9/30/2013								
17	DPH DAS LLC	DPH DAS LLC	Flint	MID005356647											4/26/2005			

GPRA 2020 Permit Baseline By Facility

For the GPRA 2020 Permit Baseline, shows the actual/projected accomplishment dates for each facility alphabetically. National Goals: 63% of facilities have approved controls in place by 2015

	Site Specific Name	Facility Legal Name	City	MID #	Exp	Who	TSD Op License Issued	TSD Op License Major Mod.	TSD Op License Renewal Submitted	TSD Op License Projected	TSD Exp App Submitted	PC Op License Issued	PC Op License Renewal Submitted	PC Op License Projected	PCP Approved	Order/LEA Issued	Voluntary Corr. Action Agreement	CC Accepted	
52	PSC Environmental Services	Petro-Chem Processing Group Of Nortru LLC	Detroit	MID980615298		DD	6/16/1999		5/18/2009	9/30/2013									11/13/2003
53	Rugged Liner Inc	Rugged Liner Inc	Owosso	MID058816927		RC													11/13/2003
54	Safety Kleen Systems Inc	Safety Kleen Systems Inc	Pontiac	MID000722686		DD													11/3/1999
55	Solutia Inc Phosphates	Solutia Inc.	Trenton	MID009708678		CH									3/27/2002				
56	Systech Environmental Corp	Systech Environmental Corp	Alpena	MID961200835		DD													9/21/2001
57	Warner Lambert Co LLC Former Manufacturing Site	Warner Lambert Co LLC	Holland	MID006013643		CH									9/28/2001				
58	Waste Storage Facility	Michigan State University	Lansing	MID053343976		KT	9/29/2010			9/29/2020									
59	Wayne Disposal Inc.	Wayne Disposal Inc.	Belleville	MID048090633		PQ	9/30/2010			9/30/2020									
59	Wayne Disposal Inc.	Wayne Disposal Inc.	Belleville	MID048090633	Y	PQ					3/4/2011								
60	Woodland Meadows Landfill North	Woodland Meadows Landfill North	Canton	MID000810408		PQ						9/12/2005		9/12/2015					

Objective and Considerations

In FY2012, the MDEQ intends to issue/renew operating licenses and postclosure operating licenses, to clean close regulated units, to approve postclosure plans, or to enter into CA consent orders/legally enforceable agreements such that the GPRA “approved controls in place” goals are achieved for at least 75 percent of the GPRA 2020 Permit Baseline.

The MDEQ will apply resources and allocate work between the U.S. EPA and other MDEQ divisions as necessary to achieve the “controls in place” schedules. This will involve approximately six FTE positions to perform this work schedule. Successfully implementing the schedule will allow the MDEQ to meet the FY2012 national goals for “approved controls in place” at Michigan’s GPRA 2020 Permit Baseline facilities. It must be recognized that the ability to evaluate and process timely “controls in place” requires financial assurance reviews as well as public participation. Additionally, the work resulting from the General Motors’ bankruptcies that took place in FY2010 and the resulting work that needs to be done to redevelop these sites now owned by Revitalizing Automotive Communities Environment Response Trust (RACER Trust) may impact this “approved controls in place” commitment. Also worthy of note is that any FTE vacancies not filled will affect the ability to complete the projected work schedule.

Hazardous Waste Section Scheduled Activities

Hazardous Waste TSD Facilities Administrative Controls Work Schedule

The Administrative Controls FY2012 Hazardous Waste Section Work Schedule follows this page.

**ADMINISTRATIVE CONTROLS
FY2012 HAZARDOUS WASTE SECTION WORK SCHEDULE**

#	MET	CARRY- OVER (Indicate if Yes)	FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	PROJECT MANAGER
Operating License Expansion Application Technical Review							
1			Drug & Laboratory Disposal Inc	Drug & Laboratory Disposal Inc	Plainwell	MID 092 947 928	Kimberly Tyson
Operating License Expansion Issuance Determination							
2			Wayne Disposal Inc	Wayne Disposal Inc	Belleville	MID 048 090 633	Pete Quackenbush
3			Drug & Laboratory Disposal Inc	Drug & Laboratory Disposal Inc	Plainwell	MID 092 947 928	Kimberly Tyson
Operating License Application Completeness Determination							
4			Detrex Corporation - Site A	Detrex Corp	Detroit	MID 091 605 972	Dan Dailey
Operating License Application Technical Review							
5			Detrex Corporation - Site A	Detrex Corp	Detroit	MID 091 605 972	Dan Dailey
6		Yes	Dow Corning Corp	Dow Corning Corp	Midland	MID 000 809 632	Kimberly Tyson
7			Pharmacia & Upjohn Co LLC	Pharmacia & Upjohn Co LLC	Portage	MID 000 820 381	Pete Quackenbush
Operating License Reissuance Determination							
8			Environmental Disposal Systems Inc		Romulus	MIR 000 016 055	Ronda Blayer
9		Yes	Dow Corning Corp	Dow Corning Corp	Midland	MID 000 809 632	Kimberly Tyson
10		Yes	EQ Detroit	EQ Detroit	Detroit	MID980991566	Rich Conforti
11		Yes	Dynecol	Dynecol	Detroit	MID074259565	Rich Conforti
12		Yes	Granger Grand River LF	Granger Land Development	Gr Ledge	MID082771700	Pete Quackenbush
13			Pharmacia & Upjohn Co LLC	Pharmacia & Upjohn Co LLC	Portage	MID000820381	Pete Quackenbush
Public Notice Draft Operating License							
14		Yes	PSC Environmental Services	Petro-Chem Processing Group of Nortru Inc	Detroit	MID 980 615 298	Dan Dailey
15		Yes	Dow Corning Corp	Dow Corning Corp	Midland	MID 000 809 632	Kimberly Tyson
16			Drug & Laboratory Disposal Inc	Drug & Laboratory Disposal Inc	Plainwell	MID 092 947 928	Kimberly Tyson
17			Pharmacia & Upjohn Co LLC	Pharmacia & Upjohn Co LLC	Portage	MID 000 820 381	Pete Quackenbush

2.5 Corrective Action

U.S. EPA FY2011 – 2015 Strategic Plan, Goal 3: Cleaning Up Communities and Advancing Sustainable Development

Objective 3.3: *Restore Land.* Prepare for and respond to accidental or intentional releases of contaminants and clean up and restore polluted sites.

U.S. EPA Guidance

FY 2012 National Program Manager's Guidance, Final – April 29, 2011, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency

Page 65 of this guidance document states:

"The 2020 Corrective Action Universe lists all 3,747 facilities that may need cleanup under the RCRA Corrective Action program. This list, which can be found online at <http://www.epa.gov/epawaste/hazard/correctiveaction/facility/index.htm#2020>, will serve as the "RCRA Cleanup Baseline for 2012."

The U.S. EPA FY2011 – 2015 Strategic Plan commits the program to reaching specific percentages for three key measures at these sites by FY2015:

- Control all identified unacceptable human exposures from site contamination to health-based levels for current land and/or groundwater use conditions (Human Exposures Environmental Indicator [EI])
- Control the migration of contaminated groundwater (Groundwater EI)
- Complete construction of final remedies (Remedy Construction)

The U.S. EPA aspires to achieve 95 percent completion for all three EI goals by the end of 2020. To assist with achieving these goals, the National Enforcement Strategy for Corrective Action (NESCA) was developed to provide a framework for strategically using enforcement where needed.

