



Environmental Services, Inc.

TSDF Operating License Application

Plainwell Facility
331 Broad Street
Plainwell, Michigan 49080

MID 092 947 928

September 12, 2022

Volume List With Management Unit(s)

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Volume 1

Existing Facility

DLS1, DLS2, DLS3, DLS4, DLS5, HWLB

Pre-Application Public Meeting Information

The public meeting newspaper notice was published in the Union Enterprise on August 4, 2022. This was the same day the radio spot ran on WAKV 980 AM and 98.9 FM in Otsego/Plainwell and 105.1FM in Kalamazoo. The sign was placed in the front yard of the facility next to the road that day as well.

The facility conducted its public meeting as advertised on Tuesday evening, September 6, 2022 at the Ransom District Library. Two local residents showed up as well as the City Manager of Plainwell.

The presentation and question and answer time lasted approximately 80 minutes. No written comments or questions were received as they were answered in real-time during the meeting.





Otsego & Plainwell UNION ENTERPRISE

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Extra Edition • Thursday, August 4, 2022

OPS prepares for school year with administrative retreat

By JASON WESSELDYK
SPORTS EDITOR

Despite continuing to deal with issues related to the COVID pandemic, Otsego Public Schools superintendent Jeff Haase believes the district made positive strides in several areas during the 2021-22 school year.

"We accomplished a lot last year with respect to closing the achievement gaps and providing social/emotional support as our students and staff return to a traditional schedule," Haase said.

That being said, Haase knows there is always work to be done when it comes to best serving the district's students and parents. Which is why the theme for this year's OPS Administrative Retreat was "Under Construction."

"Our theme for this year is Under Construction as we still have some cracks in our foundation that need to be addressed," Haase said. "This will be accomplished through our new



Administrators, directors and supervisors from Otsego Public Schools gathered for their annual retreat in preparation for the new school year. The theme of this year's retreat was "Under Construction." (Photo provided)

as we start school and throughout the year.

"We have an amazing team and one that I'm extremely proud of"

from 2020-21 school year because of COVID, we needed to rebuild our foundation," Haase said. "This year I needed to think of



OTSEGO DISTRICT PUBLIC LIBRARY

NOTICE OF PUBLIC HEARING ON PROPOSED 2023 BUDGET

PLEASE TAKE NOTICE that on Wednesday, August 17 at 5:30 p.m. at the Otsego District Public Library, 401 Dix Street, Otsego, Michigan, the Library Board of the Otsego District Public Library will hold a public hearing to consider the Library's proposed budget for the period from January 1, 2023 through December 31, 2023.

The Board may not adopt its proposed budget until after the public hearing. A copy of the proposed budget is available for public inspection during normal business hours at the Library, 401 Dix Street, Otsego, Michigan. All interested parties will be given an opportunity to be heard at the public hearing regarding the proposed budget.

The property tax millage rate proposed to be levied to support the proposed budget will be a subject of this hearing.

This notice is given by order of the Otsego District Public Library Board.

OTSEGO DISTRICT PUBLIC LIBRARY BOARD

All meetings will be held at Otsego Township Hall at 400 N 16th St Otsego, MI 49078. The board would appreciate attendance from as many, if not all, residents from the listed areas on their respective listed days as we will be sharing a lot of information and are wanting as much input from them as possible before we make decisions.

NOTICE

Drug & Laboratory Disposal, Inc. will host a public meeting at the Ransom District Library, 180 S Sherwood Street in Plainwell, on Tuesday, September 6, 2022 at 6:00 P.M., for the purpose of discussing the renewal of their Part B license and new construction that is being planned.

DLD's primary business is the transport, storage, and treatment of a wide variety of chemical wastes. The company has been in business since 1977.

Questions may be sent to Brent Walter at the facility's address of 331 Broad Street, Plainwell, MI 49080 or by phone at 269-685-9824. A map to both the facility and the meeting location will be provided upon request.

If special accommodations to participate in the meeting are required, please contact the facility at least 72 hours in advance of the meeting.

COMMISSION CITY OF OTSEGO Allegan County, Michigan

NOTICE OF PUBLIC HEARING TO CONSIDER A TEXT AMENDMENT TO THE CITY OF OTSEGO ZONING ORDINANCE

The Otsego Planning Commission will hold a public hearing on Monday, August 22, 2022, at City Hall, 117 East Orleans, Otsego, MI 49078, at 7:00 p.m., local time, to consider public comment regarding proposed amendments to the Otsego Zoning Ordinance.

AMENDMENT OF THE CITY OF OTSEGO ZONING ORDINANCE; TO INCLUDE UNDER CHAPTER 3 - GENERAL PROVISIONS; ADDITION OF SECTION 3.21- PRIVATE VEHICLE SALES; AND AMENDMENT OF SECTION 3.19 - ACCESS MANAGEMENT

Copies of the proposed amendment are available for inspection at the office of the City Clerk, 117 East Orleans, Otsego, MI 49078, during normal City business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, excluding City holidays. Written comments concerning the proposed amendment may be submitted to the City Clerk by first class mail or in person up to the meeting time.

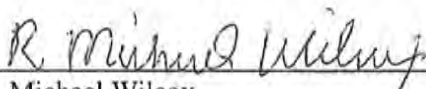
Angela Cronen, MMC
City Clerk

AFFIDAVIT OF PUBLICATION

State of Michigan
County of Allegan

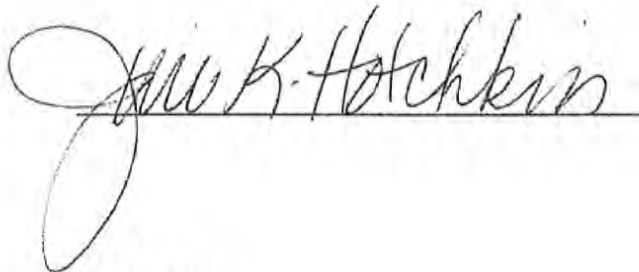
R. Michael Wilcox, being duly sworn says he is one of the principal clerks of the Union Enterprise, a weekly newspaper published and circulated in said county. The annexed is a printed copy of a notice which was published in said newspaper on the following date(s), to wit.

August 4, 2022


R. Michael Wilcox

Subscribed and sworn to me before this

9th September 2022
____ day of _____ A.D. _____



Julie Hotchkiss
Notary Public,
Acting In Allegan County, Michigan
My commission expires 03/15/2023

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DLD Plainwell - Facility Expansion Preapplication Meeting

Ransom District Library, Plainwell, Michigan

September 6, 2022 6:00 p.m.

Sign-in Sheet

Please record your name and contact information so that we may have a record of your attendance.

	PRINT NAME	ADDRESS	PHONE #	EMAIL ADDRESS
1	Cory Redder	731 Thomas St	419-296-7607	coryredder@gmail.com
2	Amanda Redder	731 Thomas	419-296-6703	mandy redder @ yahoo
3	ERIK Wilson	1184 N. Applect.	269 685 6821	EWILSON @ PLAINWELL.ORG
4				
5				
6				
7				
8				
9				
10				
11				
12				



Michigan Department of Environment, Great Lakes, and Energy
Materials Management Division

**OPERATING LICENSE APPLICATION FORM FOR
HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES**

Required under authority of Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to submit this information may result in civil or criminal penalties.

Note: Copies of the current EGLE Site Identification Form, EQP 5150, and the EPA Part A Permit Application Form, 8700-23, must be submitted with this application.

I. FACILITY SITE ID NUMBER		MID 092 947 928								
II. FACILITY'S LEGAL OWNER										
A. Name		DLD Environmental Services, Inc. *								
B. Street or P.O. Box		331 Broad Street								
C. City/State/ZIP		Plainwell, MI 49080								
D. Telephone Number (area code included)		(269) 685-9824								
E. Owner Type		P	F. Ownership Change?*		Y	N	X*	N/A	Date	
III. FACILITY OPERATOR										
A. Name		DLD Environmental Services, Inc. (formerly "Drug & Laboratory Disposal, Inc.")								
B. Street or P.O. Box		331 Broad Street								
C. City/State/ZIP		Plainwell, MI 49080								
D. Telephone Number (area code included)		(269) 685-9824								
E. Operator Type		P	F. Operator Change?		Y	N	X*	N/A	Date	
IV. TITLEHOLDER OF LAND										
A. Name		Folley, Inc.								
B. Street or P.O. Box		331 Broad Street								
C. City/State/ZIP		Plainwell, MI 49080								
D. Telephone Number (area coded included)		(269) 685-9824								
V. OPERATING LICENSE APPLICATION										
Place an "X" in the appropriate box under either A or B (select only one box)										
A. Operating License Application										
<input type="checkbox"/>	First Application for *Existing Facility	Place an "X" here if application is for a facility that has not been previously licensed in Michigan to treat, store, or dispose of hazardous waste and has interim status pursuant to 40 CFR §270.70.								
<input checked="" type="checkbox"/>	Renewal Application for *Existing Facility (Volume 1)	Place an "X" here if renewal application for a facility that was previously licensed in Michigan to treat, store, or dispose hazardous waste and whose hazardous waste operations have not had any new construction or been altered, enlarged, or expanded.								
<input type="checkbox"/>	Application for Modification of License	Place an "X" here if application is for a license modification.								
<input type="checkbox"/>	First Application for Research, Development, and Demonstration (RDD) License	Place an "X" here if application for a temporary license for RDD.								
<input type="checkbox"/>	Renewal Application for RDD License	Place an "X" here if application for the renewal of a temporary license for RDD.								
B. Operating License Application for New, Altered, Enlarged, or Expanded Facility										
<input checked="" type="checkbox"/>	First Application (Volumes 2-10)	Place an "X" here if application is for a new facility or a facility that wishes to alter, enlarge, or expand its hazardous waste operations.								
For existing facilities, provide date operation began.								Date	05 – 03 – 1977	
For RDD activities, provide the date RDD began or expected to begin.								Date		
For new, altered, enlarged, or expanded facilities, provide date expected construction to begin.								Date	TBD	
<i>*Existing Facility means a hazardous waste treatment, storage, or disposal facility (TSDF) that either received all necessary state-issued environmental permits or licenses before January 1, 1980, or for which approval of construction was received from the Air Pollution Control Commission before November 19, 1980, or before promulgation of new federal rules that caused the facility to become subject to regulation as a TSDF. Existing facilities also include TSDFs that were operating before January 1, 1980, under existing authority, or before promulgation of new federal rules that caused the facility to become subject to regulation as a TSDF and that did not require state-issued environmental permits or licenses.</i>										

* **Name Change Only** - formerly "Drug & Laboratory Disposal, Inc."

VI. OPERATING LICENSE APPLICATION FEES			
<input checked="" type="checkbox"/>	A.	Operating License Application Fixed Fee	\$ 500
<input type="checkbox"/>	B.	Additional License Application Fees for New, Altered, Enlarged, or Expanded Facility	\$ 25,000
Check Type of Facility			
<input type="checkbox"/>		Land Disposal (\$9,000)	\$
<input type="checkbox"/>		Incineration or Other Treatment (\$7,200)	\$
<input type="checkbox"/>		Storage (\$500)	\$
Total Operating License Fee			\$
<p>Note: Checks shall be made payable to the "State of Michigan" and the state accounting code "HWOL" written in the memo portion. Checks shall be mailed to EGLE, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909-8157, with a copy of payment included with application that is mailed to the EGLE, MMD, P.O. Box 30241, Lansing, Michigan 48909-7741.</p>			

VII. EXISTING ENVIRONMENTAL PERMITS (attach copies of each as proof of issuance)			
<input type="checkbox"/>	A.	NPDES (Discharges to Surface Water) Permit Number	N/A
<input type="checkbox"/>	B.	UIC (Underground Injection of Fluids) Permit Number	N/A
<input type="checkbox"/>	C.	RCRA (Hazardous Waste) Permit Number	MID 092 947 928
<input type="checkbox"/>	D.	PSD (Air Emissions From Proposed Sources) Permit Number	N/A
<input type="checkbox"/>	E.	Other (Specify below) Permit Number	AQD - Permits to Install

VIII. NATURE OF BUSINESS (Provide a brief description)	
<p>DLD provides hazardous and nonhazardous chemical waste disposal services to a wide variety of academic, healthcare, and industrial customers.</p> <p>DLD is a large quantity generator, a hazardous waste transporter both in the U.S. and Canada, and is a hazardous waste treatment and storage facility.</p> <p>DLD is also a registered medical waste producing facility and has a Reverse Distributors License from the US Department of Justice/DEA enabling it to manage Schedules I-V controlled substances.</p>	

IX. MAP	
<p>Attach to this application a topographic map of the area extending at least one mile beyond the property boundaries. The map must show the legal boundaries of the facility; the location of each of its existing and proposed intake and discharge structures; each of its hazardous waste treatment, storage, or disposal facilities, including the location of all processes listed in Items XII and XIII identified by process code; and each well where it injects fluids underground. Include all springs, rivers, and other surface water bodies in the map area, plus all drinking water wells within a quarter mile of the facility that are identified in the public record or otherwise known to you. (see instructions for specific requirements)</p> <p style="text-align: center;">(See Attached Topographic Maps IX-1 and IX-2)</p>	

X. FACILITY DRAWING	
<p>All existing facilities must include a scale drawing of the facility showing the property boundaries of the facility; the areas occupied by treatment, storage, or disposal operations that will be used during interim status; the name of each operation (drum storage area, etc.); areas of past TSD operations; areas of future TSD; and the approximate dimensions of the property boundaries and all TSD areas. Where applicable, use the process codes listed in Items XII and XIII to indicate the location of all TSD. This drawing should fit on an 8.5 by 11 inch sheet of paper.</p> <p style="text-align: center;">(See Attached Facility Drawing X-1)</p>	

XI. PHOTOGRAPHS	
<p>All existing facilities must include photographs that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. Use the process codes and descriptions in Items XII and XIII to indicate the location of all TSD areas. Indicate the date of the photograph on the back of each photograph. Photographs may be in color or black and white, aerial or ground-level.</p> <p style="text-align: center;">(See Attached Aerial Views XI-1 and XI-2)</p>	

XII. PROCESS CODES AND DESIGN CAPACITIES (see instructions)									
Line Number	A. Process Code (from list)	B. Process Design Capacity			Line Number	A. Process Code (from list)	B. Process Design Capacity		
		B.1. Quantity	B.2. Unit of Measure	For Official Use Only			B.1. Quantity	B.2. Unit of Measure	For Official Use Only
1.	S01	343,439	G		6.				
2.	S02	120,000	G		7.				
3.	T04	117,672	U		8.				
4.	X02	13,090	U		9.				
5.					10.				

C. Additional Process Codes or Description of Nonlisted Processes (Codes "S99" and "T04").

Treatment Processes (T04)

- Commingling
- Lab packing
- Shredder throughput
- Chemical oxidation (T22)
- Chemical precipitation (T23)
- Chemical reduction (T24)
- Cyanide destruction (T27)
- Neutralization (T31)
- Decanting (T38)
- Solidification (T39)
- Distillation (T54)
- Burn-off Oven (T34)
- Filtration (T40)
- Electrolysis (T56)
- Precious Metals Recovery (T66)

Treatment Processes (X02)

- Aerosol Recovery/Recycling
- Filter Press
- Extractor
- Shredder

XIV. DESCRIPTION OF HAZARDOUS WASTES									
LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES					
				D.1. PROCESS CODES (enter code)				D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
1	D001	12,500	T	S01	S02	T04	000	Commingle or lab pack	
2				T31	T35	T39	T40		
3	D002	10,000	T	S01	S02	T04	000	Commingle or lab pack	
4				T31	T35	T39	T40		
5	D003	7,800	T	S01	S02	T04	000	Commingle or lab pack	
6				T31	T35	T39	T40		
7	D004	2,500	T	S01	S02	T04	000	Commingle or lab pack	
8				T31	T35	T39	T40		
9	D005	2,500	T	S01	S02	T04	000	Commingle or lab pack	
10				T31	T35	T39	T40		
12	D006	2,500	T	S01	S02	T04	000	Commingle or lab pack	
13				T31	T35	T39	T40		
14	D007	2,500	T	S01	S02	T04	000	Commingle or lab pack	
15				T31	T35	T39	T40		
16	D008	2,500	T	S01	S02	T04	000	Commingle or lab pack	
17				T31	T35	T39	T40		
18	D009	2,500	T	S01	S02	T04	000	Commingle or lab pack	
19				T31	T35	T39	T40		
20	D010	2,500	T	S01	S02	T04	000	Commingle or lab pack	
21				T31	T35	T39	T40		
22	D011	2,500	T	S01	S02	T04	000	Commingle or lab pack	
23				T31	T35	T39	T40		
24	D012	2,500	T	S01	S02	T04	000	Commingle or lab pack	
25				T31	T35	T30			
26	D013	2,500	T	S01	S02	T04	000	Commingle or lab pack	
27				T31	T35	T39			
28	D014	2,500	T	S01	S02	T04	000	Commingle or lab pack	
29				T31	T35	T39			
30	D015	2,500	T	S01	S02	T04	000	Commingle or lab pack	
31				T31	T35	T39			
32	D016	2,500	T	S01	S02	T04	000	Commingle or lab pack	
33				T31	T35	T39			
34	D017	2,500	T	S01	S02	T04	000	Commingle or lab pack	
35				T31	T35	T39			
36	D018	8,000	T	S01	S02	T04		Commingle or lab pack	
37	D019	6,000	T	S01	S02	T04		Commingle or lab pack	
38	D020	3,000	T	S01	S02	T04		Commingle or lab pack	
39	D021	2,500	T	S01	S02	T04		Commingle or lab pack	
40	D022	5,000	T	S01	S02	T04		Commingle or lab pack	

