

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

Work Plan for Fiscal Year 2010



September 17, 2009

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1.0 INTRODUCTION

This Resource Conservation and Recovery Act of 1976 (RCRA) Grant Work Plan for fiscal year 2010 (Work Plan) describes work the Michigan Department of Environmental Quality (MDEQ), Waste and Hazardous Materials Division (WHMD), is committing to accomplish during fiscal year (FY) 2010, October 1, 2009, to September 30, 2010 (FY10). This work fulfills the WHMD'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 two sections, as follows:

Introduction

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

Programs, Strategic Planning, and Scheduled Activities

This section consists of a narrative of the MDEQ priorities for the year, including strategic planning activities. This narrative includes a description of how the overall program priorities coincide or vary from the U.S. EPA guidance and description of state-specific initiatives and priorities. A detailed account of priority activities specific to each program element, how activities relate to the U.S. EPA guidance, and further background on state priorities are provided. The program elements are as follows:

- Compliance and Enforcement
- Administrative Controls (permits, closure, approved postclosure plans)
- Corrective Action
- State Authorization
- Waste Minimization
- Management and Reporting

Finally, for each program element, there are schedules of activities planned for the year (inspections, permits, etc.). Schedules show midyear milestones and end-of-year commitments.

1.2 Guidance Documents Used to Develop Work Plan

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

- *FY10 National Program Manager's Guidance, April 2009, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency*
- *Region 5 Corrective Action Program, Strategic Approach to Addressing the 2020 Corrective Action Universe, updated January 2009*

1.3 FY10 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 Management 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 Management 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 Management Program.

RCRA Work Plan Program Element	Work Years
Statutory/Regulatory/Application Development <ul style="list-style-type: none"> • Obtain/Maintain Authorization 	1
Compliance Monitoring and Enforcement <ul style="list-style-type: none"> • Inspections and/or Record Review • Timely and Appropriate Enforcement Action • Corrective Action Compliance and Enforcement • Manifest Processing • Hazardous Waste Technical Support Unit (TSU) • Waste Classification • Laboratory Support • Financial Record Reviews • Biennial Report Reviews 	30
Administrative Controls <ul style="list-style-type: none"> • Permits • Postclosure Plans • Closures • Public Participation • TSU 	6
Corrective Action <ul style="list-style-type: none"> • Planning and Priority Setting • Oversight • TSU • Waste Classification • Permitting/Closure/Corrective Action Tracking • Laboratory Support • Enforcement 	12
Management and Reporting <ul style="list-style-type: none"> • Administrative Activities • Information Management and Reporting • Training • Information Requests • Laboratory Coordination 	15
RCRA Total FTE Work Years	64*

*Note: Total FTE Work Years includes 4 FTE vacancies that will likely remain unfilled for FY10.

2.0 PROGRAMS, STRATEGIC PLANNING, AND SCHEDULED ACTIVITIES

2.1 Introduction

Program Elements

In FY10 the MDEQ will use six elements in an effective state program to manage hazardous waste through a delegation of RCRA authorities. These six elements are:

- Compliance and Enforcement
- Administrative Controls (permits, closure, and orders)
- Corrective Action
- State Authorization
- Waste Minimization
- Management and Reporting

The FY10 program priorities for the MDEQ, including any strategic planning activities, are discussed below. The discussion is organized into the program elements as listed above.

In Section 2 of the Work Plan, the following program and strategic planning information are presented for each of the program elements:

- the goal for the program element
- the priorities for the program element
- the MDEQ program strategy discussion
- the MDEQ objective discussion for the program element
- the MDEQ considerations discussion for the program element
- the MDEQ scheduled activities discussion, by district and units

In order for the Work Plan to be useful to the staff performing the work, the scheduled activities are grouped by WHMD office and section, where appropriate, allowing staff to view FY10 program priorities for their office.

2.2 Compliance and Enforcement

Goal

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.

Priority

Compliance assistance activities should focus on newly-regulated facilities, facilities subject to new regulations, and other small businesses with compliance problems. Also, encourage the regulated community to voluntarily discover, disclose, and correct violations before being identified by regulatory agencies.

Consistent with Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), the

U.S. EPA, Office of Enforcement and Compliance Assurance's (OECA) and MDEQ guidelines, the following details the inspection frequencies being targeted:

- federal facilities; annually
- active operating treatment, storage, and disposal (TSD) facilities; at a minimum of annually
- remaining active nonoperating TSD facilities; every other year
- twenty percent of the large quantity generators (LQGs); annually
- an appropriate level of small quantity generators (SQGs); annually
- an appropriate level of transporter evaluations

Compliance Program Strategy Discussion

Field compliance activities during FY10 will focus on the following activities in the Great Lakes watersheds instead of concentrating on priority industrial sectors:

- Inspect and conduct the necessary follow-up activities at all categories of generators. The MDEQ inspection schedule for active TSD facilities usually meets or exceeds the OECA core program. The MDEQ will continue to conduct inspections at 20 percent of LQGs.
- Program improvements include continued attention to inspection quality and identification and tracking of responses to violations. That, coupled with a broader inspection emphasis, allows staff to provide compliance assistance, including pollution prevention and waste information, directly to the regulated community.
- Continue review of facility status in comparison to manifested waste data and follow up as appropriate.
- Continue development and subsequent implementation of a plan to address facilities that have not paid hazardous waste user charges.
- Continue implementation of program to collect manifest data from nonreporting sites.
- Continue review of identified manifest discrepancies.
- Continue efforts to identify and address transporters of hazardous waste without a registration and permit and/or financial responsibility (i.e., fleet liability coverage for accidental occurrences arising from hazardous materials transportation activities). These efforts are expected to identify noncompliance with other transporter requirements.

Objective

Put forth efforts to prevent environmental harm by encouraging and helping the regulated community meet legal obligations by identifying and correcting violations that occur in order to foster program integrity and deter future violations or violations by others.

Considerations

- 1) Effect of the MDEQ's planning and priority-setting activities, as indicated by its compliance monitoring and enforcement strategy, in achieving the program element's objective.
- 2) Effect of the MDEQ's compliance monitoring activities as indicated by:
 - a) Status of inspection and record review activities as described in the Work Plan.
 - b) Effect of tools (e.g., inspection checklists) and techniques (e.g., sampling) used in compliance monitoring activities.
 - c) Accuracy and completeness of inspections and follow up.
 - d) Effectiveness of communication with the U.S. EPA on compliance monitoring-related activities.
 - e) Effect of other activities, such as compliance assistance and encouraging the regulated community to meet legal obligations.
- 3) Effect of the MDEQ's enforcement activities as indicated by:
 - a) Nature, timeliness, and appropriateness of enforcement actions.
 - b) Degree of support afforded other enforcement officials.
 - c) Nature of follow up to enforcement actions.
 - d) Effectiveness of communication with the U.S. EPA on enforcement-related issues.

Scheduled Activities: District and Field Offices

Inspection Focus

The MDEQ will continue to focus inspection activities on all categories of facilities. Experience continues to demonstrate that the frequency and magnitude of violations increase substantially if inspections are not completed on a regular frequency. For example LQGs are inspected once every five years and transporters are inspected on a three-year frequency.

The MDEQ continues to have an inspection focus on any facility that has obtained an identification number, including conditionally exempt small quantity generators (CESQGs). Staff continues to find that smaller generators often have compliance issues that need to be resolved, and this also provides a meaningful opportunity for waste reduction. As a result, MDEQ inspections afford effective opportunities to assist facilities to gain and maintain compliance status, help identify improved disposal options, and provide information on waste reduction.

The MDEQ will continue to organize work toward achieving these inspection frequencies and program objectives. Current staffing levels and funding are factors that

play a part in trying to maximize the MDEQ inspections. In part, decisions about which facilities to inspect will be based on target inspections, complaints, risk criteria, and management factors as outlined in the WHMD and the specific district's neutral criteria plan.

The overall program effectiveness is assisted through a focus on inspections and compliance follow up. Specifically, the MDEQ will use the following to assist with facility selection for inspections:

- Review sites' status in comparison to manifested waste data.
- Address sites that have not paid hazardous waste user charges.
- Collect manifest data from nonreporting sites.
- Review manifest discrepancies during evaluations.
- Unpermitted transporters.
- 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 annual groundwater compliance monitoring evaluations (GMEs). 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 provides compliance assistance and compliance incentives through several means, to include:

- Staff assists, during inspections and through noninspection inquiries, the regulated community in achieving compliance. For example, inspectors provide written material on common compliance requirements such as secondary containment, manifest tracking, and universal waste.
- Staff develops and participates in providing compliance information through presentations to trade associations and interest groups. The MDEQ, Office of Pollution Prevention and Compliance Assistance (OPPCA), undertakes complex, detailed projects of compliance assistance/incentives. See also Section 2.6, Waste Minimization, for a discussion of other OPPCA 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 WHMD 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 continue to be refined for improved effectiveness and efficiencies.