For FY2012, the U.S. EPA National Performance Goals for EI Completion are:

- Human Exposures EI – 76 percent (150 facilities)
- Groundwater EI – 67 percent (112 facilities)
- Remedy Construction – 42 percent (150 facilities)

EIs

The RCRA CA Program now tracks EIs as the means by which environmental results are measured. Of the three milestones listed for FY2012, the first two are EI milestones because they are meant to "indicate" environmental quality at the site.

The RCRA CA EIs are a means of evaluating and reporting on the acceptability of current site conditions (i.e., they are interim milestones and not final remedy or site

closure milestones). EIs provide an opportunity for facilities and regulators to show meaningful progress that is achievable in the near future. They are a high priority within the U.S. EPA and the highest priority under the RCRA CA Program. EIs measure the effectiveness of stabilization actions. Stabilization of these sites is the MDEQ's first priority with limited resources. These EIs focus on results (i.e., changes in the quality of the environment) and de-emphasize the CA process. The EIs reflect "current" conditions (i.e., known or expected at the time of the determination). EIs are site-wide determinations and should reflect all contaminants of concern present above risk-based levels of concern. The facility cannot achieve the EI until all aspects of the facility subject to RCRA CA are considered in the determination.

- The Current Human Exposures Under Control (CA725) EI is an assessment of actual current human risks and would typically take the form of a qualitative assessment of the completeness of exposure pathways but, as necessary, may include a traditional quantitative risk assessment.
- The Groundwater Migration Under Control (CA750) EI is strictly a resource protection measure and not a direct measure of human risk. It may include the assessment of impacts of groundwater discharges to surface waters and surface water ecosystems.

Corrective Action Completion Progress

The U.S. EPA will use one administrative milestone in FY2012 to track the progress of the GPRA 2020 CA Universe facilities. That milestone is reported in the national RCRA database (RCRAInfo) using the following data element:

Date of Certification of Remedy Completion or Construction Completion (CA550): The date on which the MDEQ or the U.S. EPA formally notifies the RCRA facility that they accept its certification that the remedy specifications in the permit/order have been met and that the specified remedy(ies) has been completed, and/or only operation and maintenance requirements remain in order to maintain this level of performance. The "actual date" is the date the Director of the MDEQ signs the final order, permit, or written acknowledgement. The "projected date" is the date the Director of the MDEQ is expected to sign the final order, permit, or written acknowledgement.

GPRA 2020 CA Universe

Refer to the GPRA 2020 CA Universe discussion in the Administrative Controls Section of this Work Plan for details regarding the sites that are in this universe.

The GPRA 2020 CA Baseline by Facility table alphabetically lists each of the 119 facilities that are in the universe, the lead agency for the facility, and the actual and projected EI accomplishment dates for each of the three corrective action goals (CA725, CA750, and CA550). An explanation of the abbreviated column headings is shown at the top of each page of the table.

The GPRA 2020 CA Baseline by Facility table follows this page.

GPRA 2020 Corrective Action Baseline By Facility

June 1, 2011

For the GPRA 2020 Corrective Action Baseline, shows the actual/projected accomplishment dates for each facility alphabetically.

Definitions: N-Caps=National Corrective Action Prioritization System; HE Control=Human Exposures Controlled; GW Control=Groundwater Controlled; Construct Comp=Construction Complete; Lead-C=CERCLA

	Site Specific Name	Facility Legal Name	Lead	City	MID #	Who	N-CAPS	HE Control CA725	Projected CA725	GW Control CA750	Projected CA750	Remedy Decision CA400	Construct Comp CA550	Projected CA550
1	Detroit Steel Company-Trenton Plant	Detroit Steel Company	C	Trenton	MID017422304	RC	Med	Approved for CERCLA		Approved for CERCLA			Approved for CERCLA	
2	Lake States Wood Preserving	Lake States Wood Preserving	C	Munising	MID990687964	PQ	Med	Approved for CERCLA		Approved for CERCLA			Approved for CERCLA	
3	American Axle & Mfg	American Axle & Mfg	EPA	Three Rivers	MID000718551	KT	High	12/31/2007		12/31/2007		No	No	
4	Anchor Danly Components	Anchor Lamina America Inc.	EPA	Bellaire	MID006017966		High	6/10/1999		6/10/1999		9/30/1999	9/30/1999	
5	Arkema Inc.	Arkema Inc.	EPA	Riverview	MID005363114		Med	9/30/2004		6/22/2005		No	No	
6	Ashland Inc	Ashland Inc	EPA	Lansing	MID047173653		Med	4/28/2005		5/26/2005		No	No	
7	BASF Corp	BASF Corp	EPA	Wyandotte	MID064197742		High	6/30/2005		9/30/2005		No	No	
8	BASF Corp	BASF Corp	EPA	Holland	MID048223986	DD	High	3/10/2004		6/14/2007		8/20/2009	No	
9	Bay City Plant	The Dow Chemical Co	EPA	Bay City	MID005380258	CH	High	3/13/2007		3/13/2007		No	No	
10	City of Adrian	County of Lenawee	EPA	Adrian	MID005044813	RC	High	3/30/2005		5/30/2007		No	No	
11	Delphi Flint-West	Delphi Automotive Systems LLC	EPA	Flint	MID005356654		Med	No		No		No	No	
12	Demmer Properties LLC	Demmer Properties LLC	EPA	Lansing	MID005380134	DD	High	9/27/2002		10/23/2006		No	No	
13	Detroit Diesel Corp Redford	Detroit Diesel Corp	EPA	Detroit	MID005356803	RB	Med	12/4/1999		9/2/2003		No	6/24/2011	
14	DPH DAS LLC	DPH DAS LLC	EPA	Flint	MID005356647		High	9/29/2004		12/28/2006		No	No	
15	Edwards C Levy Co Plant 3	Edwards C Levy Co	EPA	Ecorse	MID000809665		Low	11/4/1999		11/4/1999		No	No	
16	Edwards C Levy Co Plant 6	Edwards C Levy Co	EPA	Detroit	MID094549425		Low	11/4/1999		11/4/1999		No	No	
17	Former GMC Metal Fabricating Division	RACER Trust	EPA	Pontiac	MID005356886		High	3/2/2004		9/29/2004		No	No	
18	Former GMPT Flint North Site MC485-143-060 Environmental	RACER Trust	EPA	Flint	MID005356712		High	8/17/2004		9/29/2005		No	No	
19	Former Pontiac Assembly Center 483 606 186	RACER Trust	EPA	Pontiac	MID005356902		High	12/6/2000		12/6/2000		8/3/2006	No	
20	Former Worldwide Facilities Group	RACER Trust	EPA	Livonia	MID005356621		High	3/5/2008		11/16/2004		No	No	
21	General Motors LLC	General Motors LLC	EPA	Flint	MID005356951		Med	11/4/2005		11/4/2005		11/4/2005	11/4/2005	
22	General Motors LLC-Saginaw Metal Castings Operations	General Motors LLC	EPA	Saginaw	MID041793340		High	8/25/2004		9/29/2004		No	No	

GPRA 2020 Corrective Action Baseline By Facility

June 1, 2011

For the GPRA 2020 Corrective Action Baseline, shows the actual/projected accomplishment dates for each facility alphabetically.