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
41	D023	1,000	T	S01	S02	T04		Commingle or lab pack
42	D024	1,500	T	S01	S02	T04		Commingle or lab pack
43	D025	1,500	T	S01	S02	T04		Commingle or lab pack
44	D026	1,500	T	S01	S02	T04		Commingle or lab pack
45	D027	1,500	T	S01	S02	T04		Commingle or lab pack
46	D028	1,500	T	S01	S02	T04		Commingle or lab pack
47	D029	1,500	T	S01	S02	T04		Commingle or lab pack
48	D030	1,500	T	S01	S02	T04		Commingle or lab pack
49	D031	1,500	T	S01	S02	T04		Commingle or lab pack
50	D032	1,500	T	S01	S02	T04		Commingle or lab pack
51	D033	1,500	T	S01	S02	T04		Commingle or lab pack
52	D034	1,500	T	S01	S02	T04		Commingle or lab pack
53	D035	1,500	T	S01	S02	T04		Commingle or lab pack
54	D036	1,500	T	S01	S02	T04		Commingle or lab pack
55	D037	1,500	T	S01	S02	T04		Commingle or lab pack
56	D038	1,500	T	S01	S02	T04		Commingle or lab pack
57	D039	1,500	T	S01	S02	T04		Commingle or lab pack
58	D040	1,500	T	S01	S02	T04		Commingle or lab pack
59	D041	1,500	T	S01	S02	T04		Commingle or lab pack
60	D042	1,500	T	S01	S02	T04		Commingle or lab pack
61	D043	1,500	T	S01	S02	T04		Commingle or lab pack
62	F001	2,750	T	S01	S02	T04		Commingle or lab pack
63	F002	5,000	T	S01	S02	T04		Commingle or lab pack
64	F003	150,000	T	S01	S02	T04		Commingle or lab pack
65	F004	3500	T	S01	S02	T04		Commingle or lab pack
66	F005	15000	T	S01	S02	T04		Commingle or lab pack
67	F006	4,500	P	S01	S02	T04		Commingle or lab pack
68	F007	2500	P	S01	S02	T04		Commingle or lab pack
69	F008	2500	P	S01	S02	T04		Commingle or lab pack
70	F009	2500	P	S01	S02	T04		Commingle or lab pack
71	F010	2500	P	S01	S02	T04		Commingle or lab pack
72	F011	2500	P	S01	S02	T04		Commingle or lab pack
73	F012	2500	P	S01	S02	T04		Commingle or lab pack
74	F019	2500	P	S01	S02	T04		Commingle or lab pack
75	F020	2500	P	S01	S02	T04		Commingle or lab pack
76	F021	2500	P	S01	S02	T04		Commingle or lab pack
77	F022	2500	P	S01	S02	T04		Commingle or lab pack
78	F023	2500	P	S01	S02	T04		Commingle or lab pack
79	F024	2500	P	S01	S02	T04		Commingle or lab pack
80	F025	2500	P	S01	S02	T04		Commingle or lab pack
81	F026	2500	P	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
82	F027	2500	P	S01	S02	T04		Commingle or lab pack
83	F028	2500	P	S01	S02	T04		Commingle or lab pack
84	F032	2500	P	S01	S02	T04		Commingle or lab pack
85	F034	2500	P	S01	S02	T04		Commingle or lab pack
86	F035	2500	P	S01	S02	T04		Commingle or lab pack
87	F037	2500	P	S01	S02	T04		Commingle or lab pack
88	F038	2500	P	S01	S02	T04		Commingle or lab pack
89	F039	2500	P	S01	S02	T04		Commingle or lab pack
90	K001	2500	P	S01	S02	T04		Commingle or lab pack
91	K002	2,500	P	S01	S02	T04		Commingle or lab pack
92	K003	2,500	P	S01	S02	T04		Commingle or lab pack
93	K004	2,500	P	S01	S02	T04		Commingle or lab pack
94	K005	2,500	P	S01	S02	T04		Commingle or lab pack
95	K006	2,500	P	S01	S02	T04		Commingle or lab pack
96	K007	2,500	P	S01	S02	T04		Commingle or lab pack
97	K008	2,500	P	S01	S02	T04		Commingle or lab pack
98	K009	2,500	P	S01	S02	T04		Commingle or lab pack
99	K010	2,500	P	S01	S02	T04		Commingle or lab pack
100	K011	2,500	P	S01	S02	T04		Commingle or lab pack
101	K013	2,500	P	S01	S02	T04		Commingle or lab pack
102	K014	2,500	P	S01	S02	T04		Commingle or lab pack
103	K015	2,500	P	S01	S02	T04		Commingle or lab pack
104	K016	2,500	P	S01	S02	T04		Commingle or lab pack
105	K017	2,500	P	S01	S02	T04		Commingle or lab pack
106	K018	2,500	P	S01	S02	T04		Commingle or lab pack
107	K019	2,500	P	S01	S02	T04		Commingle or lab pack
108	K020	2,500	P	S01	S02	T04		Commingle or lab pack
109	K021	2,500	P	S01	S02	T04		Commingle or lab pack
110	K022	2,500	P	S01	S02	T04		Commingle or lab pack
111	K023	2,500	P	S01	S02	T04		Commingle or lab pack
112	K024	2,500	P	S01	S02	T04		Commingle or lab pack
113	K025	2,500	P	S01	S02	T04		Commingle or lab pack
114	K026	2,500	P	S01	S02	T04		Commingle or lab pack
115	K027	2,500	P	S01	S02	T04		Commingle or lab pack
116	K028	2,500	P	S01	S02	T04		Commingle or lab pack
117	K029	2,500	P	S01	S02	T04		Commingle or lab pack
118	K030	2,500	P	S01	S02	T04		Commingle or lab pack
119	K031	2,500	P	S01	S02	T04		Commingle or lab pack
120	K032	2,500	P	S01	S02	T04		Commingle or lab pack
121	K033	2,500	P	S01	S02	T04		Commingle or lab pack
122	K034	2,500	P	S01	S02	T04		Commingle or lab pack
123	K035	2,500	P	S01	S02	T04		Commingle or lab pack
124	K036	2,500	P	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
125	K037	2,500	P	S01	S02	T04		Commingle or lab pack
126	K038	2,500	P	S01	S02	T04		Commingle or lab pack
127	K039	2,500	P	S01	S02	T04		Commingle or lab pack
128	K040	2,500	P	S01	S02	T04		Commingle or lab pack
129	K041	2,500	P	S01	S02	T04		Commingle or lab pack
130	K042	2,500	P	S01	S02	T04		Commingle or lab pack
131	K043	2,500	P	S01	S02	T04		Commingle or lab pack
132	K044	2,500	P	S01	S02	T04		Commingle or lab pack
133	K045	2,500	P	S01	S02	T04		Commingle or lab pack
134	K046	2,500	P	S01	S02	T04		Commingle or lab pack
135	K047	2,500	P	S01	S02	T04		Commingle or lab pack
136	K048	2,500	P	S01	S02	T04		Commingle or lab pack
137	K049	2,500	P	S01	S02	T04		Commingle or lab pack
138	K050	2,500	P	S01	S02	T04		Commingle or lab pack
139	K051	2,500	P	S01	S02	T04		Commingle or lab pack
140	K052	2,500	P	S01	S02	T04		Commingle or lab pack
141	K060	2,500	P	S01	S02	T04		Commingle or lab pack
142	K061	1,500	P	S01	S02	T04		Commingle or lab pack
143	K062	1,500	P	S01	S02	T04		Commingle or lab pack
144	K069	1,500	P	S01	S02	T04		Commingle or lab pack
145	K071	1,500	P	S01	S02	T04		Commingle or lab pack
146	K073	1,500	P	S01	S02	T04		Commingle or lab pack
147	K083	1,500	P	S01	S02	T04		Commingle or lab pack
148	K084	1,500	P	S01	S02	T04		Commingle or lab pack
149	K085	1,500	P	S01	S02	T04		Commingle or lab pack
150	K086	1,500	P	S01	S02	T04		Commingle or lab pack
151	K087	1,500	P	S01	S02	T04		Commingle or lab pack
152	K088	1,500	P	S01	S02	T04		Commingle or lab pack
153	K093	1,500	P	S01	S02	T04		Commingle or lab pack
154	K094	1,500	P	S01	S02	T04		Commingle or lab pack
155	K095	1,500	P	S01	S02	T04		Commingle or lab pack
156	K096	1,500	P	S01	S02	T04		Commingle or lab pack
157	K097	1,500	P	S01	S02	T04		Commingle or lab pack
158	K098	1,500	P	S01	S02	T04		Commingle or lab pack
159	K099	1,500	P	S01	S02	T04		Commingle or lab pack
160	K100	1,500	P	S01	S02	T04		Commingle or lab pack
161	K101	1,500	P	S01	S02	T04		Commingle or lab pack
162	K102	1,500	P	S01	S02	T04		Commingle or lab pack
163	K103	1,500	P	S01	S02	T04		Commingle or lab pack
164	K104	1,500	P	S01	S02	T04		Commingle or lab pack
165	K105	1,500	P	S01	S02	T04		Commingle or lab pack
166	K106	1,500	P	S01	S02	T04		Commingle or lab pack
167	K107	1,500	P	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
168	K108	1,500	P	S01	S02	T04		Commingle or lab pack
169	K109	1,500	P	S01	S02	T04		Commingle or lab pack
170	K110	1,500	P	S01	S02	T04		Commingle or lab pack
171	K111	1,500	P	S01	S02	T04		Commingle or lab pack
172	K112	1,500	P	S01	S02	T04		Commingle or lab pack
173	K113	1,500	P	S01	S02	T04		Commingle or lab pack
174	K114	1,500	P	S01	S02	T04		Commingle or lab pack
175	K115	1,500	P	S01	S02	T04		Commingle or lab pack
176	K116	1,500	P	S01	S02	T04		Commingle or lab pack
177	K117	1,500	P	S01	S02	T04		Commingle or lab pack
178	K118	1,500	P	S01	S02	T04		Commingle or lab pack
179	K123	1,500	P	S01	S02	T04		Commingle or lab pack
180	K124	1,500	P	S01	S02	T04		Commingle or lab pack
181	K125	1,500	P	S01	S02	T04		Commingle or lab pack
182	K126	1,500	P	S01	S02	T04		Commingle or lab pack
183	K131	1,500	P	S01	S02	T04	T31	Commingle or lab pack
184	K132	1,500	P	S01	S02	T04	T31	Commingle or lab pack
185	K136	1,500	P	S01	S02	T04		Commingle or lab pack
186	K140	1,500	P	S01	S02	T04		Commingle or lab pack
187	K141	1,500	P	S01	S02	T04		Commingle or lab pack
188	K142	1,500	P	S01	S02	T04		Commingle or lab pack
189	K143	1,500	P	S01	S02	T04		Commingle or lab pack
190	K144	1,500	P	S01	S02	T04		Commingle or lab pack
191	K145	1,500	P	S01	S02	T04		Commingle or lab pack
192	K147	1,500	P	S01	S02	T04		Commingle or lab pack
193	K148	1,500	P	S01	S02	T04		Commingle or lab pack
194	K149	1,500	P	S01	S02	T04		Commingle or lab pack
195	K150	1,500	P	S01	S02	T04		Commingle or lab pack
196	K151	1,500	P	S01	S02	T04		Commingle or lab pack
197	K156	1,500	P	S01	S02	T04		Commingle or lab pack
198	K157	1,500	P	S01	S02	T04		Commingle or lab pack
199	K158	1,500	P	S01	S02	T04		Commingle or lab pack
200	K159	1,500	P	S01	S02	T04		Commingle or lab pack
201	K161	1,500	P	S01	S02	T04		Commingle or lab pack
202	K169	1,500	P	S01	S02	T04		Commingle or lab pack
203	K170	1,500	P	S01	S02	T04		Commingle or lab pack
204	K171	1,500	P	S01	S02	T04		Commingle or lab pack
205	K172	1,500	P	S01	S02	T04		Commingle or lab pack
206	K174	1,500	P	S01	S02	T04		Commingle or lab pack
207	K175	1,500	P	S01	S02	T04		Commingle or lab pack
208	K176	1,500	P	S01	S02	T04		Commingle or lab pack
209	K177	1,500	P	S01	S02	T04		Commingle or lab pack
210	K178	1,500	P	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
211	K181	1,500	P	S01	S02	T04		Commingle or lab pack
212	P001	2.5	T	S01	S02	T04		Commingle or lab pack
213	P002	2.5	T	S01	S02	T04		Commingle or lab pack
214	P003	2.5	T	S01	S02	T04		Commingle or lab pack
215	P004	2.5	T	S01	S02	T04		Commingle or lab pack
216	P005	2.5	T	S01	S02	T04		Commingle or lab pack
217	P006	2.5	T	S01	S02	T04		Commingle or lab pack
218	P007	2.5	T	S01	S02	T04		Commingle or lab pack
219	P008	2.5	T	S01	S02	T04		Commingle or lab pack
220	P009	2.5	T	S01	S02	T04		Commingle or lab pack
221	P010	2.5	T	S01	S02	T04		Commingle or lab pack
222	P011	2.5	T	S01	S02	T04		Commingle or lab pack
223	P012	2.5	T	S01	S02	T04		Commingle or lab pack
224	P013	2.5	T	S01	S02	T04		Commingle or lab pack
225	P014	2.5	T	S01	S02	T04		Commingle or lab pack
226	P015	2.5	T	S01	S02	T04		Commingle or lab pack
227	P016	2.5	T	S01	S02	T04		Commingle or lab pack
228	P017	2.5	T	S01	S02	T04		Commingle or lab pack
229	P018	2.5	T	S01	S02	T04		Commingle or lab pack
230	P020	2.5	T	S01	S02	T04		Commingle or lab pack
231	P021	2.5	T	S01	S02	T04		Commingle or lab pack
232	P022	2.5	T	S01	S02	T04		Commingle or lab pack
233	P023	3.5	T	S01	S02	T04		Commingle or lab pack
234	P024	2.5	T	S01	S02	T04		Commingle or lab pack
235	P026	2.5	T	S01	S02	T04		Commingle or lab pack
236	P027	2.5	T	S01	S02	T04		Commingle or lab pack
237	P028	2.5	T	S01	S02	T04		Commingle or lab pack
238	P029	2.5	T	S01	S02	T04	T27	Commingle or lab pack
239	P030	5	T	S01	S02	T04	T27	Commingle or lab pack
240	P031	2.5	T	S01	S02	T04	T27	Commingle or lab pack
241	P033	2.5	T	S01	S02	T04	T27	Commingle or lab pack
242	P034	2.5	T	S01	S02	T04		Commingle or lab pack
243	P036	2.5	T	S01	S02	T04		Commingle or lab pack
244	P037	2.5	T	S01	S02	T04		Commingle or lab pack
245	P038	2.5	T	S01	S02	T04		Commingle or lab pack
246	P039	2.5	T	S01	S02	T04		Commingle or lab pack
247	P040	2.5	T	S01	S02	T04		Commingle or lab pack
248	P041	2.5	T	S01	S02	T04		Commingle or lab pack
249	P042	2.5	T	S01	S02	T04		Commingle or lab pack
250	P043	2.5	T	S01	S02	T04		Commingle or lab pack
251	P044	2.5	T	S01	S02	T04		Commingle or lab pack
252	P045	2.5	T	S01	S02	T04		Commingle or lab pack
253	P046	2.5	T	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
254	P047	2.5	T	S01	S02	T04		Commingle or lab pack
255	P048	2.5	T	S01	S02	T04		Commingle or lab pack
256	P049	2.5	T	S01	S02	T04		Commingle or lab pack
257	P050	2.5	T	S01	S02	T04		Commingle or lab pack
258	P051	2.5	T	S01	S02	T04		Commingle or lab pack
259	P054	2.5	T	S01	S02	T04		Commingle or lab pack
260	P056	2.5	T	S01	S02	T04		Commingle or lab pack
261	P057	2.5	T	S01	S02	T04		Commingle or lab pack
262	P058	2.5	T	S01	S02	T04		Commingle or lab pack
263	P059	2.5	T	S01	S02	T04		Commingle or lab pack
264	P060	2.5	T	S01	S02	T04		Commingle or lab pack
265	P062	2.5	T	S01	S02	T04		Commingle or lab pack
266	P063	2.5	T	S01	S02	T04		Commingle or lab pack
267	P064	2.5	T	S01	S02	T04		Commingle or lab pack
268	P065	2.5	T	S01	S02	T04		Commingle or lab pack
269	P066	2.5	T	S01	S02	T04		Commingle or lab pack
270	P067	2.5	T	S01	S02	T04		Commingle or lab pack
271	P068	2.5	T	S01	S02	T04		Commingle or lab pack
272	P069	2.5	T	S01	S02	T04		Commingle or lab pack
273	P070	2.5	T	S01	S02	T04		Commingle or lab pack
274	P071	2.5	T	S01	S02	T04		Commingle or lab pack
275	P072	2.5	T	S01	S02	T04		Commingle or lab pack
276	P073	2.5	T	S01	S02	T04		Commingle or lab pack
277	P074	2.5	T	S01	S02	T04	T27	Commingle or lab pack
278	P075	500	T	S01	S02	T04		Commingle or lab pack
279	P076	2.5	T	S01	S02	T04		Commingle or lab pack
280	P077	2.5	T	S01	S02	T04		Commingle or lab pack
281	P078	2.5	T	S01	S02	T04		Commingle or lab pack
282	P081	2.5	T	S01	S02	T04		Commingle or lab pack
283	P082	2.5	T	S01	S02	T04		Commingle or lab pack
284	P084	2.5	T	S01	S02	T04		Commingle or lab pack
285	P085	2.5	T	S01	S02	T04		Commingle or lab pack
286	P087	2.5	T	S01	S02	T04		Commingle or lab pack
287	P088	2.5	T	S01	S02	T04		Commingle or lab pack
288	P089	2.5	T	S01	S02	T04		Commingle or lab pack
289	P092	2.5	T	S01	S02	T04		Commingle or lab pack
290	P093	2.5	T	S01	S02	T04		Commingle or lab pack
291	P094	2.5	T	S01	S02	T04		Commingle or lab pack
292	P095	2.5	T	S01	S02	T04		Commingle or lab pack
293	P096	2.5	T	S01	S02	T04		Commingle or lab pack
294	P097	2.5	T	S01	S02	T04		Commingle or lab pack
295	P098	2.5	T	S01	S02	T04	T27	Commingle or lab pack
296	P099	2.5	T	S01	S02	T04	T27	Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
297	P101	2.5	T	S01	S02	T04		Commingle or lab pack
298	P102	2.5	T	S01	S02	T04		Commingle or lab pack
299	P103	2.5	T	S01	S02	T04		Commingle or lab pack
300	P104	2.5	T	S01	S02	T04	T27	Commingle or lab pack
301	P105	2.5	T	S01	S02	T04		Commingle or lab pack
302	P106	2.5	T	S01	S02	T04	T27	Commingle or lab pack
303	P107	2.5	T	S01	S02	T04		Commingle or lab pack
304	P108	2.5	T	S01	S02	T04		Commingle or lab pack
305	P109	2.5	T	S01	S02	T04		Commingle or lab pack
306	P110	2.5	T	S01	S02	T04		Commingle or lab pack
307	P111	2.5	T	S01	S02	T04		Commingle or lab pack
308	P112	2.5	T	S01	S02	T04		Commingle or lab pack
309	P113	2.5	T	S01	S02	T04		Commingle or lab pack
310	P114	2.5	T	S01	S02	T04		Commingle or lab pack
311	P115	2.5	T	S01	S02	T04		Commingle or lab pack
312	P116	2.5	T	S01	S02	T04		Commingle or lab pack
313	P118	2.5	T	S01	S02	T04		Commingle or lab pack
314	P119	2.5	T	S01	S02	T04		Commingle or lab pack
315	P120	2.5	T	S01	S02	T04	T22	Commingle or lab pack
316	P121	2.5	T	S01	S02	T04	T27	Commingle or lab pack
317	P122	2.5	T	S01	S02	T04		Commingle or lab pack
318	P123	2.5	T	S01	S02	T04		Commingle or lab pack
319	P127	2.5	T	S01	S02	T04		Commingle or lab pack
320	P128	2.5	T	S01	S02	T04		Commingle or lab pack
321	P185	2.5	T	S01	S02	T04		Commingle or lab pack
322	P188	2.5	T	S01	S02	T04		Commingle or lab pack
323	P189	2.5	T	S01	S02	T04		Commingle or lab pack
324	P190	2.5	T	S01	S02	T04		Commingle or lab pack
325	P191	2.5	T	S01	S02	T04		Commingle or lab pack
326	P192	2.5	T	S01	S02	T04		Commingle or lab pack
327	P196	2.5	T	S01	S02	T04		Commingle or lab pack
328	P197	2.5	T	S01	S02	T04		Commingle or lab pack
329	P198	2.5	T	S01	S02	T04		Commingle or lab pack
330	P199	2.5	T	S01	S02	T04		Commingle or lab pack
331	P200	2.5	T	S01	S02	T04		Commingle or lab pack
332	P201	2.5	T	S01	S02	T04		Commingle or lab pack
333	P202	2.5	T	S01	S02	T04		Commingle or lab pack
334	P203	2.5	T	S01	S02	T04		Commingle or lab pack
335	P204	2.5	T	S01	S02	T04		Commingle or lab pack
336	P205	2.5	T	S01	S02	T04		Commingle or lab pack
337	U001	2.5	T	S01	S02	T04		Commingle or lab pack
338	U002	2.5	T	S01	S02	T04		Commingle or lab pack
339	U003	2.5	T	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
340	U004	2.5	T	S01	S02	T04		Commingle or lab pack
341	U005	2.5	T	S01	S02	T04		Commingle or lab pack
342	U006	2.5	T	S01	S02	T04		Commingle or lab pack
343	U007	2.5	T	S01	S02	T04		Commingle or lab pack
344	U008	2.5	T	S01	S02	T04		Commingle or lab pack
345	U009	2.5	T	S01	S02	T04		Commingle or lab pack
346	U010	5	T	S01	S02	T04		Commingle or lab pack
347	U011	2.5	T	S01	S02	T04		Commingle or lab pack
348	U012	2.5	T	S01	S02	T04		Commingle or lab pack
349	U014	2.5	T	S01	S02	T04		Commingle or lab pack
350	U015	2.5	T	S01	S02	T04		Commingle or lab pack
351	U016	2.5	T	S01	S02	T04		Commingle or lab pack
352	U017	2.5	T	S01	S02	T04		Commingle or lab pack
353	U018	2.5	T	S01	S02	T04		Commingle or lab pack
354	U019	30	T	S01	S02	T04		Commingle or lab pack
355	U020	2.5	T	S01	S02	T04		Commingle or lab pack
356	U021	2.5	T	S01	S02	T04		Commingle or lab pack
357	U022	2.5	T	S01	S02	T04		Commingle or lab pack
358	U023	2.5	T	S01	S02	T04		Commingle or lab pack
359	U024	2.5	T	S01	S02	T04		Commingle or lab pack
360	U025	2.5	T	S01	S02	T04		Commingle or lab pack
361	U026	2.5	T	S01	S02	T04		Commingle or lab pack
362	U027	2.5	T	S01	S02	T04		Commingle or lab pack
363	U028	2.5	T	S01	S02	T04		Commingle or lab pack
364	U029	2.5	T	S01	S02	T04		Commingle or lab pack
365	U030	2.5	T	S01	S02	T04		Commingle or lab pack
366	U031	2.5	T	S01	S02	T04		Commingle or lab pack
367	U032	2.5	T	S01	S02	T04		Commingle or lab pack
368	U033	2.5	T	S01	S02	T04		Commingle or lab pack
369	U034	2.5	T	S01	S02	T04		Commingle or lab pack
370	U035	2.5	T	S01	S02	T04		Commingle or lab pack
371	U036	10	T	S01	S02	T04		Commingle or lab pack
372	U037	2.5	T	S01	S02	T04		Commingle or lab pack
373	U038	2.5	T	S01	S02	T04		Commingle or lab pack
374	U039	2.5	T	S01	S02	T04		Commingle or lab pack
375	U040	2.5	T	S01	S02	T04		Commingle or lab pack
376	U041	2.5	T	S01	S02	T04		Commingle or lab pack
377	U042	2.5	T	S01	S02	T04		Commingle or lab pack
378	U043	2.5	T	S01	S02	T04		Commingle or lab pack
379	U044	30	T	S01	S02	T04		Commingle or lab pack
380	U045	2.5	T	S01	S02	T04		Commingle or lab pack
381	U046	2.5	T	S01	S02	T04		Commingle or lab pack
382	U047	2.5	T	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
383	U048	2.5	T	S01	S02	T04		Commingle or lab pack
384	U049	2.5	T	S01	S02	T04		Commingle or lab pack
385	U050	2.5	T	S01	S02	T04		Commingle or lab pack
386	U051	2.5	T	S01	S02	T04		Commingle or lab pack
387	U052	2.5	T	S01	S02	T04		Commingle or lab pack
388	U053	2.5	T	S01	S02	T04		Commingle or lab pack
389	U055	2.5	T	S01	S02	T04		Commingle or lab pack
390	U056	2.5	T	S01	S02	T04		Commingle or lab pack
391	U057	2.5	T	S01	S02	T04		Commingle or lab pack
392	U058	2.5	T	S01	S02	T04		Commingle or lab pack
393	U059	2.5	T	S01	S02	T04		Commingle or lab pack
394	U060	2.5	T	S01	S02	T04		Commingle or lab pack
395	U061	2.5	T	S01	S02	T04		Commingle or lab pack
396	U062	2.5	T	S01	S02	T04		Commingle or lab pack
397	U063	2.5	T	S01	S02	T04		Commingle or lab pack
398	U064	2.5	T	S01	S02	T04		Commingle or lab pack
399	U066	2.5	T	S01	S02	T04		Commingle or lab pack
400	U067	2.5	T	S01	S02	T04		Commingle or lab pack
401	U068	2.5	T	S01	S02	T04		Commingle or lab pack
402	U069	2.5	T	S01	S02	T04		Commingle or lab pack
403	U070	2.5	T	S01	S02	T04		Commingle or lab pack
404	U071	2.5	T	S01	S02	T04		Commingle or lab pack
405	U072	2.5	T	S01	S02	T04		Commingle or lab pack
406	U073	2.5	T	S01	S02	T04		Commingle or lab pack
407	U074	2.5	T	S01	S02	T04		Commingle or lab pack
408	U075	2.5	T	S01	S02	T04		Commingle or lab pack
409	U076	2.5	T	S01	S02	T04		Commingle or lab pack
410	U077	2.5	T	S01	S02	T04		Commingle or lab pack
411	U078	2.5	T	S01	S02	T04		Commingle or lab pack
412	U079	2.5	T	S01	S02	T04		Commingle or lab pack
413	U080	2.5	T	S01	S02	T04		Commingle or lab pack
414	U081	30	T	S01	S02	T04		Commingle or lab pack
415	U082	2.5	T	S01	S02	T04		Commingle or lab pack
416	U083	2.5	T	S01	S02	T04		Commingle or lab pack
417	U084	2.5	T	S01	S02	T04		Commingle or lab pack
418	U085	2.5	T	S01	S02	T04		Commingle or lab pack
419	U086	2.5	T	S01	S02	T04		Commingle or lab pack
420	U087	2.5	T	S01	S02	T04		Commingle or lab pack
421	U088	2.5	T	S01	S02	T04		Commingle or lab pack
422	U089	2.5	T	S01	S02	T04		Commingle or lab pack
423	U090	2.5	T	S01	S02	T04		Commingle or lab pack
424	U091	2.5	T	S01	S02	T04		Commingle or lab pack
425	U092	2.5	T	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
426	U093	2.5	T	S01	S02	T04		Commingle or lab pack
427	U094	2.5	T	S01	S02	T04		Commingle or lab pack
428	U095	2.5	T	S01	S02	T04		Commingle or lab pack
429	U096	2.5	T	S01	S02	T04		Commingle or lab pack
430	U097	2.5	T	S01	S02	T04		Commingle or lab pack
431	U098	2.5	T	S01	S02	T04		Commingle or lab pack
432	U099	2.5	T	S01	S02	T04		Commingle or lab pack
433	U101	2.5	T	S01	S02	T04		Commingle or lab pack
434	U102	2.5	T	S01	S02	T04		Commingle or lab pack
435	U103	2.5	T	S01	S02	T04		Commingle or lab pack
436	U105	2.5	T	S01	S02	T04		Commingle or lab pack
437	U106	2.5	T	S01	S02	T04		Commingle or lab pack
438	U107	2.5	T	S01	S02	T04		Commingle or lab pack
439	U108	2.5	T	S01	S02	T04		Commingle or lab pack
440	U109	2.5	T	S01	S02	T04		Commingle or lab pack
441	U110	2.5	T	S01	S02	T04		Commingle or lab pack
442	U111	2.5	T	S01	S02	T04		Commingle or lab pack
443	U112	30	T	S01	S02	T04		Commingle or lab pack
444	U113	2.5	T	S01	S02	T04		Commingle or lab pack
445	U114	2.5	T	S01	S02	T04		Commingle or lab pack
446	U115	2.5	T	S01	S02	T04		Commingle or lab pack
447	U116	2.5	T	S01	S02	T04		Commingle or lab pack
448	U117	2.5	T	S01	S02	T04		Commingle or lab pack
449	U118	2.5	T	S01	S02	T04		Commingle or lab pack
450	U119	2.5	T	S01	S02	T04		Commingle or lab pack
451	U120	2.5	T	S01	S02	T04		Commingle or lab pack
452	U121	2.5	T	S01	S02	T04		Commingle or lab pack
453	U122	2.5	T	S01	S02	T04		Commingle or lab pack
454	U123	2.5	T	S01	S02	T04		Commingle or lab pack
455	U124	2.5	T	S01	S02	T04		Commingle or lab pack
456	U125	2.5	T	S01	S02	T04		Commingle or lab pack
457	U126	2.5	T	S01	S02	T04		Commingle or lab pack
458	U127	2.5	T	S01	S02	T04		Commingle or lab pack
459	U128	2.5	T	S01	S02	T04		Commingle or lab pack
460	U129	2.5	T	S01	S02	T04		Commingle or lab pack
461	U130	2.5	T	S01	S02	T04		Commingle or lab pack
462	U131	2.5	T	S01	S02	T04		Commingle or lab pack
463	U132	2.5	T	S01	S02	T04		Commingle or lab pack
464	U133	2.5	T	S01	S02	T04		Commingle or lab pack
465	U134	2.5	T	S01	S02	T04		Commingle or lab pack
466	U135	2.5	T	S01	S02	T04	T22	Commingle or lab pack
467	U136	2.5	T	S01	S02	T04		Commingle or lab pack
468	U137	2.5	T	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
469	U138	2.5	T	S01	S02	T04		Commingle or lab pack
470	U140	2.5	T	S01	S02	T04		Commingle or lab pack
471	U141	2.5	T	S01	S02	T04		Commingle or lab pack
472	U142	2.5	T	S01	S02	T04		Commingle or lab pack
473	U143	2.5	T	S01	S02	T04		Commingle or lab pack
474	U144	2.5	T	S01	S02	T04		Commingle or lab pack
475	U145	2.5	T	S01	S02	T04		Commingle or lab pack
476	U146	2.5	T	S01	S02	T04		Commingle or lab pack
477	U147	2.5	T	S01	S02	T04		Commingle or lab pack
478	U148	2.5	T	S01	S02	T04		Commingle or lab pack
479	U149	2.5	T	S01	S02	T04		Commingle or lab pack
480	U150	2.5	T	S01	S02	T04		Commingle or lab pack
481	U151	2.5	T	S01	S02	T04		Commingle or lab pack
482	U152	2.5	T	S01	S02	T04		Commingle or lab pack
483	U153	2.5	T	S01	S02	T04		Commingle or lab pack
484	U154	30	T	S01	S02	T04		Commingle or lab pack
485	U155	2.5	T	S01	S02	T04		Commingle or lab pack
486	U156	2.5	T	S01	S02	T04		Commingle or lab pack
487	U157	2.5	T	S01	S02	T04		Commingle or lab pack
488	U158	2.5	T	S01	S02	T04		Commingle or lab pack
489	U159	2.5	T	S01	S02	T04		Commingle or lab pack
490	U160	2.5	T	S01	S02	T04		Commingle or lab pack
491	U161	2.5	T	S01	S02	T04		Commingle or lab pack
492	U162	2.5	T	S01	S02	T04		Commingle or lab pack
493	U163	2.5	T	S01	S02	T04		Commingle or lab pack
494	U164	2.5	T	S01	S02	T04		Commingle or lab pack
495	U165	2.5	T	S01	S02	T04		Commingle or lab pack
496	U166	2.5	T	S01	S02	T04		Commingle or lab pack
497	U167	2.5	T	S01	S02	T04		Commingle or lab pack
498	U168	2.5	T	S01	S02	T04		Commingle or lab pack
499	U169	2.5	T	S01	S02	T04		Commingle or lab pack
500	U170	2.5	T	S01	S02	T04		Commingle or lab pack
501	U171	2.5	T	S01	S02	T04		Commingle or lab pack
502	U172	2.5	T	S01	S02	T04		Commingle or lab pack
503	U173	2.5	T	S01	S02	T04		Commingle or lab pack
504	U174	2.5	T	S01	S02	T04		Commingle or lab pack
505	U176	2.5	T	S01	S02	T04		Commingle or lab pack
506	U177	2.5	T	S01	S02	T04		Commingle or lab pack
507	U178	2.5	T	S01	S02	T04		Commingle or lab pack
508	U179	2.5	T	S01	S02	T04		Commingle or lab pack
509	U180	10	T	S01	S02	T04		Commingle or lab pack
510	U181	2.5	T	S01	S02	T04		Commingle or lab pack
511	U182	2.5	T	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
512	U183	2.5	T	S01	S02	T04		Commingle or lab pack
513	U184	2.5	T	S01	S02	T04		Commingle or lab pack
514	U185	2.5	T	S01	S02	T04		Commingle or lab pack
515	U186	2.5	T	S01	S02	T04		Commingle or lab pack
516	U187	2.5	T	S01	S02	T04		Commingle or lab pack
517	U188	10	T	S01	S02	T04		Commingle or lab pack
518	U189	2.5	T	S01	S02	T04	T22	Commingle or lab pack
519	U190	2.5	T	S01	S02	T04		Commingle or lab pack
520	U191	2.5	T	S01	S02	T04		Commingle or lab pack
521	U192	2.5	T	S01	S02	T04		Commingle or lab pack
522	U193	2.5	T	S01	S02	T04		Commingle or lab pack
523	U194	2.5	T	S01	S02	T04		Commingle or lab pack
524	U196	2.5	T	S01	S02	T04		Commingle or lab pack
525	U197	2.5	T	S01	S02	T04		Commingle or lab pack
526	U200	2.5	T	S01	S02	T04		Commingle or lab pack
527	U201	2.5	T	S01	S02	T04		Commingle or lab pack
528	U202	2.5	T	S01	S02	T04		Commingle or lab pack
529	U203	5	T	S01	S02	T04		Commingle or lab pack
530	U204	5	T	S01	S02	T04		Commingle or lab pack
531	U205	5	T	S01	S02	T04		Commingle or lab pack
532	U206	5	T	S01	S02	T04		Commingle or lab pack
533	U207	5	T	S01	S02	T04		Commingle or lab pack
534	U208	5	T	S01	S02	T04		Commingle or lab pack
535	U209	5	T	S01	S02	T04		Commingle or lab pack
536	U210	30	T	S01	S02	T04		Commingle or lab pack
537	U211	30	T	S01	S02	T04		Commingle or lab pack
538	U213	5	T	S01	S02	T04		Commingle or lab pack
539	U214	5	T	S01	S02	T04		Commingle or lab pack
540	U215	5	T	S01	S02	T04		Commingle or lab pack
541	U216	5	T	S01	S02	T04		Commingle or lab pack
542	U217	5	T	S01	S02	T04		Commingle or lab pack
543	U218	8	T	S01	S02	T04		Commingle or lab pack
544	U219	5	T	S01	S02	T04		Commingle or lab pack
545	U220	30	T	S01	S02	T04		Commingle or lab pack
546	U221	30	T	S01	S02	T04		Commingle or lab pack
547	U222	30	T	S01	S02	T04		Commingle or lab pack
548	U223	30	T	S01	S02	T04		Commingle or lab pack
549	U225	30	T	S01	S02	T04		Commingle or lab pack
550	U226	30	T	S01	S02	T04		Commingle or lab pack
551	U227	30	T	S01	S02	T04		Commingle or lab pack
552	U228	30	T	S01	S02	T04		Commingle or lab pack
553	U234	30	T	S01	S02	T04		Commingle or lab pack
554	U235	30	T	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
555	U236	30	T	S01	S02	T04		Commingle or lab pack
556	U237	30	T	S01	S02	T04		Commingle or lab pack
557	U238	30	T	S01	S02	T04		Commingle or lab pack
558	U239	30	T	S01	S02	T04		Commingle or lab pack
559	U240	5	T	S01	S02	T04		Commingle or lab pack
560	U243	5	T	S01	S02	T04		Commingle or lab pack
561	U244	5	T	S01	S02	T04		Commingle or lab pack
562	U246	5	T	S01	S02	T04	T27	Commingle or lab pack
563	U247	5	T	S01	S02	T04		Commingle or lab pack
564	U248	5	T	S01	S02	T04		Commingle or lab pack
565	U249	5	T	S01	S02	T04		Commingle or lab pack
566	U271	5	T	S01	S02	T04		Commingle or lab pack
567	U278	5	T	S01	S02	T04		Commingle or lab pack
568	U279	5	T	S01	S02	T04		Commingle or lab pack
569	U280	5	T	S01	S02	T04		Commingle or lab pack
570	U328	5	T	S01	S02	T04		Commingle or lab pack
571	U353	5	T	S01	S02	T04		Commingle or lab pack
572	U359	5	T	S01	S02	T04		Commingle or lab pack
573	U364	5	T	S01	S02	T04		Commingle or lab pack
574	U367	5	T	S01	S02	T04		Commingle or lab pack
575	U372	5	T	S01	S02	T04		Commingle or lab pack
576	U373	5	T	S01	S02	T04		Commingle or lab pack
577	U387	5	T	S01	S02	T04		Commingle or lab pack
578	U389	5	T	S01	S02	T04		Commingle or lab pack
579	U394	5	T	S01	S02	T04		Commingle or lab pack
580	U395	5	T	S01	S02	T04		Commingle or lab pack
581	U404	5	T	S01	S02	T04		Commingle or lab pack
582	U408	5	T	S01	S02	T04		Commingle or lab pack
583	U409	5	T	S01	S02	T04		Commingle or lab pack
584	U411	5	T	S01	S02	T04		Commingle or lab pack
585	001S	2,000	P	S01	S02	T04		Commingle or lab pack
586	002S	2,000	P	S01	S02	T04		Commingle or lab pack
587	003S	2,000	P	S01	S02	T04		Commingle or lab pack
588	004S	2,000	P	S01	S02	T04		Commingle or lab pack
589	005S	2,000	P	S01	S02	T04		Commingle or lab pack
590	006S	2,000	P	S01	S02	T04		Commingle or lab pack
591	007S	2,000	P	S01	S02	T04		Commingle or lab pack
592	001U	2,500	P	S01	S02	T04		Commingle or lab pack
593	002U	2,500	P	S01	S02	T04		Commingle or lab pack
594	003U	2,500	P	S01	S02	T04		Commingle or lab pack
595	004U	2,500	P	S01	S02	T04		Commingle or lab pack
596	005U	2,500	P	S01	S02	T04		Commingle or lab pack
597	007U	2,500	P	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
598	011U	2,500	P	S01	S02	T04		Commingle or lab pack
599	012U	2,500	P	S01	S02	T04		Commingle or lab pack
600	014U	2,500	P	S01	S02	T04		Commingle or lab pack
601	020U	2,500	P	S01	S02	T04		Commingle or lab pack
602	023U	2,500	P	S01	S02	T04		Commingle or lab pack
603	027U	1,500	P	S01	S02	T04		Commingle or lab pack
604	029U	1,500	P	S01	S02	T04		Commingle or lab pack
605	032U	1,500	P	S01	S02	T04		Commingle or lab pack
606	033U	1,500	P	S01	S02	T04		Commingle or lab pack
607	036U	1,500	P	S01	S02	T04		Commingle or lab pack
608	038U	1,500	P	S01	S02	T04		Commingle or lab pack
609	040U	1,500	P	S01	S02	T04		Commingle or lab pack
610	042U	1,500	P	S01	S02	T04		Commingle or lab pack
611	046U	1,500	P	S01	S02	T04		Commingle or lab pack
612	051U	1,500	P	S01	S02	T04		Commingle or lab pack
613	052U	1,500	P	S01	S02	T04		Commingle or lab pack
614	054U	1,500	P	S01	S02	T04		Commingle or lab pack
615	056U	1,500	P	S01	S02	T04		Commingle or lab pack
616	057U	1,500	P	S01	S02	T04		Commingle or lab pack
617	061U	1,500	P	S01	S02	T04		Commingle or lab pack
618	068U	1,500	P	S01	S02	T04		Commingle or lab pack
619	070U	1,500	P	S01	S02	T04		Commingle or lab pack
620	073U	1,500	P	S01	S02	T04		Commingle or lab pack
621	074U	1,500	P	S01	S02	T04		Commingle or lab pack
622	075U	1,500	P	S01	S02	T04		Commingle or lab pack
623	076U	1,500	P	S01	S02	T04		Commingle or lab pack
624	078U	1,500	P	S01	S02	T04		Commingle or lab pack
625	079U	1,500	P	S01	S02	T04		Commingle or lab pack
626	086U	1,500	P	S01	S02	T04		Commingle or lab pack
627	094U	1,500	P	S01	S02	T04		Commingle or lab pack
628	097U	1,500	P	S01	S02	T04		Commingle or lab pack
629	098U	1,500	P	S01	S02	T04		Commingle or lab pack
630	100U	1,500	P	S01	S02	T04		Commingle or lab pack
631	104U	1,500	P	S01	S02	T04		Commingle or lab pack
632	106U	1,500	P	S01	S02	T04		Commingle or lab pack
633	108U	1,500	P	S01	S02	T04		Commingle or lab pack
634	110U	1,500	P	S01	S02	T04		Commingle or lab pack
635	111U	1,500	P	S01	S02	T04		Commingle or lab pack
636	112U	1,500	P	S01	S02	T04		Commingle or lab pack
637	113U	1,500	P	S01	S02	T04		Commingle or lab pack
638	115U	1,500	P	S01	S02	T04		Commingle or lab pack
639	116U	1,500	P	S01	S02	T04		Commingle or lab pack
640	117U	1,500	P	S01	S02	T04		Commingle or lab pack

