



**State of Michigan**  
**Department of Environment, Great Lakes, and Energy**  
**HAZARDOUS WASTE MANAGEMENT FACILITY OPERATING LICENSE**



NAME OF LICENSEE: US ECOLOGY MICHIGAN, INC.

NAME OF FACILITY OWNER: US ECOLOGY MICHIGAN, INC.

NAME OF FACILITY OPERATOR: US ECOLOGY MICHIGAN, INC.

NAME OF TITLEHOLDER OF LAND: US ECOLOGY MICHIGAN, INC.

FACILITY NAME: US ECOLOGY MICHIGAN, DETROIT NORTH INC.

FACILITY LOCATION: 6520 GEORGIA STREET

EPA IDENTIFICATION (ID) NUMBER: MID 074 259 565

EFFECTIVE DATE: JANUARY 29, 2020

REAPPLICATION DATE: AUGUST 2, 2029

EXPIRATION DATE: JANUARY 29, 2030

**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 thereunder, being R 299.9101 *et seq.*, of the Michigan Administrative Code, by the Michigan Department of Environment, Great Lakes, and Energy (EGLE), an operating license (hereafter called the "license") is issued to US Ecology Michigan, Inc. (hereafter called the "licensee") to operate a hazardous waste management facility (hereafter called the "facility") located at latitude 42.392831 and longitude -83.032564. 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 of Act 451, and its rules. This license consists of the 25 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 September 7, 2007, 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 29<sup>th</sup> day of JANUARY 2020

by Jack Schinderle  
 Jack Schinderle, Director  
 Materials Management Division



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Department of Environment, Great Lakes, and Energy  
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Issued this 29<sup>th</sup> day of JANUARY 2020

by \_\_\_\_\_  
Jack Schinderle, Director  
Materials Management Division

**HAZARDOUS WASTE MANAGEMENT FACILITY OPERATING LICENSE  
FOR  
US ECOLOGY MICHIGAN, INC.  
MID 074 259 565**

**TABLE OF CONTENTS**

	Page
<b>PART I: STANDARD CONDITIONS</b>	
A. Terminology and References .....	1
B. Effect of License .....	1
C. Severability .....	1
D. Responsibilities .....	1
E. Submittal Deadlines .....	2
<b>PART II: GENERAL OPERATING CONDITIONS</b>	
A. General Waste Analysis .....	3
B. Security .....	3
C. General Inspection Requirements .....	3
D. Personnel Training .....	3
E. Preparedness and Prevention .....	3
F. Contingency Plan .....	3
G. Duty to Mitigate .....	3
H. Manifest System .....	4
I. Record Keeping and Reporting .....	4
J. Closure .....	5
K. Financial Assurance for Closure .....	5
L. Financial Assurance for Corrective Action .....	6
M. Financial Responsibility for Liability Coverage .....	6
N. Waste Minimization .....	6
O. Land Disposal Restrictions.....	6

P.	Air Emission Standards.....	6
Q.	Documents to be Maintained at the Facility.....	6
R.	Engineering Plans.....	7
S.	Vehicle Traffic.....	7

**PART III: CONSTRUCTION FOR EXPANSION CONDITIONS**

A.	Construction .....	9
B.	Postconstruction Documentation .....	9
C.	Operation.....	10
D.	Notice Requirements.....	10

**PART IV: CONTAINER STORAGE CONDITIONS**

A.	Coverage of License .....	11
B.	Waste Identification and Quantity .....	11
C.	Use and Management of Containers .....	12
D.	Special Requirements for Ignitable or Reactive Wastes .....	12
E.	Special Requirements for Incompatible Wastes or Materials .....	12
F.	Disposition of Accumulated Liquids .....	13

**PART V: TANK SYSTEM STORAGE AND TREATMENT CONDITIONS**

A.	Coverage of License .....	14
B.	Waste Identification and Quantity .....	14
C.	Waste Treatment Capacity and Methods .....	15
D.	Design, Containment, and Assessment of Tank Systems .....	16
E.	Management of Tank Systems .....	16
F.	Special Requirements for Ignitable or Reactive Wastes.....	16
G.	Prohibition on Storage or Treatment of Ignitable or Reactive Wastes or Materials .....	17
H.	Special Requirements for Storage or Treatment of Incompatible Wastes or Materials .....	17

