FACT SHEET

Proposed Post-Closure Renewal Licensing of
Waste Management of Michigan
Woodland Meadows North
Hazardous Waste Landfill Facility
Canton Township, Michigan

MID 000 810 408

January 18, 2018

Michigan Department of Environmental Quality
Waste Management and Radiological Protection Division
The Michigan Department of Environmental Quality (MDEQ), Waste Management and Radiological Protection Division (WMRPD), proposes to issue a renewal of the post-closure operating license to Waste Management of Michigan, Inc. (Waste Management) for the continued post-closure care and maintenance of the Woodland Meadows North hazardous waste landfill in Canton Township, Michigan (Facility). Section I of this Fact Sheet describes the state and federal programs established to regulate hazardous waste and to license hazardous waste treatment, storage, and disposal facilities.

The provisions of R 299.9502 and R 299.9518, of the Michigan Administrative Code (MAC), require the MDEQ to issue a post-closure license to a hazardous waste landfill disposal facility. Based on the review of the Waste Management post-closure operating license renewal application, WMRPD staff have proposed the renewal of the post-closure license be issued based on the following conclusions:

1. The Facility has been maintained in accordance with approved plans and applicable rules. Section II of this Fact Sheet describes the Facility site, design, its prior licensing, and MDEQ audit activities.

2. The issuance of the post-closure operating license will minimize the potential for this Facility to present a hazard to human health or the environment during post-closure care.

3. The application submitted by Waste Management is sufficiently detailed to demonstrate that the Facility's post-closure care and monitoring complies with the applicable technical standards. In addition to the standard and general facility operating conditions contained in all operating licenses, the draft license contains conditions specific to Waste Management's landfill post-closure maintenance and monitoring activities. A summary and explanation of these conditions is included in Section II.C. of this Fact Sheet. The portions of the license application that describe, in detail, how the company will comply with certain regulations have been attached to the draft license, as enforceable documents. Such attachments include the Post-Closure Inspection Schedule, Contingency Plan, and Environmental Monitoring Programs.

On occasion, during the operating life of the Facility, Waste Management has been found to be out of compliance with certain provisions of Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) [formerly referred to as Michigan Hazardous Management Act, 1979 PA 64, as amended (Act 64)]. Waste Management has, however, corrected the violations for which they were cited.

Although the MDEQ believes it has done a thorough job of reviewing the company's application for the post-closure operating license, the agency is seeking public input on the issuance of this license. Section IV of this Fact Sheet describes the public participation process.

I. INTRODUCTION

Part 111 of Act 451 was passed by the Michigan Legislature to regulate the management of hazardous waste from generation to disposal. Likewise, Subtitle C of the Solid Waste Disposal
Act, as amended, 42 USC 6901, et. seq. [commonly known as the Resource Conservation and Recovery Act of 1976 (RCRA)], was passed by the U.S. Congress to regulate hazardous waste nationwide. RCRA was amended substantially by the Hazardous and Solid Waste Amendments of 1984 (HSWA).

Both RCRA and Part 111 of Act 451 established a permit system governing the treatment, storage, and disposal of hazardous wastes. RCRA allows the states to obtain authorization to issue a state hazardous waste operating license in lieu of a federal permit. Effective December 27, 1985, the State of Michigan amended its hazardous waste management administrative rules to be equivalent to those under RCRA and applied to the U.S. Environmental Protection Agency for authorization. In October 1986, Michigan was granted authorization to administer all portions of the RCRA program, except some provisions under HSWA. Since that time Michigan has continued to amend its hazardous waste management administrative rules and is currently authorized to administer all portions of the RCRA program applicable to this post-closure operating license. The duration of the State operating license will be ten years.

II. DESCRIPTION OF THE FACILITY

A. Site Description

The Woodland Meadows North site is a 61-acre landfill cell that accepted non-hazardous wastes and wastes that became regulated as hazardous with the implementation of the above referenced state and federal regulations. Waste Management decided not to continue the landfill disposal of hazardous waste at this Facility and closed the cell in 1983, certified the closure, and has been conducting post-closure maintenance and monitoring of the cell. The Facility is located at 4620 Hannan Road, Canton Township, Michigan.

B. Facility Design and Regulatory Status

Currently, the closed hazardous waste landfill cell is licensed under Part 111 of Act 451. The existing post-closure operating license was issued on September 12, 2005, and expired on that date in 2015. Waste Management submitted a timely renewal application on May 18, 2015, which has allowed them to continue post-closure maintenance and monitoring, under that existing license, until a final decision is made on their renewal application.