LINE NUMBER	A. HAZARDOUS WASTE NUMBER (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES				
				D.1. PROCESS CODES (enter code)			D.2. PROCESS DESCRIPTION (if no code entered in D.1)	
641	118U	1,500	P	S01	S02	T04		Commingle or lab pack
642	119U	1,500	P	S01	S02	T04		Commingle or lab pack
643	124U	1,500	P	S01	S02	T04		Commingle or lab pack
644	127U	1,500	P	S01	S02	T04		Commingle or lab pack
645	128U	1,500	P	S01	S02	T04		Commingle or lab pack
646	129U	1,500	P	S01	S02	T04		Commingle or lab pack
647	131U	1,500	P	S01	S02	T04		Commingle or lab pack
648	136U	1,500	P	S01	S02	T04		Commingle or lab pack
649	138U	1,500	P	S01	S02	T04		Commingle or lab pack
650	142U	1,500	P	S01	S02	T04		Commingle or lab pack
651	143U	1,500	P	S01	S02	T04		Commingle or lab pack
652	150U	1,500	P	S01	S02	T04		Commingle or lab pack
653	151U	1,500	P	S01	S02	T04		Commingle or lab pack
654	154U	1,500	P	S01	S02	T04		Commingle or lab pack
655	160U	1,500	P	S01	S02	T04		Commingle or lab pack
656	165U	1,500	P	S01	S02	T04		Commingle or lab pack
657	169U	1,500	P	S01	S02	T04		Commingle or lab pack
658	170U	1,500	P	S01	S02	T04		Commingle or lab pack
659	171U	1,500	P	S01	S02	T04		Commingle or lab pack
660	175U	1,500	P	S01	S02	T04		Commingle or lab pack

XIV. OTHER REQUIRED ATTACHMENTS

A. General Information (each item should be a separate attachment to the application)

- | | | |
|--------------------------------------|---------------------------------------|--|
| 1. General facility description | 6. Preparedness/prevention or waiver* | 11. Closure and Postclosure (C/PC) Plan* |
| 2. Chemical and physical analyses* | 7. Contingency Plan* | 12. C/PC cost estimates* |
| 3. Waste Analysis Plan* | 8. Traffic information | 13. Topographic map |
| 4. Security procedures and equipment | 9. Location information | 14. Liability mechanism |
| 5. Inspection schedules* | 10. Personnel training program* | 15. Financial assurance instrument |

* Use template provided to complete application

B. Supplemental Information (each item, if needed, should be a separate attachment to the application)

- | | |
|---|--|
| 1. Status of compliance with other federal laws | 6. Engineering plans |
| 2. Corrective action information* | 7. Proof of issuance of other permits or licenses |
| 3. Hydrogeological Report* | 8. Capability certification/compliance schedule |
| 4. Environmental Assessment* | 9. Restrictive covenant (landfills only) |
| 5. Environmental monitoring Programs* | 10. Construction certification (new, altered, enlarged, or expanded) |

* Use template provided to complete application

C. Facility Specific Information (each item, if needed, should be a separate attachment to the application)

- | | |
|--------------------------------------|--|
| 1. Containers* | 8. Land treatment |
| 2. Tanks* | 9. Miscellaneous units |
| 3. Incineration or thermal treatment | 10. Underground mines or caves |
| 4. Treatment | 11. Drip pads |
| 5. Surface impoundments | 12. Boilers and industrial furnaces |
| 6. Waste piles | 13. Air emissions from process vents, equipment leaks, tanks, containers, and surface impoundments** |
| 7. Landfills | |

* Use template provided to complete application

** Use templates C.11-AA, C.11-BB, and C.11-CC provided to complete application

XV. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Brent W. Walter	<i>Brent W. Walter</i>	09/09/2022
OWNER NAME (type or print)	SIGNATURE	DATE SIGNED
DLD Environmental Services, Inc	<i>Brent W. Walter</i> (its President)	09/09/2022
OPERATOR NAME (type or print)	SIGNATURE	DATE SIGNED
Folley, Inc.	<i>Brent W. Walter</i> (its President)	09/09/2022
TITLEHOLDER OF LAND NAME (type or print)	SIGNATURE	DATE SIGNED



MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
MATERIALS MANAGEMENT DIVISION
SITE IDENTIFICATION FORM

You must save this file to your computer before completing the form

Required under authority of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to submit this information may result in civil or criminal penalties

1. Reason for Submittal (Select only one)

<input type="checkbox"/>	Obtaining an initial United States Environmental Protection Agency (EPA) Identification (ID) number, as a new site or new owner , for an on-going regulated activity that will continue for a period of time. FEES DO NOT APPLY TO LIB ONLY SITES. 1. Pay the \$50 fee on-line using MasterCard, VISA, or Discover Card at https://www.thepayplace.com/mi/deq/siteid . 2. E-mail the form , with a copy of the fee receipt, to EGLE-MMD-Site-ID-Reporting@Michigan.gov ; or, Mail the form with check payable to the State of Michigan to: Michigan Department of Environment, Great Lakes and Energy (EGLE), Cashier's Office—HWUC, P.O. Box 30657, Lansing, Michigan 48909-7741.
<input type="checkbox"/>	Submitting a subsequent notification to change, update, or verify site information for an existing owner of a site with a previously issued Site ID number. E-mail to EGLE-MMD-Site-ID-Reporting@Michigan.gov
<input type="checkbox"/>	* NOTIFYING that SITE IS STILL IN BUSINESS AND NO LONGER GENERATING WASTE (end date required) _____ Authorized Signature _____ Date _____ * E-mail completed pages 1-2 to EGLE-MMD-Site-ID-Reporting@Michigan.gov
<input type="checkbox"/>	*NOTIFYING that SITE IS OUT OF BUSINESS AND NO LONGER GENERATING WASTE (end date required) _____ Authorized Signature _____ Date _____ *E-mail completed pages 1-2 to EGLE-MMD-Site-ID-Reporting@Michigan.gov
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities.
<input type="checkbox"/>	Submitting a new or revised Part A Form.
<input type="checkbox"/>	Submitting as component of the Hazardous Waste Biennial Report for _____(Reporting Year)
<input type="checkbox"/>	Former TSD facility, reverse distributor, and/or generator of less than 1,000 kilograms(kg) hazardous waste, less than 1 kg acute hazardous waste, or 100 kg acute hazardous waste spill cleanup in one or more months of the reporting year.

2. Site EPA ID Number

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

3. Site Legal Name

--

4. Site Specific Name

--

Site ID _____

5. Site Location Address

Street Address		
Street Address (room/suite/mail code)		
City, Town, or Village		County
State	Country	Zip Code

6. Site Mailing Address

☐ Same as Location Address

Street Address		
Street Address (room/suite/mail code)		
City, Town, or Village		County
State	Country	Zip Code

7. Federal Tax ID # (required)

--

8. Site Land Type (check one)

Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Tribal <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
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9. North American Industry Classification System (NAICS) at least one 6-digit code REQUIRED

A	B	C	D
---	---	---	---

10. Site Contact Information

☐ Same as Location Address

First Name		MI	Last Name	
Street Address				
City, Town, or Village				
State		Country	Zip Code	
Email				
Phone		Ext	Fax	

11. Name of Site's Legal Owner (Company or Individual)

☐ Change in Ownership

Approximate date became owner _____

☐ Same as Site Mailing Address

Full Name		
Street Address		
City, Town, or Village		
State	Country	Zip Code
Email		
Phone	Ext	Fax

Site ID _____

11(b) Name of Site's Legal Operator (Company or Individual)

☐ **Change in Operator**

Approximate date became operator _____

☐ **Same as Site Specific Name/Address**

Full Name		
Street Address		
City, Town, or Village		
State	Country	Zip Code
Email		
Phone	Ext	Fax

Hazardous Waste Activities (Please complete all questions)

12. Type of Regulated Waste Activity

Date Activity Began _____

<input type="checkbox"/> Y <input type="checkbox"/> N	1. Generator of Hazardous Waste – If “Yes”, mark only one of the following:	
<input type="checkbox"/>	Large Quantity Generator (LQG)	-Generates, in any calendar month (includes quantities imported by importer site), 1,000 kg per month (mo) (2,200 pounds (lb)/mo) or more of non-acute hazardous waste; or -Generates, in any calendar month or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or -Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material
<input type="checkbox"/>	Small Quantity Generator (SQG)	100 to 1,000 kg/mo (220 to 2,200 lb/mo) of non-acute hazardous waste, and no more than 1 kg (2.2 lb) of acute hazardous waste, and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material
<input type="checkbox"/>	Very Small Quantity Generator (VSQG)	Less than, or equal to, 100 kg/mo (220 lb/mo) of non-acute hazardous waste
Please answer all questions		
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Short Term Generator (generates from a short-term or one-time event and not from on-going processes). If “Yes” provide an explanation in the Comments Section.	
<input type="checkbox"/> Y <input type="checkbox"/> N	3. Treater, Stores or Disposer of Hazardous Waste – Hazardous waste Part B permit is required for these activities	
<input type="checkbox"/> Y <input type="checkbox"/> N	4. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y <input type="checkbox"/> N	5. Recycler of Hazardous Waste	
	<input type="checkbox"/> who stores prior to recycling <input type="checkbox"/> who does not store prior to recycling	
<input type="checkbox"/> Y <input type="checkbox"/> N	6. Exempt Boiler and/or Industrial Furnace – If “Yes”, mark all that apply.	
	<input type="checkbox"/> Small Quantity On-site Burner Exemption	
	<input type="checkbox"/> Smelting, Melting, and Refining Furnace Exemption	

Waste Codes for Federally Regulated Hazardous Waste. Please list the waste codes of the Federal Hazardous Wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D002, F007, U112). Use an additional page if more spaces are needed.

Waste Codes for State Regulated (non-Federal) Hazardous Waste. Please list the waste codes of the State Hazardous Wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

13. Additional Regulated Waste Activities

Other Waste Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	Transporter of Hazardous Waste – If “Yes”, mark all that apply. (May require permits or registration)
	<input type="checkbox"/> Transporter
	<input type="checkbox"/> Transfer Facility (at your site)
<input type="checkbox"/> Y <input type="checkbox"/> N	Commingle Waste
<input type="checkbox"/> Y <input type="checkbox"/> N	Off Loads During Transportation
<input type="checkbox"/> Y <input type="checkbox"/> N	Underground Injection Control
<input type="checkbox"/> Y <input type="checkbox"/> N	United States Importer of Hazardous Waste
<input type="checkbox"/> Y <input type="checkbox"/> N	Recognized Trader – If “Yes”, mark all that apply
	<input type="checkbox"/> Importer
	<input type="checkbox"/> Exporter
<input type="checkbox"/> Y <input type="checkbox"/> N	Importer/Exporter of Spent Lead-Acid Batteries (SLABs under R 299.9804) – If “Yes”, mark all that apply.
	<input type="checkbox"/> Importer
	<input type="checkbox"/> Exporter

Universal Waste Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) – If “Yes”, mark all that apply. Note: Refer to state regulations to determine what is regulated.
	<input type="checkbox"/> Batteries
	<input type="checkbox"/> Pesticides
	<input type="checkbox"/> Thermostats
	<input type="checkbox"/> Mercury Switches
	<input type="checkbox"/> Mercury Thermometers
	<input type="checkbox"/> Devices containing elemental mercury
	<input type="checkbox"/> Electric Lamps
	<input type="checkbox"/> Pharmaceuticals
	<input type="checkbox"/> Consumer Electronics
	<input type="checkbox"/> Antifreeze as defined in R 299.9101
<input type="checkbox"/> Y <input type="checkbox"/> N	Destination Facility of Universal Waste (a hazardous waste permit may be required for this activity)

Used Oil Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	Used Oil Transporter – If “Yes”, mark all that apply.
	<input type="checkbox"/> Transporter
	<input type="checkbox"/> Transfer Facility (at your site)
<input type="checkbox"/> Y <input type="checkbox"/> N	Used Oil Processor and/or Re-refiner – If “Yes,” mark all that apply.
	<input type="checkbox"/> Processor Date Activity Began:
	<input type="checkbox"/> Re-refiner Date Activity Began:
<input type="checkbox"/> Y <input type="checkbox"/> N	Off-Specification Used Oil Burner Date Activity Began:
<input type="checkbox"/> Y <input type="checkbox"/> N	Used Oil Fuel Marketer – If “Yes”, mark all that apply.
	<input type="checkbox"/> Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner Date Activity Began:
	<input type="checkbox"/> Marketer Who First Claims the Used Oil Meets the Specifications Date Activity Began:
<input type="checkbox"/> Y <input type="checkbox"/> N	Used Oil Collection or Aggregation Point
<input type="checkbox"/> Y <input type="checkbox"/> N	Collection Center or Aggregation Point that accepts DIY Used Oil

Liquid Industrial By-Product Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	Liquid Industrial By-Product Transporter – If “Yes”, mark all that apply. (requires Permit & Registration)
	<input type="checkbox"/> Transporter Date Activity Began:
	<input type="checkbox"/> Transfer Facility (at your site) Date Activity Began:
<input type="checkbox"/> Y <input type="checkbox"/> N	Transports Own Waste. Date Activity Began:
<input type="checkbox"/> Y <input type="checkbox"/> N	Liquid Industrial Waste By-Product Generator. Date Activity Began:
<input type="checkbox"/> Y <input type="checkbox"/> N	Liquid Industrial By-Product Designated Facility. Date Activity Began:

14. Eligible Academic Entities with Laboratories - Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to R 299.9315.

<input type="checkbox"/> Y <input type="checkbox"/> N	Opting into, or currently operating under, R 299.9315, for the management of hazardous wastes in laboratories. If "Yes", mark all that apply. NOTE: See the item-by-item instructions for definitions of types of eligible academic entities.
	<input type="checkbox"/> College or University
	<input type="checkbox"/> Teaching Hospital that is owned by, or has a formal written affiliation with, a college or university
	<input type="checkbox"/> Non-profit Institute that is owned by, or has a formal written affiliation with, a college or university
<input type="checkbox"/> Y <input type="checkbox"/> N	Withdrawing from R 299.9315, for the management of hazardous wastes in laboratories.

