



State of Michigan  
Department of Environmental Quality  
**HAZARDOUS WASTE MANAGEMENT FACILITY OPERATING LICENSE**



NAME OF LICENSEE: EQ Resource Recovery, Inc.

NAME OF FACILITY OWNER: EQ Resource Recovery, Inc.

NAME OF FACILITY OPERATOR: EQ Resource Recovery, Inc.

NAME OF TITLEHOLDER OF LAND: EQ Resource Recovery, Inc.

FACILITY NAME: EQ Resource Recovery, Inc.

FACILITY LOCATION: 36345 Van Born Road, Romulus, Michigan

EFFECTIVE DATE: September 30, 2015

EPA IDENTIFICATION (ID) NUMBER: MID 060 975 844

REAPPLICATION DATE: April 30, 2025

EXPIRATION DATE: September 30, 2025

**AUTHORIZED ACTIVITIES**

Pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), being §§324.11101 to 324.11153 of the Michigan Compiled Laws, and the hazardous waste management administrative rules (hereafter called the "rules") promulgated there under, being R 299.9101 *et. seq.* of the Michigan Administrative Code, by the Michigan Department Environmental Quality (MDEQ), an operating license (hereafter called the "license") is issued to EQ Resource Recovery, Inc. (hereafter called the "licensee") to operate a hazardous waste management facility (hereafter called the "facility") located at latitude 83 24' 30" and longitude '42 16' 30". The licensee is authorized to conduct the following hazardous waste management activities:

- |   |   |  |  |
|---|---|--|--|
| <input checked="" type="checkbox"/> STORAGE   | <input checked="" type="checkbox"/> TREATMENT | <input type="checkbox"/> DISPOSAL            | <input type="checkbox"/> POSTCLOSURE         |
| <input checked="" type="checkbox"/> Container | <input type="checkbox"/> Container            | <input type="checkbox"/> Landfill            | <input type="checkbox"/> Tank                |
| <input checked="" type="checkbox"/> Tank      | <input checked="" type="checkbox"/> Tank      | <input type="checkbox"/> Land Application    | <input type="checkbox"/> Surface Impoundment |
| <input type="checkbox"/> Waste Pile           | <input type="checkbox"/> Surface Impoundment  | <input type="checkbox"/> Surface Impoundment | <input type="checkbox"/> Landfill            |
| <input type="checkbox"/> Surface Impoundment  | <input type="checkbox"/> Incinerator          |  | <input type="checkbox"/> Waste Pile          |
| <input type="checkbox"/> Drip Pad             | <input type="checkbox"/> Other:               |  |  |

**APPLICABLE REGULATIONS AND LICENSE APPROVAL**

The conditions of this license were developed in accordance with the applicable provisions of the rules, effective November 5, 2013. The licensee shall comply with all terms and conditions of this license, Part 111, and its rules. This license consists of the 24 pages of conditions attached hereto, as well as those in Attachments 1 through 13, and the applicable rules contained in R 299.9101 through R 299.11008, as specified in the license. For purposes of compliance with this license, applicable rules are those that are in effect on the date of issuance of this license in accordance with R 299.9521(3)(a).

This license is based on the information in the license application submitted on April 12, 2013, and any subsequent amendments (hereafter referred to as the "application"). Pursuant to R 299.9519(11)(c), the license may be revoked if the licensee fails, in the application or during the license issuance process, to disclose fully all relevant facts or, at any time, misrepresents any relevant facts. As specified in R 299.9519(1), the facility shall be constructed, operated, and maintained in accordance with Part 111 of Act 451, the rules, and this license.

This license is effective on the date of issuance and shall remain in effect for 10 years from the date of issuance, unless revoked pursuant to R 299.9519 or continued in effect as provided by the Michigan Administrative Procedures Act, 1969 PA 306, as amended (Act 306).

Issued this 30<sup>th</sup> day of September, 2015

by DeLores Montgomery  
DeLores Montgomery, Chief  
Hazardous Waste Section  
Office of Waste Management and Radiological Protection

**HAZARDOUS WASTE MANAGEMENT FACILITY OPERATING LICENSE  
FOR**

**EQ RESOURCE RECOVERY, INC.  
MID 060 975 844**

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**PART I  
STANDARD CONDITIONS**

**A. TERMINOLOGY AND REFERENCES**

Throughout this license, the term "Office" means the Office of Waste Management and Radiological Protection, and any successor organization, within the MDEQ responsible for administering Part 111 of Act 451 and the rules. Throughout this license, "Director" means the Director of the MDEQ or the Director's duly authorized designee such as the Office Chief. All of the provisions of Title 40 of the Code of Federal Regulations (CFR) referenced in this license are adopted by reference in R 299.11003.

**B. EFFECT OF LICENSE**

Except as otherwise provided by law, any treatment, storage, or disposal of hazardous waste not specifically authorized in this license is prohibited. Issuance of this license does not authorize any injury to persons or property, any invasion of other private rights, or any infringement of federal, state, or local law or regulations {R 299.9516(8)}; nor does it obviate the necessity of obtaining such permits or approvals from other units of government as may be required by law. Compliance with the terms of this license does not constitute a warranty or representation of any kind by the MDEQ, nor does the MDEQ intend that compliance with this license constitutes a defense to any order issued or any action brought under Act 451 or any other applicable state statute or §106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) {42 U.S.C. 9606(a)}, the Resource Conservation and Recovery Act of 1976, as amended (RCRA), and its rules, or any other applicable federal statute. The licensee, however, does not represent that it will not argue that compliance with the terms of this license may be a defense to such future regulatory actions. Each attachment to this license is a part of, and is incorporated into, this license and is deemed an enforceable part of the license.

**C. SEVERABILITY**

The provisions of this license are severable, and if any provision of this license, or the application of any provision of this license to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this license shall not be affected thereby.