Definitions: N-Caps=National Corrective Action Prioritization System; HE Control=Human Exposures Controlled; GW Control=Groundwater Controlled; Construct Comp=Construction Complete; Lead-C=CERCLA

	Site Specific Name	Facility Legal Name	Lead	City	MID #	Who	N-CAPS	HE Control CA725	Projected CA725	GW Control CA750	Projected CA750	Remedy Decision CA400	Construct Comp CA550	Projected CA550
23	GM Components Holdings LLC	GM Components Holdings LLC	EPA	Wyoming	MID017079625		High	9/29/2004		12/28/2006		No	No	
24	Henkel Surface Technologies	Henkel Surface Technologies	EPA	Morenci	MID058723867		High	8/24/2004		8/26/2003		8/15/2006	6/27/2006	
25	Johnson Controls Inc.	Johnson Controls Inc.	EPA	Fowlerville	MID099124299		High	3/31/2004		9/30/2004		12/1/2006	No	
26	Lacks Industries Inc. Saranac	Lacks Industries Inc.	EPA	Saranac	MID080359433		High	9/30/2004		9/17/2003		No	No	
27	National Copper Products Inc	National Copper Products Inc	EPA	Dowagiac	MID005068507	DD	Med	8/28/2007		4/7/2008		No	No	
28	Occidental Chemical Corp	Occidental Chemical Corp	EPA	Montague	MID006014906		High	9/30/2003		2/24/2000		7/18/2001	No	
29	St. Mary's Cement	St. Mary's Cement	EPA	Detroit	MID094553419	PQ	Low	6/30/2003		6/30/2003		No	3/6/2009	
30	Tecumseh Compressor Co	Tecumseh Compressor Co	EPA	Tecumseh	MID005049440	PQ	Low	No		No		No	No	
31	Universal Die Cast Inc.	Washtenaw Industrial Facility LLC	EPA	Saline	MID980795512	PQ	High	9/25/2008		No		No	No	
32	Access Business Group LLC	Access Business Group LLC	Part 111	Ada	MID006026793	PQ	High	9/30/2002		8/20/2004		7/10/2006	1/30/2008	
33	Alma Facility	MRP Properties Co LLC	Part 111	Alma	MID005358130	PQ	High	9/27/2004		9/16/2004		No	No	
34	Automotive Components Holdings LLC Saline	Automotive Components Holdings LLC	Part 111	Saline	MID009305665	PQ	Med	No		No		No	No	
35	Bayer CropScience LP	Bayer CropScience LP	Part 111	Muskegon	MID080358351	RC	High	9/14/2005		9/23/2004		No	No	9/30/2013
36	Beck Road Facility	University of Michigan	Part 111	Belleville	MIR000001834	RB	Med	9/21/2006		7/11/2005		9/21/2006	10/20/2004	
37	Black River Public School	Black River Schools	Part 111	Holland	MID006411953	RB	Low	9/21/2006		9/16/2003		9/21/2006	3/6/2009	
38	Blue Cow Inc	Blue Cow Inc	Part 111	Middleville	MID060197662	PQ	High	1/16/1998		1/16/1998		6/13/1996	1/16/1998	
39	Bostik Inc	Bostik Inc	Part 111	Marshall	MID060198249		Med	No		No		No	No	
40	Carlton Creek Iron Works LLC	Carlton Creek Iron Works LLC	Part 111	Rothbury	MID006025217	PQ	High	7/14/2004		7/11/2011		No	No	9/30/2012
41	Chemical Analytics Inc	Chemical Analytics Inc	Part 111	Romulus	MID985568021	RC	Not Ranked	8/4/1998		8/4/1998		No	No	9/30/2012
42	Chrysler Introl Division	Old Carco LLC	Part 111	Dexter	MID990760100	JR	Med	9/28/2006		8/14/2007		No	No	9/30/2012

GPRA 2020 Corrective Action Baseline By Facility

June 1, 2011

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	Site Specific Name	Facility Legal Name	Lead	City	MID #	Who	N-CAPS	HE Control CA725	Projected CA725	GW Control CA750	Projected CA750	Remedy Decision CA400	Construct Comp CA550	Projected CA550
43	Container Specialities Inc (USEPA Region 5)	Container Specialities Inc	Part 111	Flint	MID005361597		High	No		No		No	No	
44	CWC Castings Division Plant 3	Textron Inc	Part 111	Muskegon	MID006030357		High	12/31/2007		12/31/2007		No	No	
45	Cytec Industries (Past TSD)	Cytec Industries	Part 111	Kalamazoo	MID005360680	DD	Low	No		9/30/2011			No	
46	Delphi Energy & Chassis Saginaw Operations	Delphi Automotive Systems LLC	Part 111	Saginaw	MID005356845		Low	No		No		No	No	
47	Detrex Corp Site A	Detrex Corp	Part 111	Detroit	MID091605972	DD	Low	No		2/10/2006		No	No	
48	Dore Industrial Inc	Dore Industrial Inc	Part 111	Bay City	MID005359286	KT	High	9/21/2006		9/21/2006		9/21/2006	9/30/1999	
49	Dow Chemical Co Main Plant & Incinerator Complex	The Dow Chemical Co	Part 111	Midland	MID000724724	CH	High	No		9/30/2003		No	No	
50	Dow Chemical Company-Salzburg Landfill	The Dow Chemical Co	Part 111	Midland	MID980617435	CH	Low	9/9/2009		9/9/2009			No	9/30/2012
51	Dow Corning Midland Plant	Dow Corning Corp.	Part 111	Midland	MID000809632	KT	Med	9/24/1999		9/24/1999		No	No	9/30/2012
52	DPH DAS LLC	DPH DAS LLC	Part 111	Flint	MID980568620	DD	Low	No		No			No	
53	Drug and Laboratory Disposal Inc.	Drug and Laboratory Disposal Inc.	Part 111	Plainwell	MID092947928	KT	Med	3/27/1996		3/27/1996		No	6/13/2011	
54	Dynecol Inc	Dynecol Inc	Part 111	Detroit	MID074259565	RC	Low	3/16/1998		3/16/1998		9/1/2010	7/8/2011	
55	E I Du Pont De Nemours	E I Du Pont Flint Site	Part 111	Flint	MID005512066	DD	Low	9/21/2006		1/30/2006		8/14/2006	5/29/2009	
56	E I Du Pont De Nemours-Montague Works	Du Pont E I De Nemours & Co	Part 111	Montague	MID000809640	RB	Med	No	9/30/2012	No	9/30/2012	No	No	
57	Edwards Oil Service Inc	Edwards Oil Service Inc	Part 111	Detroit	MID088754668		Med	7/2/1992		11/23/1993		No	No	
58	EQ Detroit Inc.	EQ Detroit Inc.	Part 111	Detroit	MID980991566	RC	Low	No	9/30/2011	8/23/1996		9/1/2010	6/21/2011	
59	EQ Resource Recovery Inc.	EQ Resource Recovery Inc.	Part 111	Romulus	MID060975844	PQ	Med	9/24/1999		9/24/1999		No	No	
60	Ethone OMI Inc.	Ethone OMI Inc.	Part 111	Warren	MID056717747	KT	Low	No		No		No	No	
61	Federal-Mogul Corp	Federal Mogul Corp	Part 111	Greenville	MID006021414	KT	High	3/10/2008		No		No	No	