Scheduled Activities: Field Offices and TSU Staff

The MDEQ has 13.15 FTE positions devoted to field inspection activities during FY10. (Note: This number of FTEs does include vacancies that will likely remain unfilled during FY10.) The work performed by these staff includes:

- inspections at TSD facilities
- inspections at fully regulated generators
- inspections at SQGs
- inspections at CESQGs
- inspections at other notifiers
- inspections at transporters
- follow-up inspections
- administrative and civil enforcement activities and support
- complaints
- compliance assistance presentations and compliance assistance 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
- operation and maintenance inspections

- inspections of used oil transporters, used oil transfer facilities, and used oil processor/re-refiners
- administrative case development/case preparation

District Field Staff Inspection Schedule

Staff will perform the following designated activities during FY10. The following designated inspection activities represent 65 percent of the work effort that staff performs:

<u>CEI Category</u>	<u>No. of Inspections</u>
TSD Facility	43 Facilities – Estimated 73 Inspections
LQGs	20 percent of LQGs – 125 Inspections
Hazardous Waste Transporter	33 percent of Transporters
SQGs	Inspections to exceed 300

TSD inspections will be conducted within the universe of 65 TSD facilities. 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.

Site ID	Site Name for TSDF	Quarter(s)*	District
MID057002602	Advanced Resource Recovery, LLC	3rd	SE Mich
MID005363114	Arkema, Inc.	3rd	SE Mich
MID985568021	Chemical Analytics, Inc.	2nd & 4th	SE Mich
MID061862926	Central Products Co. (Intertape)	1st	SE Mich
MID098011992	Le Petomane VII Custodial Trust (CyanokEM)	3rd	SE Mich
MID091605972	Detrex Corp. Site A	2nd & 4th	SE Mich
MID074259565	Dynecol, Inc.	1st, 2nd, 3rd, & 4th	SE Mich
MIR000016055	Environmental Disposal Systems, Inc.	1st, 2nd, 3rd, & 4th	SE Mich
MID980991566	EQ Detroit, Inc.	1st, 2nd, 3rd, & 4th	SE Mich
MID060975844	EQ Resource Recovery, Inc.	2nd & 4th	SE Mich
MID980568711	FMC Allen Park Clay Mine Landfill	3rd	SE Mich
MID005338801	Gage Products Co.	1st & 3rd	SE Mich
MID050616622	General Electric Co.	FY11 - 1st	SE Mich
MID005356910	GMNA Property Mgmt. Fiero Facility	2nd	SE Mich
MID005356886	GMC Metal Fabricating Division	2nd	SE Mich
MID050615996	GMC Technical Center	2nd & 4th	SE Mich
MID005378161	Michigan Chrome & Chemical Co.	FY11 - 1st	SE Mich
MID000724831	Michigan Disposal Waste Treatment Pl.	1st, 2nd, 3rd, & 4th	SE Mich
MID082767591	Michigan Seamless Tube LLC	1st	SE Mich
MID980615298	Petro-Chem Processing Group of Nortru	1st, 2nd, 3rd, & 4th	SE Mich
MID009708678	Solutia, Inc.	FY11 - 1st	SE Mich
MID980793467	Univertical Solder Alloys	3rd	SE Mich
MID048090633	Wayne Disposal, Inc., Site #2	1st, 2nd, 3rd, & 4th	SE Mich
MID000810408	Woodland Meadows Landfill North	4th	SE Mich
MID004508628	AMPCO Pittsburgh Corp (Wyckoff Steel)	FY11 - 1st	SE Mich
MID980825632	MDNR Roscommon Toxaphene Pit	4th	Cadillac

Site ID	Site Name for TSDF	Quarter(s)*	District
MID053343976	Michigan State University	1st, 2nd, & 3rd	Lansing
MID005356712	GMC NAO Flint Operations	2nd	Lansing
MID005356860	GMC Delphi Coldwater Road	FY11 - 3rd	Lansing
MID005358130	Michigan Reutilization LLC (Total Petroleum)	1st & 3rd	Lansing
MID005356647	Delphi Automotive Systems LLC	FY11 - 2nd	Lansing
MID082771700	Granger Land Development Co.	3rd	Lansing
MID980506265	Grand Blanc Landfill	FY11 - 3rd	Lansing
MID980568620	Delphi Automotive Systems LLC	FY11 - 2nd	Lansing
MID000020743	REALM Coldwater	1st	Lansing
MID980617435	The Dow Chemical Co. Salzburg Landfill	1st & 3rd	Saginaw Bay
MID000724724	The Dow Chemical Co.	1st & 3rd	Saginaw Bay
MID000809632	Dow Corning Corp.	FY11 - 2nd	Saginaw Bay
MID000820381	Pfizer (formerly Pharmacia & Upjohn)	FY11 - 3rd	Kalamazoo
MID047153077	MDEQ (Prod. Plated Plastics.)	FY11 - 3rd	Kalamazoo
MID092947928	Drug & Laboratory Disposal, Inc.	2nd & 4th	Kalamazoo
MID005119748	Auto Specialties MFG Co.	FY11 - 3rd	Kalamazoo
MI0571924760	US Dept/Defense	3rd	UP
MID990687964	Lake States Wood Preserving	FY11 - 3rd	UP
MID020263877	Erie Coatings & Chemicals Inc.	FY11 - 3rd	Jackson
MID005044813	County of Lenawee (Buckeye Products Corp.)	FY11 - 3rd	Jackson
MID058723867	Henkel Surface Technologies	3rd	Jackson
MIR000001834	University of Michigan Beck Road	1st & 3rd	Jackson
MID005057005	ACH LLC (Visteon Ford Monroe Stamping)	FY11 - 3rd	Jackson
MID009305665	ACH LLC (Visteon Ford Saline)	1st	Jackson
MID990760100	Chrysler Corp. Introl Division	4th	Jackson
MID020906764	Detrex Chemical	4th	Gr Rapids
MID006026793	Access Business Gr LLC (formerly Amway)	4th	Gr Rapids
MID017079625	Delphi Automotive Systems	FY11 -1st	Gr Rapids
MID006025217	Kurziel Iron of Rothbury, Inc.	3rd	Gr Rapids
MID006407597	General Dynamics Land Systems (Teledyne)	1st	Gr Rapids
MID006014666	Lacks Industries, Inc. - Cascade	2nd	Gr Rapids
MID080359433	Lacks Industries, Inc. - Saranac	2nd	Gr Rapids
MID006020895	KHI, Inc.	1st	Gr Rapids
MID072589328	MDEQ – RRD Fenske Landfill	1st	Gr Rapids
MID980995534	Michigan Environmental Recovery Inc	FY11 - 3rd	Gr Rapids
MID980499735	Perfect Circle Division of Dana Corp.	FY11 - 1st	Gr Rapids
MID006013643	Pfizer Global Manufacturing (Parke Davis)	FY11 - 4th	Gr Rapids
MID990858003	Organic Chemicals, Inc.	FY11 - 3rd	Gr Rapids
MID006014906	Occidental Chemical Corp.	FY11 - 2nd	Gr Rapids

*Note: FY11 inspections are listed for tracking, projection, and planning purposes only and are not FY10 commitments. This reflects a complete list of the TSD Universe and the schedule for inspections to be completed in FY10 as well as inspections that will not be completed in FY10 but will be inspected in FY11.

Hazardous Waste Section CME/Operation & Maintenance (O&M) Schedule

HWS staff, which involves 2.5 FTE positions, will conduct the CME/O&M inspections as shown in the Compliance and Enforcement FY10 TSD Work Schedule, which follows this page.

COMPLIANCE AND ENFORCEMENT FY10 TSD WORK SCHEDULE

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Hazardous Waste Section

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COMMITMENT		MID
FACILITY LEGAL NAME	FACILITY SITE NAME	
Corrective Action Monitoring and Maintenance (CAMP) Inspection In Q2		
1 UNIVERSITY OF MICHIGAN	BECK ROAD FACILITY	MIR000001834 JR
2 WHIRLPOOL CORP	WHIRLPOOL CORP ST JOSEPH DIV PLTS 3-6	MID005477773 JR
Corrective Action Monitoring and Maintenance (CAMP) Inspection In Q4		
3 MI DEPT/NATURAL RESOURCES	MI DEPT/NAT RES STORAGE FACILITY ROSCOMMON	MID980825632 JR
Enforcement Technical Support		
4 ENVIRONMENTAL DISPOSAL SYSTEMS INC	ENVIRONMENTAL DISPOSAL SYSTEMS	MIR000016055 RB
Groundwater Operations & Maintenance (O&M) Inspection in Q2		
5 MRP PROPERTIES CO LLC	ALMA FACILITY	MID005358130 CS
6 THE DOW CHEMICAL COMPANY	DOW CHEMICAL COMPANY- SALZBURG LANDFILL	MID980617435 VH
7 GRAND BLANC LANDFILL	GRAND BLANC LANDFILL	MID980506265 JR
8 WOODLAND MEADOWS LANDFILL NORTH	WOODLAND MEADOWS LDFL NORTH	MID000810408 JM
Groundwater Operations & Maintenance (O&M) Inspection in Q4		
9 FORD MOTOR COMPANY	AUTOMOTIVE COMPONENTS HOLDINGS LLC MONROE PLANT	MID005057005 JR
10 LACKS INDUSTRIES INC	LACKS INDUSTRIES INC	MID006014666 CS
11 MI DEPT/NATURAL RESOURCES	MI DEPT/NAT RES STORAGE FACILITY ROSCOMMON	MID980825632 JM
12 WAYNE DISPOSAL INC	WAYNE DISPOSAL INC	MID048090633 VH
Post Closure Cap Inspection In Q1		
13 GRAND BLANC LANDFILL	GRAND BLANC LANDFILL	MID980506265 JR
Post Closure Cap Inspection In Q2		
14 THE DOW CHEMICAL COMPANY	DOW CHEMICAL COMPANY- SALZBURG LANDFILL	MID980617435 JR
15 THE DOW CHEMICAL COMPANY	DOW CHEMICAL MAIN PLANT & INCINERATOR COMPLEX	MID000724724 JR
16 OCCIDENTAL CHEMICAL CORP	OCCIDENTAL CHEMICAL CORP	MID006014906 JR
17 WOODLAND MEADOWS LANDFILL NORTH	WOODLAND MEADOWS LDFL NORTH	MID000810408 JR