15. Episodic Generation

<input type="checkbox"/> Y <input type="checkbox"/> N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category? If "Yes", you must fill out the Addendum for Episodic Generator.
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16. LQG Consolidation of VSQG Hazardous Waste

<input type="checkbox"/> Y <input type="checkbox"/> N	Are you an LQG notifying of consolidating VSQG hazardous waste under the control of the same person pursuant to R 299.9307(6)? If "Yes", you must fill out the Addendum for LQG Consolidation of VSQGs hazardous waste.
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17. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (Required)

<input type="checkbox"/> Y <input type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility
	<input type="checkbox"/> Central Accumulation Area (CAA)
	<input type="checkbox"/> Entire Facility
	Expected Closure date:
	Requesting new closure date:
	Date Closed:
<input type="checkbox"/> Y <input type="checkbox"/> N	In compliance with the closure performance standards R 299.9307(1)(k)
<input type="checkbox"/> Y <input type="checkbox"/> N	Not in compliance with the closure performance standards R 299.9307(1)(k)

18. Notification of Hazardous Secondary Material (HSM) Activity

<input type="checkbox"/> Y <input type="checkbox"/> N	Are you notifying under R 299.9204(1) that you will begin managing, are managing, or will stop managing HSM under R 299.9204(1), R 299.9204(1)(aa – dd)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
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19. Electronic Manifest Broker

<input type="checkbox"/> Y <input type="checkbox"/> N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
---	--

20. Comments (include item number for each comment)

21. Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Note: For the RCRA Hazardous Waste Part A Permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial, Last)	Title
Email	

Signature of legal owner, operator, or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial, Last)	Title
Email	

Site ID _____

**ADDENDUM TO THE SITE IDENTIFICATION FORM
NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY**

ONLY FILL OUT THIS FORM IF:

You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under rule R 299.9204 (1)(aa - dd) of Part 111;

AND

- a. You are or will be managing excluded HSM in compliance with rules R 299.9202 (6)(a – f), or R 299.9204 (1)(aa – dd) (or federal equivalent) or have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section. Note: if your facility was granted a solid waste variance under rules R 299.9202 (6)(a – f) prior to July 13, 2015, your management of HSM under rules R 299.9202 (6)(a – f) is grandfathered under the previous regulations and you are not required to notify for the HWM management activity excluded under rules R 299.9202 (6)(a – f).

Reason for Notification (include dates where requested)

Facility will begin managing excluded HSM as of _____

Facility is still managing excluded HSM/re-notifying, as required, by March 1 of each even-numbered year.

Facility has stopped managing excluded HSM as of _____ and is notifying as required.

Description of Excluded HSM Activity: Please list the appropriate codes (see Code List section of the instructions) and quantities, in short tons, to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

Facility Code	HSM Waste Codes	Est. Short Tons of Excluded HSM Managed Annually	Actual Short Tons of Excluded HSM Managed During the Most Recent Odd-numbered Year	Land-based Unit Code

Site ID _____

ADDENDUM TO THE SITE IDENTIFICATION FORM EPISODIC GENERATOR

ONLY fill out this form if:

You are an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves the generator to a higher generator category pursuant to R 299.9316. Note: Only one planned and one unplanned episodic event are allowed within one year. Otherwise, you must follow the requirements of the higher generator category. Use additional pages if more space is needed.

Type of Episodic Event

Planned (requires 30 day prior notification) <input type="checkbox"/> Excess chemical inventory removal <input type="checkbox"/> Tank Cleanouts <input type="checkbox"/> Short-term construction or demolition <input type="checkbox"/> Equipment maintenance during plant shutdowns <input type="checkbox"/> Other _____	Unplanned (requires notification within 72 hours) <input type="checkbox"/> Accidental Spills <input type="checkbox"/> Production process upsets <input type="checkbox"/> Product recalls <input type="checkbox"/> "Acts of nature" (Tornado, hurricane, flood, etc.) <input type="checkbox"/> Other _____
Emergency Contact Phone	Emergency Contact Name
Beginning Date	End Date

Waste 1

Waste Description	Estimated Quantity (in pounds)
Federal and/or State Hazardous Waste Codes	

Waste 2

Waste Description	Estimated Quantity (in pounds)
Federal and/or State Hazardous Waste Codes	

Waste 3

Waste Description	Estimated Quantity (in pounds)
Federal and/or State Hazardous Waste Codes	

Site ID _____

**ADDENDUM TO THE SITE IDENTIFICATION FORM
LQG CONSOLIDATION OF VSQG HAZARDOUS WASTE**

ONLY fill out this form if:

You are an LQG receiving hazardous waste from VSQGs under the control of the same person. Use additional pages if more space is needed.

VSQG 1

Site ID Number (if assigned)	Name	
Street Address		
City, Town, or Village	State	Zip Code
Contact Phone Number	Contact Name	
Email		

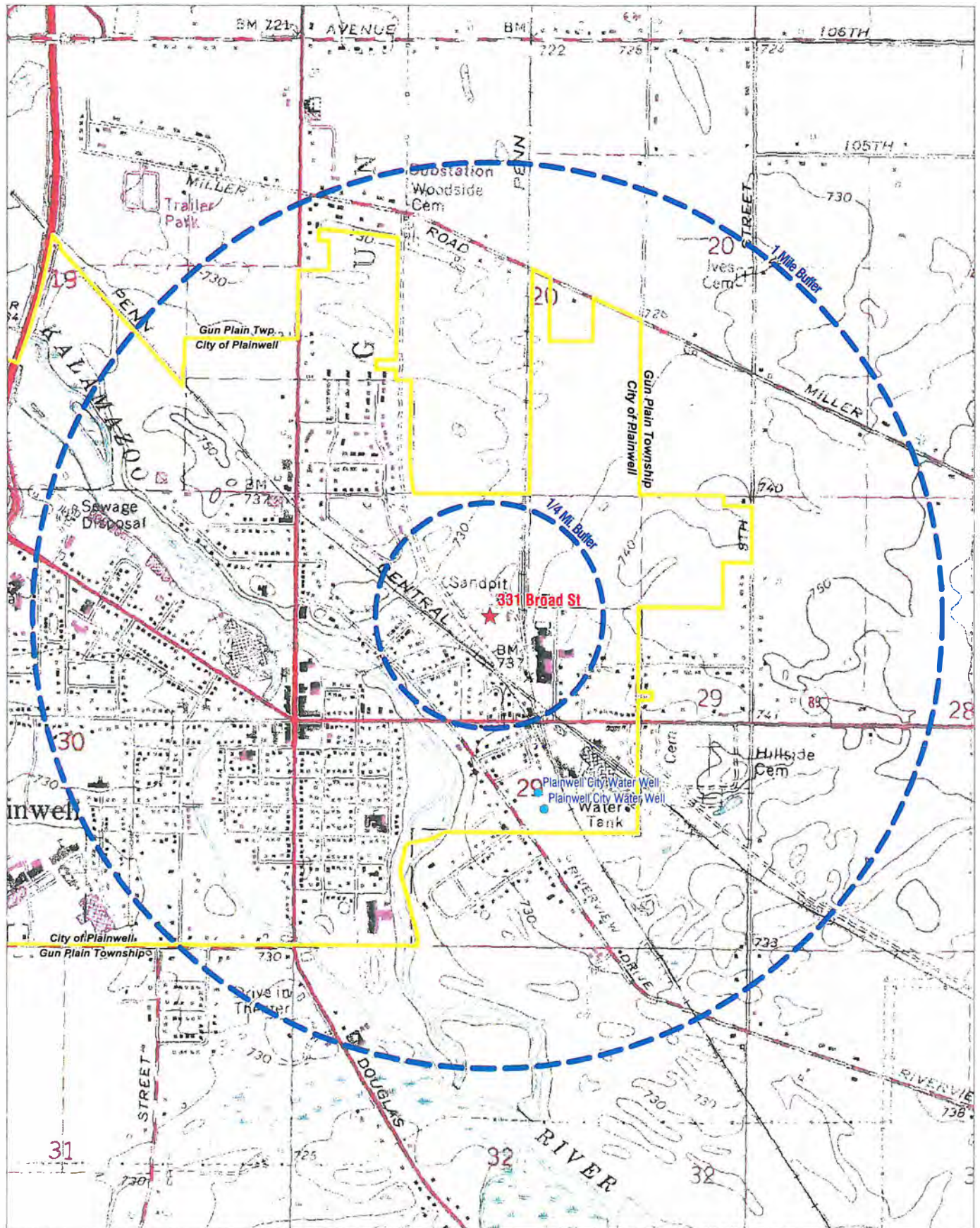
VSQG 2

Site ID Number (if assigned)	Name	
Street Address		
City, Town, or Village	State	Zip Code
Contact Phone Number	Contact Name	
Email		

VSQG 3

Site ID Number (if assigned)	Name	
Street Address		
City, Town, or Village	State	Zip Code
Contact Phone Number	Contact Name	
Email		

Attachment IX-1: Topographical Map (1-Mile Radius)



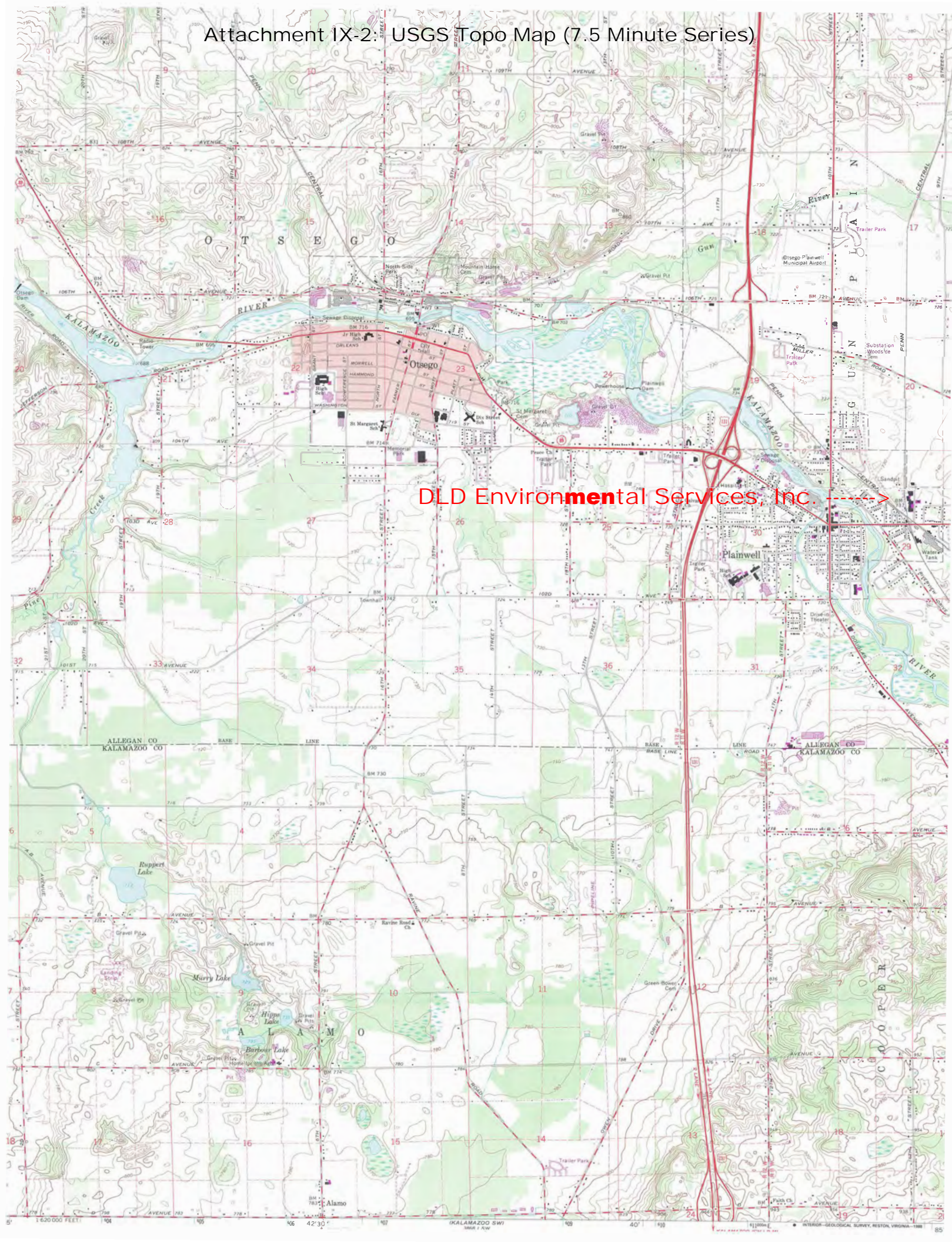
331 Broad St, Plainwell, Michigan Including 1-Mile Buffer Around Site

Allegan County Land Information Services assumes no liability for the conclusions drawn from the use of this data

1 inch equals = 1,500 feet
Map Printed: 8/14/2008

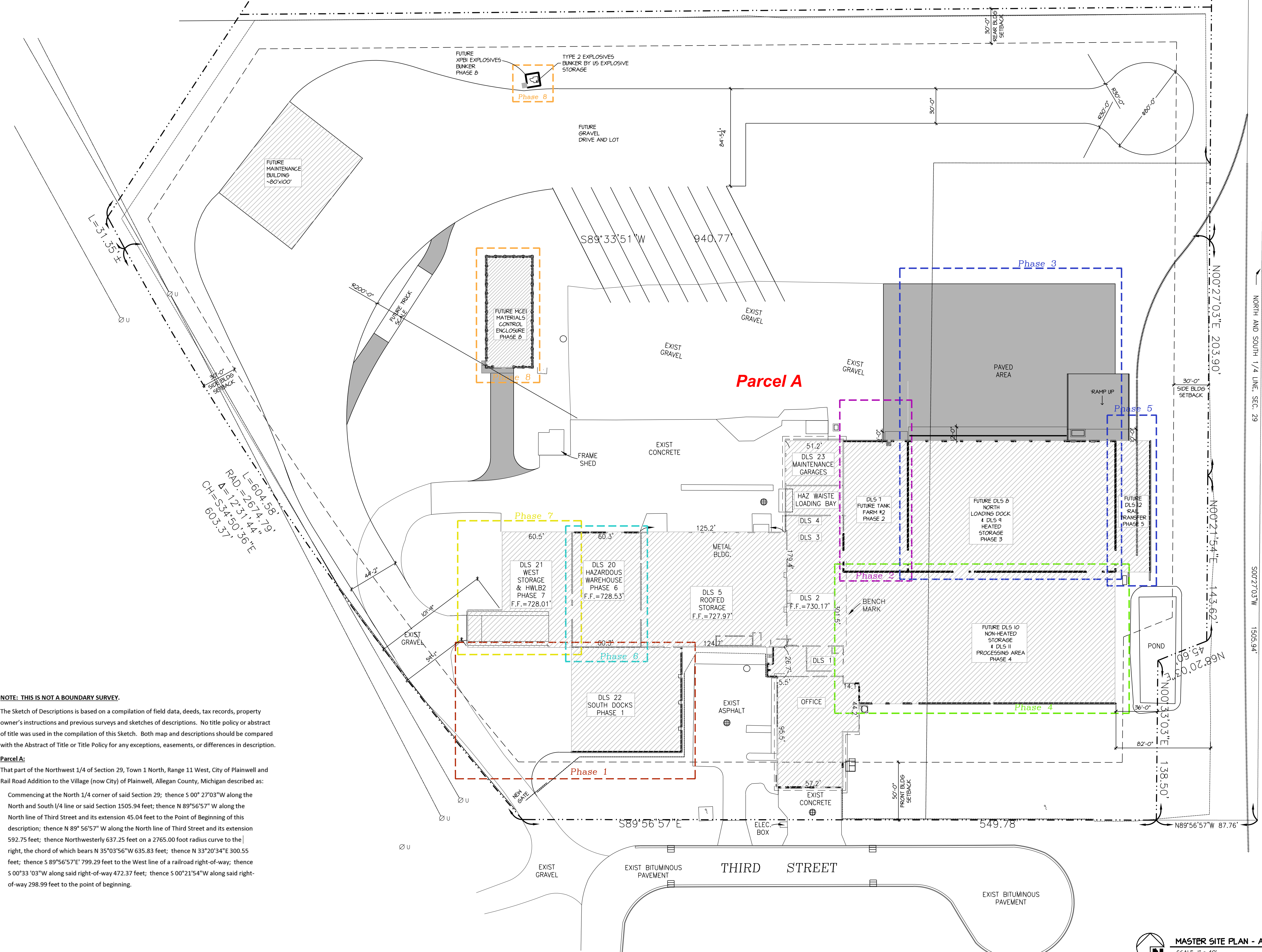


Attachment IX-2: USGS Topo Map (7.5 Minute Series)



DLD Environmental Services, Inc. ----->

Attachment X-1: Facility Drawing



NOTE: THIS IS NOT A BOUNDARY SURVEY.

The Sketch of Descriptions is based on a compilation of field data, deeds, tax records, property owner's instructions and previous surveys and sketches of descriptions. No title policy or abstract of title was used in the compilation of this Sketch. Both map and descriptions should be compared with the Abstract of Title or Title Policy for any exceptions, easements, or differences in description.

Parcel A:
That part of the Northwest 1/4 of Section 29, Town 1 North, Range 11 West, City of Plainwell and Rail Road Addition to the Village (now City) of Plainwell, Allegan County, Michigan described as:

Commencing at the North 1/4 corner of said Section 29; thence S 00° 27'03"W along the North and South 1/4 line or said Section 1505.94 feet; thence N 89°56'57" W along the North line of Third Street and its extension 45.04 feet to the Point of Beginning of this description; thence N 89° 56'57" W along the North line of Third Street and its extension 592.75 feet; thence Northwesterly 637.25 feet on a 2765.00 foot radius curve to the right, the chord of which bears N 35°03'56"W 635.83 feet; thence N 33°20'34"E 300.55 feet; thence S 89°56'57"E 799.29 feet to the West line of a railroad right-of-way; thence S 00°33' 03"W along said right-of-way 472.37 feet; thence S 00°21'54"W along said right-of-way 298.99 feet to the point of beginning.

 **MASTER SITE PLAN - ALL PHASES**
SCALE: 1" = 40'

DLD Environmental Services, Inc.

Broad Street
Plainwell, Michigan 49080

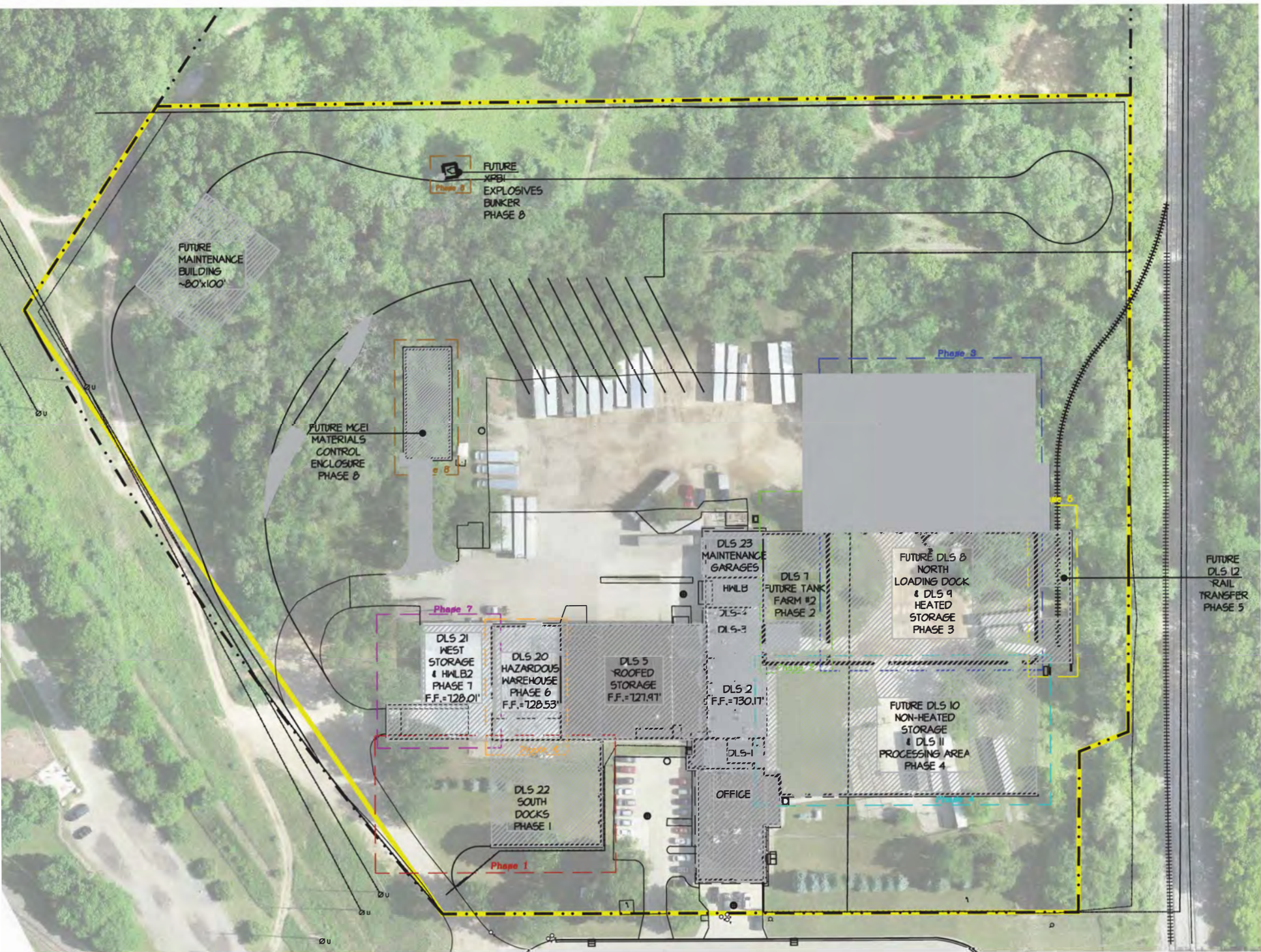
ISSUED
1-29-2010 FOR STATE SUBMITTAL
09-08-2022 FOR STATE SUBMITTAL

bosch
ARCHITECTURE
ENGINEERING
INTERIOR DESIGN
8068 Vineyard Parkway
Kalamazoo, Michigan 49009
ph: 269-321-5151
www.boscharch.com

MASTER
SITE PLAN -
ALL PHASES

C001

Attachment XI-2: Aerial View with Current Facilities and Future Expansions Overlay



EQP 5111 Module A1

A1: GENERAL FACILITY DESCRIPTION

DLD Environmental Services, Inc. (hereinafter "DLD") is a licensed treatment, storage, and disposal facility of hazardous waste and which is located in the City of Plainwell, MI at 331 Broad Street. The property on which DLD currently is situated is approximately 14.5 acres and is owned by Folley, Inc.

The location of this property is further described as within Section 29 of Gun Plains Township at approximately 42 degrees 26 minutes 47.5 seconds North latitude and 85 degrees 38 minutes 01 seconds West longitude.

Legal property descriptions of the current site are as follows (see Attachment A1-1):

Parcel A:

That part of the Northwest 1/4 of Section 29, Town 1 North, Range 11 West, City of Plainwell and Rail Road Addition to the Village (now City) of Plainwell, Allegan County, Michigan described as:

Commencing at the North 1/4 corner of said Section 29; thence S 00° 27'03"W along the North and South 1/4 line of said Section 1505.94 feet; thence N 89°56'57" W along the North line of Third Street and its extension 45.04 feet to the Point of Beginning of this description; thence N 89° 56'57" W along the North line of Third Street and its extension 592.75 feet; thence Northwesterly 637.25 feet on a 2765.00 foot radius curve to the right, the chord of which bears N 35°03'56"W 635.83 feet; thence N 33°20'34"E 300.55 feet; thence S 89°56'57"E 799.29 feet to the West line of a railroad right-of-way; thence S 00°33 '03"W along said right-of-way 472.37 feet; thence S 00°21'54"W along said right-of-way 298.99 feet to the point of beginning.

DLD is located in an "I" zoning area which is Industrial. (See Attachment A1-2)

History

DLD Environmental Services, Inc. was incorporated in 1977 for the purpose of providing hazardous waste management services to laboratories in industry, medicine and academia. Since that time, since that point in time services have expanded and grown, and the company now provides waste management services to a wide variety of clients and industries that generate many different hazardous and nonhazardous waste streams. As its services and waste handling capabilities have grown, so too has its geographic reach.

DLD is not the final disposal site for any of the wastes it receives. Instead, waste received by DLD undergoes any number of treatments and the resultant waste or wastes are ultimately sent for final disposal at one of many third party facilities.

Current Facilities

DLD consists of approximately 5,700 square feet of active hazardous waste handling area; 12,507 square feet of non-hazardous waste storage area; 1,250 square feet of hazardous waste loading dock area (RCRA loading dock); 6,057 square feet of non-hazardous waste loading dock area (warehouse loading dock); and 6,040 square feet of new material warehouse space, all of which is under cover. DLD also has 5,411 square feet of maintenance garage area.

The current treatment, storage and disposal facility licensed area is divided into four separate containment areas. The waste processing and storage areas are referred to as DLS-1, DLS-2, DLS-3, DLS-4, DLS-5.. The hazardous waste loading and unloading area is referred to as the HWLB. (Refer to Attachment A1-1 as well as drawings and photos from Part A of this application)

DLD is currently licensed for 30,000 gallons of bulk waste storage. All of this licensed bulk tank capacity is in six 5,000-gallon stainless steel tanks currently in service. Additional licensed capacity consists of 33,770 gallons of containerized storage (614 55-gallon drums). All liquid storage capacity is and will continue to be in covered contained areas with secondary containment.

The RCRA loading dock went into use in March of 1991. The secondary containment volume of the loading area is sufficient to contain all of the liquid from a catastrophic failure of DLD cargo tanks. A vapor control system is in use in conjunction with the DLS-3 and DLS-4 bulk storage tanks. This system directs vapors from the cargo tank to the tank system during the cargo tanker loading and unloading operations thus eliminating the escape of fugitive vapors.