I.	Disposition of Accumulated Liquids .....	17
<b>PART VI:</b>	<b>ENVIRONMENTAL MONITORING CONDITIONS</b>	
A.	Ambient Air Monitoring Program .....	18
B.	Effluent Monitoring Program.....	18
<b>PART VII:</b>	<b>CORRECTIVE ACTION CONDITIONS</b>	
A.	Corrective Action at the Facility .....	19
B.	Corrective Action Beyond the Facility Boundary .....	19
C.	Identification of Waste Management Units and Areas of Concern.....	19
D.	Corrective Action Investigation .....	21
E.	Interim Measures .....	21
F.	Determination of No Further Action .....	21
G.	Corrective Measures Study .....	22
H.	Corrective Measures Implementation Plan .....	22
I.	Corrective Action Management Units .....	23
J.	Temporary Units .....	23
K.	Summary of Corrective Action Submittals .....	23
L.	Corrective Action Documents Retention.....	24
<b>PART VIII:</b>	<b>SCHEDULE OF COMPLIANCE</b>	
A.	Compliance Schedule .....	25
B.	Reporting .....	25

## **LIST OF ATTACHMENTS**

Attachment 1	Waste Analysis Plan
Attachment 2	Inspection Schedule
Attachment 3	Personnel Training Program
Attachment 4	Contingency Plan
Attachment 5	Closure Plan
Attachment 6	Engineering Plans
Attachment 7	Acceptable Hazardous Wastes
Attachment 8	Containers
Attachment 9	Tanks Systems
Attachment 10	Treatment Procedures
Attachment 11	Ambient Air Monitoring Program
Attachment 12	Effluent Monitoring Program
Attachment 13	Corrective Action

## **PART I STANDARD CONDITIONS**

### **A. TERMINOLOGY AND REFERENCES**

Throughout this license, the term "Division" means the Materials Management Division within EGLE responsible for administering Part 111 of Act 451 and the rules. Throughout this license, "Director" means the Director of EGLE or the Director's duly authorized designee such as the Division Director. All the provisions of Title 40 of the Code of Federal Regulations (CFR) referenced in this license are adopted by reference in R 299.11003. Throughout this license, the term Dynecol is synonymous with US Ecology or USE and any process or procedures related to Dynecol must be followed by USE.

### **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 EGLE, nor does the EGLE 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 {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 EGLE pursuant to the terms of an emergency operating license. Any license noncompliance, except to the extent authorized by the EGLE 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 Division Director at least 180 days before this license expires, January 29, 2030, 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 EGLE, 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 Division 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 of Act 451 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 Division Director. 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 complies 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.

**G. DUTY TO MITIGATE**

Upon notification from the Division 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 Division Director pursuant to §11148(1) of Act 451 to halt such activity and conduct other activities as required by the Division Director to eliminate the said endangerment. The licensee shall not resume the halted activity without the prior written approval from the Division 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/quarterly 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 operating report shall be submitted on the EQP 5142 form provided by the Division Director, or an equivalent form that has been approved by the Division Director.
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 Division Director 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 the Buildings, Safety Engineering and Environmental Department-Environmental Affairs of the city of Detroit 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 Division Director. {R 299.9521(3)(b)}
5. The licensee shall immediately report to the Division Director 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 517-284-6838, 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 EGLE 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 Division Director 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 Division Director may waive the five-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(l)(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.I.5 of this license. {R 299.9521(1)(a) and 40 CFR §270.30(l)(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 Division Director prior to implementing the use of the modified form(s). If the Division Director 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 \$208,558. This estimate covers the existing Container Storage Areas and the Tank Systems. The licensee shall keep this estimate current as required under R 299.9702 and 40 CFR §264.142.

1.	Container Storage Areas	\$ 62,568
2.	Tank Systems	\$ 145,990
<b>TOTAL</b>		<b>\$ 208,558</b>

2. On the effective date of this license, the facility closure cost estimate for the proposed units is \$721,874. The licensee shall keep this estimate current, as required under R 299.9702 and 40 CFR §264.142.

1.	Building 4	\$ 315,521
2.	Proposed Building 5A	\$ 223,885
3.	Proposed Building 5B	\$ 182,468
<b>TOTAL</b>		<b>\$ 721,874</b>

3. The licensee shall submit proof of financial assurance for the proposed units in accordance with Condition III.B.1.(e) of this license.
4. 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, no cost has been identified for performing corrective action at the facility. No corrective action is being required, at this time, for the waste management units (WMUs), identified in Condition VII.C., of this license. The identified WMUs are currently operating pursuant to the act and its rules with no evidence of a release of any contaminants. Corrective action and financial assurance for corrective action may be required when the WMUs undergo final closure.
2. The licensee shall continuously maintain financial assurance for corrective action as required under R 299.9713.