**COMPLIANCE AND ENFORCEMENT
FY10 TSD WORK SCHEDULE**

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COMMITMENT

MID

FACILITY LEGAL NAME

FACILITY SITE NAME

Post Closure Cap Inspection In Q4

18 MRP PROPERTIES CO LLC

ALMA FACILITY

MID005358130 JR

Office of Criminal Investigations (OCI)

The OCI and the WHMD will continue to examine waste and facility data to identify potential noncompliant facilities/transporters for inspection. Uniform waste manifest databases, waste generation reports, TSD facility reports, manufacturing facility databases, and other objective factors will be analyzed to identify targets for enforcement actions. Emphasis will be placed on users who have not paid significant user fees, those with delinquent financial assurance, nonreporting sites, noncompliant shippers, and unlicensed waste haulers. In addition, manifest discrepancies posing environmental harm (considering risk-based criteria) or impacting on program integrity, will be investigated for potential criminal enforcement action.

The OCI, in conjunction with the WHMD, will continue periodic border-crossing inspections targeting international waste haulers' importation and disposal activities. The OCI and the WHMD will continue to regularly communicate and work with U.S. Customs to monitor waste shipments, identify violations and targets for enforcement actions, and prosecute violators. The OCI will strive to coordinate these efforts with the Ontario Ministry of the Environment for surveillance of hazardous waste movement across our common border.

At border inspections, the OCI and the WHMD will continue to analyze available facility data relating to imported solid wastes, liquid industrial wastes, and hazardous wastes. Compliance reviews will include an evaluation of shipper waste characterization documentation and solid waste disposal facility screening procedures. Each individual facility's compliance with Part 111 and Part 115, Solid Waste Management, of the NREPA, will be evaluated.

These efforts may also provide intelligence for future enforcement initiatives in concert with the Eastern and Western Michigan Environmental Crime Task Forces comprised of state and federal criminal justice agencies.

Activity Discussion

The OCI activities in conjunction with the Work Plan are grouped into three categories:

- 1) TSD Facilities: OCI officers will investigate violations at TSD facilities in conjunction with WHMD staff pursuant to a complaint or the findings of a WHMD staff inspection. In addition, the OCI may institute random patrols resulting in the inspection of waste hauling vehicles at TSD facilities and inspection of TSD records. Where warranted, the OCI will compile cases for referral to a county prosecutor or the Michigan Department of Attorney General (MDAG) for prosecution.
- 2) Hazardous Waste Transporters: The OCI 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., Blue Water Bridge at Port Huron and major highway weigh stations). Scheduled events will be conducted in conjunction with U.S. Customs/Ontario officials and/or Michigan State Police, Traffic Safety Division, officers as appropriate.

To supplement the on-road vehicle inspection program, the OCI may audit waste transporter facility documents. Also, the OCI will work with the WHMD to determine whether existing data meet enforcement needs.

As an area of concentration, the OCI and the WHMD 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 OCI will investigate generator/facility violations of suspected hazardous waste mismanagement or releases in conjunction with WHMD staff pursuant to a complaint or the findings of a WHMD staff inspection. Noncompliant generators may also be detected by OCI officers during transporter and TSD audits. Where warranted, the OCI will compile cases for referral to a county prosecutor or the MDAG for prosecution.

2.3 Administrative Controls

Goals

The U.S. EPA developed a RCRA Cleanup Baseline in conjunction with the states as a result of a mandate in the Government Performance and Results Act (GPRA) requiring the U.S. EPA to measure and track program progress. Because the U.S. EPA has set ambitious goals for 2020 that relate to these facilities, the group is called the GPRA 2020 Corrective Action (CA) Universe. In total, the GPRA 2020 CA Universe contains a wide variety of sites. Some facilities are heavily contaminated, while others were contaminated but have since been cleaned up. Still other facilities have not been fully investigated yet and may require little or no remediation.

Priority

The cleanup of some of the facilities in the GPRA 2020 CA Universe is enforced via enforceable administrative controls, such as issuance of an operating license, postclosure operating license, or an approved postclosure plan equivalent to a postclosure operating license.

There are 113 Michigan facilities in the GPRA 2020 CA Universe, and the MDEQ is the lead regulatory agency for corrective action at 86 of the facilities.

Of the 113 Michigan facilities in the GPRA 2020 CA Universe, there are 60 facilities that are subject to enforceable administrative controls by issuance of an operating license, postclosure operating license, or an approved postclosure plan equivalent to a postclosure operating license. This subset of the GPRA 2020 CA Universe is referred to as the GPRA 2020 Permit Baseline.

With respect to the permitting program, the *FY2010 National Program Manager's Guidance, April 2009, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency*, goal statement is:

During FY 2010, Regions should work with the states towards achieving the FY 2011 national strategic target....by implementing initial approved controls or updated controls. This should result in getting at least 98% of

the facilities on the permitting baseline under approved controls, and updating controls at additional facilities,

GPRA 2020 Permit Baseline by Facility

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 bottom of each page of the table.

The GPRA 2020 Permit Baseline by Facility Table follows this page.

Strategy

The MDEQ strategy is to issue or reissue operating licenses and postclosure operating licenses and approve postclosure plans at a pace that will ensure that these administrative controls are maintained for 98 percent of the 60 facilities in the GPRA 2020 Permit Baseline.

The national goal is to have achieved 98 percent of the GPRA 2020 Permit Baseline facilities with “controls in place” by September 30, 2011 (FY11). The MDEQ expects to achieve the national goal of 98 percent.

Objective

The objective of the administrative controls is to implement the described strategy to issue operating licenses and postclosure operating licenses, approve closure plans and postclosure plans, and apply other administrative mechanisms such that the GPRA “approved controls in place” goals by FY11 will be achieved for 98 percent of the GPRA 2020 Permit Baseline.

Considerations

The MDEQ will apply resources as well as allocate the work to be done between the U.S. EPA and other MDEQ divisions to achieve the “controls in place” schedules. Successfully implementing these schedules will allow the MDEQ to meet the FY11 national goals for the “approved controls in place” GPRA 2020 Permit Baseline facilities. It must also be recognized that the ability to evaluate and process timely “controls in place” requires financial assurance reviews. This work involves approximately 6 FTE positions to perform this work schedule. Additionally, this effort is severely constrained by the resources that must be spent on The Dow Chemical Company (Dow) hazardous waste management facility operating license modifications and dioxin cleanup work, both on-site and off-site being performed under the operating license. The work necessary to maintain progress at the Dow facility may prevent the WHMD from maintaining administrative controls for 98 percent of all 60 facilities in the GPRA 2020 permit baseline. Note: any FTE vacancies not filled will affect the ability to complete the projected work schedule.

Scheduled Activities: Hazardous Waste Section

Hazardous Waste TSD Facilities Administrative Controls Work Schedule

The Administrative Controls FY10 TSD Work Schedule follows the GPRA 2020 Permit Baseline by Facility Table.

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GPRA 2020 PERMIT BASELINE BY FACILITY

For the GPRA 2020 Permit Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically, and the resulting cumulative percentage of the baseline met. See footnote for examples of approved controls in place. National Goals: 98% of facilities have approved controls in place by 2011 and renew permits/post closure permits/approved post closure plans/clean closure to maintain 98% Controls in Place by 2011.