Future Facilities:


Several additional hazardous waste units shall be built and licensed under this application. Each is listed below and more fully described in its respective volume of this application.

- Volume 2: **DLS-22** Hazardous waste loading bay. (This area will have dock capacity for up to 5 large trucks with full containment);
- Volume 3: **DLS-7** Bulk storage facility. (This area will house fifteen additional tanks);
- Volume 4: **DLS-8** Hazardous waste loading bay. (This area will have dock capacity for up to 9 large trucks with full containment);
 DLS-9 Temperature-controlled hazardous waste storage warehouse;
- Volume 5: **DLS-10** Hazardous waste processing and storage area;
 DLS-11 Hazardous waste processing and storage area;
- Volume 6: **DLS-12** Railcar loading and storage area with full containment.
- Volume 7: **DLS-20** Hazardous waste processing & storage area
- Volume 8: **DLS-21** Hazardous waste storage area with high density FILO drum racks
 HWLB-2 Hazardous Waste Loading Bay with full containment.
- Volume 9: **MCE1** Materials Control Enclosure (Secured Access, Hazardous Waste Storage Area for security sensitive materials)
 XPB1 Explosives Bunker
- Volume 10: **DLS-23** Hazardous waste storage area. This is a heated area of the facility that is being contained for use in thawing frozen waste during the winter.

The details for these new areas will be found in this and referenced volumes.

Utilities for DLD consist of natural gas, electricity, telephone, water and sanitary sewer. All utilities are underground. There is no storm water connection to the municipal system. Storm water which impacts waste processing areas is collected in three sumps and sent out as waste material. The sanitary system receives waste only from the DLD sanitary areas. The waste processing area is not connected to the sanitary system. See Attachment A1-3 and A1-4 for municipal water and sewer utility drawings, respectively.

DLT Environmental Services, Inc.

[illegible]

JOB NUMBER
21084

MASTER
SITE PLAN -
ALL PHASES

C001

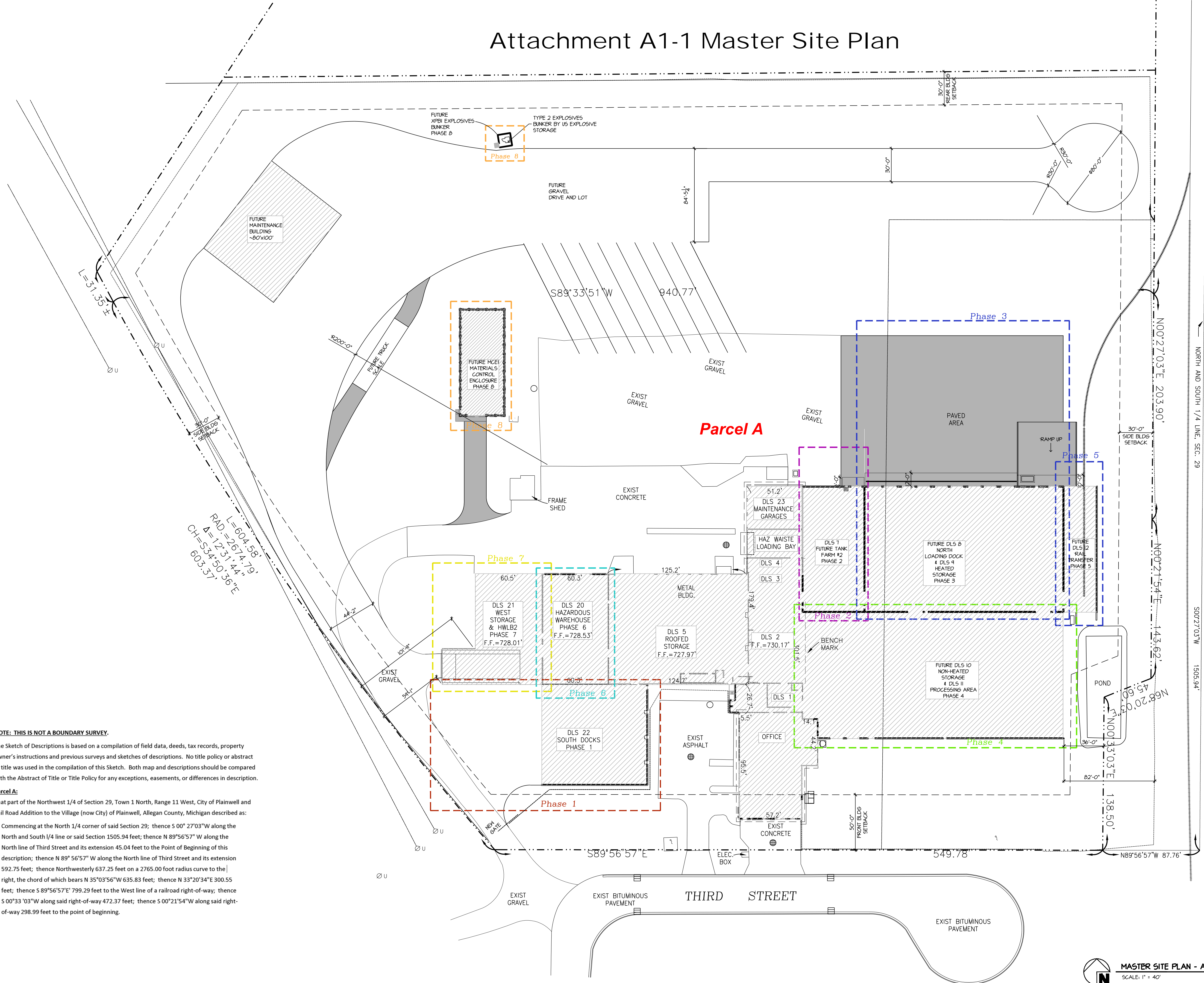
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 **MASTER SITE PLAN - ALL PHASES**
SCALE: 1" = 40'

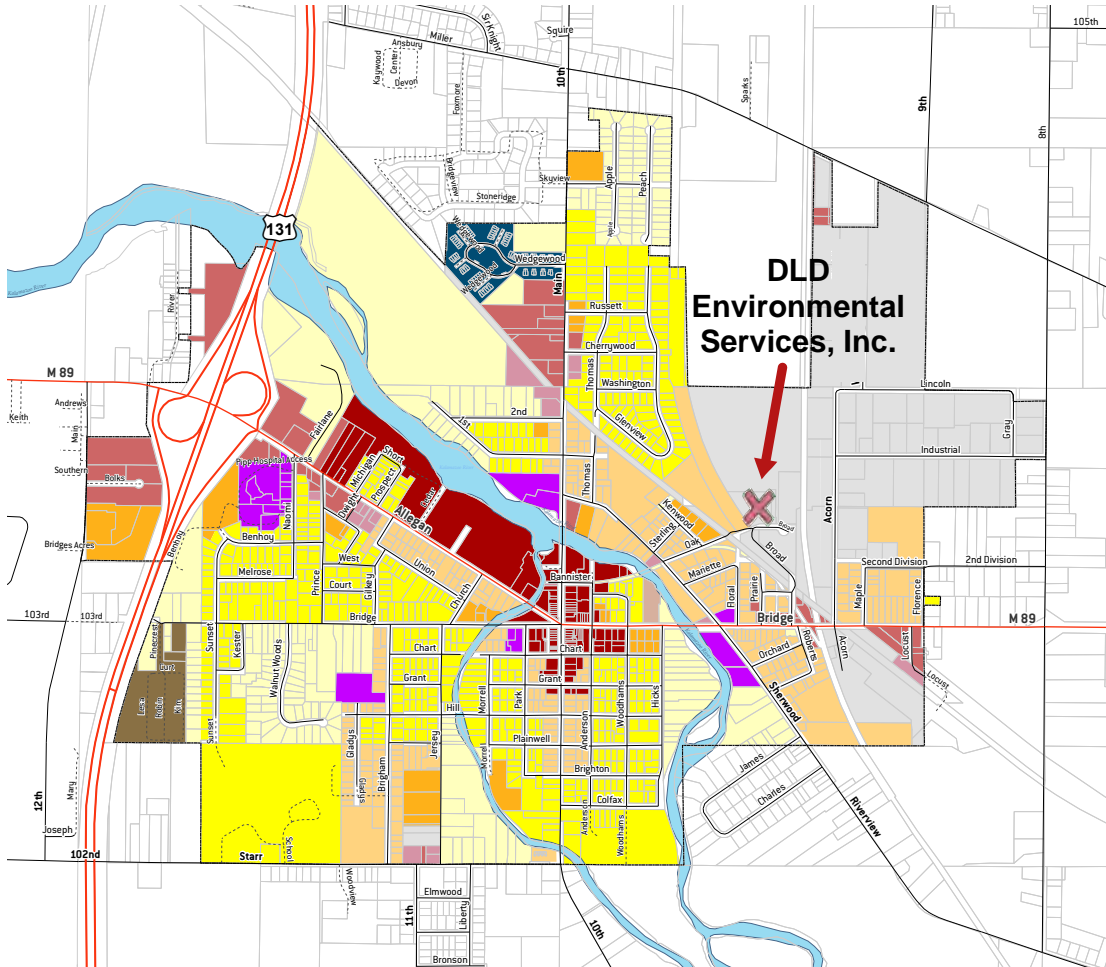
Allegan County, Michigan

As amended through April 9, 2018

- R-1A, Single-Family Residence
- R-1B, Single-Family Residence
- R-1C, Single and Two-Family Residence
- R-2, Multiple Family Residence
- RMH, Residential Mobile Home
- C-1, Local Commercial
- SB, Service Business
- C-2, General Commercial
- CBD, Central Business
- CS, Community Service
- I, Industrial
- PUD, Planned Unit Development

williams&works
engineers, surveyors, planners

Data Sources: Michigan CGI, Allegan County Land Information Services, City of Plainwell



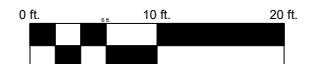
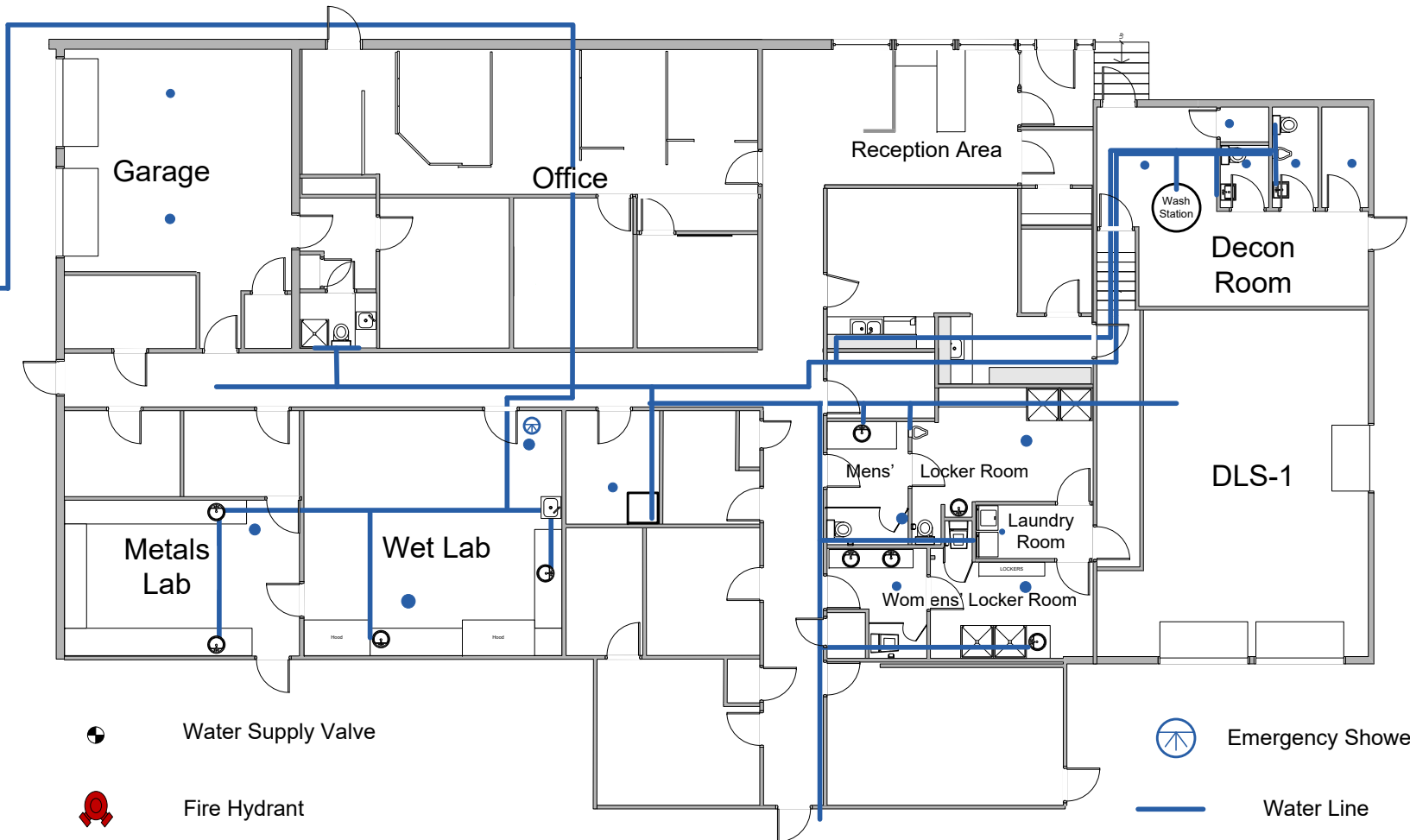
Municipal Water Lines



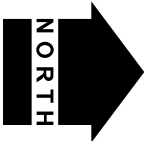
Drug and Laboratory Disposal
MID 092 947 928

Street
Division
Third

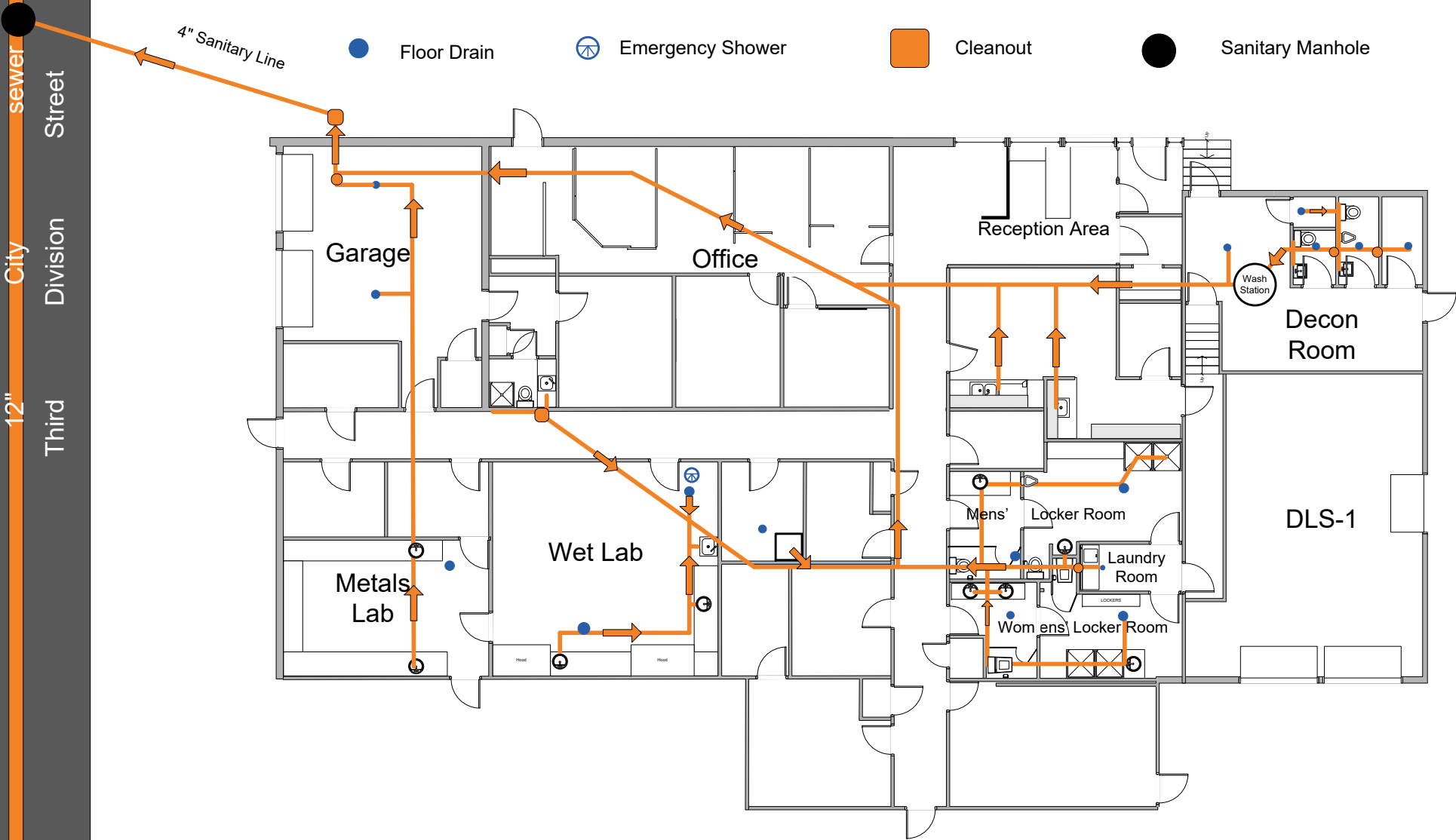
10" Water Main



Municipal Sewer Lines



Drug and Laboratory Disposal
MID 092 947 928



FORM EQP 5111 TEMPLATE MODULE A2

A2: CHEMICAL AND PHYSICAL ANALYSES

This document is an attachment to the Michigan Department of Environment, Great Lakes, and Energy's *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities*. See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), being R 299.9504, R 299.9508, and R 299.9605, and Title 40 of the Code of Federal Regulations (CFR) §§264.13(a) and 270.14(b)(2), establish requirements for chemical and physical analyses at hazardous waste management facilities. All references to the 40 CFR citations specified herein are adopted by reference in R 299.11003

This license application template addresses requirements for chemical and physical analyses at the hazardous waste management facility for the facility DLD Environmental Services, Inc. (hereinafter "DLD") in Plainwell, Michigan. The information included in the template demonstrates how the facility meets the chemical and physical analyses requirements for hazardous waste management facilities.

Type of applicant: *(Check as appropriate)*

- ☒ Applicant for Operating License for Existing Facility
- ☐ Applicant for Operating License for New, Altered, Enlarged, or Expanded Facility

Type of Facility: *(Check as appropriate)*

- ☒ On-site Facility (generates hazardous waste)
- ☒ Off-site Facility (accepts hazardous waste from other generators)

Type of Units to be Constructed or Operated at the Facility: *(Check as appropriate)*

- | | |
|--|---|
| <input checked="" type="checkbox"/> Containers | <input type="checkbox"/> Waste Incineration |
| <input checked="" type="checkbox"/> Tank(s) | <input type="checkbox"/> Land Treatment |
| <input type="checkbox"/> Waste Pile(s) | <input checked="" type="checkbox"/> Miscellaneous Unit(s) |
| <input type="checkbox"/> Landfilled Waste | <input type="checkbox"/> Boilers and Industrial Furnace |

This template is organized as follows:

A2.A WASTE DESCRIPTION

A2.A.1 Waste Description (*generate on-site wastes*)

A2.A.2 Waste Description (*receive wastes from off-site generators*)

A2.A.2(a) Procedures for Obtaining Chemical and Physical Analyses from Off-Site Generators.

Table A2.A.1 Hazardous Waste Generated at the Facility

Table A2.A.2 Hazardous Wastes Accepted at the Facility

A2.B CONTAINERIZED WASTE

A2.B.1 Wastes Compatible with Container

A2.B.2 Containers without Secondary Containment System

A2.C WASTE IN TANK SYSTEMS

A2.C.1 Wastes Compatible with Tanks

A2.C.2 Tanks without Secondary Containment System

A2.H WASTE IN MISCELLANEOUS UNITS

A2.A WASTE DESCRIPTION

[R 299.9504(1)(c) and 40 CFR §270.14(b)(2)]

A2.A.1 Waste Description (generate on-site wastes)

[R 299.9504(1)(c) and 40 CFR §270.14(b)(2)]

Hazardous waste generated on-site by DLD includes:

1. Small or very small quantities of cyanide waste, solvent waste and acid wastes, which are generated in the analytical laboratory.
2. Spent charcoal is generated from permitted carbon filter air pollution control devices throughout the facility, and from air filters in the laboratory area.
3. Spent solvents are generated from a small parts washer located in the maintenance garage.

All hazardous waste generated by DLD is put in its respective outgoing waste stream and disposed of in an environmentally safe manner, and in accordance with applicable regulations.

DLD also generates wastewater from a glass-washing device, where we wash glass bottles before recycling. Analytical data has proven that this waste stream is not regulated, but the wastewater is treated as if it was, and sent off-site for mixed with our aqueous waste stream.

A2.A.2 Waste Description (receive wastes from off-site generators)

[R 299.9504(1)(c) and 40 CFR §270.14(b)(2)]

Please see Section A3 - Waste Analysis Plan for a description of waste analysis.

A2.A.2(a) Procedures for Obtaining Chemical and Physical Analyses from Off-Site Generators

Please see Section A3 - Waste Analysis Plan.

Table A2.A.1 Hazardous Waste Generated at the Facility

Please see Part A, pages 5-21

Table A2.A.2 Hazardous Wastes Accepted at the Facility

Please see Part A, pages 5-21

A2.B CONTAINERIZED WASTE

[R 299.9504(1)(c) and 40 CFR §264.172]

A2.B.1 Wastes Compatible with Container

All containers used are DOT approved as necessary, and are chosen for their compatibility with the processed chemical(s). (See Section C1).

A2.B.2 Containers without Secondary Containment System

All containers used without Secondary Containment:

1. Are DOT approved as necessary, and chosen for their compatibility with the processed chemical(s). (See Section C1); and
2. Do not contain free liquids.

(Note: If necessary, the Paint Filter Liquids Test (Method 9095) can be used to ensure a container contains no free liquids.)

A2.C WASTE IN TANK SYSTEMS

[R 299.9504(1)(c) and 40 CFR §§264.190(a), 264.191(b)(2), 264.192(a)(2)]

A2.C.1 Wastes Compatible with Tanks

Please see Section C2 - Tanks

A2.C.2 Tanks without Secondary Containment System

N/A - All Tanks at DLD have secondary containment.

A2.H WASTE IN MISCELLANEOUS UNITS

[R 299.9504(1)(c) and 40 CFR §270.13(d)]

Please see Section C9.

FORM EQP 5111 TEMPLATE MODULE A3

A3: WASTE ANALYSIS PLAN (WAP)

(Volume 1)

This document is an attachment to the Michigan Department of Environment, Great Lakes, and Energy's *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities*. See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), being R 299.9504, R 299.9508, and R 299.9605, and Title 40 of the Code of Federal Regulations (CFR) §270.14(b)(3) and 264.13(b) and (c), establish requirements for WAPs for hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application template addresses requirements for a WAP for the hazardous waste management units and the hazardous waste management facility of DLD Environmental Services, Inc. This application applies to activities associated with the WAP for the company's facility at 331 Broad Street, Plainwell, MI 49080. (Hereinafter "DLD")

Table of Contents

This template is organized as follows:

A3.A COMMERCIAL FACILITY

A3.A.1 Initial Waste Characterization Requirements for Generators

- A3.A.1(a) Generator Waste Characterization Discrepancies
- A3.A.1(b) Subsequent Waste Shipment Procedures
- A3.A.1(c) Additional Waste Analysis Requirements

Figures A3.A.1 Information That Must Be Shown On A
Generator Waste Profile

A3.A.2 Waste Acceptance Procedures

- A3.A.2(a) Review Paperwork
- A3.A.2(b) Visual Inspection of Waste
- A3.A.2(c) Waste Screening/Fingerprinting
- A3.A.2(d) Waste Analysis Procedures – Incoming Manifest Verification

Table A3.A.1 Quarterly & Annual Complete Analysis Requirements

A3.A.2(d) Waste Analysis Procedures – Incoming drummed liquid and solid waste.