**M. FINANCIAL RESPONSIBILITY FOR LIABILITY COVERAGE**

The licensee shall continuously maintain liability coverage for sudden and accidental occurrences and non-sudden 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), 40 CFR §264.73(b)(9), and §3005(h) of RCRA, 42 U.S.C. §6925(h)}

**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 BB, regarding air emission standards for equipment leaks, and Subpart CC, regarding air emission standards for tanks, surface impoundments, and containers.
2. The licensee shall notify the Division Director of any WMUs that become 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. {R 299.9630, R 299.9631, and R 299.9634 and 40 CFR, Part 264, Subparts AA, BB, and CC}
3. The licensee shall operate the facility in a manner that will prevent air emissions in violation of Part 55, Air Pollution Control, of Act 451. {R 299.9602(1)(b)}

**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 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.

## **S. VEHICLE TRAFFIC**

1. The licensee shall limit over-the-road hazardous waste transport vehicle deliveries to the facility to no more than a weekly average of 45 per day.
2. The licensee shall advise the drivers of all hazardous waste transport vehicles coming to and leaving from the facility to utilize I-94, Mt. Elliot Avenue, the section of Georgia Street between Mt. Elliot and Sherwood Avenue, and the section of Sherwood Avenue between Georgia Street and the two automatic slide gates on the north side of the facility and the one automatic slide gate on the east side. Vehicular access to the facility is from Sherwood Avenue through the gate(s) located on the east side or the north side of the facility. Vehicles enter at the gate and travel west to the facility's exit at the western gate on the north side of the facility. Alternate routing on classified roads is permitted if the specified route is blocked or in disrepair. The Division Director may approve an alternate route proposed by the licensee, either on a permanent or temporary basis, if the route described above, is blocked or otherwise not available.
3. In the event an alternate route is required, the licensee shall report to the Division Director by doing the following:

- (a) The licensee shall notify the Hazardous Waste Section at 517-284-6838, if the need for an alternate route occurs Monday through Friday during the period of 8:00 a.m. to 5:00 p.m., except state holidays, or by calling the EGLE PEAS at 1-800-292-4706 during all other times. This notice shall include the following:
  - (i) Information concerning the reason for the alternate route, (blocked, accident, repair work); and
  - (ii) A description of the alternate route to be used and the anticipated duration.
- 4. The licensee shall limit the vehicular traffic within the facility to the parking lots, driveways, and the loading/unloading areas. Figure A1-4 illustrates vehicle entrance and exit points.

### PART III CONSTRUCTION FOR EXPANSION CONDITIONS

#### A. CONSTRUCTION

1. The licensee shall construct the expanded facility, Building 4 – Stabilization Facility, Building 5A – Proposed Bulking and Consolidation Building, Building 5B – Roll-off Box/Trailer Container Storage, and the Treatment Facility, in accordance with the Engineering Plans, Attachment 6, of this license.
2. The licensee shall construct tank systems in Building 4 (three in-ground pits) and the Treatment Facility (new and conversion of existing nonregulated tanks) in accordance with the applicable requirements of R 299.9615 and 40 CFR §§264.192, 264.193, and 264.194.
3. The licensee shall notify the Division Director at least seven days prior to initiating any construction phase for the expanded facility.
4. The licensee shall submit quarterly progress reports regarding the construction activities to the Division Director. The first report shall be submitted within 90 days of issuance of this license and then every 90 days thereafter during active construction until submission of the final as-built plans and construction certification documents.
5. The licensee shall obtain written approval from the Division Director prior to initiating any significant construction change orders that modify the Engineering Plans, Attachment 6, of this license. The construction change orders shall become part of this license upon approval by the Division Director.
6. The licensee shall ensure that the registered professional engineer who signs the certification of construction required under §11123(2)(n)(ii) of Act 451, or competent subordinates under his or her direct supervision, are on-site at all times when construction activity authorized under this license is performed.
7. The licensee shall initiate construction of the expanded facility within three years of the effective date of this license. Authorization for construction remains valid for a period of not more than ten years if construction is initiated within the three-year period and proceeds in a continuous manner. Extensions to the authorization for construction may be granted by the Division Director if unexpected construction delays occur beyond the control of the licensee.