	FACILITY LEGAL NAME	FACILITY SITE NAME	MID	OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CC ACCEPTED / PROJ
1	ACCESS BUSINESS GROUP LLC	ACCESS BUSINESS GROUP LLC	MID 006 026 793	4/14/2000 4/14/2010		
2	AMPCO PITTSBURGH CORP	FORMER WYCOFF STEEL INC	MID 004 508 628		8/21/1996	8/21/1996
3	ANCHOR LAMINA AMERICA INC	ANCHOR DANLY COMPONENTS	MID 006 017 966			7/21/1998
4	AUTOMOTIVE COMPONENTS HOL	AUTOMOTIVE COMPONENTS HO	MID 009 305 665		5/18/2007	
5	BAYER CROPSCIENCE LP	BAYER CROPSCIENCE LP	MID 080 358 351			12/30/2003
6	CARLTON CREEK IRONWORKS LL	CARLTON CREEK IRONWORKS L	MID 006 025 217		3/31/2009	8/14/1995
7	CHEMICAL ANALYTICS INC	CHEMICAL ANALYTICS INC	MID 985 568 021	9/30/2002 9/30/2012		
8	CHRYSLER CORP	CHRYSLER INTROL DIVISION	MID 990 760 100		9/30/2003	
9	CYTEC INDUSTRIES INC	CYTEC INDUSTRIES INC (PAST T	MID 005 360 680			5/11/1999
10	DELPHI AUTOMOTIVE SYSTEMS L	DELPHI FLINT EAST - DORT HWY	MID 005 356 647		4/26/2005	
11	DELPHI AUTOMOTIVE SYSTEMS L	DELPHI POWERTRAIN SYSTEMS	MID 017 079 625		9/30/2005	2/1/1991
12	DETREX CORP	DETREX CORPORATION SITE A	MID 091 605 972	1/31/2001 1/31/2011		3/24/1997
13	DETROIT STEEL COMPANY	DETROIT STEEL COMPANY - TRE	MID 017 422 304			9/1/1998
14	DOW CORNING CORPORATION	DOW CORNING MIDLAND PLT	MID 000 809 632	9/29/2000 9/29/2010	4/5/1996	
15	DRUG AND LABORATORY DISPOS	DRUG AND LABORATORY DISPO	MID 092 947 928	11/15/1999 12/30/2009		
16	DYNECOL INC	DYNECOL INC	MID 074 259 565	9/6/2007 3/31/2009		
17	EDWARDS OIL SERVICE INC	EDWARDS OIL SERVICE INC	MID 088 754 668			8/15/2003
18	ENTHONE OMI INC	ENTHONE OMI INC	MID 056 717 747			11/14/2001
19	EQ DETROIT INC	EQ DETROIT INC	MID 980 991 566	12/12/2003 9/30/2010		
20	EQ RESOURCE RECOVERY INC	EQ RESOURCE RECOVERY INC	MID 060 975 844	9/12/2003 9/13/2013		
21	FORD MOTOR COMPANY	FORD MOTOR CO ALLEN PK CLA	MID 980 568 711		9/30/2004	
22	FORD MOTOR COMPANY	FORD MOTOR COMPANY MONR	MID 005 057 005	11/28/2007		3/27/2000
23	GAGE PRODUCTS CO	GAGE PRODUCTS CO	MID 005 338 801	8/4/2003 8/4/2013		
24	GENERAL MOTORS CORPORATIO	REALM/COLDWATER ROAD LAN	MID 005 356 860		6/26/2006	3/24/2005
25	GENERAL MOTORS CORPORATIO	GM FLINT VAN SLYKE COMPLEX	MID 005 356 951			3/31/1992
26	GENERAL MOTORS CORPORATIO	GMC TECHNICAL CENTER- 480-1	MID 050 615 996	12/5/2001 12/5/2011		

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date

DATE:date of administrative control in place

PCP ISSUE / PROJ: post closure plan issuance or projected issuance date

CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

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GPRA 2020 PERMIT BASELINE BY FACILITY

For the GPRA 2020 Permit Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically, and the resulting cumulative percentage of the baseline met. See footnote for examples of approved controls in place. National Goals: 98% of facilities have approved controls in place by 2011 and renew permits/post closure permits/approved post closure plans/clean closure to maintain 98% Controls in Place by 2011.

	FACILITY LEGAL NAME	FACILITY SITE NAME	MID	OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CC ACCEPTED / PROJ
27	GRAND BLANC LANDFILL	GRAND BLANC LANDFILL	MID 980 506 265	5/28/2008	9/26/1985 9/30/2008	
28	GRANGER LAND DEVELOPMENT	GRANGER GRAND RIVER MID08	MID 082 771 700	9/30/1999	7/24/1985	
29	GREDE FOUNDRIES INC	GREDE VASSAR INC VASSAR FO	MID 005 513 262			
30	HADLEY INDUSTRIES	HADLEY INDUSTRIES DIV OF ASI	MID 982 222 242			4/30/1999
31	HOLCIM US INC	HOLCIM US INC DUNDEE PLANT	MID 005 038 500			2/10/1998
32	KHI INC	KHI INC	MID 006 020 895			1/16/2001
33	LACKS INDUSTRIES INC	LACKS INDUSTRIES INC	MID 006 014 666			9/25/1992
34	LACKS INDUSTRIES INC	LACKS INDUSTRIES INC SARANA	MID 080 359 433			5/31/2005
35	LAFARGE MIDWEST INC	LAFARGE MIDWEST INC	MID 005 379 607			6/4/2001
36	LAKE STATES WOOD PRESERVIN	LAKE STATES WOOD PRESERVI	MID 990 687 964		9/5/1995	
37	LE PETOMANE VII CUSTODIAL TR	CYANOKEM - DETROIT	MID 098 011 992	9/10/1996		6/16/1998
38	MACDERMID INC	MACDERMID INC	MID 005 338 371			8/3/1999
39	MAHLE ENGINE COMPONENTS U	MAHLE MUSKEGON SANFORD S	MID 980 499 735		5/30/2002	
40	MI DEPT/NATURAL RESOURCES	MI DEPT/NAT RES STORAGE FAC	MID 980 825 632		8/9/2000	2/1/2002
41	MICHIGAN DISPOSAL INC	MICHIGAN DISPOSAL WASTE TR	MID 000 724 831	10/31/2007 10/31/2017		9/2/1999
42	MICHIGAN SEAMLESS TUBE LLC	MICHIGAN SEAMLESS TUBE	MID 082 767 591			9/24/1998
43	MICHIGAN STATE UNIVERSITY	WASTE STORAGE FACILITY	MID 053 343 976	9/29/2000 9/29/2010		
44	MRP PROPERTIES CO LLC	ALMA FACILITY	MID 005 358 130		6/30/1989	10/2/2003
45	NATIONAL STANDARD COMPANY	LAKE ST PLANT	MIT 270 010 549			3/4/1998
46	OCCIDENTAL CHEMICAL CORP	OCCIDENTAL CHEMICAL CORP	MID 006 014 906			3/24/1993
47	PEPIN IRECO INC	PEPIN IRECO INC	MID 041 413 154			3/23/1992
48	PERMA FIX OF MICHIGAN INC	PERMA FIX OF MICHIGAN INC	MID 096 963 194			1/13/2006
49	PETRO-CHEM PROCESSING GRO	PSC ENVIRONMENTAL SERVICE	MID 980 615 298	11/27/2000 8/1/2009		
50	PHARMACIA & UPJOHN COMPAN	PHARMACIA & UPJOHN COMPAN	MID 000 820 381	3/30/2001 3/30/2011		6/23/2005
51	RUGGED LINER INC	RUGGED LINER INC	MID 058 816 927			2/24/1994
52	SAFETY KLEEN SYSTEMS INC	SAFETY KLEEN SYSTEMS INC	MID 000 722 686			1/20/1999

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date

DATE:date of administrative control in place

PCP ISSUE / PROJ: post closure plan issuance or projected issuance date

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GPRA 2020 PERMIT BASELINE BY FACILITY

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	FACILITY LEGAL NAME	FACILITY SITE NAME	MID	OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CC ACCEPTED / PROJ
53	SOLUTIA INC	SOLUTIA INC-PHOSPHATES/SAF	MID 009 708 678		3/27/2002	
54	SYSTECH ENVIRONMENTAL COR	SYSTECH ENVIRONMENTAL COR	MID 981 200 835			9/21/2001
55	THE DOW CHEMICAL COMPANY	DOW CHEMICAL MAIN PLANT & I	MID 000 724 724	6/12/2003 6/12/2013		
56	THE DOW CHEMICAL COMPANY	DOW CHEMICAL COMPANY-SALZ	MID 980 617 435	9/30/1991 9/30/2009	12/23/1986	
57	UNIVERSITY OF MICHIGAN	BECK ROAD FACILITY	MIR 000 001 834	7/16/1999 7/16/2009		
58	WARNER LAMBERT COMPANY LL	WARNER LAMBERT CO LLC FOR	MID 006 013 643		9/28/2001	
59	WAYNE DISPOSAL INC	WAYNE DISPOSAL INC	MID 048 090 633	7/13/2001 3/31/2009		
60	WOODLAND MEADOWS LANDFILL	WOODLAND MEADOWS LDFL NO	MID 000 810 408	9/12/2005		

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date
 PCP ISSUE / PROJ: post closure plan issuance or projected issuance date
 CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