The 61-acre cell, used for the disposal of non-hazardous waste and hazardous waste, consists of a natural clay liner with leachate collection around the perimeter of the cell, which removes leachate via three leachate collection risers. A five-foot clay cap was placed over the waste to close the landfill, in accordance with the regulatory requirements in effect at the time.
C.  Facility-Specific License Conditions
The following items are Facility-specific license conditions for the post-closure care of the landfill:

1.  Conditions for Post-Closure.  Condition III.B. requires the Facility to maintain run-on and run-off controls, including the leachate collection and removal system.  Condition III.C. requires the Facility to submit an annual report summarizing all the maintenance activities necessary to properly maintain the Facility during the previous year.

2.  Environmental Monitoring Conditions.  Conditions IV.A., IV.B, IV.C, and IV.D require the licensee to conduct a groundwater monitoring program, a surface water monitoring program, a leachate monitoring program, and an effluent monitoring program (Attachment 4 of the license).

3.  Part V of the license identifies waste management units (WMUs) at the Facility.  Currently, there is no evidence of a release from any of the WMUs.  Part V of the license also requires Waste Management to notify the MDEQ if a new release of contaminants has occurred.  If a release is identified from any of the WMUs, the Facility is required to prepare and implement plans for the remediation of the contamination.

4.  Part VI of the license contains a schedule for Waste Management to submit a plan to the MDEQ, for review and approval to collect and evaluate the monitoring and maintenance data, to determine if changes in the post-closure components and duration can be modified during periodic review of the license.

III.  ENVIRONMENTAL IMPACT

A.  Wastes Landfilled

Waste Management landfilled both characteristic and listed hazardous wastes, as well as non-hazardous wastes in this 61-acre cell.  The hazardous wastes contained some volatile organic compounds (primarily solvents) and inorganic metals (lead, zinc, chromium, copper, and cadmium) from various manufacturing processes.

B.  Groundwater Monitoring

Waste Management conducts a groundwater monitoring program to evaluate whether hazardous constituents, from the landfill cells, have entered the groundwater under the landfill area.  The results of the monitoring, to date, have shown that the operation of the landfill has not impacted the groundwater.  The draft post-closure operating license includes a groundwater monitoring program to detect any release of contamination from the landfill.

C.  Surface Water Monitoring

Waste Management conducts a surface water monitoring program to evaluate whether hazardous constituents, from the landfill, have entered the surface water on the site.
The results of the monitoring, to date, have shown that the operation of the landfill has not impacted the surface water.

IV. PUBLIC PARTICIPATION

A. Public Comment Procedures

The purpose of public participation is to ensure that the interested public has knowledge of the MDEQ proposed actions, and that it has the opportunity to comment on those actions. In addition, the process ensures that the MDEQ has the opportunity to benefit from any information the public might have, relevant to the proposed actions. Comments may be submitted in writing to the addressee listed in Subsection C between January 18, 2018 and March 5, 2018. No hearing has been scheduled for this draft post-closure operating license. A request for a public hearing must be made in writing and state the nature of the issues proposed to be raised at the hearing. The public comment procedures that will be followed are stated in MAC R 299.9514 and R 299.9515 and in Title 40 of the Code of Federal Regulations 124.11 and 124.12.

After the close of the public comment period, the MDEQ will decide whether to issue the renewal of the post-closure operating license. Written comments submitted during the public comment period will be considered by the Director of the WMRPD, in the formulation of the final decision. Responses to written comments and statements will be included in the record supporting the final decision of the agency. The final post-closure operating license decision by the MDEQ will be communicated to the applicant, each person who submitted a written comment during the public comment period, and all persons on the Facility mailing list.

B. Locations of Available Information

The administrative record for the draft Act 451 post-closure operating license renewal is on file at the MDEQ, WMRPD, Constitution Hall, 525 West Allegan Street, Fourth Floor South, Lansing, Michigan (contact Mr. Peter Quackenbush at 517-284-6568 or quackenbushp@michigan.gov). In addition, copies of the draft post-closure operating license and the Fact Sheet are available for review at the MDEQ, WMRPD, Southeast Michigan District Office, located at 27700 Donald Court in Warren, Michigan (contact Mr. Michael Busse at 586-753-3839); and at the Canton Public Library, located at 1200 South Canton Center Road, Canton, Michigan (contact Ms. Carol Kuchta at 734-397-0999 ext.1180).

C. Contact Person

Comments and requests regarding the Part 111 of Act 451 post-closure operating license should be addressed to:

Mr. Peter Quackenbush
Michigan Department of Environmental Quality
Waste Management and Radiological Protection Division
P.O. Box 30241
Lansing, Michigan 48909-7741
Written comments concerning the draft post-closure operating license should include the name and address of the writer, a concise statement of the basis for the comments, and the supporting relevant facts upon which the comments are based. All further requests for information, including requests for copies of the draft license and the Fact Sheet, should be made to the addressee printed above. Written comments must be postmarked no later than March 5, 2018.