#### B. POSTCONSTRUCTION DOCUMENTATION

1. The licensee shall submit postconstruction documentation to the Division Director following construction of the expanded facility. The postconstruction documentation shall include the following:
  - (a) Any changes in, or additions to, the previously submitted disclosure information, or a certification that the disclosure listings previously submitted continues to be correct.
  - (b) A certification under the seal of a licensed professional engineer verifying that the construction has proceeded according to the plans approved by the Division Director and, if applicable, the approved construction permit, including as-built plans.
  - (c) A certification of the expanded facility capability of treating, storing, or disposing of hazardous waste in compliance with Part 111 of Act 451.

- (d) Information regarding any deviations from the specific conditions in this license.
  - (e) Proof of financial assurance as required by R 299.9703 and in accordance with Condition II.K.2. of this license. {§§11123(2)(n) and 11125(9) of Act 451}
2. The licensee shall submit the required postconstruction documentation in accordance with the schedule below.

<b>POSTCONSTRUCTION DOCUMENTATION</b>	<b>SUBMITTAL DEADLINE</b>
Updated disclosure information or certification that disclosure continues to be correct	Within 30 days after the change or within 30 days of construction completion
Certification of construction	Within 30 days of construction completion and anytime thereafter, when requested by the Division Director
Certification of capability signed and sealed by licensed professional engineer	Within 30 days of construction completion
Information regarding any deviations from specific conditions in operating license	As soon as the licensee becomes aware of the need to make the deviation, if applicable
Proof of financial responsibility	60 days before the date on which hazardous waste is first received for treatment, storage, or disposal

{§11125(9) of Act 451}

**C. OPERATION**

- 1. The licensee shall not treat, store, or dispose of hazardous waste in the expanded facility until final written authorization is obtained from the Division Director. {§11124(1) of Act 451}
- 2. The licensee shall operate the expanded facility in compliance with Part 111 of Act 451, the rules, and this license. {R 299.9519(1)}

**D. NOTICE REQUIREMENTS**

- 1. Within 60 days of initiating operations in the expanded facility built during the final construction phase, the licensee shall modify the October 27, 2000, notice required pursuant to R 299.9525 to identify the legal description of the land upon which the expanded facility is located.
- 2. Within 30 days after the modification, the licensee shall submit verification of the execution, filing, and recording of the modified notice with the Wayne County Register of Deeds to the Division Director.



## PART IV CONTAINER STORAGE CONDITIONS

### A. COVERAGE OF LICENSE

The existing and proposed hazardous waste container storage areas: Container Management Facility (CMF), Building 4, Building 5A, and Building 5B shown in Drawings A1-4 (existing), A1-4, A1-5, SK-2, SK-3, SK-4, CC-13-01(B), and CC-13-02(B) are covered by this license. Any expansion or enlargement beyond the facility boundary shown in Drawings A1-4 and A1-5 or beyond the 500,739-gallon storage design capacity requires a new operating license for the expansion, enlargement, or alteration of an existing facility from the Director. Drawings A1-4 (existing), A1-4, A1-5, SK-2, SK-3, SK-4, CC-13-01(B), and CC-13-02(B) are incorporated into this license as part of Attachment 6, Engineering Plans. {R 299.9521(1)(b)}

### B. WASTE IDENTIFICATION AND QUANTITY

1. The licensee may store no more than a total volume of 500,739 gallons of Acceptable Hazardous Wastes, Attachment 7, of this license in containers at the facility, subject to the terms of this license. The maximum number of 55-gallon drum equivalents of hazardous waste that may be stored at the facility is 9,104 drums. {R 299.9521(2)(d)}
2. The licensee may store no more than a total volume of 52,800 gallons of Acceptable Hazardous Wastes, Attachment 7, of this license in containers in the CMF area at the facility, subject to the terms of this license. The maximum number of 55-gallon drums of hazardous waste that may be stored in the CMF area is 960 drums. {R 299.9521(2)(d)}
3. The licensee may store no more than a total volume of 61,600 gallons of Acceptable Hazardous Wastes, Attachment 7, of this license in containers in the proposed Building 4 storage area at the facility, subject to the terms of this license. The maximum number of 55-gallon drums of hazardous waste that may be stored in the Building 4 area is 1,120 drums. {R 299.9521(2)(d)}
4. The licensee may store no more than a total volume of 24,237 gallons of Acceptable Hazardous Wastes, Attachment 7, of this license in bulk containers along the south wall in the proposed Building 4 storage area at the facility, subject to the terms of this license. The maximum number of 30-cubic yard containers, roll-off or trailer, of hazardous waste that may be stored in the Building 4 area is 4 containers. {R 299.9521(2)(d)}
5. The licensee may store no more than a total volume of 228,800 gallons of Acceptable Hazardous Wastes, Attachment 7, of this license in containers in the proposed Building 5A storage area at the facility, subject to the terms of this license. The maximum number of 55-gallon drums of hazardous waste that may be stored in the Building 5A area is 4,160 drums. {R 299.9521(2)(d)}
6. The licensee may store no more than a total volume of 121,184 gallons of Acceptable Hazardous Wastes, Attachment 7, of this license in containers in the proposed Building 5B storage area at the facility, subject to the terms of this license. The maximum number of 30-cubic yard containers, roll-off or trailer, of hazardous waste that may be stored in the Building 5B area is 20 containers. {R 299.9521(2)(d)}
7. The licensee may store no more than a total volume of 12,118 gallons of de-watered filter press sludge, generated from the treatment of the Acceptable Hazardous Wastes, Attachment 7 of this license, in a maximum of three containers, roll-off or trailer, holding no more than a