DATE:date of administrative control in place

ADMINISTRATIVE CONTROLS FY10 TSD WORK SCHEDULE

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Hazardous Waste Section

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COMMITMENT		MID	
FACILITY LEGAL NAME	FACILITY SITE NAME		
Construction Certification Oversight			
1 EQ RESOURCE RECOVERY INC	EQ RESOURCE RECOVERY INC	MID060975844	PQ
Construction Permit Application Administrative and Technical Review			
2 WAYNE DISPOSAL INC	WAYNE DISPOSAL INC	MID048090633	PQ
Construction Permit Application Completeness Review			
3 DRUG AND LABORATORY DISPOSAL INC	DRUG AND LABORATORY DISPOSAL INC	MID092947928	KT
License Application Completeness and Technical Review			
4 DRUG AND LABORATORY DISPOSAL INC	DRUG AND LABORATORY DISPOSAL INC	MID092947928	KT
5 PETRO-CHEM PROCESSING GROUP OF NORTRU LLC	PSC ENVIRONMENTAL SERVICES	MID980615298	DD
6 MICHIGAN STATE UNIVERSITY	WASTE STORAGE FACILITY	MID053343976	KT
License Application Completeness Review			
7 DOW CORNING CORPORATION	DOW CORNING MIDLAND PLT	MID000809632	KT
8 GRANGER LAND DEVELOPMENT CO	GRANGER GRAND RIVER MID082771700 LANDFILL	MID082771700	PQ
License Application Technical Review (Carryover)			
9 WAYNE STATE UNIVERSITY	LIMITED STORAGE FACILITY	MIK644147266	DD
License Reissuance Determination			
10 MICHIGAN STATE UNIVERSITY	WASTE STORAGE FACILITY	MID053343976	KT
License Reissuance Determination (Carryover)			
11 WAYNE DISPOSAL INC	WAYNE DISPOSAL INC	MID048090633	PQ
License Reissuance Determination (FY09 Carryover)			
12 DYNECOL INC	DYNECOL INC	MID074259565	RC
13 EQ DETROIT INC	EQ DETROIT INC	MID980991566	RC

2.4 Corrective Action

Goals

With respect to the corrective action program for the GPRA 2020 CA Universe for FY10, the *FY 2010 National Program Manager's Guidance, April 2009, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency*, the guidance states:

The 2020 Corrective Action Universe lists all 3,746 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 2010. EPA's forthcoming 2009-2014 Strategic Plan will commit the program to reaching specific percentages for three key measures at these sites by 2014:

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

EPA envisions meeting all three goals at 95 percent of the 2020 Universe by the end of FY 2020.

Performance Goals for FY 2010:

EPA has set the following three national targets for 2010:

- Human Exposures EI – 63 percent (2,360 facilities)
- Groundwater EI – 55 percent (2,060 facilities)
- Remedy Construction – 30 percent (1,124 facilities)

Priority: GPRA 2020 CA Universe

There are 113 Michigan facilities in the GPRA 2020 CA Universe, and the MDEQ is the lead regulatory agency for corrective action at 86 of the facilities. Of these 86 facilities, 40 are high National Corrective Action Prioritization System (NCAPS).

GPRA 2020 CA Universe MDEQ-Lead Facility

The GPRA 2020 CA Universe MDEQ Lead by Facility Table shows the actual and projected accomplishment dates for each facility, alphabetically, for each of the three corrective action goals stated above.

An explanation of the abbreviated column headings is shown at the bottom of each page of the table.

The GPRA 2020 CA Universe MDEQ Lead by Facility Table follows this page.

GPRA 2020 CORRECTIVE ACTION BASELINE : MDEQ LEAD BY FACILITY

For the GPRA 2020 Corrective Action Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. See footnote for examples of approved controls in place. National Goals By 2011: 1) 95% of High-NCAPS ranked sites on baseline with Human Exposures Controlled; 2) 80% of High-NCAPS ranked sites on baseline with Groundwater Controlled; 3) 22% of all sites on baseline with Construction Complete.

FACILITY LEGAL NAME	FACILITY SITE NAME	MID	NCAPS	EXP CONTROL / PROJ	GW CONTROL / PROJ	CONSTRUCT / PROJ
1 5200 EAST CORK ST INVESTORS LLC	MIDLINK BUSINESS PARK	MID 001 876 663	M			
2 ACCESS BUSINESS GROUP LLC	ACCESS BUSINESS GROUP LLC	MID 006 026 793	H	9/30/2002	8/20/2004	9/30/2008
3 AMPCO PITTSBURGH CORP	FORMER WYCOFF STEEL INC	MID 004 508 628	H	2/18/1996	2/18/1996	8/29/2003
4 AUTOMOTIVE COMPONENTS HOLDINGS LLC	AUTOMOTIVE COMPONENTS HOLDINGS LLC SALINE	MID 009 305 665	M			
5 BAYER CROPSCIENCE LP	BAYER CROPSCIENCE LP	MID 080 358 351	H	9/14/2005	9/23/2004	1/1/2021
6 BLACK RIVER SCHOOLS	BLACK RIVER PUBLIC SCHOOL	MID 006 411 953	L	9/21/2006	9/16/2003	9/30/2009
7 BLUE COW INC	BLUE COW INC	MID 060 197 662	H	1/16/1998	1/16/1998	1/16/1998
8 BOSTIK INC	BOSTIK INC	MID 060 198 249	M			
9 CARLTON CREEK IRONWORKS LLC	CARLTON CREEK IRONWORKS LLC	MID 006 025 217	H	7/14/2004	9/1/1990	
10 CENTRAL PRODUCTS CO	INTERTAPE POLYMER GRP	MID 061 862 926	L			
11 CHEMICAL ANALYTICS INC	CHEMICAL ANALYTICS INC	MID 985 568 021		8/4/1998	8/4/1998	
12 CHRYSLER CORP	CHRYSLER INTROL DIVISION	MID 990 760 100	M	9/28/2006	8/14/2007	9/30/2010
13 CONTAINER SPECIALTIES INC	CONTAINER SPECIALTIES INC (USEPA REGIN 5)	MID 005 361 597	H		9/30/2008	
14 CYTEC INDUSTRIES INC	CYTEC INDUSTRIES INC (PAST TSD)	MID 005 360 680	L		9/30/2008	9/30/2010
15 DELPHI AUTOMOTIVE SYSTEMS LLC	DELPHI FLINT EAST ENGINEERING CENTER	MID 980 568 620	L			
16 DELPHI AUTOMOTIVE SYSTEMS LLC	DELPHI ENERGY & CHASSIS SAGINAW OPERATIONS	MID 005 356 845	L			
17 DETREX CORP	DETREX CORPORATION SITE A	MID 091 605 972	H		2/10/2006	
18 DETROIT STEEL COMPANY	DETROIT STEEL COMPANY - TRENTON PLANT	MID 017 422 304	M		9/30/2010	9/30/2010
19 DORE INDUSTRIAL INC	DORE INDUSTRIAL INC	MID 005 359 286	H	9/21/2006	8/3/2006	9/30/1999
20 DOW CORNING CORPORATION	DOW CORNING MIDLAND PLT	MID 000 809 632	H	9/24/1999	9/24/1999	

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

NCAPS: National Corrective Action Prioritization System

H=High M=Medium L=Low rank

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GPRA 2020 CORRECTIVE ACTION BASELINE : MDEQ LEAD BY FACILITY

For the GPRA 2020 Corrective Action Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. See footnote for examples of approved controls in place. National Goals By 2011: 1) 95% of High-NCAPS ranked sites on baseline with Human Exposures Controlled; 2) 80% of High-NCAPS ranked sites on baseline with Groundwater Controlled; 3) 22% of all sites on baseline with Construction Complete.

FACILITY LEGAL NAME	FACILITY SITE NAME	MID	NCAPS	EXP CONTROL / PROJ	GW CONTROL / PROJ	CONSTRUCT / PROJ
21 DRUG AND LABORATORY DISPOSAL INC	DRUG AND LABORATORY DISPOSAL INC	MID 092 947 928	M	3/27/1996	3/27/1996	
22 DU PONT E I DE NEMOURS & CO	E I DU PONT DE NEMOURS-MONTAGUE WORKS	MID 000 809 640	M			
23 DYNECOL INC	DYNECOL INC	MID 074 259 565	L	3/16/1998	3/16/1998	
24 EDWARDS OIL SERVICE INC	EDWARDS OIL SERVICE INC	MID 088 754 668		7/2/1992	11/22/1993	
25 EI DUPONT FLINT SITE	EI DUPONT DE NEMOURS	MID 005 512 066	L	9/21/2006	1/30/2006	9/30/2008
26 ENTHONE OMI INC	ENTHONE OMI INC	MID 056 717 747	L			
27 EQ DETROIT INC	EQ DETROIT INC	MID 980 991 566	L		8/23/1996	
28 EQ RESOURCE RECOVERY INC	EQ RESOURCE RECOVERY INC	MID 060 975 844	H	9/24/1999	9/24/1999	
29 FEDERAL-MOGUL CORP	FEDERAL-MOGUL CORP	MID 006 021 414	H		9/30/2008	
30 FORD MOTOR COMPANY	FORD MOTOR COMPANY MONROE PLANT	MID 005 057 005	H	10/1/2001	3/25/2005	
31 FORD MOTOR COMPANY	FORD MOTOR CO ALLEN PK CLAY MINE LF	MID 980 568 711	M	9/6/2007	1/4/2007	9/30/2004
32 GAGE PRODUCTS CO	GAGE PRODUCTS CO	MID 005 338 801	L			
33 GENERAL MOTORS CORPORATION	GM POWERTRAIN WILLOW RUN PLANT	MID 980 587 893	L			
34 GENERAL MOTORS CORPORATION	REALM/COLDWATER ROAD LANDFILL	MID 005 356 860	H	5/29/1998	5/29/1998	
35 GENERAL MOTORS CORPORATION	GMPT BAY CITY PLANT	MID 005 356 688	H		9/30/2008	9/30/2010
36 GENERAL MOTORS CORPORATION	GMC TECHNICAL CENTER- 480-101-240	MID 050 615 996	L			
37 GENERAL MOTORS CORPORATION	GM PLANT SAGINAW MALLEABLE IRON	MID 005 356 696	M		9/30/2008	9/15/2006
38 GRAND BLANC LANDFILL	GRAND BLANC LANDFILL	MID 980 506 265	M			
39 GRANGER LAND DEVELOPMENT CO	GRANGER GRAND RIVER MID082771700 LANDFILL	MID 082 771 700	H	9/5/2001	9/5/2001	9/17/2008 9/30/2008
40 GREDE FOUNDRIES INC	GREDE VASSAR INC VASSAR FOUNDRY	MID 005 513 262	M			