Table A3.A.2 Incoming Liquid Drum Requirements

Table A3.A.3 Incoming Inorganic Landfillable Solid Drum Requirements

Table A3.A.4 Additional Requirements For Randomly Selected
Fingerprinting Of Incoming Liquid Drums

Table A3.A.5 Additional Requirements For Randomly Selected
Fingerprinting Of Incoming Solid Drums

A3.A.2(e) Waste Analysis Procedures – Treatment Analysis Requirements

Table A3.A.6 Bulk Organic Liquid Requirements

Table A3.A.7 Chromium Reduction Requirements

Table A3.A.8 Stabilization Requirements

Table A3.A.9 Cyanide Oxidation Requirements

A3.A.3 Procedures to Ensure Compliance with Land Disposal Restrictions (LDR) Requirements

- A3.A.3(a)** Spent Solvents and Dioxin Wastes
- A3.A.3(b)** Listed Wastes
- A3.A.3(c)** Characteristic Wastes
- A3.A.3(d)** Radioactive Mixed Wastes
- A3.A.3(e)** Leachates
- A3.A.3(f)** Laboratory Packs
- A3.A.3(g)** Contaminated Debris
- A3.A.3(h)** Waste Mixtures and Wastes with Overlapping Requirements
- A3.A.3(i)** Dilution and Aggregation of Wastes

A3.B CAPTIVE FACILITY

A3.B.1 Selection of Waste Analysis Parameters

A3.B.2 Additional Waste Analysis Requirements

- Table A3.B1** Organic Solutions Requirements
- Table A3.B2** Potential Additional Fuel Blend Requirements
- Table A3.B3** Potential Additional Organic Mixtures Requirements
- Table A3.B4** Bulk Acid Requirements
- Table A3.B5** Potential Bulk Acid Requirements
- Table A3.B6** Heavy Metals Powder Requirements
- Table A3.B7** Solidified Waste Requirements

A3.B.3 Procedures to Ensure Compliance with Land Disposal Restriction Requirements

- A3.B.3(a)** Spent Solvents and Dioxin Wastes
- A3.B.3(b)** Listed Wastes
- A3.B.3(c)** Characteristic Wastes
- A3.B.3(d)** Radioactive Mixed Wastes
- A3.B.3(e)** Leachates
- A3.B.3(f)** Laboratory Packs
- A3.B.3(g)** Contaminated Debris
- A3.B.3(h)** Waste Mixtures and Wastes with Overlapping Requirements
- A3.B.3(i)** Dilution and Aggregation of Wastes

A3.C NOTIFICATION, CERTIFICATION, AND RECORD KEEPING REQUIREMENTS

- A3.C.1** Retention of Generator Notices and Certifications
- A3.C.2** Notification and Certification Requirements for Treatment Facilities
- A3.C.3** Waste Shipped to Subtitle C Facilities
- A3.C.4** Waste Shipped to Subtitle D Facilities
- A3.C.5** Recyclable Materials
- A3.C.6** Record Keeping
- A3.C.7** Required Notice

A3.A COMMERCIAL FACILITY

DLD is a commercial facility that receives wastes generated off site. DLD has developed a WAP to ensure that its facility at 331 Broad Street/Plainwell, MI 49080 will accept only wastes that it is authorized to accept. The hazardous wastes stored at DLD will be properly characterized prior to waste acceptance. All generators will be required to provide a complete waste characterization, including chemical analysis when appropriate. Waste screening will be conducted on every shipment of waste to ensure that the waste conforms to the waste information from the generator and the information on the incoming manifests and to ensure that the waste is properly managed within the facility.

All analysis performed pursuant to this application will be consistent with the QA/QC Plan included in Template B5, Attachment B5-1. All samples for the purpose of waste characterization will be collected, transported, stored, and disposed by trained and qualified individuals in accordance with the QA/QC Plan.

In accordance with R 299.9609 and 40 CFR §264.73 and Part 264, Appendix I, DLD will retain all records and results of waste determinations performed as specified in 40 CFR §264.13, 264.17, 264.314, 264.1034, 24.1063, 264.1083, 268.4(a), and 268.7 in the facility operating record until closure of the facility.

A3.A.1 Initial Waste Characterization Requirements for Generators [R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §264.13(b)(5)]

DLD will require waste stream information for initial waste shipments from all off-site generators prior to shipment. Before a waste stream is accepted at DLD, a detailed characterization of the waste will be obtained from the generator [40 CFR §264.13(a)(1)]. The information required for each waste will be sufficient to determine the acceptance of the waste into DLD and to determine the treatment process the waste will receive at DLD.

See Figure A3.A.1 below for a list of information to be on Each Generator Waste Profile Form.

In addition to the waste information submitted by the generator, DLD may, as necessary:

- ☒ Require submittal of a representative waste sample
- ☒ Conduct an audit of the generator facility
- ☒ Review industry literature to identify typical waste streams
- ☒ Other: SDS, consumer product guidance info from “off-the-shelf” containers, generator inventory

All the information needed to treat, store and dispose of the waste safely, properly, and in accordance with land disposal restrictions as required in 40 CFR 268 will be contained in the following:

1. Generator Waste Profile

This information is gathered in paper or electronic form for each waste stream and is revised or recertified as necessary by the generator or at any time that the process generating the waste changes.

2. Manifest

This is the standard Uniform Hazardous Waste Manifest **or electronic manifest when authorized** for all incoming EPA hazardous waste shipments into DLD.

3. Land Disposal Restriction Notification

This information is gathered in paper or electronic form and is designed to notify DLD or certify that the generator has generated a restricted waste which must be treated to an applicable treatment standard prior to land disposal.

A3.A.1(a) Generator Waste Characterization Discrepancies

[R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §264.13(a)(3) and (4), 264.13(b)(c), and 264.72]

In the event of waste discrepancies that are discovered during the visual inspection of the waste, DLD will follow the procedures that have been documented in Section A3.A.2(b)(8).

In the event of manifest discrepancies, DLD may:

1. Opt to reject the waste (which would be marked on the manifest and returned to the generator);
2. Reject any residues that exceed the quantity limits for “empty” containers set forth in 40 CFR 261.7(b); or
3. If able, work with the generator to determine if the manifest can be amended or re-manifested in a manner that would correct the discrepancy and allow DLD to accept the waste.

A3.A.1(b) Subsequent Waste Shipment Procedures

[R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §264.13(a)(3) and 264.13(b)(4)]

Under the following circumstances, the initial analysis of waste from each generator will be repeated and/ or updated to ensure that the analysis is accurate and up-to-date. :

1. When DLD is notified by a generator, or has reason to believe, that a particular waste stream has changed significantly from the chemical data on file with the waste profile; or
2. When the results of either the inspection indicated in Section A3.A.2(c), or analysis otherwise required by this WAP, indicates that the hazardous waste received does not match the waste designated in the corresponding profile, manifest, or shipping paper(s).

A3.A.1(c) Additional Waste Analysis Requirements

[R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §264.13(b)(6) and 264.13(c)(3)]

DLD will review the waste information to ensure that DLD is authorized to receive the waste and can manage the waste in compliance with the following:

- | | |
|--|--|
| <input checked="" type="checkbox"/> R 299.9605 and 40 CFR §264.17 | General requirements for ignitable, reactive, or incompatible wastes |
| <input checked="" type="checkbox"/> R 299.9605 and 40 CFR §264.314 | Special requirements for bulk and containerized liquids |
| <input type="checkbox"/> R 299.9630 and 40 CFR §264.1034(d) | Test methods and procedures (Subpart AA)
[Template A3, Section A3.A.2(c)] |
| <input checked="" type="checkbox"/> R 299.9631 and 40 CFR §264.1063(d) | Test methods and procedures (Subpart BB)
[Template A3, Section A3.A.2(c)] |
| <input checked="" type="checkbox"/> 40 CFR §264.1083 | Waste determination procedures (Subpart CC)
[Template A3, Section A3.A.2(c)] |
| <input checked="" type="checkbox"/> R 299.9627 and 40 CFR §268.7 | Waste analysis and record keeping LDR requirements |
| <input checked="" type="checkbox"/> | R 299.9228 Universal waste requirements
[Template A3, Sections A3.A.3, A3.B.3 and A3.C] |

FIGURE A3.A.1

INFORMATION THAT MUST BE SHOWN ON A GENERATOR'S WASTE PROFILE

Waste Generator Information:

- Generator Name
- Street Address
- City, State/Province
- Zip Code
- County
- Customer Contact
- Billing Address
- Telephone Number
- Generator EPA/
- Federal ID #
- MDEQ ID #

Waste Stream Information

- | | |
|--|--|
| <ul style="list-style-type: none"> • Name of Waste • Process Generating Waste • Color • Strong Odor [describe] • Physical State at 70° F • Layers • Free Liquid Range • pH Range • Liquid Flash Point • Physical and Chemical • Composition | <ul style="list-style-type: none"> • Constituents • Concentration Range • Oxidizer • Carcinogen • Pyrophoric • Infectious • Explosive • Shock Sensitive • Radioactive • Water Reactive • Poison - Inhalation Hazard |
|--|--|

Does the waste represented by this profile contain dioxins?

Does the waste represented by this profile contain asbestos?

Is the waste subject to RCRA Subpart CC controls?

Does the waste contain debris?

Are all containers included in this waste stream empty and as defined in R 299.9207 and/or 40 CFR §761.79?

Quantity of Waste: *(Including units)*

Shipping Information:

- Packaging
- Shipping Frequency
- Personal Protective Equipment Requirements

Generator Certification:

Is this a Part 111 of Act 451 hazardous waste (R 299.9201 to R 299.9229)?

Does the waste represented by this Waste Profile contain any of the following pesticides or herbicides: Endrin, Lindane, Methoxychlor, Toxaphene, 2,4-D, 2,4,5-TP (silvex), chlordane, Heptachlor (and its epoxide)?

Is the waste from a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (40 CFR, Part 300, Appendix B) or MDEQ mandated cleanup?

Does the waste represented by this Waste Profile contain concentrations of radioactive elements regulated by the Nuclear Regulatory Commission?

Does the waste represented by this Waste Profile contain concentrations of PCBs regulated under 40 CFR, Part 147, PCB Compounds, of Act 451 or 40 CFR, Part 761?

Do the Waste Profile and all associated information contain true and accurate descriptions of the waste material and has all the relevant information within the possession of the generator regarding known or suspected hazards pertaining to the waste been disclosed to the treatment storage and facility owner/operator?

Notes:

CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EPA	U.S. Environmental Protection Agency
MDEQ	Michigan Department of Environmental Quality
PCB	Polychlorinated biphenyl
RCRA	Resource Conservation and Recovery Act of 1976, as amended
TSDf	Treat, Store, Disposal Facilities

A3.A.2 Waste Acceptance Procedures

[R 299.9605(1) and R 299.9504(1)(c), and 40 CFR §264.13(c), 264.72(a) and (b), and 264.73(b)]

Waste shipments arrive at DLD in the following containers:

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> Drums | <input checked="" type="checkbox"/> Totes | <input checked="" type="checkbox"/> Tanker trucks |
| <input checked="" type="checkbox"/> Carboys | <input checked="" type="checkbox"/> Wrangler box | <input checked="" type="checkbox"/> Filter bags |
| <input checked="" type="checkbox"/> Roll-off boxes | <input checked="" type="checkbox"/> Vacuum trucks | <input checked="" type="checkbox"/> <u>Other</u> : any UN approved specification package or any approved performance package |

Upon receipt of wastes from an off-site generator, DLD will perform all of the following tasks:

- Review paperwork
- Visually inspect the waste
- Perform waste screening/fingerprint analysis of waste

These tasks are discussed below.

A3.A.2(a) Review Paperwork

[R 299.9605(1) and R 299.9504(1)(c), and 40 CFR §264.13(c), 264.72(a) and (b), and 264.73(b)]

DLD will review all paperwork, including manifests and LDR notifications, before any wastes are accepted by the facility. DLD will review all paperwork for completeness. In addition, the manifest and LDR notification will be compared for consistency. The manifest will also be compared to the waste information and any analytical information provided by the generator and to the waste shipment to ensure the accuracy of information provided on shipment paperwork. The manifest will also be compared to the number of containers, the volume, and/or the weight of the waste in the shipment. All discrepancies will be resolved before processing the waste.

A3.A.2(b) Visual Inspection of Waste

[R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §264.13(c)]

DLD will visually inspect a minimum of one container and up to a maximum of 100% percent of the containers from each generator. The contents of the container will be inspected for the following:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Color | <input checked="" type="checkbox"/> Consistency |
| <input checked="" type="checkbox"/> Physical state | <input type="checkbox"/> Other: |
| <input checked="" type="checkbox"/> pH | |

Visual observations may be compared to the waste profile information. All discrepancies will be resolved before processing the waste.

All trucked incoming waste, regardless of the transporter, is brought into a truck loading bay. The wastes are off-loaded, segregated by the generator and manifest number, and put into temporary storage in one of DLD's designated waste storage area. The waste is stored in one of these areas (following the requirements of 40 CFR 264.35, 40 CFR 264.171, 40 CFR 264.173, 40 CFR 264.174). After wastes are put into temporary storage, the Hazardous Waste Chemist or a team of Hazardous Waste Chemists, begins the examination and investigation of the waste. The Hazardous Waste Chemist will make a visual inspection of the wastes, verifying to his or her own satisfaction that it matches the manifest description and the Generator Waste Profile [40 CFR 264.13(a)(4)]. This inspection is documented. Wastes brought in via railcar, once the railroad spur is built (DLS-12), will be subject to the same fingerprinting process as wastes received by truck.

When it is necessary to remove aliquots of the waste, DLD utilizes the sampling methodologies dictated by 40 CFR 264.13 (b)(3) and 40 CFR 261, Appendix I (in most instances, COLIWASA sampling for liquids and Trier sampling for loose pack solids or suspensions are employed). The waste will be place on hold and be handled by a Hazardous Waste Chemist or team supervised by a Hazardous Waste Chemist even after the fingerprinting has been completed. (A Hazardous Waste Chemist must approve the verification of waste (including fingerprinting.)

There are some cases where it is best to have one chemist work on a particular treatment area rather than working on a particular generator's waste (i.e., commingling of all acids). In these instances, once the waste has been fingerprinted and prepared for processing, it is often re-fingerprinted and may undergo additional screening or analysis. In these cases, after verification and approval from the initial Hazardous Waste Chemist, the waste now is under the control of a Hazardous Waste Chemist until the waste leaves DLD for additional treatment off-site. The following methodologies are employed to fingerprint wastes before treatment:

1. Organic liquids to be commingled for incineration will be tested for compatibility following ASTM D5058A. Mixing the liquids would be done for the purpose of observing incompatibilities. The mixing process would be carried out in the waste processing and storage area. This procedure is particularly important since compatibility is often a matter of concentration.

2. Organic peroxides are received at DLD and inspected to assure that initiators are not packaged in the same container or, if they are in the same container, the initiators are separated. Processing of peroxides and initiators are carried out in separate locations in DLD's waste processing and storage areas. Organic peroxides are lab packed, quenched or deactivated. Quenching consists of diluting with an appropriate solvent and subsequent commingling with halogenated organic solvents. Deactivation is accomplished by hydrolysis in an alkaline solution.
3. Incoming waste from generators who could reasonably be expected to have PCBs in their waste and oil waste is screened for PCBs in most instances at the discretion of the Hazardous Waste Chemist.
4. Certain acids and bases are commingled, thereby reducing reactivity potential and generating neutral aqueous solutions. After the pH has been determined and neutralization completed, the liquid is commingled or stored until shipment off-site for further treatment and/or disposal.
5. Separation and determination of where and how acids will be disposed of is determined by a Hazardous Waste Chemist. All mineral acids or non-organic acids are tested for compatibility (ASTM D 5058A), commingled, and analyzed for certain metals before a determination is made as to whether precipitation or other metal removing processes are conducted. Acids are then tested for compatibility on a larger scale (ASTM D 5058A) and commingled to be sent off site for neutralization and continuing metal precipitation.
6. Further physical inspection using probes, test strips, simple chemical tests, or organoleptic testing will be employed as deemed necessary by the chemist with consideration for the treatment the waste will receive. This inspection will be documented.
7. If at any time during inspection the waste does not exhibit the expected properties, or if the fingerprint process identifies chemical incompatibilities of the waste prior to processing, the Hazardous Waste Director will be informed so that a secondary inspection can be conducted which will consist of the initial characterization plus the analytical parameters used for fingerprinting. If confirmation or verification cannot be obtained at this point, then three options are available to the Hazardous Waste Director:
 - a. Reject the waste. In this case, waste would be off-loaded and remain in storage until arrangements can be made to return the waste to the generator. DLD may transport the rejected wastes back to the generator and offer any expertise and knowledge to help the generator find an appropriate TSD facility for the waste; or
 - b. Obtain additional information from the generator: In this case DLD would consult the generator for more information; or

- c. Perform additional analysis: In this case DLD would have the waste sampled and conduct additional analyses to determine the chemical composition or characterization of the waste. Processing of that particular waste or container would be halted until determination is made as to what must be done in order to approve the waste stream. Any analyses which may be requested by the Hazardous Waste Chemist would be noted. If any significant discrepancies are verified, the generator would be notified and documentation made of the change and rejection or acceptance of different waste types. Additional analysis does not guarantee that the waste will be accepted.
8. If, after a visual and physical inspection, the waste material exhibits the expected properties, the chemist will proceed with processing.
9. If at any time during processing the waste does not exhibit the expected properties, the Hazardous Waste Chemist will take one of the actions described in Step 7.

A3.A.2(c) Waste Screening/Fingerprinting

[R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §264.13(b)(4) and 264.13(c)(2)]

A prerequisite to proper waste management is the identification of hazardous wastes in accordance with regulatory and permit requirements. All generators that utilize the services of DLD are required to evaluate solid wastes, through testing or applying acceptable knowledge, to determine if the wastes are hazardous in accordance with the RCRA characteristic and listed waste criteria (40 CFR 261). Also, as a result of the LDR regulations, they must determine whether hazardous wastes are restricted from land disposal.

The fingerprinting procedure is to assure that the waste is characterized to the extent necessary to determine the process that will receive the waste. Since the process that the waste will receive at DLD has been tentatively decided from information supplied with or on the waste profile, the fingerprinting procedure is to verify that the initial treatment decision was correct. The fingerprinting procedure also will verify that the manifest and/or shipping documents have properly described the waste [40 CFR 264.13(a)(4)].

In regards to its Waste Analysis Plan, DLD documents the fingerprint screen and/or additional analysis required for a particular generator and manifest number.

Table A3.A.1 lists the waste analysis procedures, including screening parameters for each hazardous waste, the rationale for the selection of these parameters, test methods that will be used to test for these parameters, the appropriate reference, whether the waste is specified in R 299.9216, the frequency of waste screening, and the rationale for the frequency. The sampling methods that will be used to obtain a representative sample of the waste to be analyzed and the sampling equipment and rationale are summarized early in section A3.A1 monthly sampling, random biannual sampling. The results of the waste screening/fingerprint analysis will be compared to the waste profile information and analytical results provided by the generator during the initial waste characterization process. The outside container of inner laboratory pack containers will be 100 percent visually inspected. Containers of personal protective equipment (PPE) or debris will undergo visual inspection. All discrepancies will be resolved before processing the waste.

A3.A.2(d) Waste Analysis Procedures – Incoming drummed liquid and solid waste.

40 CFR 264.13(a)(3) specifies that “waste analysis must be repeated as often as necessary to ensure that it is accurate and up to date”. The Hazardous Material Chemist notes any process or waste changes. This information would be noted with the waste profile information or a new waste profile can be requested from the generator at this time. If the waste changes, it is understood that additional screening and analysis may be required by the Hazardous Waste Chemist in order to process the waste. All sampling that would be required for frequent re-evaluation would be documented. This sampling occurs according to the following parameters:

Quarterly Random Samples (see Table A3.A.1 for analysis parameters)

DLD will do full monthly random samples. Quarterly samples will be pulled on any type of hazardous waste that DLD has received within a particular calendar quarter, regardless of whether or not changes have taken place with the process. Complete analyses will be run on this waste regardless of suspect.

Bi-Annual Large Quantity Generator Samples (see Table A3.A.1 for analysis parameters)

On an Bi-annual basis, DLD will run complete analyses on samples from every large quantity generator that is expected to send waste to DLD at least four (4) times per year. Annual, large quantity (LQ) sampling will be done on any type of hazardous waste from the generator, regardless of whether or not changes have taken place with the process generating the waste.

Biannual, Small Quantity Generator Samples (see Table A3.A.1 for analysis parameters)

On an annual basis, a randomly selected small quantity (SQ) generator of hazardous waste will be selected for complete analyses, regardless of whether or not changes have taken place with the process generating the waste.

TABLE A3.A.1 Quarterly and Annual Complete Analysis Requirements		
Parameter 40 CFR 264.13 (b)(5)	Reference Methods 40 CFR 264.13(b)(2)	Reason For Analysis 40 CFR 264.13 (b)(1)
Volatile Organic Solvent Scan	SW-846, 8015A, 8021A	<ul style="list-style-type: none"> confirms certain solvents (or lack thereof) that could possibly be in the waste
Flash Point	SW-846, 1010	<ul style="list-style-type: none"> ensuring that DLD is meeting DOT/EPA manifest requirements
PCB Analysis	SW-846, 8082	<ul style="list-style-type: none"> ensure an off-site restricted material facility does not receive
Heat Content (BTU/lb)	ASTM D 240	<ul style="list-style-type: none"> document within the parameters of incinerator and/or fuel blender requirements
Chlorine	ASTM D 808	<ul style="list-style-type: none"> document within the parameters of incinerator and/or fuel blender requirements
Sulfide	ASTM D 4978A	<ul style="list-style-type: none"> document within the parameters of incinerator and/or fuel blender requirements
Metals: As, Ba, Cd, Cr, Pb, Hg, Se, Ag	SW-846 (As) 7060A (Ba) 7080A (Cd) 7130 (Cr) 7190 (Pb) 7421 (Hg) 7470A (Hg) 7471A (Se) 7740 (Ag) 7761	<ul style="list-style-type: none"> incinerator and fuel blender requirements fuel quality control check to ensure that metals quantities are within required incinerator and BIF parameters.
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none"> confirm that the waste “appears” as it should: color, apparent viscosity, apparent weight

TABLE A3.A.2 Incoming Liquid Drum Requirements		
Parameter 40 CFR §264.13(B)(5)	Reference Methods 40 CFR §264.13(B)(2)	Reason For Analysis 40 CFR §264.13 (B)(1)
Compatibility	ASTM D5058A	<ul style="list-style-type: none"> System, container and waste compatibility
Water Compatibility Screen	ASTM D5058C	<ul style="list-style-type: none"> ensure the miscibility of the waste in water ensure the compatibility of the waste in water
pH (aqueous solutions)	SW-846, 9041A (test strips)	<ul style="list-style-type: none"> System, container type and waste compatibility document whether the waste meets the EPA definition of a hazardous waste due to the characteristic of corrosivity
Hg (for all acid and heavy metal solutions)	SW-846, 7470A	<ul style="list-style-type: none"> knowledge of total Hg dictates the possible treatment options for liquids or solids containing Hg
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none"> confirm that the waste “appears” as it should: color, apparent viscosity, apparent weight

TABLE A3.A.3 Incoming Inorganic Landfillable Solid Drum Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason for Analysis 40 CFR §264.13 (b)(1)
Total Metals: As, Ba, Cd, Cr, Hg, Pb, Se, Ag	SW-846 (As) 7060A (Ba) 7080A (Cd) 7130 (Cr) 7190 (Pb) 7421 (Hg) 7470A (Hg) 7471A (Se) 7740 (Ag) 7761	<ul style="list-style-type: none"> knowledge of total metals helps to determine possible treatment options for solids containing heavy metals
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none"> confirm that the waste “appears” as it should: color, apparent weight

TABLE A3.A.4 Additional Requirements For Randomly Selected Fingerprinting Of Incoming Liquid Drums		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
Compatibility	ASTM D5058A	<ul style="list-style-type: none"> System, container and waste compatibility
PCB Analysis	SW-846, 8082	<ul style="list-style-type: none"> non-negative data provided by PCB screen
Heat Content (BTU/lb.)	ASTM D 240	<ul style="list-style-type: none"> incinerator and fuel blender requirements
Chlorine	ASTM D 808	<ul style="list-style-type: none"> fuel quality
Flash point	SW-846, 1010	<ul style="list-style-type: none"> document whether meets the EPA definition of a hazardous waste due to the characteristic of ignitability

TABLE A3.A.5 Additional Requirements For Randomly Selected Fingerprinting Of Incoming Solid Drums		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
Heat Content (BTU/lb)	ASTM D 240	<ul style="list-style-type: none"> incinerator and fuel blender requirements
Chlorine	ASTM D 808	<ul style="list-style-type: none"> fuel quality

A3.A.2(e) Waste Analysis Procedures – Treatment Analysis Requirements

The goal for treatment at DLD is to render wastes non-hazardous, less hazardous, or make it more appropriate for disposal at a receiving TSD facility.

Bulking organic liquids. In most instances, DLD is commingling both hazardous and non-hazardous solvents. After ensuring compatibility with container and other wastes, mixed liquids are transferred into appropriate tank(s). The tank contents continue to be regulated as hazardous waste under the “mixture” or “derived from” rules (40 CFR 261.3(c)).

TABLE A3.A6 Bulked Organic Liquid Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
Compatibility	ASTM D5058A	<ul style="list-style-type: none">• System, container and waste compatibility
Water Compatibility Screen	ASTM D5058C	<ul style="list-style-type: none">• ensure the miscibility of the waste in water• ensure the compatibility of the waste in water
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none">• confirm that the waste “appears” as it should: color, apparent viscosity, apparent weight

Chromium reduction. This process involves the chemical reduction of hexavalent chromium to trivalent chromium. The presence of chromium must be verified to justify the treatment process.