**D. RESPONSIBILITIES**

1. The licensee shall comply with Part 111 of Act 451, the rules, and all conditions of this license, except to the extent authorized by the MDEQ pursuant to the terms of an emergency operating license. Any license noncompliance, except to the extent authorized by the MDEQ pursuant to the terms of an emergency operating license, constitutes a violation of Part 111 of Act 451 and is grounds for enforcement action, license revocation, license modification, or denial of a license renewal application. {§§11148, 11150, and 11151 of Act 451; R 299.9521(1)(a) and (c) and (3)(a) and (b); and 40 CFR §270.30(a)}
2. If the licensee wishes to continue an activity regulated by this license after the expiration date of this license, the licensee shall submit a complete application for a new license to the Office Chief at least 180 days before this license expires, September 30, 2025, unless an extension is granted pursuant to R 299.9510(5). To the extent the licensee makes a timely and sufficient application for renewal of this license, this license and all conditions herein will remain in effect beyond the license expiration date and shall not expire until a decision on the application is finally made by the MDEQ, and if the application is denied or the terms of the new license are limited, until the last day for applying for judicial review of the new license or a later date fixed

by order of the reviewing court consistent with §91(2) of Act 306. {R 299.9521(1)(a) and (c) and (3)(a) and 40 CFR §270.30(b)}

3. The licensee shall comply with the conditions specified in R 299.9521(1)(b)(i) to (iii) and 40 CFR §270.30(c) through (k), (l)(2), (3), (5), (7), and (11), and (m). {§§11123(3), 11146(1) and (2), and 11148(1) of Act 451 and R 299.9501(1), R 299.9516, R 299.9519, R 299.9521(1)(a) and (b) and (3)(a) and (b), R 299.9522, and R 299.9525}
4. The licensee shall give notice to the Office as soon as possible prior to any planned physical alterations or additions to the licensed facility. {R 299.9501, R 299.9519(1), and Part 6 of the Part 111 Rules}

#### **E. SUBMITTAL DEADLINES**

When the deadline for submittals required under this license falls on a weekend or legal state holiday, the deadline shall be extended to the next regular business day. This extension does not apply to the deadline for financial mechanisms and associated renewals, replacements, and extensions of financial mechanisms required under this license. The licensee may request extension of the deadlines for submittals required under this license. The licensee shall submit such requests at least five business days prior to the existing deadline for review and approval by the Office Chief. Written extension requests shall include justification for each extension. {R 299.9519 and R 299.9521(3)(a)}

**PART II  
GENERAL OPERATING CONDITIONS**

**A. GENERAL WASTE ANALYSIS**

The licensee shall ensure that any waste managed at the facility has been properly characterized pursuant to R 299.9302 and comply with the procedures described in the attached Waste Analysis Plan, Attachment 1, of this license. {R 299.9605(1), and 40 CFR §264.13}

**B. SECURITY**

The licensee shall comply with the barrier, surveillance, and signage requirements of R 299.9605(1) and 40 CFR §264.14.

**C. GENERAL INSPECTION REQUIREMENTS**

1. The licensee shall inspect the facility in accordance with the Inspection Schedule, Attachment 2, of this license, and comply with the inspection requirements of R 299.9605(1) and 40 CFR §264.15.
2. The licensee shall develop and implement a procedure to ensure compliance with the requirements of R 299.9605(2) regarding transport vehicles and other containers leaving the facility.

**D. PERSONNEL TRAINING**

The licensee shall comply with the personnel training requirements of R 299.9605 and 40 CFR §264.16. The Personnel Training Program, Attachment 3, of this license, shall, at a minimum, cover all items in R 299.9605 and 40 CFR §264.16.

**E. PREPAREDNESS AND PREVENTION**

The licensee shall comply with the preparedness and prevention requirements of R 299.9606 and 40 CFR Part 264, Subpart C.

**F. CONTINGENCY PLAN**

The licensee shall comply with the contingency plan requirements of R 299.9607 and 40 CFR Part 264, Subpart D. The Contingency Plan, Attachment 4 of this license, and the prescribed emergency procedures shall be immediately implemented by the licensee whenever there is a fire, explosion, or other release of hazardous waste or hazardous waste constituents that threatens or could threaten human health or the environment, or if the licensee has knowledge that a spill has reached surface water or groundwater. In the event of a fire or explosion with potential off-site releases the licensee shall conduct an evaluation of the potential release in accordance with a Standard Operating Procedure approved by the OWMRP.

**G. DUTY TO MITIGATE**

Upon notification from the Director or his or her designee that an activity at the facility may present an imminent and substantial endangerment to human health or the environment, the licensee shall immediately comply with an order issued by the Director pursuant to §11148(1) of Act 451 to halt such activity and conduct other activities as required by the Director to eliminate the said endangerment. The licensee shall not resume the halted activity without the prior written approval from the Director. {§11148 of Act 451 and R 299.9521(3)(b)}



## H. MANIFEST SYSTEM

The licensee shall comply with the manifest requirements of R 299.9304, R 299.9305, and R 299.9608.

## I. RECORD KEEPING AND REPORTING

1. The licensee shall comply with the written operating record and monthly operating report (EQP 5142 form) requirements of R 299.9609 and 40 CFR §264.73 and Part 264, Appendix I, and R 299.9610(3), respectively. The monthly/quarterly operating report shall be submitted on EQP 5142 form provided by the Office Chief, or an equivalent form that has been approved by the Office Chief.
2. The licensee shall comply with the biennial report requirements of R 299.9610. {R 299.9521(1)(a) and 40 CFR §270.30(l)(9)}
3. The licensee shall submit the results of all environmental monitoring required by this license and any additional environmental sampling or analysis conducted beyond that required by this license, in the form of an Environmental Monitoring Report to the Office Chief within 60 days after any sample collection. {R 299.9521(1)(a) and R 299.9521(3)(b) and 40 CFR §270.30(l)(4)}
4. The licensee shall provide environmental monitoring information or data that is required pursuant to this license, to an authorized representative of an environmental or emergency response department of the city of Romulus or county of Wayne, who requests such information or data and that has jurisdiction over the facility. Such information or data shall be made available on the same day the licensee forwards this information to the Office Chief. {R 299.9521(3)(b)}
5. The licensee shall immediately report to the Office Chief any noncompliance with the license that may endanger human health or the environment by doing both of the following:
  - (a) The licensee shall immediately notify the Hazardous Waste Section at 517-284-6562, if the noncompliance occurs Monday through Friday during the period of 8:00 a.m. to 5:00 p.m., except state holidays, or by calling the MDEQ Pollution Emergency Alerting System (PEAS) at 1-800-292-4706 during all other times. This notice shall include the following:
    - (i) Information concerning the fire, explosion, release, or discharge of any hazardous waste or hazardous waste constituent that could threaten human health or the environment, that has reached surface water or groundwater, or that may endanger public drinking water supplies or the environment; and
    - (ii) A description of the occurrence and its cause, including all of the information outlined in R 299.9607(2)(a)-(i).
  - (b) The licensee shall also follow up the verbal notice by providing a written report to the Office Chief within five days of the time the licensee becomes aware of the circumstances. The written report shall contain all of the information in Condition II.1.5.(a)(i)-(ii) of this license along with a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected and, if not, the anticipated time it is expected to

continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance and when those activities occurred or will occur. The Office Chief may waive the 5-day written notice requirement in favor of submittal of a written report within 15 days of the time the licensee becomes aware of the circumstances.  
{R 299.9521(1)(a) and R 299.9607 and 40 CFR §270.30(I)(6)}