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

NCAPS: National Corrective Action Prioritization System

H=High M=Medium L=Low rank

GPRA 2020 CORRECTIVE ACTION BASELINE : MDEQ LEAD BY FACILITY

For the GPRA 2020 Corrective Action Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. See footnote for examples of approved controls in place. National Goals By 2011: 1) 95% of High-NCAPS ranked sites on baseline with Human Exposures Controlled; 2) 80% of High-NCAPS ranked sites on baseline with Groundwater Controlled; 3) 22% of all sites on baseline with Construction Complete.

FACILITY LEGAL NAME	FACILITY SITE NAME	MID	NCAPS	EXP CONTROL / PROJ	GW CONTROL / PROJ	CONSTRUCT / PROJ
41 HADLEY INDUSTRIES	HADLEY INDUSTRIES DIV OF ASI	MID 982 222 242				
42 HOLCIM US INC	HOLCIM US INC DUNDEE PLANT	MID 005 038 500	M			
43 HONEYWELL INTERNATIONAL INC	HONEYWELL INTERNATIONAL INC BURDICK AND JACKSON	MID 072 575 731	H	9/30/2008		
44 HONEYWELL INTERNATIONAL INC	FORMER DETROIT COKE CORPORATION SITE	MID 099 114 704	M	9/25/2003		
45 KHI INC	KHI INC	MID 006 020 895	H	1/16/2001		1/16/2001
46 LACKS INDUSTRIES INC	LACKS INDUSTRIES INC	MID 006 014 666	H	9/29/2003	9/30/2010	1/1/2021
47 LAFARGE MIDWEST INC	LAFARGE MIDWEST INC	MID 005 379 607	M	5/17/2001	5/17/2001	5/17/2001
48 LAKE STATES WOOD PRESERVING	LAKE STATES WOOD PRESERVING	MID 990 687 964	M			
49 LE PETOMANE VII CUSTODIAL TRUST	CYANOKEM - DETROIT	MID 098 011 992	H			
50 MACDERMID INC	MACDERMID INC	MID 005 338 371	M			
51 MAHLE ENGINE COMPONENTS USA INC	MAHLE MUSKEGON SANFORD STREET	MID 980 499 735	H	10/3/2002	8/28/2002	9/30/2010
52 MI DEPT/ENVIRONMENTAL QUALITY	REMEDATION & REDEVELOPMENT-PROD PLATED PLASTICS	MID 047 153 077	H	7/14/2000	6/12/2001	
53 MI DEPT/ENVIRONMENTAL QUALITY	REMEDATION & REDEVELOPMENT DIV FENSKE LANDFILL	MID 072 589 328	H			
54 MI DEPT/NATURAL RESOURCES	MI DEPT/NAT RES STORAGE FACILTY ROSCOMMON	MID 980 825 632	H	9/29/2000	9/29/2000	2/1/2002
55 MICHIGAN DISPOSAL INC	MICHIGAN DISPOSAL WASTE TREATMENT PLANT	MID 000 724 831	H	9/30/2009	9/30/2009	
56 MICHIGAN SEAMLESS TUBE LLC	MICHIGAN SEAMLESS TUBE	MID 082 767 591	H	9/9/2004	9/30/2005	
57 MICHIGAN STATE UNIVERSITY	WASTE STORAGE FACILITY	MID 053 343 976	H	5/29/1998	5/29/1998	2/18/1993
58 MODINEER CO	MODINEER COMPANY	MIK 367 427 523				
59 MRP PROPERTIES CO LLC	ALMA FACILITY	MID 005 358 130	H	9/27/2004	9/16/2004	9/30/2010

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

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FACILITY LEGAL NAME	FACILITY SITE NAME	MID	NCAPS	EXP CONTROL / PROJ	GW CONTROL / PROJ	CONSTRUCT / PROJ
60 NATIONAL STANDARD COMPANY	LAKE ST PLANT	MIT 270 010 549	M			
61 NATIONAL STANDARD NILES CITY COMPLEX	NATIONAL STANDARD NILES CITY COMPLEX	MID 005 069 257	H	9/29/2003	9/22/2004	
62 PEPIN IRECO INC	PEPIN IRECO INC	MID 041 413 154	M	9/8/2008 9/30/2008		
63 PERMA FIX OF MICHIGAN INC	PERMA FIX OF MICHIGAN INC	MID 096 963 194	H	3/24/2004	9/24/2003	9/30/2010
64 PETRO-CHEM PROCESSING GROUP OF NORTRU LLC	PSC ENVIRONMENTAL SERVICES	MID 980 615 298	H	6/16/1999	6/16/1999	
65 PHARMACIA & UPJOHN COMPANY LLC	PHARMACIA & UPJOHN COMPANY LLC	MID 000 820 381	H	3/29/2001	3/29/2001	3/30/2001
66 PPG INDUSTRIES INC	PPG INDUSTRIES INC	MID 048 788 749	H		9/30/2008 3/10/2008	9/30/2010
67 REICHHOLD INC	REICHHOLD INC FERNDALE MICHIGAN	MID 020 087 128	H	5/28/1998	4/24/1998	
68 RUGGED LINER INC	RUGGED LINER INC	MID 058 816 927	M	8/25/2006	8/4/2006	9/30/2008
69 RUSSO PROPERTIES CORPORATION	MOUNT CLEMENS DISTRIBUTION CENTER	MID 076 342 708	M			
70 SAFETY KLEEN SYSTEMS INC	SAFETY KLEEN SYSTEMS INC	MID 981 000 359	H	5/28/1998	5/28/1998	4/25/1996
71 SAFETY KLEEN SYSTEMS INC	SAFETY KLEEN SYSTEMS INC	MID 000 722 686	M		7/18/1998	
72 SEVERSTAL NORTH AMERICA INC	SEVERSTAL NORTH AMERICA INC	MID 087 738 431	M	2/8/2005	2/8/2005	9/30/2010
73 SOLUTIA INC	SOLUTIA INC-PHOSPHATES/SAFLEX OPS	MID 009 708 678	M			
74 SYSTECH ENVIRONMENTAL CORP	SYSTECH ENVIRONMENTAL CORP	MID 981 200 835	M			
75 TELEDYNE VEHICLE SYSTEMS	FORMER TDY VEHICLE SYSTEMS	MID 006 407 597	H	7/7/2005	7/7/2005	9/30/2010
76 TEXTRON INC	CWC CASTINGS DIVISION PLANT 3	MID 006 030 357	H			
77 THE DOW CHEMICAL COMPANY	DOW CHEMICAL COMPANY-SALZBURG LANDFILL	MID 980 617 435	L		9/30/2009 9/30/2009	

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

NCAPS: National Corrective Action Prioritization System

H=High M=Medium L=Low rank

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GPRA 2020 CORRECTIVE ACTION BASELINE : MDEQ LEAD BY FACILITY

For the GPRA 2020 Corrective Action Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. See footnote for examples of approved controls in place. National Goals By 2011: 1) 95% of High-NCAPS ranked sites on baseline with Human Exposures Controlled; 2) 80% of High-NCAPS ranked sites on baseline with Groundwater Controlled; 3) 22% of all sites on baseline with Construction Complete.