combined total volume of 60 cubic yards of hazardous waste that may be stored in the Filter Press Building. {R 299.9521(2)(d)}

8. The licensee shall not accept waste for storage with organic concentrations of at least 10 percent by weight. This condition is identified in the Subpart BB template to the Waste Analysis Plan, Attachment 1, of this license.

**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 areas referenced in Condition IV.A of this license in accordance with the configuration shown in Drawings A1-5, SK-2, SK-3, SK-4, CC-13-01(B), and CC-13-02(B) in the Engineering Plans, Attachment 6, of this license or an alternate configuration approved by the Division Director. {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 the Engineering Plans, Attachment 6, of this license.

**D. SPECIAL REQUIREMENTS FOR IGNITABLE OR 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 the Waste Analysis Plan, Attachment 1, 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)}

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

1. Prior to placing incompatible wastes or incompatible wastes and materials in the same container, the licensee shall comply with R 299.9605 and 40 CFR §264.17(b) by following the procedures specified in the Waste Analysis Plan, Attachment 1, of this license. {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 IV.E.1 and IV.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 the Waste Analysis Plan, Attachment 1, 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 and the procedures in the Containers, Attachment 8, of this license. The liquids shall be promptly sampled, analyzed, characterized, and placed in containers and stored in an appropriate bay for ultimate disposal. {R 299.9521(3)(b) and R 299.9614(1)(a) and 40 CFR §264.175(b)(5)}

**PART V  
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 1, 2, 3, 4, TL-13-01, TL-13-02, TL-13-03, TL-13-04, S-1 through S-9, A-1, D-29019-2, D-29019-3, D-29019-5, D-29019-6, D-29019-7,1A, and DFT-900541.02-1 are covered by this license. Any expansion or enlargement beyond the facility boundary shown in Drawings A1-4 and A1-5 or beyond the 176,200-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 1, 2, 3, 4, TL-13-01, TL-13-02, TL-13-03, TL-13-04, S-1 through S-9, A-1, D-29019-2, D-29019-3, D-29019-5, D-29019-6, D-2901-7,1A, and DFT-900541.02-1 are incorporated into this license as part of the Engineering Plans, Attachment 6. {R 299.9521(1)(b)}

**B. WASTE IDENTIFICATION AND QUANTITY**

1. The licensee may store no more than a total volume of 176,200 gallons of Acceptable Hazardous Wastes, Attachment 7, of this license in the tank systems identified in the table below, subject to the terms of this license. {R 299.9521(2)(d)}

<b>Tank Number</b>	<b>Status</b>	<b>Location</b>	<b>Tank Volume (gallons)</b>	<b>Usage</b>
7	Existing	Chemical Storage Area (Building #2)	10,000	Storage
10	Existing	Chemical Storage Area (Building #2)	12,000	Storage
11	Proposed	Chemical Storage Area (Building #2)	20,000	Storage
12	Proposed	Chemical Storage Area (Building #2)	25,800	Storage
13	Proposed	Chemical Storage Area (Building #2)	25,800	Storage
16	Proposed	Chemical Storage Area (Building #2)	25,800	Storage
17	Proposed	Chemical Storage Area (Building #2)	25,800	Storage
27	Proposed	Chemical Storage Area (Building #2)	20,000	Storage
32	Proposed	Chemical Storage Area (Building #2)	5,500	Storage
33	Proposed	Chemical Storage Area (Building #2)	5,500	Storage

**C. WASTE TREATMENT CAPACITY AND METHODS**

- The licensee may treat no more than a total volume of 144,000 gallons per day of the Acceptable Hazardous Wastes, Attachment 7, of this license in the tank systems identified in the table below, subject to the terms of this license. {R 299.9521(2)(d) and (3)(a) and (b)}