6. The licensee shall report all other instances of noncompliance with this license, Part 111 of Act 451, the rules, and any other applicable environmental laws or rules that apply to the licensed facility, at the time monitoring reports required by this license are submitted or within 30 days, whichever is sooner. The reports shall contain the information listed in Condition II.1.5. of this license. {R 299.9521(1)(a) and 40 CFR §270.30(I)(10)}
7. The licensee may make minor modifications to the forms contained in the attachments to this license. The modifications may include changing the format, updating existing references and information, adding necessary information, and changing certification and notification information in accordance with Part 111 of Act 451 and its rules and RCRA and its regulations. The licensee shall submit the modifications to the Office Chief prior to implementing the use of the modified form(s). If the Office Chief does not reject or require revision of the modified form(s) within 14 days of receipt, the licensee shall implement use of the modified form(s) and the form(s) shall be incorporated into this license as a replacement for the existing form(s).

**J. CLOSURE**

The licensee shall comply with the closure requirements of R 299.9613. The licensee shall close the facility in accordance with the Closure Plan, Attachment 5, of this license, all other applicable requirements of this license, and all other applicable laws. {R 299.9613 and 40 CFR Part 264, Subpart G, except 40 CFR §§264.112(d)(1), 264.115, and 264.120}

**K. FINANCIAL ASSURANCE FOR CLOSURE**

1. On the effective date of this license, the facility closure cost estimate is \$319,515. The licensee shall keep this estimate current as required under R 299.9702 and 40 CFR §264.142.
2. The licensee shall continuously maintain financial assurance for the current closure cost estimate as required under R 299.9703.

**L. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION**

1. On the effective date of this license, the cost of performing corrective action at the facility is as follows:

Interim Response Activities	\$
Remedial Investigation	\$
Feasibility Study	\$
Remedial Action Plan Implementation	\$ 2,933,540
Total	\$ 2,933,540

The licensee shall keep this estimate current as required under R 299.9712.

2. The licensee shall continuously maintain financial assurance for corrective action as required under R 299.9713, in accordance with the following schedule:

**M. FINANCIAL RESPONSIBILITY FOR LIABILITY COVERAGE**

The licensee shall continuously maintain liability coverage for sudden and accidental occurrences, as required by R 299.9710.

**N. WASTE MINIMIZATION**

The licensee shall certify, at least annually, that the licensee has a hazardous waste minimization program in place. {R 299.9609(1)(a) and 40 CFR §264.73(b)(9)}

**O. LAND DISPOSAL RESTRICTIONS**

The licensee shall comply with all of the requirements of 40 CFR Part 268. {R 299.9627 and 40 CFR Part 268}

**P. AIR EMISSION STANDARDS**

1. The licensee shall comply with the requirements of 40 CFR Part 264, Subpart AA and Subpart AA Air Emissions from Process Vents, Attachment 6, of this license, Subpart BB and Subpart BB Air Emissions from Equipment Leaks, Attachment 7 of this license, and Subpart CC and Subpart CC Air Emissions from Tanks, Containers, and Surface Impoundments, Attachment 8 of this license.
2. The licensee shall notify the Office Chief of any hazardous waste management unit or equipment that becomes subject to the requirements of 40 CFR Part 264, Subparts AA, BB, and/or CC within 30 days of the start of the regulated activity. If any hazardous waste management unit or equipment becomes subject to the requirements of 40 CFR, Part 264, Subparts AA, BB, and/or CC, the licensee shall request modification of this license, as appropriate.

{R 299.9630, R 299.9631, and R 299.9634, and 40 CFR Part 264, Subparts AA, BB, and CC}

**Q. DOCUMENTS TO BE MAINTAINED AT THE FACILITY**

The licensee shall maintain at the facility the following documents and amendments required by this license, until closure/postclosure is completed, certified by an independent registered professional engineer, and the facility is released from financial assurance requirements for closure/postclosure by the Director:

1. Waste Analysis Plan, including Quality Assurance/Quality Control (QA/QC) Plans.
2. Inspection Schedules and records.
3. Personnel Training Program documents and records.
4. Contingency Plan.
5. Closure Plan.
6. Cost estimates for facility closure and corrective action and copies of related financial assurance documents.
7. Operating record.

8. Site Security Plan.
9. Facility engineering plans and specifications.
10. Record keeping procedures.
11. Environmental monitoring plans, including Sampling and Analysis Plans and QA/QC Plans.
12. Environmental monitoring data and statistical records.
13. Preventative procedures (Personnel Protection Plan).
14. Hazardous waste minimization program certification.

{R 299.9521(3)(a)}

**R. ENGINEERING PLANS**

The licensee shall construct, operate, and maintain the facility in accordance with the Engineering Plans, Attachment 6 of this license, and any modifications to those plans shall be made in accordance with this license. The licensee shall initiate construction of the container storage and tank storage and treatment facilities within 3 years of the issuance of this license. This authorization remains valid for a period of not more than 10 years if construction is initiated within 3 years of issuance and proceeds in a continuous manner.