FACILITY LEGAL NAME	FACILITY SITE NAME	MID	NCAPS	EXP CONTROL / PROJ	GW CONTROL / PROJ	CONSTRUCT / PROJ
78 THE DOW CHEMICAL COMPANY	DOW CHEMICAL MAIN PLANT & INCINERATOR COMPLEX	MID 000 724 724	H		9/30/2003	
79 TRANSIGN LLC	TRANSIGN LLC	MID 006 007 967	L	8/25/2008 9/30/2008	8/25/2008 9/30/2008	8/25/2008 9/30/2009
80 UNIVERSITY OF MICHIGAN	BECK ROAD FACILITY	MIR 000 001 834		9/21/2006	7/11/2005	10/20/2004
81 US DEPT/DEFENSE	SELFRIDGE AIR NATIONAL GUARD	MID 099 113 128	H	9/29/2004		9/30/2020
82 WACKER CHEMICAL CORP	WACKER CHEMICAL CORP	MID 075 400 671		9/27/2007	9/14/2007	9/30/2010
83 WARNER LAMBERT COMPANY LLC	WARNER LAMBERT CO LLC FORMER MANUFACTURING SITE	MID 006 013 643	H	11/13/2003	9/21/2004	9/30/2010
84 WAYNE DISPOSAL INC	WAYNE DISPOSAL INC	MID 048 090 633	M	9/30/2009	9/30/2009	
85 WHIRLPOOL CORP	WHIRLPOOL CORP ST JOSEPH DIV PLTS 3-6	MID 005 477 773	H	2/27/2001	2/27/2001	12/27/2002
86 WOODLAND MEADOWS LANDFILL NORTH	WOODLAND MEADOWS LDFL NORTH	MID 000 810 408	L			9/30/2009

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

NCAPS: National Corrective Action Prioritization System

H=High M=Medium L=Low rank

Environmental Indicators (EIs)

The RCRA CA Program now tracks EIs as the means by which environmental results are measured. Of the three milestones listed for FY10, the first two are environmental indicator 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 are site-wide determinations; the facility cannot achieve the EI until all aspects of the facility subject to RCRA CA are considered in the determination. 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 deemphasize the CA process. The EIs reflect “current” conditions (i.e., known or expected at the time of the determination). EIs are site-wide and should reflect all contaminants of concern present above risk-based levels of concern.

- 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 FY10 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.

Strategy

The MDEQ strategy during FY10 is to apply available resources (11.9 FTEs) at a pace that will enable the meeting of the following milestones for the MDEQ-lead GPRA 2020 CA Universe facilities by FY11:

- Human exposure controlled milestone at 63 percent of the sites and 95 percent of the high NCAPS-ranked sites;
- Contaminated groundwater controlled at 55 percent of the sites and 80 percent of all high-NCAPS-ranked sites;
- Complete construction of final remedies at 30 percent of the entire GPRA 2020 CA Universe.

Objective

The objective of the RCRA CA Program is to implement the strategy described to conduct correction action at the GPRA 2020 CA Universe facilities for which the MDEQ is the lead regulatory agency such that the MDEQ will achieve the U.S. EPA GPRA permitting and corrective action goals by FY11. Any FTE vacancies that may occur during FY10 will likely not be filled, thereby affecting the MDEQ's ability to complete these GPRA goals.

Considerations

The MDEQ will apply resources as well as allocate the work to be done between the U.S. EPA and other MDEQ divisions to allow the MDEQ to meet the FY11 national goals for the GPRA 2020 CA Universe facilities. However, financial assurance review is an important component to the RCRA CA Program objectives and current economic trends involving regulated facilities entering into bankruptcy is altering the progress planned for the MDEQ-lead GPRA 2020 CA schedule. The MDEQ will also continue to follow through on financial recoveries for U.S. EPA-lead facilities.

Scheduled Activities: Hazardous Waste Section

Hazardous Waste TSD Facilities Corrective Action Work Schedule.

Following this page is the Corrective Action FY10 TSD Work Schedule.

Corrective Action Monitoring and Maintenance (CAMM) Corrective Action 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. During FY07 a pilot inspection process was developed. These pilot inspections to evaluate corrective action compliance continued in FY08 so a more finalized inspection format and proposed inspection rotation schedule could be planned, approved, and initiated for FY09. The CAMMs are also included in the Corrective Action FY10 TSD Work Schedule.

2.5 State Authorization

Goal

The U.S. EPA is committed to authorizing state programs and enhancing the U.S. EPA/MDEQ partnership. The MDEQ has 1 FTE devoted to authorization.

CORRECTIVE ACTION FY10 TSD WORK SCHEDULE

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Hazardous Waste Section

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COMMITMENT			MID	
FACILITY LEGAL NAME	FACILITY SITE NAME			
Corrective Action Oversight				
1	ADVANCED RESOURCE RECOVERY LLC	ADVANCED RESOURCE RECOVERY LLC	MID057002602	JR
2	MRP PROPERTIES CO LLC	ALMA FACILITY	MID005358130	PQ
3	FORD MOTOR COMPANY	AUTOMOTIVE COMPONENTS HOLDINGS LLC MONROE PLANT	MID005057005	PQ
4	AUTOMOTIVE COMPONENTS HOLDINGS LLC	AUTOMOTIVE COMPONENTS HOLDINGS LLC SALINE	MID009305665	PQ
5	BASF CORP	BASF CORP	MID064197742	RC
6	CYTEC INDUSTRIES INC	CYTEC INDUSTRIES INC (PAST TSD)	MID005360680	DD
7	DETROIT STEEL COMPANY	DETROIT STEEL COMPANY - TRENTON PLANT	MID017422304	RC
8	DU PONT E I DE NEMOURS & CO	E I DU PONT DE NEMOURS-MONTAGUE WORKS	MID000809640	RB
9	EI DUPONT FLINT SITE	EI DUPONT DE NEMOURS	MID005512066	DD
10	EQ RESOURCE RECOVERY INC	EQ RESOURCE RECOVERY INC	MID060975844	PQ
11	L3 COMMUNICATIONS	L3 COMMUNICATIONS COMBAT PROPULSION SYSTEMS	MIR000015313	DD
12	MAHLE ENGINE COMPONENTS USA INC	MAHLE MUSKEGON SANFORD STREET	MID980499735	DD
13	MICHIGAN SEAMLESS TUBE LLC	MICHIGAN SEAMLESS TUBE	MID082767591	RB
14	NATIONAL STANDARD NILES CITY COMPLEX	NATIONAL STANDARD NILES CITY COMPLEX	MID005069257	KT
15	PERMA FIX OF MICHIGAN INC	PERMA FIX OF MICHIGAN INC	MID096963194	KT
16	US DEPT/DEFENSE	SELFRIDGE AIR NATIONAL GUARD	MID099113128	PQ
17	SEVERSTAL NORTH AMERICA INC	SEVERSTAL NORTH AMERICA INC	MID087738431	KT
18	TRICIL ENVIRONMENTAL SERVICES	TRICIL ENVIRONMENTAL SERVICES	MID072585755	KT
19	WACKER CHEMICAL CORP	WACKER CHEMICAL CORP	MID075400671	DD
Corrective Action Oversight - Off Site				
20	THE DOW CHEMICAL COMPANY	DOW CHEMICAL MAIN PLANT & INCINERATOR COMPLEX	MID000724724	CH

CORRECTIVE ACTION FY10 TSD WORK SCHEDULE

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Hazardous Waste Section

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COMMITMENT	FACILITY LEGAL NAME	FACILITY SITE NAME	MID	
Corrective Action Oversight - On Site				
21	THE DOW CHEMICAL COMPANY	DOW CHEMICAL MAIN PLANT & INCINERATOR COMPLEX	MID000724724	CH
GPRA CA400 Remedy Select Determination				
22	CHEMICAL ANALYTICS INC	CHEMICAL ANALYTICS INC	MID985568021	RC
23	DYNECOL INC	DYNECOL INC	MID074259565	RC
24	EQ DETROIT INC	EQ DETROIT INC	MID980991566	RC
GPRA CA550 Construction Complete Determination				
25	CHRYSLER CORP	CHRYSLER INTROL DIVISION	MID990760100	JR
GPRA CA550 Construction Complete Determination (Carryover)				
26	TRANSIGN LLC	TRANSIGN LLC	MID006007967	DD
GPRA CA725 Human Exposures Controlled Determination (Carryover)				
27	DETREX CORP	DETREX CORPORATION SITE A	MID091605972	DD
License Reissuance Determination				
28	UNIVERSITY OF MICHIGAN	BECK ROAD FACILITY	MIR000001834	RB

Priorities

Focus identifying opportunities to streamline the authorization process.

Strategy

The MDEQ will continue to obtain and maintain the legal authorities needed to administer a quality state program and conduct RCRA-required regulatory activities.

The MDEQ will continue to pursue authorization for recently promulgated administrative rules that address, in part, the balance of RCRA Cluster 14 and all of RCRA Clusters 15, 16, and 17, along with several state-initiated revisions.

Additionally, the MDEQ will initiate work on administrative rules associated with RCRA Cluster 18 and portions of RCRA Cluster 19.

Objective

Obtain and maintain legal authorities to conduct regulatory activities required by RCRA.

Considerations

- 1) Status of authorization activities indicated in the Work Plan.
- 2) Effectiveness of communication with the U.S. EPA on authorization activities, including timeliness and sufficiency of responses to U.S. EPA comments.