TABLE A3.A7 Chromium Reduction Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
pH	SW-846, 9041A (test strips)	<ul style="list-style-type: none">• document whether waste meets the EPA definition of a hazardous waste due to the characteristic of corrosivity
Hexavalent chrome	SW-846 7195, 7196A or 7197	<ul style="list-style-type: none">• document the reduction of hexavalent chromium to trivalent chromium
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none">• confirm that the waste “appears” as it should: color, apparent viscosity, apparent weight

Stabilization. This process involves the chemical stabilization process of waste or debris requiring stabilization as a method of reducing hazards of a waste stream and producing a product that can be sent for landfill.

TABLE A3.A.8		
Stabilization Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
pH	SW-846, 9041A (test strips)	<ul style="list-style-type: none"> ensuring that solidification process takes place in a slightly basic solution to avoid violent reaction with the introduction of Portland cement
Compatibility	ASTM D 5058A	<ul style="list-style-type: none"> ensure all materials intended for solidification will not cause violent reaction when mixed with cement mixture
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none"> confirm that the waste “appears” as it should: color, apparent viscosity, apparent weight

Cyanide Oxidation. This process involves the chemical oxidation of cyanide to cyanate. The presence of cyanide must be verified to justify the treatment process and the pH must be determined to assure that cyanide gas will not be liberated during the commingling process.

TABLE A3.A.9		
Cyanide Oxidation Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
Cyanide	ASTM D 5049C	<ul style="list-style-type: none"> verification of cyanide limit personnel exposure risk assessment
pH	SW-846, 9041A (test strips)	<ul style="list-style-type: none"> documentation of required maintenance for proper pH necessary to assure that cyanide gas will not be liberated during the commingling process
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none"> confirm that the waste “appears” as it should: color, apparent viscosity, apparent weight

A3.A.3 Procedures to Ensure Compliance with Land Disposal Restrictions (LDR) Requirements
[R 299.9627 and 40 CFR, Part 268]

All shipments of wastes subject to LDR received at DLD will be accompanied by appropriate generator notification and LDR notification in accordance with R 299.9627 and 40 CFR §268.7. The LDR notification accompanying generator wastes will be reviewed, and any discrepancies in the LDR notification and the associated manifest, analytical records, or the waste profile will require shipment rejection unless additional, satisfactory, clarifying information is provided by the generator. All information obtained to document LDR compliance will be maintained in the facility operating record until closure of the facility.

If DLD receives a shipment of waste without LDR notification, or a notification with incorrect or incomplete information, the following actions will be conducted:

In accordance with the LDR regulations, all wastes shipped off site will be analyzed, or generator knowledge will be used when appropriate, to determine whether the waste meets the applicable LDR treatment standards specified in R 299.9627 and 40 CFR §268.41-43. All analytical results will be maintained in the facility operating record until closure of the facility.

DLD may supply LDR notifications and certification, including appropriate analytical records to support the certification, to the receiving facility with initial shipments of waste and anytime the waste stream changes. The notifications and certifications will contain the information required under R 299.9627 and 40 CFR §268.7. Any additional waste data extracted from the waste profile, original LDR notifications, and/or analysis provided by the generator, will be provided to the licensed TSDF where the waste will be sent.

A3.A.3(a) Spent Solvent and Dioxin Wastes
[R 299.9627 and 40 CFR §264.13(a)(1), 268.7, 268.30, 268.31, 268.40, 268.41, 268.42, and 268.43]

Spent solvent wastes (F001-F005) are accepted at DLD. Generator process knowledge will be used to determine the presence of spent solvent wastes (F001-F005). Generator process knowledge will be documented with the waste profile and LDR notification. The LDR notification will provide additional information regarding the appropriate treatment standards for the waste and whether it has already been treated to the appropriate standards.

A3.A.3(b) Listed Wastes
[R 299.9627, R 299.9213, and R 299.9214 and 40 CFR §264.13(a)(1), 268.7, 268.33, 268.34, 268.35, 268.36, 268.39, 268.40, 268.41, 268.42, and 268.43]

Generator process knowledge will be used to determine whether listed waste meets the applicable treatment standards or to demonstrate that the waste has been treated by the appropriate specified treatment technology. In accordance with R 299.9627 and 40 CFR §268.41, where treatment standards are based on concentrations in the waste extract, the facility will use toxicity characteristic leaching procedures (TCLP), or other appropriate analytical method, to determine if wastes meet treatment standards.

A3.A.3(c) Characteristic Wastes

[R 299.9627, R 299.9208, and R 299.9212 and 40 CFR §261.3(d)(1), 264.13(a)(1), 268.7, 268.9, 268.37, 268.40, 268.41, 268.42, 268.43 and Part 268, Appendix I and Appendix IX]

Generator process knowledge will be used to determine whether characteristic waste meets the applicable treatment standards or to demonstrate that the waste has been treated by the appropriate specified treatment technology. In accordance with R 299.9627 and 40 CFR §268.41, where treatment standards are based on concentrations in the waste extract, generators shipping waste to the facility will determine if their wastes meet treatment standards.

Characteristic D008 lead nonwastewaters and D004 arsenic nonwastewaters may be analyzed using TCLP to determine compliance with treatment standards of 40 CFR §268.40 and 268.48. If after treatment a hazardous waste displays a characteristic for the first time, the characteristic waste code will be added to the LDR notification and facility records. Wastes will be retreated, as appropriate, to meet the characteristic treatment standards of 40 CFR §268.40 and 268.48 prior to land disposal. In addition, the generator process knowledge will be used to identify the underlying hazardous constituents that are expected to be present in the waste. Generator process knowledge will be documented on the waste profile and LDR notification.

A3.A.3(d) Radioactive Mixed Waste

[R 299.9627 and 40 CFR §268.7, 268.35(c), 268.35(d), 268.36, and 268.42(d)]

☐ The facility does not accept radioactive mixed waste.

OR

☒ Generator process knowledge will be used to determine whether a radioactive mixed waste meets the applicable treatment standard.

The acceptance of radioactive mixed wastes at DLD is limited to radioactive oxidizing compounds that exhibit the EPA characteristic of ignitability (D001, 40 CFR §261.21(4)). The vast majority of radioactive oxidizers received are still in their original manufacturer containers. Prior to being shipped to a destination facility with the appropriate technology for disposal of radioactive wastes, these chemical compounds are deactivated by stabilization in cement, meeting the treatment standard set forth in 40 CFR §268.40, Treatment Standards For Hazardous Wastes, for the waste code D001 under the waste description and treatment/regulatory subcategory of "Ignitability (Oxidizer)" is based on 40 CFR §261.21(4).

A3.A.3(e) Leachates

[R 299.9627 and 40 CFR §260.10 and 40 CFR §268.35(a) and 268.40]

☐ The facility does not accept single-source or multi-source F039 leachates.

OR

☒ Single-source leachate will not be combined to produce multi-source leachates.

DLD will conduct an initial analysis of all regulated constituents in F039 leachates and, based on the results of the analysis, develop a reduced list of constituents to be monitored on a regular basis.

A3.A.3(f) Laboratory Packs

[R 299.9627 and 40 CFR §268.7 and 268.42(c) and Part 268, Appendix IV and Appendix V]

☐ The facility does not accept laboratory packs.

OR

☒ The laboratory packs accepted at the facility are not land disposed.

DLD utilizes degreed Hazardous Waste Chemists to sort the lab packed chemicals. Using chemical knowledge, the chemists commingle or repackage the lab packs.

Lab packs generated by DLD are then sent to other EPA licensed facilities for disposal. These facilities are chosen based on their compliance with the treatment standards enumerated in 40 CFR §268.40, Treatment Standards For Hazardous Waste, and 40 CFR §268.42(c). Wastes commingled with other compatible lab pack hazardous wastes and non-lab pack hazardous wastes are sent for treatment utilizing treatment standards protective of human health and the environment.

Hazardous waste -organic lab packs received at DLD are repacked and disposed off-site at high temperature hazardous waste incinerators with exhaust stack scrubbing units.

A3.A.3(g) Contaminated Debris

[R 299.9627 and 40 CFR §268.2(g), 268.7, 268.9, 268.36, 268.45, and 270.13(n)]

- ☒ The hazardous debris categories and the contaminant categories associated with the types of hazardous debris are accepted at the facility.

Hazardous debris accepted at DLD that exhibits the characteristics of ignitability, corrosivity, or reactivity will either be treated using one of the extraction, destruction, or immobilization technologies identified in Table 1 of 40 CFR §268.45, or will transported off-site to other TSDFs.

Commingled debris accepted at DLD are repackaged and disposed of under the Thermal Destruction technology description in Table 1 – Alternative Treatment Standards For Hazardous Debris presented in 40 CFR §268.45, or some other allowed treatment technology. These incineration facilities are chosen based on their compliance with the treatment standards enumerated in 40 CFR §268.40, Treatment Standards For Hazardous Waste, and 40 CFR §268.42, or 40 CFR §268.45, Treatment standards for hazardous debris.

OR

- ☐ Contaminated debris is not accepted at the facility.

A3.A.3(h) Waste Mixtures and Wastes with Overlapping Requirements

[R 299.9627 and 40 CFR §264.13(a), 268.7, 268.41(b), 268.43(b), and 268.45(a)]

Generator process information and/or analytical data will be used to demonstrate that those waste mixtures and wastes with multiple codes are properly characterized. Each waste that has more than one characteristic will be identified with a number for each characteristic. Waste identified as meeting a listing and exhibiting a characteristic will be primarily identified with the listed waste code for the purpose of manifesting, etc.

A3.A.3(i) Dilution and Aggregation of Wastes

[R 299.9627 and 40 CFR §268.3]

Listed wastes, if destined for land disposal, may not be diluted from the point of generation to the point of land disposal. Characteristic wastes may only be diluted if, (1) the waste is managed in a Clean Water Act (CWA)/CWA-equivalent surface unit or a Class I Safe Drinking Water Act injection well, (2) the waste has a concentration-based treatment standard or is treated using the DEACT technology-based treatment standard, and (3) the waste is not a D003 reactive waste. [Note: these requirements may change in the future. At that time, this template may be amended.]

DLD may not dilute or partially treat a listed waste to change its treatability category (i.e., from wastewater to nonwastewater), in order to comply with different treatment standards. If the wastes are all legitimately amenable to the same type of treatment to be performed, DLD may aggregate wastes for treatment.

A3.B CAPTIVE FACILITY

☐ DLD generates waste on site. DLD does not receive waste generated off site.

OR

☒ DLD generates waste on site. DLD also receives waste generated off site. Waste screening procedures for receiving wastes from off-site generators is discussed in Section A3.A.

The hazardous waste treated will be properly characterized using generator knowledge or chemical analysis to ensure that it is properly managed within the facility.

All analysis performed pursuant to this application will be consistent with the QA/QC Plan included in Attachment B5. All samples for the purpose of waste characterization will be collected, transported, stored, and disposed by trained and qualified individuals in accordance with the QA/QC Plan.

In accordance with R 299.9609 and 40 CFR §264.73 and Part 264, Appendix I, DLD will retain all records and results of waste determinations performed as specified in 40 CFR §264.13, 264.17, 264.314, 264.1034, 24.1063, 264.1083, 268.4(a), and 268.7 in the facility operating record until closure of the facility.

A3.B.1 Selection of Waste Analysis Parameters [R 299.9605(1) and 40 CFR §264.13(B)(1)]

DLD will select waste analysis parameters to confirm the identity of waste streams generated at the facility. The selection of waste analysis parameters will be based on knowledge of the raw material, analytical results, and/or physical and chemical processes that produce the waste stream. Knowledge of the process and analytical testing will be used to determine if the hazardous wastes exhibit one or more characteristics to: (1) ensure compliance with LDR regulations and (2) provide waste compatibility information to determine appropriate waste storage.

Tables A3.B.1 through A3.B.7 list the waste analysis procedures, including the waste analysis parameters for each hazardous waste, the rationale for the selection of these parameters, test methods that will be used to test for these parameters, the appropriate reference, the frequency of waste characterization, and the rationale for frequency. When it is necessary to remove aliquots of the waste, DLD utilizes the sampling methodologies dictated by 40 CFR 264.13 (b)(3) and 40 CFR 261, Appendix I (in most instances, COLIWASA sampling for liquids and Trier sampling for loose pack solids or suspensions are employed)

A3.B.2 Additional Waste Analysis Requirements

[R 299.9605(1) and R 299.9504(1)(c) and 40 CFR §264.13(b)(6) and (c)(3)]

DLD will review the waste characterization information to ensure that the facility is authorized to manage the waste in compliance with the following:

(Check as appropriate)

- | | | |
|-------------------------------------|------------------------------------|---|
| <input checked="" type="checkbox"/> | R 299.9605 and 40 CFR §264.17 | General requirements for ignitable, reactive, or incompatible wastes |
| <input checked="" type="checkbox"/> | R 299.9605 and 40 CFR §264.314 | Special requirements for bulk and containerized liquids |
| <input type="checkbox"/> | R 299.9630 and 40 CFR §264.1034(d) | Test methods and procedures (Subpart AA)
[Template A3, Section A3.B(2)] |
| <input checked="" type="checkbox"/> | R 299.9631 and 40 CFR §264.1063(d) | Test methods and procedures (Subpart BB)
[Template A3, Section A3.B(2)] |
| <input checked="" type="checkbox"/> | 40 CFR §264.1083 | Waste determination procedures (Subpart CC)
[Template A3, Section A3.B(2)] |
| <input checked="" type="checkbox"/> | R 299.9627 and 40 CFR §268.7 | Waste analysis and record keeping LDR
requirements
[Template A3, Sections A3.B(3) and A3.C] |
| <input checked="" type="checkbox"/> | R 299.9228 | Universal waste requirements |

DLD treats, commingles, packages, and otherwise handles hazardous and non-hazardous wastes from many generators. The resulting waste is shipped for final disposal with DLD listed as the generator on the manifest. Each receiving facility has very stringent requirements for all their incoming waste. DLD is responsible, as the waste generator, for the identification and characterization of the wastes and for completing all profiles requested by the off-site facility's WAP.

Outgoing Waste Shipping Paper Requirements

Receiving facilities are utilized based on site facility audits, receiving facility abilities and economic factors. As the waste disposal options of DLD are not limited to facilities in Michigan, manifests utilized by the state where the receiving facility is located are used as appropriate. If an off-site facility state doesn't utilize its own manifest, then a Michigan manifest may be used. DLD must comply with all rules from the EPA, Michigan and any other off-site facility state when manifesting wastes. All appropriate LDR treatment standard notifications are provided to the receiving TSDF.

Outgoing Waste Analysis Requirements

There are waste analysis requirements from off-site treatment facilities that DLD utilizes to continue the waste treatment process. It is necessary to document the additional waste analysis as specified in 40 CFR 264.13 (5) and (6). All outgoing analyses are to verify the characteristics of the waste and to document the chemical content of the waste shipped off site. These analyses are also necessary to meet the waste analysis plan of the receiving facility because the generator is responsible for waste identification.

Outgoing Tank Requirements

Organic Solutions – Incineration, Fuel Blend Treatment or Waste Water Treatment - Off Site. The final procedure for ensuring that bulk waste is correctly disposed of involves the analysis of bulk shipments of liquid waste prior to shipment off site. The following analyses are performed as necessary on each 5,000-gallon tank.

TABLE A3.B1 Organic Solutions Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
Volatile Organic Solvent Scan	SW-846, 8015A, 8021A	<ul style="list-style-type: none">confirms certain-solvents (or lack thereof) that could possibly be in the waste
Flash Point	SW-846, 1010	<ul style="list-style-type: none">ensuring that DLD is meeting DOT/EPA manifest requirements
PCB Analysis	SW-846, 8082	<ul style="list-style-type: none">ensure end disposal facility does not receive restricted materials
Heat Content (BTU/lb)	ASTM D 240	<ul style="list-style-type: none">document within the parameters of incinerator and fuel blender requirements
Chlorine	ASTM D 808	<ul style="list-style-type: none">document within the parameters of incinerator and/or fuel blender requirements
Sulfide	ASTM D 4978A	<ul style="list-style-type: none">document within the parameters of incinerator and/or fuel blender requirements
Metals: As, Ba, Cd, Cr, Pb, Hg, Se, Ag	SW-846 (As) 7060A (Ba) 7080A (Cd) 7130 (Cr) 7190 (Pb) 7421 (Hg) 7470A (Hg) 7471A (Se) 7740 (Ag) 7761	<ul style="list-style-type: none">incinerator and fuel blender requirementsfuel quality controlcheck to ensure that metals quantities are within required incinerator and BIF parameters
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none">confirm that the waste “appears” as it should: color, apparent viscosity, apparent weight

Outgoing Drum Requirements

Organic Mixtures - Incineration or Fuel Blend Treatment Off Site. This waste stream often includes non-pumpables which have accumulated in the bottom of the storage tanks of DLD. It is necessary that any listed waste codes that would be applicable to the tank contents would also be carried through and identified on drummed tank waste [40 CFR 261.3(c)].

TABLE A3.B2 Potential Additional Fuel Blend Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
PCB Analysis	SW-846, 8082	<ul style="list-style-type: none"> restricted material for fuel blenders and incinerators
Heat Content (BTU/lb)	ASTM D 240	<ul style="list-style-type: none"> document within the parameters of incinerator and fuel blender requirements
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none"> confirm that the waste “appears” as it should, color, apparent viscosity, apparent weight

Possible additional analyses may be required on occasion (per off-site facility requirements).

TABLE A3.B3 Potential Additional Organic Mixtures Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
Volatile Organic Solvent Scan	SW-846, 8015A, 8021A	<ul style="list-style-type: none"> provides knowledge about majority solvents within the drums
Flash Point	SW-846, 1010	<ul style="list-style-type: none"> ensuring that DLD is meeting DOT/EPA manifest requirements
Heat Content (BTU/lb)	ASTM D 240	<ul style="list-style-type: none"> document within the parameters of incinerator and fuel blender requirements
Metals: As, Ba, Cd, Cr, Pb, Hg, Se, Ag	SW-846 (As) 7060A (Ba) 7080A (Cd) 7130 (Cr) 7190 (Pb) 7421 (Hg) 7470A (Hg) 7471A (Se) 7740 (Ag) 7761	<ul style="list-style-type: none"> incinerator and fuel blender requirements fuel quality control check to ensure that metals quantities are within required incinerator and BIF parameters document metals for outgoing load
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none"> confirm that the waste “appears” as it should: color, apparent viscosity, apparent weight

Acid Drum Waste Requirements. This waste has been segregated based on the incoming waste screens and analysis. When waste is sent to outside facilities for continuing treatment, it often requires accompanying analytical information.

TABLE A3.B4 Bulked Acid Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
Metals: Hg	SW-846, 7470A	<ul style="list-style-type: none">• check to ensure that mercury quantities are within selected treatment facility requirements• ensure presence or absence of mercury and document mercury totals for outgoing waste
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none">• confirm that the waste “appears” as it should: color, apparent viscosity, apparent weight

Additional testing for outgoing acid drums (randomly chosen or suspected concerns of the Hazardous Waste Chemist):

TABLE A3.B5 Potential Bulked Acid Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
Metals: As, Ba, Cd, Cr, Pb, Hg, Se, Ag	SW-846 (As) 7060A (Ba) 7080A (Cd) 7130 (Cr) 7190 (Pb) 7421 (Hg) 7470A (Hg) 7471A (Se) 7740 (Ag) 7761	<ul style="list-style-type: none">• check to ensure that mercury quantities are within selected treatment facility requirements• ensure and document mercury totals for outgoing waste• ensure presence or absence of ten EPA/MI metals and document metal totals as required by off-site treatment facility

Outgoing heavy metal powders. Each waste stream that enters these drums has been segregated and in many cases analyzed for certain metals before being commingled. Before the waste is able to go out for continuing treatment, it requires additional analytical information.

TABLE A3.B6 Heavy Metals Powder Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
Metals: As, Ba, Cd, Cr, Pb, Hg, Se, Ag	SW-846 (As) 7060A (Ba) 7080A (Cd) 7130 (Cr) 7190 (Pb) 7421 (Hg) 7470A (Hg) 7471A (Se) 7740 (Ag) 7761	<ul style="list-style-type: none"> • check to ensure that mercury quantities are within selected treatment facility requirements • ensure and document mercury totals for outgoing waste • ensure presence or absence of ten EPA/MI metals and document metal totals as required by off-site treatment facility
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none"> • confirm that the waste “appears” as it should: color

Outgoing stabilized waste. This waste stream consists of the final product from the stabilization process. The intent of the process is to remove any characteristics that may cause the waste to be hazardous. This is intended to be a waste stream that would bind inert substances and make them less hazardous. DLD specifically works to keep organic and all listed material from this waste. Since all organic material is restricted from this waste stream, only metals may be detected.

TABLE A3.B7 Solidified Waste Requirements		
Parameter 40 CFR §264.13(b)(5)	Reference Methods 40 CFR §264.13(b)(2)	Reason For Analysis 40 CFR §264.13 (b)(1)
TCLP: complete without pesticides or herbicides	SW-846, 1311	<ul style="list-style-type: none"> • documentation of reduction of characteristics • documentation of applicability of landfill for the waste stream
Physical analysis confirmation - organoleptic testing	ASTM D 4979	<ul style="list-style-type: none"> • confirm that the waste “appears” as it should: color

A3.B.3 Procedures to Ensure Compliance with LDRs Requirements
[R 299.9627 and 40 CFR, Part 268]

In accordance with the LDR regulations, all wastes shipped off site will be analyzed to determine whether the waste meets the applicable LDR treatment standards specified in R 299.9627 and 40 CFR §268.41-43. All analytical results will be maintained in the operating record of DLD until closure of the facility. Wastes that are determined through analysis to meet treatment standards as specified in R 299.9627 and 40 CFR §268.41-43 may be land filled.

DLD will supply LDR notifications and certifications, including appropriate analytical records or documentation of generator knowledge to support the certifications, to the receiving facility with each shipment of waste. The notifications and certifications will contain the information required under R 299.9627 and 40 CFR §268.7.

A3.B.3(a) Spent Solvent and Dioxin Wastes
[R 299.9627 and 40 CFR §264.13(a)(1), 268.7, 268.30, 268.31, 268.40, 268.41, 268.42, and 268.43]

Spent solvent wastes (F001-F005) are generated at DLD. Generator process knowledge will be used to determine the presence of spent solvent wastes (F001-F005). This process knowledge will be documented with the waste profile and LDR notification. The LDR notification will provide additional information regarding the appropriate treatment standards for the waste and whether it has already been treated to the appropriate standards.

A3.B.3(b) Listed Wastes
[R 299.9627, R 299.9213, and R 299.9214 and 40 CFR, Sections 264.13(a)(1), 268.7, 268.33, 268.34, 268.35, 268.36, 268.39, 268.40, 268.41, 268.42, and 268.43]

Generator process knowledge will be used to determine whether the listed waste meets the applicable treatment standards or to demonstrate that the waste has been treated by the appropriate specified treatment technology. In accordance with R 299.9627 and 40 CFR §268.41, where treatment standards are based on concentrations in the waste extract, the facility will use TCLP to determine if waste meets the treatment standards.

Generator process knowledge will be documented with the waste profile and LDR notification.

A3.B.3(c) Characteristic Wastes

[R 299.9627, R 299.9208, and R 299.9212 and 40 CFR §261.3(d)(1), 264.13(a)(1), 268.7, 268.9, 268.37, 268.40, 268.41, 268.42, and 268.43 and Part 268, Appendix I and Appendix IX]

Generator process knowledge will be used to determine whether characteristic wastes meet the applicable treatment standards or to demonstrate that the waste has been treated by the appropriate specified treatment technology. In accordance with R 299.9627 and 40 CFR §268.41, where treatment standards are based on concentrations in the waste extract, DLD will determine if the wastes meet treatment standards.

Characteristic D008 lead nonwastewaters and D004 arsenic nonwastewaters may be analyzed using TCLP to determine compliance with treatment standards. If after treatment a hazardous waste displays a characteristic for the first time, the characteristic waste code will be added to the LDR notification and facility records. Wastes will be retreated, as appropriate, to meet the characteristic treatment standard prior to land disposal. In addition, generator process knowledge will be used to identify the underlying hazardous constituents that are expected to be present in D001 and D002 wastes. The generator process knowledge will be documented with the waste profile and LDR notification.

A3.B.3(d) Radioactive Mixed Waste

[R 299.9627 and 40 CFR §268.7, 268.35(c), 268.35(d), 268.36, and 268.42(d)]

☐ The facility does not generate radioactive mixed waste.

OR

☒ Generator process knowledge will be used to determine whether a radioactive mixed waste meets the applicable treatment standard.

OR

Currently, DLD only treats radioactive oxidizing compounds that exhibit the EPA characteristic of reactivity (D001, 40 CFR §261.21(4)). Prior to being shipped to a destination facility with the appropriate technology for disposal of radioactive wastes, these chemical compounds are deactivated by stabilization in cement, meeting the treatment standard set forth in 40 CFR §268.40, Treatment Standards For Hazardous Wastes, for the waste code D001 under the waste description and treatment/regulatory subcategory of "Ignitability (Oxidizer)" is based on 40 CFR §261.21(4).