**PART III  
CONTAINER STORAGE CONDITIONS**

**A. COVERAGE OF LICENSE**

The hazardous waste container storage area at the facility shown in Drawing DS-1 is covered by this license. Any expansion or enlargement beyond the facility boundary shown in Drawing DS-1 or beyond the 35,200 gallon storage design capacity requires a new operating license for the expansion, enlargement, or alteration of an existing facility from the Director. Drawing DS-1 is incorporated into this license as part of Attachment 6. {R 299.9521(1)(b)}

**B. WASTE IDENTIFICATION AND QUANTITY**

The licensee may store no more than a total volume of 35,200 gallons of the hazardous wastes listed in Attachment 10, in containers at the facility, subject to the terms of this license. The maximum number of containers of hazardous waste that may be stored at the facility is 640 55-gallon containers or an equivalent volume of other size containers. {R 299.9521(2)(d)}

**C. USE AND MANAGEMENT OF CONTAINERS**

1. The licensee shall manage all containers in compliance with R 299.9521(3)(b), R 299.9614, and R 299.9627 and 40 CFR §§264.171, 264.172, 264.173, and 268.50(a)(2)(i).
2. The licensee shall only place containers, stacked no greater than two high, into the hazardous waste container storage area referenced in Condition III.A. of this license in accordance with the configuration shown in Drawing DS-1 in Attachment 6 of this license or an alternate configuration approved by the Office Chief. {R 299.9521(3)(b)}
3. The licensee shall construct, operate, and maintain the containment system in accordance with the requirements of R 299.9614 and 40 CFR §264.175, and the attached plans and specifications in Attachment 6 of this license.

**D. SPECIAL REQUIREMENTS FOR IGNITABLE WASTES AND PROHIBITION ON STORAGE OF REACTIVE WASTES**

1. The licensee shall locate containers holding ignitable or reactive wastes in accordance with R 299.9614 and 40 CFR §264.176.
2. The licensee shall take precautions to prevent the accidental ignition or reaction of ignitable or reactive wastes by following the procedures specified in Attachment 11, of this license. The licensee shall document compliance with this condition and place this documentation in the operating record. {R 299.9605 and 40 CFR §264.17(a) and (c)}
3. The licensee is prohibited from storing reactive wastes in the hazardous waste container storage area referenced in Condition III.A. of this license. {R 299.9521(2)(d) and (3)(b)}

**E. SPECIAL REQUIREMENTS FOR STORAGE OF INCOMPATIBLE WASTES OR MATERIALS**

1. The licensee is prohibited from placing incompatible wastes or incompatible wastes and materials in the same container. {R 299.9521(2)(d) and (3)(b)}

2. The licensee shall prevent the placement of hazardous waste in an unwashed container that previously held an incompatible waste or material. {R 299.9614 and 40 CFR §264.177(b)}
3. The licensee shall document compliance with Conditions III.E.1. and III.E.2. of this license and place this documentation in the operating record. {R 299.9605 and 40 CFR §264.17(c)}
4. The licensee shall separate containers of incompatible wastes as indicated in the procedures contained in Attachment 11, of this license. {R 299.9614 and 40 CFR §264.177(c)}

**F. DISPOSITION OF ACCUMULATED LIQUIDS**

The licensee shall remove all liquids accumulated in the containment system within 24 hours of detection and manage the liquids in accordance with the requirements of Part 111 of Act 451 and the rules. {R 299.9521(3)(b) and R 299.9614(1)(a) and 40 CFR §264.175(b)(5)}

**PART IV  
TANK SYSTEM STORAGE AND TREATMENT CONDITIONS**

**A. COVERAGE OF LICENSE**

The hazardous waste tank system storage and treatment areas at the facility shown in Drawings GFL-1, TP-1, and TP-5 are covered by this license. Any expansion or enlargement beyond the facility boundary shown in Drawings GFL-1, TP-1, and TP-5 or beyond the 289,400 gallon tank system storage design capacity requires a new operating license for the expansion, enlargement, or alteration of an existing facility from the Director. Drawings GFL-1, TP-1, and TP-5 are incorporated into this license as Attachment 6. {R 299.9521(1)(b)}

**B. WASTE IDENTIFICATION AND QUANTITY**

The licensee may store no more than a total volume of 289,400 gallons of the hazardous wastes listed in Attachment 10, in the tank systems identified as Tanks W1 through W23 in Table C-2.1 and Drawings TP-1 and TP-5 in Attachment 6, subject to the terms of this license. {R 299.9521(2)(d)}

**C. WASTE TREATMENT CAPACITY AND METHODS**

The licensee may treat by fuel blending, no more than a total volume of 63,000 gallons per day of the hazardous wastes listed in Attachment 10, in the tanks identified as W4, W5, and W6 in Table C-2.1 and Drawing TP-1 in Attachment 6, subject to the terms of this license. {R 299.9521(2)(d) and (3)(a) and (b)}

**D. DESIGN, CONTAINMENT, AND ASSESSMENT OF TANK SYSTEMS**

The licensee shall construct, operate, and maintain all tank systems in accordance with the applicable requirements of R 299.9615 and 40 CFR §§264.191, 264.192, 264.193, and 264.194, and in accordance with the attached plans and specifications in Attachment 6, of this license.

**E. MANAGEMENT OF TANK SYSTEMS**

1. The licensee shall label and manage the tank systems in accordance with the requirements of R 299.9615 and R 299.9627, 40 CFR §§264.194, 264.196, and 268.50(a)(2)(ii), R 29.4101 to R 29.4504 pursuant to the provisions of the Fire Prevention Act, 1941 PA 207, as amended, National Fire Protection Association (NFPA) Standard No. 704, and the spill and overflow prevention procedures specified in Attachment 11, of this license. {R 299.9615}
2. The licensee shall conduct the treatment of hazardous wastes in accordance with the methods and procedures specified in Attachment 11, of this license. {R 299.9633}

**F. SPECIAL REQUIREMENTS FOR STORAGE AND TREATMENT OF IGNITABLE WASTES**

1. The licensee shall not place ignitable waste in a tank system unless the procedures described in Attachment 11, of this license are followed. The licensee shall document compliance with this condition and place this documentation in the operating record. {R 299.9605, R 299.9609, R 299.9615 and 40 CFR §§264.17(c), 264.73(b)(3), and 264.198(a)}
2. The licensee shall maintain the protective distances between the tank systems and any public ways, streets, alleys, or adjoining property lines that can be built upon, as required in Tables 2-1 through 2-6 of the NFPA's "Flammable and Combustible Liquids Code"

(1977 or 1981) as specified in Attachment 11, of this license, and as required by R 299.9615 and 40 CFR §264.198(b).