<b>Tank Number</b>	<b>Status</b>	<b>Location</b>	<b>Tank Volume (gallons)</b>	<b>Usage</b>
1	Existing	Primary Treatment Area	20,000	Primary Treatment
2	Existing	Primary Treatment Area	20,000	Primary Treatment
3	Existing	Primary Treatment Area	20,000	Primary Treatment
4	Existing	Primary Treatment Area	20,000	Primary Treatment
18	Existing	Secondary Treatment Area	20,000	Secondary Treatment
19	Existing	Secondary Treatment Area	20,000	Secondary Treatment
20	Existing	Secondary Treatment Area	20,000	Secondary Treatment
21	Existing	Secondary Treatment Area	20,000	Secondary Treatment
30	Existing	Effluent Room	15,000	Effluent
31	Existing	Effluent Room	15,000	Effluent
34	Existing	Dissolved Air Flotation (DAF) Building	30,000	Effluent
35	Existing	DAF Building	30,000	Effluent
36	Existing	DAF Building	1,000	Treatment
37	Existing	DAF Building	30,000	Effluent
38	Existing	DAF Building	30,000	Effluent
CV1	Existing	Filter Press Control Room	1,000 lbs. carbon	Treatment
CV2	Existing	Filter Press Control Room	1,000 lbs. carbon	Treatment

- The licensee may treat no more than a total volume of 600 tons per day of the Acceptable Hazardous Wastes, Attachment 7, of this license in the tank systems identified in the table below, subject to the terms of this license. {R 299.9521(2)(d) and (3)(a) and (b)}

Tank Number	Status	Location	Tank Volume (gallons)	Usage
PP1	Proposed	Building 4	30,000	Stabilization/Processing
PP2	Proposed	Building 4	30,000	Stabilization/Processing
PP3	Proposed	Building 4	30,000	Stabilization/Processing

- The licensee may operate the treatment systems 24 hours per day, 7 days a week, for no more than 312 days per year, or 7,488 hours per year. {R 299.9521(3)(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 the Tanks Systems, Attachment 9, and the Engineering Plans, Attachment 6, of this license.

#### **E. MANAGEMENT OF TANK SYSTEMS**

- 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 the Tanks Systems, Attachment 9, of this license. {R 299.9615}
- The licensee shall conduct the treatment of hazardous wastes in accordance with the methods and procedures specified in the Treatment Procedures, Attachment 10, of this license. {R 299.9633}
- The licensee shall not accept waste for treatment with an organics concentration of greater than or equal to 500 ppm. This condition is identified in the Subpart CC template to the Waste Analysis Plan, Attachment 1, of this license.
- The licensee shall not accept waste for treatment with organic concentrations of at least 10 percent by weight. This condition is identified in the Subpart BB template to the Waste Analysis Plan, Attachment 1, of this license.

#### **F. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES**

- The licensee shall not place ignitable or reactive waste in a tank system as prohibited in the Waste Analysis Plan, Attachment 1. The licensee shall document compliance with this condition and place this documentation in the operating record. {R 299.9605, R 299.9609, and R 299.9615 and 40 CFR §§264.17(c), 264.73(b)(3), and 264.198(a)}
- 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 the Tanks Systems, Attachment 9, of this license and as required by R 299.9615 and 40 CFR §264.198(b).

**G. PROHIBITION ON STORAGE OR TREATMENT OF IGNITABLE OR REACTIVE WASTES OR MATERIALS**

The licensee is prohibited from storing or treating ignitable or reactive wastes or materials in the wastewater treatment facility tank systems at the facility as specified in the Waste Analysis Plan, Attachment 1, of this license. {R 299.9521(2)(d) and (3)(b)}

**H. SPECIAL REQUIREMENTS FOR 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 unless the procedures specified in the Waste Analysis Plan, Attachment 1, and the Tanks Systems, Attachment 9, of this license, are followed, as required by R 299.9615 and 40 CFR §264.17(b). The licensee shall document compliance with this condition and place this documentation in the operating record. {R 299.9609 and R 299.9615 and 40 CFR §§264.17(c), 264.73(b)(3), and 264.199}

**I. 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 and the procedures in the Tanks Systems, Attachment 9, of this license. {R 299.9521(3)(b) and R 299.9615 and 40 CFR §264.193(c)(4)}

**PART VI  
ENVIRONMENTAL MONITORING CONDITIONS**

**A. AMBIENT AIR MONITORING PROGRAM**

The licensee shall conduct ambient air monitoring in accordance with the program specified in the Ambient Air Monitoring Program, Attachment 11, of this license. {R 299.9611(2)(c)}

**B. 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 Great Lakes Water Authority (GLWA). The licensee shall comply with the city of Detroit, GLWA discharge limitations.
2. The licensee shall provide written notification to the Division Director of any anticipated changes in the approved effluent monitoring program or discharge limitations specified in the Effluent Monitoring Program, Attachment 12, of this license and obtain written approval prior to implementation.