A3.B.3(e) Leachates

[R 299.9627 and 40 CFR §260.10, 268.35(a), and 268.40]

☐ The facility does not generate single-source or multi-source F039 leachates.

OR

☒ Single-source leachate will not be combined to produce multi-source leachates.

DLD will conduct an initial analysis of all regulated constituents in F039 leachates and, based on the results of the analysis, develop a reduced list of constituents to be monitored on a regular basis.

A3.B.3(f) Laboratory Packs

[R 299.9627 and 40 CFR §268.7, 268.42(c) and Part 268, Appendix IV and Appendix V]

☐ The facility does not generate laboratory packs.

OR

☒ The laboratory packs generated at the facility are not land disposed.

DLD utilizes degreed Hazardous Waste Chemists to sort the lab packed chemicals. Using chemical knowledge, the chemists commingle or repackage lab pack wastes.

Lab packs generated by DLD are then sent to other EPA licensed facilities for disposal. These facilities are chosen based on their compliance with the treatment standards enumerated in 40 CFR §268.40, Treatment Standards For Hazardous Waste, and 40 CFR §268.42(c). Wastes commingled with other compatible lab pack hazardous wastes and non-lab pack hazardous wastes are sent for treatment utilizing treatment standards protective of human health and the environment.

Hazardous waste organic lab packs received at DLD are repacked and disposed off-site at high temperature hazardous waste incinerators with exhaust stack scrubbing units.

A3.B.3(g) Contaminated Debris

[R 299.9627 and 40 CFR §268.2(g), 268.7, 268.9, 268.36, 268.45, and 270.13(n)]

☒ Hazardous debris generated at DLD that exhibits the characteristics of ignitability, corrosivity, or reactivity will be treated using one of the extraction, destruction, or immobilization technologies identified in Table 1 of 40 CFR §268.45.

OR

☐ Contaminated debris is not generated at the facility.

Commingled debris accepted at DLD are repackaged and disposed of under the Thermal Destruction technology description in Table 1 – Alternative Treatment Standards For Hazardous Debris presented in 40 CFR §268.45, or any other allowed Treatment Standard. These facilities are chosen based on their compliance with the treatment standards enumerated in 40 CFR §268.40, Treatment Standards For Hazardous Waste, and 40 CFR §268.42, or 40 CFR §268.45, Treatment standards for hazardous debris.

A3.B.3(h) Waste Mixtures and Wastes with Overlapping Requirements
[R 299.9627 and 40 CFR §264.13(a), 268.7, 268.41(b), 268.43(b), and 268.45(a)]

Generator process information and/or analytical data will be used to demonstrate that waste mixtures and wastes carrying multiple codes are properly characterized. Wastes that carry more than one characteristic will be identified with a number for each characteristic.

A3.B.3(i) Dilution and Aggregation of Wastes
[R 299.9627 and 40 CFR §268.3]

Listed wastes, if destined for land disposal, may not be diluted from the point of generation to the point of land disposal. Characteristic wastes may only be diluted if (1) the waste is managed in a CWA/CWA-equivalent surface unit or a Class I Safe Drinking Water Act injection well, (2) the waste has a concentration-based treatment standard or is treated using the DEACT technology-based treatment standard, and (3) the waste is not a D003 reactive waste.

DLD may not dilute or partially treat a listed waste to change its treatability category (i.e., from nonwastewater to wastewater), in order to comply with different treatment standards. If the wastes are all legitimately amenable to the same type of treatment to be performed, then DLD may aggregate wastes for treatment.

A3.C NOTIFICATION, CERTIFICATION, AND RECORDKEEPING REQUIREMENTS
[R 299.9627 and R 299.9609 and 40 CFR §264.73, 268.7, and 268.9(d)]

DLD will perform the following procedures for preparing and/or maintaining applicable notifications and certifications to comply with LDRs:

A3.C.1 Retention of Generator Notices and Certifications
[R 299.9627 and 40 CFR §268.7(a)(7)]

DLD will retain a copy of all notices, certifications, demonstrations, data, and other documentation associated with compliance to LDRs.

The following notices and certifications submitted by the initial generator of the waste will be reviewed and maintained:

- Notices of restricted wastes not meeting treatment standards or exceeding levels specified in RCRA §3004(d), including the information listed in R 299.9627 and 40 CFR §268.7(a)(1).
- Notices of restricted wastes meeting applicable treatment standards and prohibition levels, including the information in R 299.9627 and 40 CFR §268.7(a)(2).

A3.C.2 Notification and Certification Requirements for Treatment Facilities
[R 299.9627 and 40 CFR §268.7(b)]

DLD will submit a notice and certification to the land disposal facility with each initial shipment of restricted waste or treatment residue of a restricted waste. The notice will include the information specified in R 299.9627 and 40 CFR §268.7(b)(4) and 268.7(b)(5).

If the waste or treatment residue will be further managed at a different treatment or storage facility, DLD will comply with the notice and certification requirements applicable to generators as specified in R 299.9627 and 40 CFR §268.7(b)(6).

A3.C.3 Waste Shipped to Subtitle C Facilities
[R 299.9627 and 40 CFR §268.7(a) and 268.7(b)(6)]

☐ DLD does not ship waste to Subtitle C facilities.

OR

☒ For restricted waste or waste treatment residues that will be further managed at a Subtitle C (hazardous waste management) facility, the facility will submit notifications and certifications in compliance with the notice and certification requirements applicable to generators under R 299.9627 and 40 CFR §268.7(a) and (b)(6). Each initial shipment of waste to be transported off site to a RCRA-authorized Subtitle C TSDF will include a written notification and certification that the waste either meets or does not meet applicable treatment standards of prohibition levels.

A3.C.4 Waste Shipped to Subtitle D Facilities
[R 299.9627 and 40 CFR §268.7(d) and 268.9(d)]

☐ DLD does not ship waste to Subtitle D facilities.

OR

☒ If DLD ships hazardous debris or characteristic waste to a Subtitle D facility, DLD will submit a one-time notification and certification for characteristic wastes, or listed wastes that are listed only because they exhibit a characteristic, that have been treated to remove the hazardous characteristic and are no longer considered hazardous. DLD facility will place a certification and all treatment records in DLD's operating log and send a notification and certification to the Director, or delegated representative, describing the wastes and applicable treatment standards and identifying the Subtitle D (solid waste management) disposal facility receiving the waste. On an annual basis, the notification and certification will be updated and re-filed if the process or operation generating the waste changes and/or if the Subtitle D facility receiving the waste changes.

A3.C.5 Recyclable Materials
[R 299.9627 and 40 CFR §268.7(b)(7)]

☐ DLD does **not accept** recyclable materials used in a manner constituting disposal.

OR

☒ For wastes that are recyclable materials used in a manner constituting disposal, in accordance with R 299.9206 and 40 CFR §266.20(b), DLD will submit a notice and certification to the Director, or delegated representative, with each shipment of waste describing the waste and applicable treatment standards and identifying the facility receiving the waste.

A3.C.6 Record Keeping

[R 299.9608(4), R 299.9609, R 299.9610(3), and R 299.9627 and 40 CFR §264.72, 264.73, 268.7(a)(5), 268.7(a)(6), 268(a)(7), and 268.7(d)]

DLD maintains a facility operating log in accordance with R 299.9609 and 40 CFR §264.73. The operating log consists of

Part 1: Waste Received/Shipped;

Part 2: Analyses;

Part 3: Site Monitoring Data;

Part 4: Inspections/ Incidents;

Part 5: Air Monitoring Data and other documents required by law to be part of the operating log..

Copies of all necessary notifications and certifications, as well as relevant inspection forms and monitoring data, are also maintained on file. Information will be maintained as required by law (currently, for a minimum of three years for inspection records and LDR notifications) or until facility closure (for inventory records).

If a significant manifest discrepancy is discovered (such as variation in piece count or misrepresentation of the type of waste) that cannot be resolved with the generator or transporter within 15 days of receipt, DLD will submit to the Director and Regional Administrator a letter describing the discrepancy and all attempts to reconcile the discrepancy. The letter will include a copy of the discrepant manifest or shipping document.

Recycling facilities: DLD will keep records of the names and locations of each entity receiving a hazardous waste derived product.

Facilities managing a restricted waste that is excluded from the definition of a hazardous or solid waste or exempt from Subtitle C regulations: DLD will place a one-time notice in the operating logs describing the generation, basis for exclusion or exemption, and disposal of the waste. For each shipment of treated debris, DLD will place a certification of compliance with applicable treatment standards in the operating logs.

A3.C.7 Required Notice

[R 299.9605(1) and 40 CFR §264.12(a) and (b)]

For all hazardous waste from a foreign source that are subject to 40 CFR part 262, subpart H, DLD will meet the notification requirements of CFR §264.12(a) and (b).

When DLD is to receive hazardous waste from an off-site source, DLD will inform the generator in writing that DLD has the appropriate license for and will accept the waste the generator is shipping. DLD will keep a copy of this written notice in the operating logs.

A4: SECURITY PROCEDURES AND EQUIPMENT

40 CFR §264.14

(Volume 1)

Physical Access

Access to the active portion of the facility is controlled by a chain link fence topped with strands of barbed wire. This fence contains seven gates which are secured by:

- padlocks (two gates);
- combination locks (three gates); or
- electronically activated, motorized openers (two gates).

Signage indicating “Danger” and “Unauthorized Personnel – Keep Out” are posted by each gate and at regular intervals along the length of the fence. The integrity of these signs, the gates and the fence are inspected on a monthly basis. The facility maintains a buffer zone on each side of the fence that is kept free of excess foliage.

All doors into the facility are locked at all times. Public access to the facility is controlled at all times.

Alarms and Surveillance

An electronic alarm system with motion sensors and contact closures secures various areas of the facility when they are not occupied. This system is connected to a central station alarm monitoring service that is staffed 24 hours a day, every day.

Key areas of the facility are covered by a video surveillance system. This system makes real-time video available for uses such as visitor screening, personnel tracking, process monitoring and vehicle tracking and identification.

FORM EQP 5111 TEMPLATE

A5: INSPECTION REQUIREMENTS

(Volume 1)

This document is an attachment to the Michigan Department of Environment, Great Lakes, and Energy's *Instructions for Completing Form EQP 5111, Hazardous Waste Treatment, Storage, and Disposal Facilities Construction Permit and Operating License Application Form*. See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), being R 299.9504, R 299.9508, R 299.9605 and Title 40 of the Code of Federal Regulations (CFR) §§264.15 and 270.14(b)(5), establish requirements for inspections at hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003

This license application template addresses requirements for inspections at the following hazardous waste management facility: DLD Environmental Services, Inc. in Plainwell, Michigan.
(Check as appropriate)

- ☒ Applicant for Operating License for Existing Facility
- ☒ Applicant for Operating License for New, Altered, Enlarged, or Expanded Facility

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INTRODUCTION

A5.A WRITTEN SCHEDULE

[R 299.9605 and 40 CFR §264.15(b)(1)]

A5.A.1 Types of Problems

[R 299.9605 and 40 CFR §264.15(b)(3)]

See Paragraph A5.A.2 below.

A5.A.2 Frequency of Inspection

[R 299.9605 and 40 CFR §§264.15(b)(4), 264.174, 264.193, 264.195, 264.226, 264.254, 264.278, 264.303, 264.347, 264.602, 264.1033, 264.1052, 264.1053, 264.1058, and 264.1083 through 264.1089, where applicable]

(a) Secondary Containment/Physical Structure

The physical structures of all areas managing hazardous waste are and will be checked the at least the first and last day of each work week for any deterioration. The seal coating will be checked for wear, any cracking in the cement will be noted and the presence of any liquid in the sumps will be noted. Maintaining the integrity of secondary containment is a priority.

(b) Equipment

- Processing equipment and hoods are and will be checked at least the first and last day of each work week to ascertain whether they are working properly, seals are intact, flaps are intact, air ducts are clear, fans are working properly and covers are in place.
- Shredders are and will be checked weekly to assure that airflow to the air pollution control devices is unobstructed. The filter press is checked for use and decontaminated monthly. Solvents for the gas neutralization processes are checked monthly as well.

(c) Containers

Containers are checked within 24 hours after they arrive onsite and at least weekly thereafter for leakage. Containers and their covers and closure devices holding hazardous materials are visually inspected to check for visible cracks, holes, gaps, or other open spaces into the interior of the container.

(d) Tanks

Tanks are checked at least the first and last day of each work week to insure that there is no leaking or corrosion of valves, fittings and seams. High level alarms are also checked at least the first and last day of each work week.

Tank liquid levels are recorded every working day.

Every two weeks the tank ancillary equipment and piping is checked for leaks, and the flange connection bolts are checked and tightened if necessary. Each tank's air pollution control device (charcoal filter) is tested once every three months for breakthrough. In addition, every tank is emptied, cleaned and then inspected by an independent, qualified and registered professional engineer once a year, who attests to tank system integrity.

(e) Communication Equipment

Safety and emergency communication devices, those being the telephone, intercom and two-way radios, are also checked weekly. A weekly check is made of the alarm system and warning lights. Tank high level alarms are and will also be checked weekly.

(f) Emergency Equipment

A weekly check of the following is and will be made. Safety showers and eyewash stations and condition of heat tape and circulating pumps in the winter. Fire extinguishers are checked for expiration dates and to make sure they are properly charged. Door seals on the decontamination room are checked to make sure they are intact. Contents of the multiple spill kits are checked for completeness. Pumps, hand pumps and vacuum pumps intended for emergency spills are checked for usability.

(g) Subpart BB and CC Inspections

Subpart BB regulates leaks from equipment that contacts hazardous waste streams equal or greater than 10% total organics. The majority of waste streams at DLD contain greater than 10% organics. Equipment at DLD covered by the regulations are vacuum pumps, valves in light liquid service, pipe flanges and pipe connections. An inspection program consisting of weekly visual inspections and an annual leak inspection is and will be conducted.

Subpart CC establishes VOC air emission control requirements for tanks and containers.

At DLD, our tanks meet Tank Level 1 control criteria, and are inspected once a year.

Containers at DLD meet the container control standard Level 1.

A5.B REMEDY SCHEDULE

[R 299.9605 and 40 CFR §264.15(c)]

All equipment, container and tank defects will be corrected as soon as possible, allowing for time to obtain parts or other repair equipment. Defects to the physical containment building will be corrected as soon as possible, with the limiting factors of obtaining parts and weather considerations.

A5.C INSPECTION LOG OR SUMMARY

[R 299.9605 and 40 CFR §264.15(d)]

At the present time, four inspection logs are kept at DLD:

1. A daily inspection log (Attachment A5-1);
2. A monthly inspection log (Attachment A5-2);
3. An auxiliary inspection log if the dock is in operation on a weekend (Attachment A5-3); and
4. A Grounds/Utility Inspection log for non-licensed areas (Attachment A5-4).

This last log covers security inspections such as gates, fencing, signage, lighting, etc. These inspection logs are representative of inspection logs prepared for all proposed hazardous waste management areas.

Note: Inspection data may be collected electronically and printed for paper record as necessary.

DAILY INSPECTION CHECK SHEET

	M	T	W	TH	F	Comments
Date:						
Time:						
Inspector's Initials:						
DLS-1 - Operating & Structural Equipment						
Containment Area:	No Cracks					
	No Deterioration					
	No Liquid in Sump					
Drums:	No Leaks					
	Covered Properly					
PCB Storage:	PCB Articles Not Leaking					
	PCB Containers Not Leaking					
	PCB Marks Displayed					
Safety & Emergency Equipment						
	Intercom Working					
DLS-2 - Operating & Structural Equipment						
Containment Area:	No Cracks					
	No Deterioration					
Drums:	No Leaks					
	Covered Properly					
Hammermill:						
	Flaps Intact					
	Integrity of Air Ducts					
	Fan Working Properly					
Shredder 3	Working Properly					
	No Deterioration					
	Fan working properly					
Shredder 2	Working Properly					
	No Deterioration					
	Fan Working Properly					
Blender:	Covers in Place					
Safety & Emergency Equipment:						
	Telephone/Intercom Working					
DLS-3 - Operating & Structural Equipment						
Containment Area:	No Cracks					
	No Deterioration					
	No Liquid in Sumps					
	Float Switch Operational					
Drums:	No Leaks					
	Covered Properly					
Tanks, Ancillary Equipment, & Piping:						
	No leaking or Corrosion of Valves/Fittings/Seams					
	High Level Alarms Working					
Fume Hoods:	Fume Hood #1 Fans Working					
	Fume Hood #2 Fans Working					
PCB Storage:	PCB Articles Not leaking					
	PCB Containers Not Leaking					
	PCB Marks Displayed					
Safety & Emergency Equipment:						
	Intercom Working					
DLS-4 - Operating & Structural Equipment						
Containment Area:	No Cracks					
	No Deterioration					
	No Free Liquid					
	Float Switch Operational					

Date:						
Time:						
Inspector's Initials:						
	M	T	W	TH	F	Comments
DLS-4 - Continued						
Tanks, Ancillary Equipment, & Piping:						
No leaking or Corrosion of Valves/Fittings/Seams						
High Level Alarms Working						
DLS-5 - Operating & Structural Equipment						
Shredder 4						
Working Properly						
No Deterioration						
Fan working properly						

	M	T	W	TH	F	Start Date	Finish Date
TANK LIQUID LEVELS							
Tank #1 -							
Tank #2 -							
Tank #3 -							
Tank #4 -							
Tank #5 -							
Tank #6 -							
Comments:							
(OOS = Out of Service) (NIU = Not in Use)							

SAFETY & EMERGENCY EQUIPMENT INSPECTIONS		
Inspected Weekly	Date Confirmed	Comments
Alarm System Tested & Operable		
Safety Shower Operable		
Shower Heat Tape Okay (in winter)		
Circulation Pump On (in winter)		

WEEKLY EQUIPMENT INSPECTIONS	
Shredders (Weekly Splintax Test)	
Shredder 3: Airflow Unobstructed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Shredder 2: Airflow Unobstructed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Shredder 4: Airflow Unobstructed?	<input type="checkbox"/> Yes <input type="checkbox"/> No

OPERATING & STRUCTURAL EQUIPMENT			
Inspected Bimonthly	Date Last Inspected	Date Inspected	Comments
Tanks, Ancillary Equipment, & Piping			
Flange Connection Bolts Intact DLS-3			
DLS-4			
Flange Connection Bolts Tightened DLS-3			
DLS-4			

MONTHLY INSPECTION SHEET

Inspection Date: _____

Time: _____

Inspector's Signature: _____

SAFETY & EMERGENCY EQUIPMENT INSPECTIONS

Inspected Monthly	Date Confirmed	Comments
Fire Protection		
Fire Extinguisher Dates Not Expired	_____	_____
Fire Extinguishers Properly Charged	_____	_____
Decontamination		
Decontamination Area Door Seals	_____	_____
Spill Control Equipment		
Absorbent Material	_____	_____
110 volt Suction Pumps (2)	_____	_____
Hand Pumps (2)	_____	_____
Air/Vacuum Pumps (3)	_____	_____

EQUIPMENT INSPECTIONS**Filter Press**Has press been used this month? ☐ Yes ☐ NoIf so, has it been decontaminated? ☐ Yes ☐ No**FILTERS**

Tested Quarterly	Date Last Tested	Date of Last Replacement	Dates Tested		Date Replaced
Tank #1 Charcoal Filter	_____	_____	_____	_____	_____
Tank #2 Charcoal Filter	_____	_____	_____	_____	_____
Tank #3 Charcoal Filter	_____	_____	_____	_____	_____
Tank #4 Charcoal Filter	_____	_____	_____	_____	_____
Tank #5 Charcoal Filter	_____	_____	_____	_____	_____
Tank #6 Charcoal Filter	_____	_____	_____	_____	_____
Tested Yearly					
Fume Hood #1 Charcoal Filter	_____	_____	_____	_____	_____
Fume Hood #2 Charcoal Filter	_____	_____	_____	_____	_____
Hammermill Charcoal	_____	_____	_____	_____	_____
Particulate Filter	_____	_____	_____	_____	_____
Tested Monthly					
Shredder #2 Charcoal Filter	_____	_____	_____	_____	_____
Shredder #3 Charcoal Filter	_____	_____	_____	_____	_____
Shredder #4 Charcoal Filter	_____	_____	_____	_____	_____

GAS NEUTRALIZATION PROCESS		
Solvents Used (lbs)	Date	Operator
H ₂ O:		
NH ₄ OH:		
Other solvents		

AUXILIARY INSPECTION CHECK SHEET
(To Be Used When Dock is Operational on Weekends)

Date:			
Time:			
Inspector's Initials:			
DLS-1 - Operating & Structural Equipment		DLS-4 - Operating & Structural Equipment	
Containment Area:	No Cracks	Containment Area:	No Cracks
	No Deterioration		No Deterioration
	No Liquid in Sump		No Free Liquid
Drums:	No Leaks		Float Switch Operational
	Covered Properly		Tanks, Ancillary Equipment, & Piping:
PCB Storage:	PCB Articles Not Leaking		No leaking or Corrosion of Valves/Fittings/Seams
	PCB Containers Not Leaking		High Level Alarms Working
	PCB Marks Displayed		
Safety & Emergency Equipment		DLS-5 - Operating & Structural Equipment	
	Intercom Working	Shredder 4	Working Properly
			No Deterioration
			Fan Working Properly
DLS-2 - Operating & Structural Equipment		TANK LIQUID LEVELS	
Containment Area:	No Cracks		Tank #1
	No Deterioration		Tank #2
Drums:	No Leaks		Tank #3
	Covered Properly		
Hammermill:	Seals Intact	(OOS = Out of Service)	Tank #4
	Flaps Intact	(NIU = Not in Use)	Tank #5
	Integrity of Air Ducts		Tank #6
	Fan Working Properly	COMMENTS	
Shredder 2	Working Properly		
	No Deterioration		
	Fan working properly		
Shredder 3	Working Properly		
	No Deterioration		
	Fan Working Properly		
Blender:	Covers in Place		
Safety & Emergency Equipment:			
	Telephone/Intercom Working		
DLS-3 - Operating & Structural Equipment			
Containment Area:	No Cracks		
	No Deterioration		
	No Liquid in Sumps		
	Float Switch Operational		
Drums:	No Leaks		
	Covered Properly		
Tanks, Ancillary Equipment, & Piping:			
	No leaking or Corrosion of Valves/Fittings/Seams		
	High Level Alarms Working		
Fume Hoods:	Fume Hood #1 Fans Working		
	Fume Hood #2 Fans Working		
PCB Storage:	PCB Articles Not leaking		
	PCB Containers Not Leaking		
	PCB Marks Displayed		
Safety & Emergency Equipment:			
	Intercom Working		

DRUG & LABORATORY DISPOSAL, INC.
GROUND/UTILITY INSPECTION CHECK SHEET
(Non-Licensed Area)

MONTHLY INSPECTIONS - This checklist should be completed by the 10th day of the month.
 (Annual inspections on reverse side)

Inspection Date: _____

Inspector: _____

BACK FLOW PREVENTERS	In place & functional
Southwest Garage	_____
Beside Parking Lot Light Pole	_____
Outside Overhead Door Leading to Dock (DLS-2)	_____
Outside on North End of Vehicle Maintenance Garage	_____

FIRE EXTINGUISHERS	Pins in place and correct expiration date
Warehouse (2)	_____
Maintenance Garages (3)	_____
Loading Dock (3)	_____
5-Car Garage (2)	_____
Reception Area (1)	_____
Office Hallways (2)	_____
Server Room (1)	_____
South Garage (1)	_____
DLS-5 (4)	_____
Decontamination Hallway (1)	_____

OUTSIDE LIGHTS	Intact & functional
Main Building (5)	_____
Parking Lot (1)	_____
Flag Pole (1)	_____
Warehouse (4)	_____
Emergency Exit Lighting (10)	_____
DLS-5 (1)	_____

PERIMETER FENCING & GATES	Intact & functional
Fencing (must walk perimeter)	_____
Gates (locks present)	_____
<i>No Authorized Personnel</i> signs	_____

FURNACE FILTERS	Locks intact & functional
New Mechanical Room (1)	_____
Decontamination Room Closet (1)	_____

OUTSIDE ENTRANCES	Locks intact & functional
Main Building (5)	_____
Warehouse (1)	_____
5-Car Garage (1)	_____
DLS-5 (2)	_____

COMMENTS:

YEARLY INSPECTIONS

This inspection should be completed no later than May 1 each year.

Inspection Date: _____

Inspector: _____

AIR CONDITIONER Primary Coils	Date Cleaned
Decon AC	_____
Breakroom AC	_____
Main Office AC	_____
Lab/Hall AC	_____

AIR CONDITIONER FILTERS Central Roof Air Intake	Replace annually (enter date)
Breakroom AC	_____
Main Office AC	_____
Lab/Hall AC	_____

AIR CONDITIONER Secondary Coils	Date Cleaned
Decon AC	_____
Breakroom AC	_____
Main Office AC	_____
Lab/Hall AC	_____

BACKFLOW PREVENTER	Must be checked annually by licensed plumbing firm

Firm Name _____ Inspection Date _____

Signature _____