**G. PROHIBITION ON STORING OR TREATING REACTIVE WASTES OR MATERIALS**

The licensee is prohibited from storing or treating reactive wastes or materials in tank systems at the facility. {R 299.9521(2)(d) and (3)(b)}

**H. PROHIBITION ON STORAGE OR TREATMENT OF INCOMPATIBLE WASTES OR MATERIALS**

The licensee shall not place incompatible wastes or incompatible wastes and materials, in the same tank system or place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material, as required by R 299.9615 and 40 CFR §264.17(b).

**I. DISPOSITION OF ACCUMULATED LIQUIDS**

The licensee shall remove spilled or leaked waste and accumulated precipitation from the tank system within 24 hours of detection and manage it in accordance with the requirements of Part 111 of Act 451 and the rules. {R 299.9521(3)(b), R 299.9615, and 40 CFR §264.193(c)(4)}



**PART V**  
**ENVIRONMENTAL MONITORING CONDITIONS**

**A. GROUNDWATER MONITORING PROGRAM**

1. The licensee shall conduct a corrective action monitoring program for primary, secondary and tertiary parameters. Under this program, the licensee shall operate and maintain a groundwater monitoring system in accordance with the Groundwater Monitoring Program Sampling and Analysis Plan (SAP), Attachment 12, of this license. {R 299.9611(2)(a) and (b), R 299.9612, and R 299.9629 and 40 CFR Part 264, Subpart F, excluding 40 CFR §§264.94(a)(2) and (3), 264.94(b) and (c), 264.100, and 264.101}
2. Water removed from each monitoring well shall be managed as specified page 4 of Attachment 12, of this license. {R 299.9521(3)(b)}
3. The licensee shall submit an annual groundwater report to the Office Chief no later than March 1st of each year for the previous calendar year's activities. At a minimum, the report shall include the following information:
  - (a) A narrative summary of the previous calendar year's sampling events, including sampling event dates, the identification of any significant problems with respect to SAP procedures, and copies of field log sheets.
  - (b) A determination of the groundwater flow rate, the direction in the monitored zone, and a summary of the hydraulic gradient across the clay barrier wall, including the preparation of a groundwater level contour map from this data.
  - (c) A summary of groundwater quality data results, including data tables, data graphs, and a narrative summary of results and trends.
  - (d) A presentation of the statistical analysis of the data and the identification of any statistically significant increases (and/or pH decreases) pursuant to Condition V.A.5 of this license.
  - (e) An analysis and discussion of laboratory and field related QA/QC information. This shall include results of equipment, field, and trip blanks, and discussion and evaluation of the adequacy of data with respect to SAP specifications and requirements.{R 299.9521(3)(b) and R 299.9612(1) and 40 CFR §264.97(j)}
4. The licensee shall establish background groundwater quality values at monitoring wells for the parameters specified in Table 2 of Attachment 12 of this license. In the event that groundwater quality at the upgradient well shows a significant change, a petition may be submitted to the Office Chief to reestablish background quality. Background values may be reestablished only upon written approval of the Office Chief. {R 299.9612(1)(c), (d), and (e) and 40 CFR §264.97(a) and (g)}
5. Corrective Action Monitoring Program. The licensee shall monitor all wells, piezometers and groundwater collection system manholes in Table 1 for static water level elevation, and analyze samples for the primary, secondary and tertiary parameters in Table 2 as specified below. Data and evaluations must be submitted to the Chief of the Office of Waste Management and Radiological Protection (OWMRP) in accordance with the time frame specified in Condition II.I.3. of this license. Tables 1 and 2 are included in Attachment 9 of this license. {R 299.9612 and R 299.9629}

- (a) The wells, piezometers and manholes listed and so designated in Table 1 shall be measured for static water elevation monthly.
- (b) If outward gradients are recorded at any well pair for any 2 months during a calendar quarter, then the licensee shall notify the Chief of the OWMRP in writing within 30 days of the second monthly outward gradient recorded of the quarter. Further, if four monthly measurements at any well pair show outward gradients for any single calendar year then the licensee shall investigate the cause of the outward gradients and propose actions to remedy the situation. A report outlining the cause and the proposed actions shall be submitted within 30 days of the fourth monthly measurement that shows an outward gradient(s).
- (c) The licensee shall sample the groundwater quality monitoring wells listed and so designated in Table 1. These wells shall be sampled at the frequency shown in Table 2, for the parameters listed therein. Data and evaluations must be submitted in accordance with the time frame specified in Condition II.I.3 of this license.
- (d) Quarterly samples will also be taken from wells P-9, OW 9, and OW-11R for enhanced monitoring of the barrier wall. These wells will be sampled for the Primary Groundwater Monitoring parameters as shown in Table 2 of the sampling and analysis plan. These sampling points will be incorporated into the monitoring well network until inward gradients are re-established, and permission to discontinue enhanced monitoring is granted by the MDEQ. If the groundwater flow direction is shown to change, it may be necessary to modify the well network.
  - (i) If no primary parameter volatile organic compounds are detected in wells P-9, OW 9, or OW-11R, then routine monitoring is continued. Data from these wells must be reported along with routine monitoring well data as per license condition V.A.5(c).
  - (ii) If primary parameter volatile organic compounds are detected in wells P-9, OW-9, or OW-11R, but concentrations are below the Groundwater-Surface Water Interface (GSI) standards pursuant to Part 201, Environmental Remediation, of Act 451, the well(s) outside the barrier wall (OW-22, OW-107, MW-16, OW-104, and OW-105) must be sampled monthly instead of quarterly unless licensee should elect to perform a tracer test or other means of demonstrating the integrity of the barrier wall.
  - (iii) If primary parameter volatile organic compounds are detected in wells P-9, OW-9, or OW-11R, above the Groundwater-Surface Water Interface (GSI) standards pursuant to Part 201, Environmental Remediation, of Act 451, the company must take measures to create an inward gradient in this area through the use of well points or some other temporary system that can ensure no outward movement. The company may also propose, in lieu of dewatering, to extend the clay barrier wall or recommend other improvements to the barrier wall.
- (e) The main groundwater collection system sump shall be sampled semi-annually for the primary and secondary parameters listed in Table 2 for the purposes of trend analysis. Any compounds detected in the method 8260 or 8270 scans, that are not listed in

Table 2, must be reported to determine whether the those compounds should be added to Table 2.