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



**PART VII  
CORRECTIVE ACTION CONDITIONS**

**A. CORRECTIVE ACTION AT THE FACILITY**

1. The licensee shall implement corrective action for all releases of a contaminant from any 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 Division Director to be necessary to protect 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(t) 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 AND AREAS OF CONCERN**

The WMUs and areas of concern (AOCs) at the facility are identified below and shown on the figure in Corrective Action, Attachment 13, of this license.

<b>WMU Number</b>	<b>WMU Name</b>	<b>Description</b>	<b>Waste Managed</b>
1	Primary Treatment Area	Tanks 1, 2, 3, and 4	See Tables A2-1 and A2-2
2	Secondary Treatment Building	Tanks 18,19, 20, and 21	See Tables A2-1 and A2-2
3	Filter Press Control Room	Press A, B and C, and Tank CV1 and CV2	See Tables A2-1 and A2-2
4	Chemical Storage Area (Tank Farm Building)	Tanks 7, 10, 11, 12, 13, 16, 17, 27, 32, and 33	See Tables A2-1 and A2-2
5	Dissolved Air Flotation Building	Tanks 34, 35, 36, 37, and 38	See Tables A2-1 and A2-2
6	Effluent Storage Tanks	Tanks 30 and 31	See Tables A2-1 and A2-2
7	CMF	Container and Bulk storage	See Tables A2-1 and A2-2
8	Activated Carbon	Spent carbon from Treatment Plant and Container Facility	See Tables A2-1 and A2-2

WMU Number	WMU Name	Description	Waste Managed
9	Building 4	Process Pits 1, 2, and 3 and Container and Bulk Storage	See Table A2-3
10	Proposed Building 5A	Container Storage	See Table A2-3
11	Proposed Building 5B	Container/Roll-off Storage	See Table A2-3

AOC Number	AOC Name	Description	Waste Managed
1	Maintenance Garage	Facility equipment repairs performed in this area	None
2	Truck Unloading Containment Area	Location for trucks to unload to tanks in chemical storage area	See Tables A2-1 and A2-2
3	Fuel Storage Area	Fuel Storage Tanks	Gasoline and Diesel
4	Former Underground Tank Farm	Located under the Tank Farm Building and east to the Container Management Facility	None

1. The following WMUs do not require corrective action at this time:
  - (a) The following WMUs are currently operating pursuant to the act and its rules with no evidence of a release of any contaminants. Corrective action may be required when any of the units undergoes final closure.
    1. WMUs 1 through 11
2. The following AOCs may require corrective action when the facility undergoes final closure.
  - (a) AOC s 1 through 4

{§§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 Division Director. 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 VII.C. 3. of this license, the Division Director may require corrective action for the newly-identified WMU. The licensee shall submit a written Investigation Work Plan to the Division Director within 60 days of written notification by the Division Director that corrective action for the unit is required.

{§§11102 and 11115a of Act 451, 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 WMUs identified in Condition VII.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 Division Director for review and approval in accordance with Condition VII.K. of this license. The Division Director 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 Division Director, 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 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 Division Director for review and approval in accordance with Condition VII.K. of this license. The Division Director 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 Division Director if the licensee wishes to terminate corrective action for a specific WMU identified in Condition VII.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 Division Director 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 WMUs 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 VII.F.2. or VII.F.3. of this license, the results of the completed Corrective Action Investigation, and other relevant information, the Division Director 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 Division Director will approve the requested modification, subject to Conditions VII.F.5. and VII.F.6., below.
5. A determination of no further action shall not preclude the Division Director 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 Division Director 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 Division Director 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 Division Director determines, based on the results of the Corrective Action Investigation and other relevant information, that remedial activities are necessary, the Division Director will notify the licensee in writing that a Corrective Measures Study (CMS) is required. If required by the Division Director, 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 Division Director for review and approval in accordance with Condition VII.K. of this license. The Division Director 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 Division Director. The licensee shall submit a written Corrective Measures Implementation (CMI) Work Plan to the Division Director 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 Division Director for review and approval in accordance with Condition VII.K. of this license. The Division Director 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 Division 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 60 days of receipt of the Division Director'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 VII.D., VII.E., VII.G., and VII.H. of this license and the schedule below.