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	Site Specific Name	Facility Legal Name	Lead	City	MID #	Who	N-CAPS	HE Control CA725	Projected CA725	GW Control CA750	Projected CA750	Remedy Decision CA400	Construct Comp CA550	Projected CA550
62	Ford Motor Company Allen Park Clay Mine LF	Ford Motor Company	Part 111	Allen Park	MID980568711	PQ	Med	9/7/2007		1/4/2007		9/30/2004	9/30/2004	
63	Ford Motor Company Monroe Plant	Ford Motor Company	Part 111	Monroe	MID005057005	PQ	High	10/1/2001		3/25/2005		No	No	
64	Former Detroit Coke Corporation Site	Honeywell International Inc.	Part 111	Detroit	MID099114704	PQ	High	9/25/2003		No		No	No	
65	Former GM Lansing Car Assembly-MC 489-066-600	RACER Trust	Part 111	Lansing	MID005356928	PQ	Med	No		No		No	No	
66	Former GMC LCC and LMC	RACER Trust	Part 111	Lansing	MID980700827	PQ	Med	No		No		No	No	
67	Former Realm/Coldwater Road Landfill	RACER Trust	Part 111	Flint	MID005356860	RC	High	5/29/1998		5/29/1998		10/29/1992	No	9/30/2013
68	Former TDY Vehicle Systems	Teledyne Vehicle Systems	Part 111	Muskegon	MID006407597	DD	High	7/1/2005		7/1/2005		No	No	
69	Former Wycoff Steel Inc.	DETD LLC	Part 111	Plymouth	MID004508628	KT	High	2/18/1996		2/18/1996		3/26/2002	8/29/2003	
70	Gage Products	Gage Products	Part 111	Ferndale	MID005338801	DD	Low	No		No		No	No	9/30/2013
71	General Motors LLC	General Motors LLC	Part 111	Warren	MID050615996	KT	Low	3/14/2011		3/17/2011		No	No	
72	General Motors LLC	General Motors LLC	Part 111	Lansing	MID005356894	PQ	Med	No		No		No	No	
73	Grand Blanc Landfill	Grand Blanc Landfill	Part 111	Grand Blanc	MID980506265	KT	Med	8/6/2010		8/6/2010		No	No	
74	Granger Grand River Landfill	Granger Land Development Co	Part 111	Grand Ledge	MID082771700	PQ	High	9/5/2001		9/5/2001		8/17/2006	9/17/2008	
75	Hadley Industries Div of ASI	Hadley Industries	Part 111	Cadillac	MID982222242	RC	Low	No		No		No	No	
76	Holcim US Inc. Dundee Plant	Holcim US Inc.	Part 111	Dundee	MID005038500	KT	Med	No		No		No	No	
77	Honeywell International Inc. Burdick and Jackson	Honeywell International Inc.	Part 111	Muskegon	MID072575731		High	9/27/1931		3/10/2008		No	No	
78	Intertape Polymer Grp	Intertape Polymer Corporation	Part 111	Marysville	MID061862926	DD	Low	No	9/30/2012	No	9/30/2012	No	No	
79	KHI Inc.	KHI Inc.	Part 111	Holland	MID006020895	PQ	High	9/6/2001		2/22/2011		10/30/1997	1/16/2001	

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	Site Specific Name	Facility Legal Name	Lead	City	MID #	Who	N-CAPS	HE Control CA725	Projected CA725	GW Control CA750	Projected CA750	Remedy Decision CA400	Construct Comp CA550	Projected CA550
80	Lacks Industries Inc.	Lacks Industries Inc.	Part 111	Grand Rapids	MID006014666	CH	High	9/29/2003		No		No	No	
81	Lafarge Midwest Inc.	Lafarge Midwest Inc.	Part 111	Alpena	MID005379607	DD	High	5/17/2001		5/17/2001		5/17/2001	5/17/2001	
82	Lear Corporation (**Duplicate of Modineer-Not in WDS)	Lear Corporation	Part 111	Niles	MID082859315	DD	Med	No		No		No	No	
83	Macdermid Inc.	Macdermid Inc.	Part 111	Ferndale	MID005338371	KT	Med	No		No		No	No	
84	Mahle Engine Components USA Inc.	Mahle Engine Components USA Inc.	Part 111	Muskegon Heights	MID980499735	DD	Low	10/3/2002		8/28/2002		No	No	9/30/2012
85	Metavation LLC	Metavation LLC	Part 111	Vassar	MID005513262	RC	Med	7/13/2011		No		No	No	
86	Mi Dept/Nat Res Storage Facility Roscommon	MI Dept/Natural Resources and Environment	Part 111	Roscommon	MID980825632		High	9/29/2000		9/29/2000		8/9/2000	2/1/2002	
87	Michigan Disposal Waste Treatment Plant	Michigan Disposal Inc.	Part 111	Belleville	MID000724831	KT	Low	5/12/2009		5/12/2009			6/10/2011	
88	Michigan Seamless Tube	Michigan Seamless Tube LLC	Part 111	South Lyon	MID082767591	RB	High	9/9/2004		9/30/2005		No	No	
89	Midlink Business Park	5200 W. Cork St Investors LLC	Part 111	Kalamazoo	MID001876663		Med	No		No		No	No	
90	Modineer Co	Modineer Co	Part 111	Niles	MIK367427523	DD	No Rank	No		No		No	No	
91	Mount Clemens Distribution Center	Russo Properties Corp	Part 111	Mount Clemens	MID076342708	RC	Med	No	9/30/2012	No	9/30/2012	No	No	
92	National Standard Company LLC	National Standard Company LLC	Part 111	Niles	MID270010549	KT	Med	No		No		No	No	
93	National Standard Niles City Complex	National Standard Niles City Complex	Part 111	Niles	MID005069257	KT	High	9/29/2003		9/22/2004		No	No	9/30/2013
94	Pepin Ireco Inc	Pepin Ireco Inc	Part 111	Ishpeming	MID041413154	RC	Med	9/8/2008		No		No	No	
95	Perma Fix of Michigan Inc	Perma Fix of Michigan Inc	Part 111	Brownstown	MID096963194	KT	High	3/24/2004		9/24/2003		No	No	9/30/2012
96	Pharmacia and Upjohn Co LLC	Pharmacia and Upjohn Co LLC	Part 111	Portage	MID000820381	PQ	High	3/29/2001		3/29/2001		No	3/30/2001	
97	PPG Industries Inc	PPG Industries Inc	Part 111	Adrian	MID048788749	RC	High	9/27/2007		3/10/2008		No	No	
98	PSC Environmental Services	Petro-Chem Processing Group Of Nortru LLC	Part 111	Detroit	MID980615298	DD	Med	6/16/1999		6/16/1999		No	No	