6. Within 60 days of each sampling of each monitoring well, the licensee shall determine if a statistically significant increase (or change in pH) has occurred for each primary and secondary parameters listed in Table 2 of Attachment 12 of this license. Statistical procedures are outlined in Appendix C of Attachment 12. {R 299.9612(1)(c) and (e) and 40 CFR §264.97(h) and (i)}
7. If a statistically significant increase (or change in pH) is detected for any primary, or secondary parameter, the licensee shall notify the Office, Hazardous Waste Section, Permit and Corrective Action Unit, by telephone within one working day and arrange a resampling as soon as possible to confirm if a statistically significant increase (or change in pH) exists. The notification is also required if data from the laboratory suggests there may be organic contaminants within the waters of Trouton Drain (page 8 of the SAP). Resampling must include not less than four replicate samples at the affected wells for the parameters in question. For the non-naturally occurring parameters, a statistically significant increase shall be confirmed if at least two of the four resample results are detected above the laboratory detection limit(s) for the parameter(s), or if at least one of the resample results is detected at five times the laboratory detection limit. {R 299.9612 and 40 CFR §264.97(g)}
8. If the licensee determines pursuant to Conditions V.A.5 6 and V.A.6 7 of this license that a statistically significant increase (or change in pH) has occurred for primary parameters, the licensee shall address the increase (or change in pH) in accordance with R 299.9612 and 40 CFR §264.98(f) and (g) and:
  - (a) Notify the Office Chief, or if unavailable, the MDEQ Pollution Emergency Alerting System at 1-800-292-4706, and arrange groundwater sampling in accordance with §264.98(g) for Appendix IX constituents.
  - (b) Immediately take steps to determine the cause of the contamination and eliminate the source of discharge.
  - (c) Within 180 days after the determination, submit to the Office Chief detailed description of corrective actions that shall achieve compliance with applicable laws and rules, including a schedule of implementation. Corrective action shall also meet the requirements of R 299.9629 and include a plan for a groundwater monitoring program that shall demonstrate the effectiveness of the corrective action. Such a groundwater monitoring program may be based on a compliance monitoring program developed to meet the requirements of 40 CFR §264.99.
  - (d) Prior to a license modification requiring a compliance monitoring and corrective action program, the licensee shall provide the Office Chief, or his or her designee, with weekly telephone updates and written reports every two weeks regarding the progress to date in determining the cause of contamination and eliminating the discharge. The written report shall include the results of all samples from environmental monitoring conducted by the licensee. {R 299.9521(3)(b)}
9. If the licensee determines pursuant to Conditions V.A.5 6 and V.A.6 7 of this license that a statistically significant increase (or change in pH) has occurred for any secondary parameter, the licensee shall address the increase (or change in pH) in accordance with R 299.9612 and:

- (a) If confirmed, the licensee shall immediately take steps to determine the cause of contamination and eliminate the source of the discharge. A report that explains the chronology of events, investigative methods, all laboratory analyses, calculations, field activities, and findings, related to this determination shall be submitted within 60 days of a statistically significant determination under Condition V.A.5 6 of this license.
  - (b) The licensee may demonstrate that a source other than the licensed facility, or an error in sampling, analysis, or evaluation solely caused the increase. A report that contains the information in Condition V.A.89.(a) of this license shall be submitted within 60 days of a statistically significant determination under Condition V.A.5 of this license.
10. In the event that the Office Chief determines from the findings of Conditions V.A.5 6 and V.A.6 7 of this license that a statistically significant increase (or change in pH) in hazardous constituents has occurred in the groundwater and the Director finds, in accordance with §11148 of Act 451, that the increase (or change in pH) may present an imminent and substantial hazard to the health of persons or to the natural resources, or is endangering or causing damage to public health or the environment, the licensee shall immediately comply with an order issued by the Director pursuant to §11148(1) of Act 451 to cease waste receipt, storage, and treatment at the affected unit(s) and conduct other activities as required by the Director to eliminate the said endangerment. {R 299.9612(1)(g)}

**B. AMBIENT AIR MONITORING PROGRAM**

The licensee shall conduct ambient air monitoring in accordance with the program specified in Attachment 13 of this license within 12 days after the issuance of this license. {R 299.9611(2)(c)}

**C. SURFACE WATER MONITORING PROGRAM**

1. The licensee shall conduct an approximately quarterly surface water monitoring program as described in Attachment 12 of this license (page 3 of the SAP). This is based on the fact that these samples must be collected within 24 hrs subsequent to a 24 hour 0.5 inch precipitation event, and when sufficient water is present within the drain to collect a sample.
2. Within 60 days of each sampling, the licensee shall determine if a confirmed statistically significant increase has occurred compared to background levels for each parameter listed in Table 3 of Attachment 12 of this license. A significant increase shall be confirmed using the statistical evaluation method specified in Appendix C of Attachment 12 of this license.
3. Duplicate samples shall be collected on an approximately quarterly basis from each sampling location. Initially, the licensee is required to analyze only one of the two samples. The licensee shall hold the duplicate sample pending the results of the initial sample. If a statistically significant increase is detected in a monitoring parameter(s), the duplicate sample shall be analyzed for confirmation purposes.
4. If statistically significant increases of monitored parameters are confirmed, the licensee must notify the Office Chief immediately by telephone and within seven days in writing.
5. Within 30 days of the determination of a statistically significant increase, the licensee shall determine whether a discharge to surface waters is occurring, determine the source, and take immediate steps to eliminate and prevent any such discharge.

{R 299.9521(3)(a) and (b) and R 299.9611(5)}

**D. EFFLUENT MONITORING PROGRAM**

1. The licensee shall conduct monitoring of the treated effluent discharged to the sewer system in accordance with the permit issued to the facility by the city of Detroit Water and Sewerage Department. The licensee shall comply with the city of Detroit discharge limitations.
2. The licensee shall provide written notification to the Office Chief of any anticipated changes in the approved effluent monitoring program or discharge limitations.
3. The licensee shall report the effluent monitoring results as set forth in Condition II.1.3. of this license.