Scheduled Activities

Program Revisions

The MDEQ will continue to pursue authorization as stated above for recently promulgated administrative rules.

Authorization Activities Schedule and Review Responsibilities

Event	Party	Time Frame
Provide the U.S. EPA with a copy of the proposed rules package	MDEQ	June 15, 2010
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 a copy of the proposed rules package available for public comment and the public notice announcing the public hearing on the package	MDEQ	No later than the time notice it 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 (ARA)	MDEQ	Within 30 days of effective date of rules

Event	Party	Time Frame
Provide the state with written comments on the draft express ARA	U.S. EPA	Within 60 days of receipt of draft express ARA
Provide the U.S. EPA with written response to comments on draft express ARA and submit final express ARA	MDEQ	Within 60 days of receipt of comments
Provide the state with written comments on final express ARA	U.S. EPA	Within 60 days of receipt of final express ARA
Provide the U.S. EPA with a written response to comments on final express ARA	MDEQ	Within 60 days of receipt of comments

Authorization Activities Schedule Adjustment

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 schedule extension requests.

Report on Authorized State Program Revisions (RASPR)

The MDEQ will submit a RASPR by January 15, 2010. 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.

2.6 Waste Minimization

To protect the Michigan environment, pollution prevention (P2) is a key element. The OPPCA administers Section 11108 of Part 111, 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 OPPCA continues to focus on voluntary P2 programs as specified in the OPPCA strategic plan. The strategic plan for FY10 has not yet been developed, but the OPPCA expects there will be new program areas based on new MDEQ objectives. The OPPCA priorities will be shifting to climate change issues and the development of a green chemistry program.

For further information about the OPPCA P2 program, the P2 Annual Report is located on the Internet at http://www.michigan.gov/documents/deq/deq-ess-p2-annualreport-2008_264178_7.pdf, and the general P2 Web site is located at <http://www.michigan.gov/deq/0,1607,7-135-3585---,00.html>.

2.7 Miscellaneous Activities

Senior Environmental Employee Program (SEEP) Employees

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

Hazardous Waste Database Integration Project

The MDEQ will continue to maintain functionality in the WDS database, as well as to finance additional projects that will facilitate data translation to the U.S. EPA and increase data entry efficiency. The WDS application is currently undergoing development and upgrading to a Web-based, client server application (.net). The WDS rebuild is being implemented through a contract with Windsor Solutions.

Computer Upgrades

The MDEQ intends to provide additional upgrades to the WHMD computers to meet the MDEQ standards and to purchase printers, updated software, and other equipment to meet operational needs.

Dioxin Sampling Contract

The MDEQ intends to continue to investigate dioxin/furan and coplanar polychlorinated biphenyl (PCB) contamination in the city of Midland, the Tittabawassee River, the Saginaw River, and Saginaw Bay. In addition, the MDEQ intends to continue community involvement activities in coordination with the U.S. EPA to keep residents in the Midland/Saginaw/Bay City area and other stakeholders informed about corrective action work being conducted to address the dioxin contamination in the Saginaw Bay watershed.

Hazardous Waste Recycling Rule

WHMD staff is providing support to the development of the federal hazardous waste recycling rule (Definition of Solid Waste) and outreach to the regulated-community in Michigan. The rule potentially has high impact on the state and the businesses in the state and, therefore, has a high level of interest. Michigan is participating through the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) in providing feedback on the rule and is also fielding questions and providing information to businesses and organizations within the state.

2.8 Management and Reporting

Objective

Manage the program to meet its overall purposes efficiently and effectively in light of resources and constraints. Note: There are 14.7 FTEs identified to properly plan, manage, track, and report the work identified in the Scheduled Activities/Baseline Oversight. Any vacancies that may exist or occur during FY10 may affect the performance of this objective.

Considerations

- 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

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:

Baseline Oversight Reporting

Reports/Reporting

WDS/RCRAInfo (CME, CA)

Financial Reporting

Equipment Inventory

Report of Staff Vacancies

Initiatives Report

RASPR

Import

Training

Expanded Public Participation

Waste Minimization

Hard Copy

Inspections of elements

State does not enforce

Commercial (off-site)

Draft and final licenses

Frequency

Monthly

Annually at end of year

Annually at end of year

Annually at end of year

Semiannually

Semiannually

Semiannually

Annually

Optional

Semiannually

Per occurrence

24-hour report; inspection report to follow

As issued, in accordance with

Memorandum of Understanding

Joint Inspections

Up to ten per year

Conference Calls

Enforcement

Permits and Closure

Corrective Action

WDS

Quarterly or as negotiated

Bimonthly or as negotiated

Bimonthly or as negotiated

Quarterly or as negotiated

File Audits

Inspections and Enforcement

Permits and Closures

Corrective Action

Annually at midyear

Annually at midyear

Annually at midyear

On-site Meetings

Annually at midyear; end-of-year;
conference call before report issuance

Written Evaluation Reports

Midyear; end-of-year

Capability Assessment

Informal, in conjunction with authorization
packages

Picture Reports

Based on WDS data, can be pulled anytime

Laboratory Support

Estimates for laboratory support needs for FY10 are based on data generated by the MDEQ Environmental Laboratory for past analytical services and work that will result from the MDEQ's authorization for the federal corrective action provision on April 8, 1996. Costs are divided into two categories to differentiate between samples collected during: (1) RCRA groundwater inspections (i.e., CMEs, O&Ms, and groundwater assessments) and (2) samples resulting from RCRA compliance and/or corrective action investigations. Although projected laboratory costs are chiefly for mandatory RCRA inspections, allowance has been included for additional sampling visits in 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. All analyses conducted by the MDEQ will be performed in accordance with standard procedures contained in the 2006 (Revision 3) quality assurance manual entitled *Waste and Hazardous Materials Division, 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 FY01, and Revision 2 was submitted to the U.S. EPA, Region 5, in February 2001. A second major update was completed in FY06, and Revision 3 was submitted to the U.S. EPA, Region 5, in May 2006. 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. 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 WHMD has developed a Health and Safety Program to ensure that staff, who perform duties at facilities where they may be exposed to hazardous chemicals, conduct tasks in the safest manner possible. The WHMD Health and Safety Program is designed to comply with Michigan's Occupational Safety and Health Administration standards, which includes the Michigan Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations and all applicable MDEQ health and safety policies.

- All WHMD staff who sample and/or inspect facilities where hazardous chemicals may be present is required to 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. WHMD staff is encouraged to take Cardiopulmonary Resuscitation (CPR), First Aid, and Automated External Defibrillator (AED) training and to maintain their certifications so that they can provide lifesaving skills if an emergency arises.

- The following training needs and costs are projected for FY10 based on current staffing levels and expected training costs:

<u>Training Needs</u>	<u>No. of Staff</u>	<u>Training Cost</u>
8-hour Annual Safety Training	65 staff	\$90/person
24-hour Initial Safety Training	3 staff	\$325/person
Annual Respirator Training and Fit Test	29 staff	\$50/person
CPR/First Aid Refresher/AED Training	65 staff	\$52/person
Total FY10 Safety Training Cost		\$11,655

Financial Capability Program

In FY10 the financial capability program will continue the extra effort that started in FY09 due to the extraordinary number of bankruptcies in Michigan. Notably General Motors Corporation and Chrysler Corporation, as well as other regulated facilities entered the bankruptcy process and significant additional work is needed to ensure that the affected financial assurance mechanisms are maintained through the bankruptcy process.

The MDEQ will use the state's WDS database to verify whether facilities are maintaining financial mechanisms as required by the rules. 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 database. Owner/operators will be contacted again if no response is received or if the response is inadequate. In FY10 we expect to issue between 60 and 100 reminder letters.

This verification and notification process is possible because all TSDs and financial mechanisms are listed in the TSD database and will soon be in WDS. The financial mechanisms are reviewed when received and rejected if inadequate. If a mechanism is listed in the database, 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.

Data will be entered into WDS to demonstrate that a financial review has been completed. Because of this proactive approach, essentially all Michigan TSDs are in compliance with the financial capability requirements at any given time. 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. This reporting will be done periodically throughout the FY, but a financial record review will be recorded for at least one-quarter of all active TSDs by the end of the first quarter.

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 Mr. Dan Bakk, U.S. EPA, Region 5.

Compliance Monitoring and Enforcement 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. The MDEQ will continue processing and submitting data for the 2009 biennial reporting cycle.

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 since the data cannot be translated through CDX. Monthly translation of permitting, closure, postclosure, and financial assurance activities may be effected by the release of RCRAInfo V4. The MDEQ will coordinate with U.S. EPA and U.S. EPA Headquarters to maintain monthly translation and to resolve any inability to translate resulting from implementation of RCRAInfo V4.

Corrective Action Module

The MDEQ commits to maintaining WDS to reflect corrective action 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 since the data cannot be translated through CDX. Monthly translation of corrective action activities may be effected by the release of RCRAInfo V4. The MDEQ will coordinate with U.S. EPA and U.S. EPA

Headquarters to maintain monthly translation and to resolve any inability to translate resulting from implementation of RCRAInfo V4.