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	Site Specific Name	Facility Legal Name	Lead	City	MID #	Who	N-CAPS	HE Control CA725	Projected CA725	GW Control CA750	Projected CA750	Remedy Decision CA400	Construct Comp CA550	Projected CA550
99	Reichhold Inc. Ferndale	Reichhold Inc	Part 111	Ferndale	MID020087128	DD	High	5/28/1998		4/24/1998		No	5/13/2003	
100	Rugged Liner Inc	Rugged Liner Inc	Part 111	Owosso	MID058816927	RC	Med	8/25/2006		8/4/2006		9/28/2007	7/23/2009	
101	Safety Kleen Systems Inc	Safety Kleen Systems Inc	Part 111	Mason	MID981000359	DD	High	5/28/1998		5/28/1998			4/25/1996	
102	Safety Kleen Systems Inc	Safety Kleen Systems Inc	Part 111	Pontiac	MID000722686	DD	Med	No	9/30/2012	9/18/1998		No	No	
103	Selfridge Air National Guard	US Dept/Defense	Part 111	Selfridge ANGB	MID099113128	PQ	High	9/29/2004		No		No	No	
104	Severstal North America Inc	Severstal North America Inc	Part 111	Dearborn	MID087738431	KT	High	2/8/2005		2/8/2005		No	No	
105	Solutia Inc Phosphates	Solutia Inc.	Part 111	Trenton	MID009708678	CH	Med	No		No		No	No	
106	Systech Environmental Corp	Systech Environmental Corp	Part 111	Alpena	MID981200835	DD	Low	No		No		No	No	
107	Transign LLC	Transign LLC	Part 111	Waterford	MID006007967	DD	Low	8/25/2008		8/25/2008		8/25/2008	9/29/2010	
108	Wacker Chemical Corp	Wacker Chemical Corp	Part 111	Adrian	MID075400671	DD	High	9/27/2007		9/14/2007		11/2/2007	No	9/30/2012
109	Warner Lambert Co LLC Former Manufacturing Site	Warner Lambert Co LLC	Part 111	Holland	MID006013643	CH	Med	11/13/2003		9/21/2004		Projected 9/30/2012	No	9/30/2013
110	Waste Storage Facility	Michigan State University	Part 111	Lansing	MID053343976	KT	High	5/29/1998		5/29/1998			2/18/1993	
111	Wayne Disposal Inc.	Wayne Disposal Inc.	Part 111	Belleville	MID048090633	PQ	Med	9/9/2009		9/9/2009		No	No	
112	Whirlpool Corporation St. Joseph Div Plants 3-6	Whirlpool Corporation	Part 111	Saint Joseph	MID005477733	KT	High	2/27/2001		2/27/2001		12/28/2000	12/27/2002	
113	Woodland Meadows Landfill North	Woodland Meadows Landfill North	Part 111	Canton	MID000810408	PQ	Low	9/30/2010		9/30/2010		9/30/2010	9/30/2010	
114	Cyanokem-Detroit	Le Petomane VII Custodial Trust	Part 201	Detroit	MID098011992	DD	Low	No		No		No	No	
115	Former Gen Motors Powertrain Bay City Plant	RACER Trust	Part 201	Bay City	MID005356688	RB	High	9/27/2007		3/10/2008		No	No	
116	Former GM Plant Saginaw Malleable Iron	RACER Trust	Part 201	Saginaw	MID005356696	CH	High	9/27/2007		9/15/2006		No	No	

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	Site Specific Name	Facility Legal Name	Lead	City	MID #	Who	N-CAPS	HE Control CA725	Projected CA725	GW Control CA750	Projected CA750	Remedy Decision CA400	Construct Comp CA550	Projected CA550
117	Former GM Powertrain Willow Run Plant	RACER Trust	Part 201	Ypsilanti	MID980587893		Low	No		No		No	No	
118	Remediation and Redevelopment Div Fenske Landfill	MI Dept/Natural Resources and Environment	Part 201	Grand Rapids	MID072589328	KT	High	4/25/2005		No		No	No	
119	Remediation and Redevelopment-Prod Plated Plastics	MI Dept/Natural Resources and Environment	Part 201	Richland	MID047153077	RC	High	7/14/2000		6/12/2001			No	

MDEQ Goal

In FY2012, the MDEQ intends to apply available resources at a pace that will enable the meeting of the following milestones for the MDEQ-lead GPRA 2020 CA Universe facilities by the end of the FY:

- Human exposures controlled milestone at 74 percent of the MDEQ-lead sites (versus the 76 percent national goal).
- Contaminated groundwater controlled at 69 percent of the MDEQ-lead sites (versus the 67 percent national goal).
- Complete construction of final remedies at 38 percent of the MDEQ-lead sites (versus the 42 percent national goal).

Strategy

The MDEQ will apply resources as well as allocate the work to be done between the U.S. EPA and other MDEQ divisions to endeavor to meet the MDEQ goal for FY2012 CA accomplishments. Note, however, that due to resource reductions and additional workloads (RACER Trust site remediation, the WDI application for an operating license expansion, Dow major license modifications, etc.), the FY2012 national goals for the MDEQ-lead GPRA 2020 CA Universe facilities for Human Exposures Controlled (CA725) and Construction Complete (CA550) will not be met. Financial assurance review continues to be an important component to the RCRA Trust program objectives (for operating licenses, postclosure, and CA), and current economic trends involving regulated facilities on the brink of bankruptcy is altering the progress planned for the MDEQ-lead GPRA 2020 CA schedule. Additionally, the MDEQ plans to continue to follow through on financial recoveries for U.S. EPA-lead facilities, some bankrupt TSD facilities will likely require CERCLA referrals, and the compliance oversight efforts of implemented CA to ensure adequate O&M, has become even more critical during these difficult economic times.

Objectives and Considerations

The MDEQ will implement the above described strategy to conduct correction action at the GPRA 2020 CA Universe facilities for which the MDEQ is the lead regulatory agency and to assist the U.S. EPA, as resources allow, in an effort to help the U.S. EPA achieve their FY2012 national CA milestones. Any FTE vacancies that are not filled in FY2012 will affect the MDEQ's ability to meet our GPRA goal.

Hazardous Waste Section Scheduled Activities

Corrective Action Work Schedule.

The Corrective Action FY2012 Hazardous Waste Section Work Schedule follows this page.