{R 299.9521(3)(a) and (b) and R 299.9611(5)}

**PART VI  
CORRECTIVE ACTION CONDITIONS**

**A. CORRECTIVE ACTION AT THE FACILITY**

1. The licensee shall implement corrective action for all releases of a contaminant from any waste management unit (WMU) at the facility, regardless of when the contaminant may have been placed in or released from the WMU. For the purposes of this license, the term "corrective action" means an action determined by the Office Chief to be necessary to protect the public health, safety, welfare, or the environment, and includes, but is not limited to, investigation, evaluation, cleanup, removal, remediation, monitoring, containment, isolation, treatment, storage, management, the temporary relocation of people, and the provision of alternative water supplies, or any corrective action allowed under Title II of the federal Solid Waste Disposal Act, PL 89-272, as amended, or regulations promulgated pursuant to that act. For the purposes of this license, the process outlined in Part 111 of Act 451 and the environmental protection standards adopted in R 299.9629 shall be used to satisfy the corrective action obligations under this license. {§§11102 and 11115a of Act 451 and R 299.9629}
2. To the extent that a release of a hazardous substance, as defined in §20101(x) of Act 451, that is not also a contaminant, as defined in §11102(2) of Act 451, is discovered while performing corrective action under this license, the licensee shall take concurrent actions as necessary to address the Part 201, Environmental Remediation, of Act 451 remedial obligations for that release. {R 299.9521(3)(b)}

**B. CORRECTIVE ACTION BEYOND THE FACILITY BOUNDARY**

The licensee shall implement corrective action beyond the facility in accordance with §11115a of Act 451 and R 299.9629(2).

**C. IDENTIFICATION OF WASTE MANAGEMENT UNITS**

The WMUs at the facility are identified below.

1. The following WMU, identified in the On-Site RCRA Facility Investigation (RFI) Report, May 30, 1996, requires continued operation of a groundwater collection and treatment system.

WMU Number 2

On-Site Groundwater and Soil

2. The following WMU, identified in the Groundwater Off-site RCRA Facility Investigation (RFI) Report, April 27, 1995, does not require corrective action at this time. No further corrective action is required at this time because the results of the RFI and the existing interim measures to remove contaminated soil and replace with a clay dike along the east border of the property and groundwater collection system to maintain an inward gradient for that portion of the site have addressed the off-site groundwater concern.

WMU Number 1

Off-Site Groundwater

{§§11102 and 11115a of Act 451 and R 299.9521(3)(b) and R 299.9629}

3. Within 30 days of discovery of a new WMU or a release of a contaminant from a new WMU, the licensee shall provide written notification to the Office Chief. The written notification shall include all of the following information:

- (a) The location of the unit on the facility topographic map.
  - (b) The designation of the type of unit.
  - (c) The general dimensions and structural description, including any available drawings of the unit.
  - (d) The date the unit was operated.
  - (e) Specification of all waste(s) that have been managed in the unit.
  - (f) All available information pertaining to any release of a contaminant from the unit.
4. Based on a review of all of the information provided in Condition VI.C.3 of this license, the Office Chief may require corrective action for the newly identified WMU. The licensee shall submit a written Investigation Work Plan to the Office Chief within 60 days of written notification by the Office Chief that corrective action for the unit is required.

{§§11102 and 11115a of Act 451 and R 299.9504(1), R 299.9508(1)(b), and R 299.9629 and 40 CFR §270.14(d)}

#### **D. CORRECTIVE ACTION INVESTIGATION**

The licensee shall conduct a Corrective Action Investigation to determine if a release of a contaminant(s) from any of the WMU identified in Condition VI.C of this license has occurred and, if a release(s) has occurred, evaluate the nature and extent of the release(s). The licensee shall submit a written Corrective Action Investigation Work Plan, Corrective Action Investigation Final Report documenting compliance with the approved Work Plan and supporting further corrective action at the facility, and Corrective Action Investigation progress reports to the Office Chief for review and approval in accordance with Condition VI.K of this license. The Office Chief will approve, modify and approve, or provide a Notice of Deficiency (NOD) for the Work Plan and Final Report. Upon approval, the Work Plan and Final Report become enforceable conditions of this license. {§§11102 and 11115a of Act 451 and R 299.9629}

#### **E. INTERIM MEASURES**

The licensee shall conduct interim measures (IM) at the facility, if determined necessary by the licensee or the Office Chief, to cleanup or remove a released contaminant or to take other actions, prior to the implementation of corrective measures, as may be necessary to prevent, minimize, or mitigate injury to the public health, safety, or welfare, or to the environment. The licensee shall submit a written IM Work Plan, an IM Final Report documenting compliance with the approved Work Plan and supporting further corrective action at the facility, and IM progress reports to the Office Chief for review and approval in accordance with Condition VI.K of this license. The Office Chief will approve, modify and approve, or provide an NOD for the Work Plan and Final Report. Upon approval, the Work Plan and Final Report become enforceable conditions of this license. {§§11102 and 11115a of Act 451 and R 299.9629}

#### **F. DETERMINATION OF NO FURTHER ACTION**

1. The licensee shall continue corrective action measures to the extent necessary to ensure that the applicable environmental protection standards adopted in Part 111 of Act 451, are met, if

the limits are not less stringent than allowed pursuant to the provisions of RCRA.

2. Based on the results of the Corrective Action Investigation and other relevant information, the licensee shall submit a written request for a license minor modification to the Office Chief if the licensee wishes to terminate corrective action for a specific WMU identified in Condition VI.C. of this license. The licensee must demonstrate that there have been no releases of a contaminant(s) from the WMU and that the WMU does not pose a threat to public health, safety, welfare, or the environment.
3. Based on the results of the Corrective Action Investigation and other relevant information, the licensee shall submit a written request for a license major modification to the Office Chief if the licensee wishes to terminate facility-wide corrective action. The licensee must conclusively demonstrate that there have been no releases of a contaminant(s) from any of the WMU at the facility and that none of the WMUs pose a threat to public health, safety, welfare, or the environment.
4. If, based upon a review of the licensee's request for a license modification pursuant to Condition VI.F.2. or VI.F.3. of this license, the results of the completed Corrective Action Investigation, and other relevant information, the Office Chief determines that the releases or suspected releases of a contaminant(s) do not exist and that the WMU(s) do not pose a threat to public health, safety, welfare, or the environment, the Office Chief will approve the requested modification, subject to Conditions VI.F.5. and VI.F.6., below.
5. A determination of no further action shall not preclude the Office Chief from requiring continued or periodic monitoring of air, soil, groundwater, or surface water, if necessary to protect public health, safety, welfare, or the environment, when facility-specific circumstances indicate that potential or actual releases of a contaminant(s) may occur.
6. A determination of no further action shall not preclude the Office Chief from requiring further corrective action at a later date, if new information or subsequent analysis indicates that a release or potential release of a contaminant(s) from a WMU at the facility may pose a threat to public health, safety, welfare, or the environment. The Office Chief will initiate the necessary license modifications if further corrective action is required at a later date.