Document	Submittal Deadline
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 30 days of receipt of a Corrective Action Work Plan NOD
Corrective Action Investigation progress reports	Within 60 days of initiation of the Corrective Action Investigation and every 90 days thereafter, unless otherwise approved
Corrective Action Investigation Final Report for WMUs and contaminant releases	Within 60 days of completion of a Corrective Action investigation
Revised Corrective Action Investigation Final Report for WMUs and contaminant releases	Within 30 days of receipt of a 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 60 days of receipt of IM Work Plan NOD

Document	Submittal Deadline
IM progress reports	Within 90 days of initiation of the IM and every 90 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 60 days of receipt of IM Final Report NOD
CMS Work Plan for WMUs and contaminant releases	Within 60 days of receipt of notification that CMS is required
Revised CMS Work Plan for WMUs and contaminant releases	Within 60 days of receipt of CMS Work Plan NOD
CMS progress reports	Within 90 days of initiation of the CMS and every 90 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 60 days of receipt of CMS Final Report NOD
CMI Work Plan for WMUs and contaminant releases	Within 60 days of approval of the CMS Final Report
Revised CMI Work Plan for WMUs and contaminant releases	Within 60 days of receipt of CMI Work Plan NOD
CMI progress reports	Within 90 days of implementation of the CMI Work Plan and every 90 days thereafter, unless otherwise approved
CMI Final Report for remediated WMUs and contaminant releases	Within 60 days of the remedial actions completion and cleanup criteria have been met
Revised CMI Final Report for WMUs and contaminant releases	Within 60 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 Director, whichever is longer. The licensee shall offer such documents to the Division Director prior to discarding those documents. {§§11102 and 11115a of Act 451 and R 299.9521(3)(b) and R 299.9629}

**PART VIII  
SCHEDULE OF COMPLIANCE**

**A. COMPLIANCE SCHEDULE**

The licensee shall complete the facility upgrades, modifications, and conversions in accordance with the following schedule. If the licensee does not complete a requirement by the specified deadline, then any replacement units or individual unit expansions associated with the requirement are no longer authorized. An expansion modification application and operating license are required to regain the authorized process capacity for the replacement units and individual unit expansions unless construction begins before the deadline, proceeds in a continuous manner, and is completed prior to submittal of the operating license renewal application.

No.	Requirement	Referenced Drawings Included in License Attachment	Deadline from Effective Date of License
1	Conversion of Stabilization Pit Number 3 from Liquid Industrial Waste stabilization to hazardous waste stabilization.	Appendix C2-6 Drawings TL-13-02, TL-13-03 and TL-13-04	1 year
2	Conversion of Stabilization Pit Number 2 from Liquid Industrial Waste stabilization to hazardous waste stabilization.	Appendix C2-6 Drawings TL-13-02, TL-13-03 and TL-13-04	2 years
3	Conversion of Stabilization Pit Number 1 from Liquid Industrial Waste stabilization to hazardous waste stabilization.	Appendix C2-6 Drawings TL-13-02, TL-13-03 and TL-13-04	3 years
4	Construction of secondary containment for storage area with existing Building 4.	Appendix C2-6 Drawings CC-13-01 and CC-13-02	1 year
5	Conversion of Tanks 11, 12, 13, 16, 17, 27, 32, and 33 within the waste water treatment plant into Hazardous Waste Storage Tanks.	Module A1, Figure A1-4	3 years
6	Construction of Proposed Building 5A.	Appendix C1-6 Drawings A1-5, SK-2, and SK-3	3 years
7	Construction of Proposed Building 5B.	Appendix C1-6 Drawings A1-5 and SK-4	3 years
8	The licensee shall submit proposed revisions to the Waste Analysis Plan to the Division Director for review and approval prior to the acceptance and treatment of waste for stabilization in Pits Number 1, 2, or 3. These revisions will address land disposal restriction post-treatment sampling requirements. Upon approval, the revisions to the Waste Analysis Plan become enforceable conditions of this license as a minor modification.	Appendix C2-6 Drawings TL-13-02, TL-13-03 and TL-13-04	1 year

**B. REPORTING**

No later than 14 days following each deadline in Condition VIII.A. of this license, the licensee shall notify the Division Director of compliance or noncompliance with each requirement. {R 299.9508(1)(g) and R 299.9521(2)(a) and 40 CFR§270.33 as ABR in R 299.11003}