**CORRECTIVE ACTION
FY2012 HAZARDOUS WASTE SECTION WORK SCHEDULE**

#	MET	FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	PROJECT MANAGER
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Corrective Action Oversight (CA001)

1		Cytec Industries - Past TSD	Cytec Industries Inc	Kalamazoo	MID 005 360 680	Dan Dailey
2		Detrex Corp - Site A	Detrex Corp	Detroit	MID 091 605 972	Dan Dailey
3		Former TDY Vehicle Systems - L3 Communications	Teledyne Vehicle Systems	Muskegon	MID 006 407 597	Dan Dailey
4		Mahle Engine Components USA Inc	Mahle Engine Components USA Inc	Muskegon	MID 980 499 735	Dan Dailey
5		Michigan Seamless Tube LLC	Michigan Seamless Tube LLC	South Lyon	MID 082 767 591	Ronda Blayer
6		E I Du Pont De Nemours - Montague Works	Du Pont E I De Nemours & Co	Montague	MID 000 809 640	Ronda Blayer
7		Chrysler Introl Division	Old Carco LLC	Dexter	MID 990 760 100	Joe Rogers
8		Alma Facility - Total Petroleum	MRP Properties Co LLC	Alma	MID 005 358 130	Pete Quackenbush
9		Ford Motor Co - Monroe PI	Ford Motor Co	Monroe	MID 005 057 005	Pete Quackenbush
10		Automotive Components Holdings LLC - Saline	Automotive Components Holdings LLC	Saline	MID 009 305 665	Pete Quackenbush
11		Selfridge Air National Guard	US Dept/Defense	Selfridge ANGB	MID 099 113 128	Pete Quackenbush
12		Dow Chemical Main PI - On Site	Dow Chemical Co	Midland	MID 000 724 724	Cheryl Howe
13		Dow Chemical Main PI - Off Site	Dow Chemical Co	Midland	MID 000 724 724	Cheryl Howe
14		Dow Chemical Main PI - River & Bay	Dow Chemical Co	Midland	MID 000 724 724	Cheryl Howe
15		General Motors - Technical Center	General Motors LLC	Warren	MID 050 615 996	Kimberly Tyson
16		National Standard - Niles City Complex	National Standard Niles City Complex	Niles	MID 005 069 257	Kimberly Tyson
17		Severstal - Rouge	Severstal Dearborn	Dearborn	MID 087 738 431	Kimberly Tyson
18		BASF Corp - Wyandotte	BASF Corp	Wyandotte	MID 064 197 742	Rich Conforti
19		Former Realm/Coldwater Road LF	Motors Liquidation Co	Flint	MID 005 356 860	Rich Conforti
20		Former GMC LCC & LMC - Lansing PI 2 & 3	RACER Trust	Lansing	MID 980 700 827	Pete Quackenbush
21		General Motors LLC - PI 1	General Motors LLC	Lansing	MID 005 356 894	Pete Quackenbush
22		Gage Products	Gage Products	Ferndale	MID 005 338 801	Dan Dailey
23		Former GM Lansing Car Assembly - Plant 6	RACER Trust	Lansing	MID 005 356 928	Pete Quackenbush

GPRA CA550 Construction Complete Determination FY2012 (CA550RC)

24		Dow Chemical Co - Salzburg LF	Dow Chemical Co	Midland	MID 980 617 435	Cheryl Howe
25		Chemical Analytics Inc	Chemical Analytics Inc	Romulus	MID985568021	Rich Conforti
26		Chrysler Introl Division	Old Carco LLC	Dexter	MID 990 760 100	Joe Rogers
27		Perma Fix of Michigan Inc	Perma Fix of Michigan Inc	Brownstown	MID 096 963 194	Kimberly Tyson
28		Wacker Chemical Corp	Wacker Chemical Corp	Adrian	MID 075 400 671	Dan Dailey
29		Rothbury Steel - Carlton Creek Iron Works LLC	Rothbury Steel	Rothbury	MID006025217	Pete Quackenbush
30		Dow Corning Corp	Dow Corning Corp	Midland	MID 000 809 632	Kimberly Tyson
31		Mahle Engine Components USA Inc	Mahle Engine Components USA Inc	Muskegon Heights	MID 980 499 735	Dan Dailey

GPRA CA400 Remedy Selection Determination FY2012 (CA400)

32		Warner Lambert Co LLC - Former Manufacturing Site	Warner Lambert Co LLC	Holland	MID006013643	Cheryl Howe
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GPRA CA725 Human Exposures Controlled Determination FY2012 (CA725YE)

33		E I Du Pont De Nemours - Montague Works	Du Pont E I De Nemours & Co	Montague	MID 000 809 640	Ronda Blayer
34		Safety Kleen Systems Inc	Safety Kleen Systems Inc	Pontiac	MID 000 722 686	Pete Quackenbush
35		Intertape Polymer Grp	Intertape Polymer Corp	Marysville	MID 061 862 926	Dan Dailey

**CORRECTIVE ACTION
FY2012 HAZARDOUS WASTE SECTION WORK SCHEDULE**

#	MET	FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	PROJECT MANAGER
36		Mount Clemens Distribution Center	Russo Properties Corp	Mount Clemens	MID 076 342 708	Rich Conforti
GPRA CA750 Groundwater Controlled Determination FY2012 (CA750YE)						
37		E I Du Pont De Nemours-Montague Works	Du Pont E I De Nemours & Co	Montague	MID 000 809 640	Ronda Blayer
38		Intertape Polymer Grp	Intertape Polymer Corporation	Marysville	MID 061 862 926	Dan Dailey
39		Mount Clemens Distribution Center	Russo Properties Corp	Mount Clemens	MID076342708	Rich Conforti
Mixing Zone Reauthorization Q1						
40		Safety Kleen - Pontiac	Safety Kleen Systems Inc	Pontiac	MID000722686	Dale Bridgford
41		Wacker Chemical Corp	Wacker Chemical Corp	Adrian	MID075400671	Dale Bridgford
42		Johnson Controls	Johnson Controls	Fowlerville	MID099124299	Dale Bridgford
43		Dore Industrial Inc	Dore Industrial Inc	Bay City	MID005359286	Dale Bridgford
Mixing Zone Reauthorization Q4						
44		E I Du Pont De Nemours - Montague Works	Du Pont E I De Nemours & Co	Montague	MID000809640	Dale Bridgford

2.6 Financial Capability

U.S. EPA FY2011 – 2015 Strategic Plan, Goal 3: Cleaning Up Communities and Advancing Sustainable Development

Objective 3.3: *Restore Land.* Prepare for and respond to accidental or intentional releases of contaminants and clean up and restore polluted sites.

MDEQ Goal

The MDEQ is committed to ensuring that all owners and operators of TSDs obtain and maintain sufficient financial assurance to pay for clean up of accidental releases of hazardous waste constituents during the life of facility operation and to pay for clean up, closure, and postclosure care in the event that the responsible party defaults on these regulatory obligations.

Strategy

The MDEQ intends to complete financial record reviews in accordance with the objectives and considerations identified below.

Objectives and Considerations

In FY2012, the MDEQ intends to review budgets and expenditures under the settlement and trust agreements for the RACER Trust, and for the CorePointe Group (formerly Chrysler Insurance Company), in follow up to the bankruptcies in FY2011. Significant work will be required to review budget proposals and track expenditures in addition to work plan review and implementation oversight.

In FY2012, the MDEQ expects to complete financial record reviews at all facilities that maintain financial assurance in Michigan, which currently includes a total of 66 financial mechanisms. The MDEQ will use the state's WDS database to track, update, and verify whether facilities are maintaining financial mechanisms as required by the rules. Compliance and financial capability data from WDS will be translated into RCRAInfo pursuant to Michigan's agreement with the U.S. EPA. The MDEQ will send letters to owners/operators reminding them to update cost estimates, make payments into trust funds, and/or renew/replace mechanisms prior to their anniversary date. Deadlines will be tracked, and responses will be logged into the WDS database. Owner/operators will be contacted again if no response is received or if the response is inadequate. As some postclosure periods are approaching 30 years, extension of this time period may need to be pursued in conjunction with perpetual care funds for financial assurance.