{§§11102 and 11115a of Act 451 and R 299.9629(2)}

#### G. **CORRECTIVE MEASURES STUDY**

If the Office Chief determines, based on the results of the Corrective Action Investigation and other relevant information, that remedial activities are necessary, the Office Chief may notify the licensee in writing that a Corrective Measures Study (CMS) is required. If notified by the Office Chief, the licensee shall conduct a CMS to develop and evaluate the corrective measures alternative(s) necessary to address the release(s) of a contaminant(s) or hazardous substances and the WMU(s) that are identified in the approved Corrective Action Investigation Final Report as requiring final remedial activities. The licensee shall submit a written CMS Work Plan, a CMS Final Report documenting compliance with the approved Work Plan and supporting further corrective action at the facility, and CMS progress reports to the Office Chief for review and approval in accordance with Condition VI.K. of this license. The Office Chief will approve, modify and approve, or provide an NOD for the Work Plan and Final Report. Upon approval, the Work Plan and Final Report become enforceable conditions of this license. {§§11102 and 11115a of Act 451 and R 299.9629}



**H. CORRECTIVE MEASURES IMPLEMENTATION PLAN**

1. The licensee shall conduct final corrective measures based on the CMS Final Report approved by the Office Chief. The licensee shall submit a written Corrective Measures Implementation (CMI) Work Plan to the Office Chief for review and approval. The licensee shall also submit a written CMI Final Report documenting the compliance with the approved CMI Work Plan and providing justification that the corrective actions may cease, and CMI progress reports to the Office Chief for review and approval in accordance with Condition VI.K. of this license. The Office Chief will approve, modify and approve, or provide an NOD for the Work Plan and Final Report. Upon approval, the Work Plan and Final Report become enforceable conditions of this license.
2. The Office will provide notice of its draft decision on the CMI Work Plan to persons on the facility mailing list and provide an opportunity for a public hearing.
3. The licensee shall implement the approved CMI Work Plan within 90 days of receipt of the Office Chief's written approval of the Work Plan.

{§§11102 and 11115a of Act 451 and R 299.9629}

**I. CORRECTIVE ACTION MANAGEMENT UNITS**

If applicable, the licensee shall comply with the requirements of R 299.9635 in order to designate an area at the facility as a corrective action management unit for implementation of corrective measures. {R 299.9521(3)(a)}

**J. TEMPORARY UNITS**

If applicable, the licensee shall comply with the requirements of R 299.9636 in order to designate tank or container storage units used for the treatment or storage of remediation wastes as temporary units for implementation of corrective measures. {R 299.9521(3)(a)}

**K. SUMMARY OF CORRECTIVE ACTION SUBMITTALS**

The licensee shall submit the required documents in accordance with Conditions VI.C., VI.D., VI.E., VI.G., and VI.H. of this license and the schedule below.

<b>Document</b>	<b>Submittal Deadline</b>
Written notification of a new release of a contaminant from an existing WMU, a new WMU, or a release of a contaminant from a new WMU.	Within 30 days of discovery.
Corrective Action Investigation Work Plan for a newly identified release of a contaminant from an existing WMU, a new WMU, or a release of a contaminant from a new WMU.	Within 60 days of receipt of notification that a Corrective Action Investigation is required.
Revised Corrective Action Investigation Work Plan for WMUs and contaminant releases.	Within 45 days of receipt of Corrective Action Work Plan NOD.

Document	Submittal Deadline
Corrective Action Investigation progress reports.	Within 60 days of initiation of the Corrective Action Investigation and every 60 days thereafter, unless otherwise approved.
Corrective Action Investigation Final Report for WMUs and contaminant releases.	Within 60 days of completion of Corrective Action investigation.
Revised Corrective Action Investigation Final Report for WMUs and contaminant releases.	Within 45 days of receipt of Corrective Action Investigation Final Report NOD.
IM Work Plan for WMUs and contaminant releases.	Within 60 days of receipt of notification that IM Work Plan is required.
Revised IM Work Plan for WMUs and contaminant releases.	Within 45 days of receipt of IM Work Plan NOD.
IM progress reports.	Within 60 days of initiation of the IM and every 60 days thereafter, unless otherwise approved.
IM Final Report for WMUs and contaminant releases.	Within 60 days of completion of the IM.
Revised IM Final Report for WMUs and contaminant releases.	Within 45 days of receipt of IM Final Report NOD.
CMS Work Plan for WMUs and contaminant releases.	Within 90 days of receipt of notification that CMS is required.
Revised CMS Work Plan for WMUs and contaminant releases.	Within 45 days of receipt of CMS Work Plan NOD.
CMS progress reports.	Within 60 days of initiation of the CMS and every 60 days thereafter, unless otherwise approved.
CMS Final Report for WMUs and contaminant releases.	Within 60 days of completion of the CMS.
Revised CMS Final Report for WMUs and contaminant releases.	Within 45 days of receipt of CMS Final Report NOD.
CMI Work Plan for WMUs and contaminant releases.	Within 90 days of approval of the CMS Final Report.
Revised CMI Work Plan for WMUs and contaminant releases.	Within 45 days of receipt of CMI Work Plan NOD.
CMI progress reports.	Within 60 days of implementation of the CMI Work Plan and every 60 days thereafter, unless otherwise approved.
CMI Final Report for remediated WMUs and contaminant releases.	Within 60 days of the remedial actions have been completed and cleanup criteria have been met.
Revised CMI Final Report for WMUs and contaminant releases.	Within 45 days of receipt of CMI Final Report NOD.

**L. CORRECTIVE ACTION DOCUMENTS RETENTION**

The licensee shall maintain all corrective action documents required by this license at the facility. The documents shall be maintained for the operating life of the facility or until the facility is released from financial assurance requirements for corrective action by the Office Chief, whichever is longer. The licensee shall offer such documents to the Office Chief prior to discarding those documents. {§§111102 and 11115a of Act 451 and R 299.9521(3)(b) and R 299.9629}

**PART VII**  
**SCHEDULE OF COMPLIANCE**

The Licensee shall provide the Office Chief with the original financial assurance for corrective action within 90 days of issuance of this license.