This verification and notification process is possible because all TSDs and financial mechanisms are listed in WDS. The financial mechanisms are reviewed when received and rejected if inadequate. If a mechanism is listed in WDS, it has the proper wording. The major concern is that the mechanism provides sufficient coverage and that it is updated and renewed/replaced on schedule. The database can be used to determine what types of coverage are required, to determine what the owner/operator has submitted to meet those requirements, and to identify the submittal deadlines.

The MDEQ has found this process is more effective than conducting facility-specific financial record reviews at only a limited number of facilities each year. This process

highlights the inadequate financial demonstrations before they occur, putting the MDEQ in a proactive mode.

Scheduled Activities

In FY2012, the MDEQ will complete a financial record review for all facilities that maintain financial assurance in Michigan, the current total is 66 financial mechanisms, and enter data into WDS to demonstrate that the review has been completed. To reflect this in WDS, the MDEQ will record an “in-compliance” financial record review (except when it does not apply) for the active TSDs in the Compliance and Enforcement Module in WDS. Because of this proactive approach, essentially all Michigan TSDs will be in compliance with the financial capability requirements at any given time.

2.7 Management and Reporting

U.S. EPA FY2011 – 2015 Strategic Plan, Goal 3: Cleaning Up Communities and Advancing Sustainable Development

Objective 3.2: *Preserve Land.* Conserve resources and prevent land contamination by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products.

MDEQ Goal

The MDEQ’s goal is to ensure that hazardous wastes are managed in a manner that protects human health and the environment and State accomplishments are entered into state and federal databases in a timely manner to track U.S. EPA milestone progress.

Strategy

The MDEQ intends to manage Michigan’s Hazardous Waste Program in a manner that ensures human health and environmental protection. The MDEQ also intends to enter the information that is needed to reflect Michigan’s performance measures towards meeting the U.S. EPA’s GPRA goals into the applicable state and federal databases and to do so in a timely manner.

Objective and Considerations

The MDEQ will manage the program to meet its overall purposes efficiently and effectively in light of resources and constraints. However, any vacancies that may exist or occur during FY2012 may affect the performance of this objective.

The following factors will be a consideration as the MDEQ strives to meet their objective:

- Accuracy and adequacy of the MDEQ program description contained in the Work Plan.
- Timeliness and accuracy of reports and other information submitted to the U.S. EPA.

- Effect of internal procedures to identify, track, and complete tasks necessary to fulfill the Work Plan.
- Effect of the MDEQ administrative records to support compliance and enforcement monitoring, permitting and closure, corrective action activities, and state authorization.
- Effectiveness of communications with the U.S. EPA relating to management and reporting issues.
- Quality of the staff training program.
- Quality of laboratory support.
- Quality of the MDEQ's responses to requests for information by the public.

Scheduled Activities

Baseline Oversight Reporting

In keeping with the RCRA State Oversight Quality Assessment Team Recommendations Report (QAT Report), September 1994, the MDEQ will follow the baseline oversight reporting requirements, as specified in Attachment 1 of the QAT Report and summarized in the following table:

<u>Reports/Reporting</u>	<u>Frequency</u>
WDS/RCRAInfo (CME, CA)	Monthly
Financial Reporting	Annually at end of year
Equipment Inventory	Annually at end of year
Report of Staff Vacancies	Annually at end of year
Initiatives Report	Semiannually
RASPR	Semiannually
Import	Semiannually
Training	Annually
Expanded Public Participation	Optional
Waste Minimization	Semiannually
Joint Inspections	Up to ten per year
Conference Calls	
Enforcement	Quarterly or as negotiated
Permits and Closure	Bimonthly or as negotiated
Corrective Action	Bimonthly or as negotiated
WDS	Quarterly or as negotiated
File Audits	
Inspections and Enforcement	Annually at mid-year
Permits and Closures	Annually at mid-year
Corrective Action	Annually at mid-year
On-site Meetings	Annually at mid-year and/or end-of-year; Conference call before report issuance
Written Evaluation Reports	Mid-year and end-of-year
Capability Assessment	Informal, in conjunction with authorization packages
Picture Reports	Based on WDS data, can be pulled anytime

Database Management and Reporting

WDS/RCRAInfo Reporting: Michigan data for the Hazardous Waste Program is entered into WDS and translated to the U.S. EPA national hazardous waste database, RCRAInfo, for Handler, Permitting, Correction Action, Compliance and Enforcement, and Hazardous Waste (biennial) Reporting data. The financial assurance information in WDS will be translated into RCRAInfo on the same schedule as Permitting and Correction Action. Any disruptions in translation or data comparison reports will be communicated to the, U.S. EPA, Region 5.

The MDEQ is committed to continue to work with the U.S. EPA on completing the switch to the Exchange Network as the means for regulatory reporting of WDS to RCRAInfo.

Compliance Monitoring and Enforcement (CME) Module: The MDEQ commits to maintaining WDS to reflect current compliance, monitoring, and enforcement activities in Michigan. This data will continue to be translated into RCRAInfo on a monthly schedule as soon as the work can be completed for changes in the flat files. CME data has been successfully translated to RCRAInfo and will be updated on a regular basis.

Handler Module and Biennial Reporting: The U.S. EPA identification numbers will continue to be issued through WDS, and the identification numbers will conform to the required check-digit algorithm. This data will continue to be translated into RCRAInfo on a monthly schedule.

Permit Module: The MDEQ commits to maintaining WDS to reflect current permitting, closure, and postclosure activities in Michigan, including facilities listed by the U.S. EPA as high priority under the federal GPRA. This data will continue to be translated into RCRAInfo on a monthly schedule by submitting flat files to U.S. EPA Headquarters. The MDEQ will coordinate with the U.S. EPA and U.S. EPA Headquarters to maintain monthly translation and to resolve any inability to translate.

CA Module: The MDEQ commits to maintaining WDS to reflect CA activities in Michigan, including facilities listed by the U.S. EPA as high priority under the federal GPRA. This data will continue to be translated into RCRAInfo on a monthly schedule by submitting flat files to U.S. EPA Headquarters. The MDEQ will coordinate with the U.S. EPA and U.S. EPA Headquarters to maintain monthly translation and to resolve any inability to translate.

Laboratory Support

Estimates for laboratory support needs for FY2012 are based on data generated by the MDEQ Environmental Laboratory for past analytical services. Costs are divided into two categories to differentiate between samples collected during: (1) RCRA groundwater inspections (i.e., GMEs, O&Ms, and groundwater assessments) and (2) samples resulting from RCRA compliance and/or CA investigations. Although projected laboratory costs are chiefly for mandatory RCRA inspections, allowance has been included for additional sampling visits in oversight support of RCRA closures, waste classification audits, and RCRA facility assessments. Estimates for laboratory support needs also include the time involved for special support of laboratory expertise

regarding specific laboratory technology, methodology, and review of specified portions of Quality Assurance Project Plans (QAPPs).

All samples collected during sampling and compliance inspections will be analyzed in the MDEQ Environmental Laboratory, unless specialized analytical capability not available through the MDEQ Environmental Laboratory is required, i.e., high resolution mass spectrometry. Samples will be sent to laboratories that participate in the MDEQ, Remediation Division, Contract Laboratory Program for any needed analyses not routinely conducted by the MDEQ Environmental Laboratory. All analyses conducted by the MDEQ will be performed in accordance with standard procedures contained in the 2009 (Revision 4) quality assurance manual entitled *Waste and Hazardous Materials Division (now the RMD), Quality Assurance Quality Control Manual for the Sampling and Analysis of Environmental Media* or subsequently approved revision. A copy of this manual was originally provided to the U.S. EPA following its completion (with the assistance of the U.S. EPA contractor) in February 1998; and it was officially approved by the U.S. EPA, Region 5, on December 16, 1998. Major updating was completed during FY2001 (Revision 2). A second major update was completed in FY2006 (Revision 3). Revision 4 was completed in FY2009. Since this manual is lengthy and the procedures contained within do not frequently change, the MDEQ will review this document on a biennial basis and perform minor revisions, as needed. The MDEQ will submit a fully updated copy of the manual to the U.S. EPA every five years (from the date of official U.S. EPA approval) unless substantial changes necessitate a release sooner. Revisions are proposed in FY2012 to address, primarily, changes resulting from the FY2011 MDEQ reorganization. In addition to this MDEQ reference manual, the *U.S. EPA SW-846 Third Edition, Update IVB*, with revisions, will be used.

Safety Training

The RMD has developed a Health and Safety Program to ensure that staff, that perform duties at facilities where they may be exposed to hazardous chemicals, conducts tasks in the safest manner possible. The RMD Health and Safety Program is designed to comply with Michigan's Occupational Safety and Health Administration standards that includes the Michigan Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations and all applicable MDEQ health and safety policies.

- All RMD staff that sample and/or inspect facilities where hazardous chemicals may be present must complete at least 24 hours of safety training designed to teach chemical awareness and toxicology and to familiarize them with personal protective equipment that may be required to perform tasks. All staff who has taken this training is required to complete an additional 8 hours of safety training annually to update their safety skills and to maintain their HAZWOPER certifications. Staff whose work duties require them to wear a respirator must complete an annual 4-hour respiratory protection refresher class, that includes a fit test, and they must be able to demonstrate that they understand and can apply the information learned during the session. All RMD staff that performs field work in a location remote from a medical facility must take Cardiopulmonary Resuscitation (CPR), First Aid, and Automated External Defibrillator (AED) training and maintain their certifications so that they can provide lifesaving skills if an emergency arises.
- The following training needs and costs are projected for FY2011 based on current staffing levels and expected training costs:

Training Needs	No. of Staff	Training Cost
8-hour Annual Safety Training	41 staff	\$90/person
24-hour Initial Safety Training	2 staff	\$325/person
40-hour Initial Safety Training	2 staff	\$450/person
Annual Respirator Training and Fit Test	25 staff	\$50/person
CPR/First Aid Refresher/AED Training	41 staff	\$51/person
Total FY2012 Safety Training Cost		\$8,581

3.0 WASTE MINIMIZATION

U.S. EPA FY2011 – 2015 Strategic Plan, Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution

Objective 4.1: *Promote Pollution Prevention.* Conserve and protect natural resources by promoting pollution prevention and the adoption of other stewardship practices by companies, communities, governmental organizations, and individuals.

MDEQ Goal

Promote pollution prevention (P2) and waste minimization throughout all aspects of the state's Hazardous Waste Program.

Strategy

P2 is central to all of U.S. EPA's sustainability strategies and U.S. EPA will continue to incorporate P2 principles into its policies, regulations, and actions. P2, a long-standing priority for U.S. EPA, encourages companies, communities, governmental organizations, and individuals to prevent pollution and waste before generation by implementing conservation techniques, promoting efficient re-use of materials, making production processes more sustainable, and promoting the use of safety substances. The MDEQ is committed to collaborating with the U.S. EPA to review P2 results and identify enhanced P2 strategies.

Objectives and Considerations

The MDEQ intends to meet our goal to promote P2 and waste minimization to the maximum extent possible.

The following considerations will impact upon our ability to provide this assistance:

- Limited funding and staff resources;
- The availability of OEA;
- Communication with the U.S. EPA on P2 results and enhanced P2 strategies.

Scheduled Activities

P2 is a key element for protecting the Michigan environment. The OEA administers Section 11108 of the NREPA, which established the state Waste Reduction Fee. Fees are assessed on businesses according to quantities of hazardous waste solidified or

landfilled. Fees collected must be used for activities specified in Part 143, Waste Minimization, and Part 145, Waste Reduction Assistance, of the NREPA.

Parts 143 and 145 contain the following major components:

- Provide P2 assistance including information, technical, and financial assistance to help businesses, institutions, and communities;
- Application of P2 multimedia compliance assistance to encourage businesses, municipalities, and the public to meet environmental responsibilities in a cost-effective manner;
- Identification of opportunities to encourage P2 through traditional regulatory activities including permit programs, environmental impact statements, inspections, and enforcement; and
- Collection, analysis, and dissemination to the public of information received under Section 313 of Subtitle B of the Emergency Planning and Community Right-to-Know Act of 1986, Title III of the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499, 42 U.S.C. 11023.

The OEA continues to focus on voluntary P2 programs as specified in the OEA strategic plan. The strategic plan for FY2012 has not yet been developed, but the OEA expects there will be new program areas based on new MDEQ objectives. The current OEA priorities include green supplier, climate change issues, and the newly-developed green chemistry program.

Further information about the OEA P2 program, the P2 Annual Report, as well as other P2 resources, is located on the general P2 Web site located at www.michigan.gov/deqp2.

4.0 MISCELLANEOUS ACTIVITIES

SEE Program Employees

The MDEQ is seeking \$270,000 in U.S. EPA In-Kind Funding for seven SEE FTEs. The employees will continue to work in the following areas: (1) RCRAInfo System, (2) manifest processing, (3) RCRAInfo data entry, (4) district inspections and (5) biennial reporting. One SEE employee will continue to be used by the Southeast Michigan District to conduct certain oversight inspections.

MDEQ Quality Management Plan (QMP)

The QMP is a document mandated by the U.S. EPA for all entities that receive federal funds and collect and/or review environmental data. The QMP outlines all of the significant processes in an organization and documents the steps taken to ensure quality in those processes (including organizational policies, standard operating procedures, etc). The Hazardous Waste Program is required to participate in the development and revision of the plan. The MDEQ QMP is in the process of revision with a deadline to present a draft QMP to the U.S. EPA by September 30, 2011. It is anticipated that staff will be spending a significant amount of time in FY2012 responding to U.S. EPA comments on the draft QMP and developing the final document.

RCRA Ready for Anticipated Use (RAU) Determinations

According to the U.S. EPA, a facility with a Human Exposures Controlled (CA725) and a Construction Complete (CA550), with or without controls, EI completion and all necessary land use controls in place, if applicable, is "Ready for Anticipated Use." As part of their land clean up efforts, the U.S. EPA tracks the number of sites and number of acres that have been cleaned up and are RAU so that they can measure how much land has been successfully revitalized. The MDEQ is committed to help the U.S. EPA track progress on land revitalization and, as such, staff will determine if a GPRA facility that meets the U.S. EPA's definition of "Ready for Anticipated Use" indeed meets that definition, and, if it does, they will complete a U.S. EPA RAU form for the facility and enter the appropriate code for the determination (CA800 Yes) into WDS and RCRAInfo.