FORM EQP 5111 TEMPLATE MODULE A6

A6: PREPAREDNESS AND PREVENTION

(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), R 299.9504, R 299.9508, and R 299.9606 and Title 40 of the Code of Federal Regulations (CFR) §§264.30 through 264.37 establish requirements for preparedness for and prevention of releases of hazardous wastes or constituents 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 preparedness for and prevention of releases of hazardous wastes or constituents at the following hazardous waste management facility for the DLD Environmental Services, Inc. in Plainwell, Michigan.

(Check as appropriate)

Applicant for Operating License for Existing Facility:

- ☒ No waiver requested
- ☐ Waiver requested for one or more units for required equipment
- ☐ Waiver requested for one or more units for required aisle space

Applicant for Operating License for New, Altered, Enlarged, or Expanded Facility:

- ☒ No waiver requested
- ☐ Waiver requested for one or more units for required equipment
- ☐ Waiver requested for one or more units for required aisle space

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(Volume 1)

This template is organized as follows:

INTRODUCTION

DLD has been designed and constructed and is maintained and operated to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or water which could threaten human health or the environment.

A6.A REQUIRED EQUIPMENT

[R 299.9606 and 40 CFR §264.32]

A6.A.1 Internal Communication System

[R 299.9606 and 40 CFR §264.32(a)]

1. An internal alarm system to signal all facility personnel has been installed. It consists of seven loud horns and an external visual alarm consisting of two flashing red lights. Activation switches have been placed in seven locations.

2. For external communication or to summon emergency assistance from local police departments, fire departments or emergency response teams, DLD has installed a telephone/intercom system with 30 extensions, five of which are located outside the office area.

3. Many dock employees and managers are equipped with two-way radio sets for added safety and convenience.

A6.A.2 Emergency Response Communication System

[R 299.9606 and 40 CFR §264.32(b)]

Evacuation codes:

1. Evacuation code is one continuous blast of the horns.

2. Man down, needs assistance is one short blast of the horns.

3. Testing is done with three short blasts of the horns.

4. Weather warnings prompting dock evacuation or take cover warnings will be accomplished by alerting all employees over the intercom and by two-way radio.

A6.A.3 Fire, Spill, and Decontamination Equipment
[R 299.9606 and 40 CFR §264.32(c)]

Emergency equipment available at DLD includes the following:

EQUIPMENT DESCRIPTION	LOCATION	EMERGENCY RESPONSE USAGE
1. Twenty-nine Type ABC fire extinguishers • Three 10# • Three 10# • Eight 10# • One 10# • Three10# • Three 10# • One 20# • Two 10# • One 10# • Three 6# • One 11# • Two 20# • Four 10#	DLS-1 DLS-2 DLS-3 DLS-4 RCRA Loading Dock Vehicle Maint. G. Warehouse Warehouse Dock Main Lab Lobby/Halls Server Room 5-Car Garage DLS-5	Extinguishing Type A (e.g. trash, wood, paper), Type B (e.g. liquids and grease), and Type C (e.g. electrical equipment) fires.
2. One 30# D-type fire extinguisher	Dock Office	Extinguishing alkaline earth metal fires.
3. One Halon fire extinguisher	Metals Lab	Extinguishing Type A, B, & C fires.
4. Two 110 V AC suction Pumps	DLS-1 RCRA Loading Dock	Suction of liquids from sump area if not served by compressed air.
5. Two hand-operated pumps	DLS-1	Suction of small volumes of liquid from areas not served by compressed air or electricity.
6. Two air-driven vacuum pumps with 1½" inlet and outlet.	DLS-1 or DLS-3	Transfer of liquids, both viscous and non-viscous, as in spill clean-up.

7. One air-driven vacuum pump with 3” inlet and outlet	DLS-1 or DLS-3	Transfer of liquids, both viscous and non-viscous, as in spill clean-up.
EQUIPMENT DESCRIPTION	**LOCATION**	**EMERGENCY RESPONSE USAGE**
8. Spill clean-up material: Oil dry, sawdust, brooms, pads, booms	DLS-3 , RCRA Loading Dock, Warehouse	As appropriate to the type of material spilled. Sawdust is not used on spills with potential for oxidation.
9. Personal equipment—modified Level C (hard hats, face shields, rubber gloves, respirators, coveralls)	Decontamination Room	Clean-up of spills requiring not higher than Level C protection.
10. Personal equipment—modified Level C (same as # 9 plus supplied air)	Decontamination Room	Clean-up of spills requiring not higher than Level C protection.
11. Telephone/Intercom • Driver’s Phones • Two-way radio set • Radio System (5)	Twenty-five office locations, five locations outside	Communication with office via intercom and with emergency responders.
12. Alarm system consisting of seven loud horns and seven activation locations	Entire Facility	Evacuation signal
13. Two visual alarms consisting of flashing red lights	West side of maintenance garage roof and west side of warehouse (outside west door)	Additional evacuation signal for outside areas when noise is a factor.
14. Mercury Vacuum	DLS-1	Clean-up of mercury spills
15. Decontamination Equipment: bucket, 1A2 drum, brushes, pump	DLS-1, DLS-2, or DLS-3	Clean-up of PCB spills
16. Emergency Gate Opener	Right side of west door of warehouse	Emergency evacuation of employees and access to facility by emergency vehicles

A6.A.4 Adequate Water Volume
[R 299.9606 and 40 CFR §264.32(d)]

The following is the fire flow information for the hydrant in front of DLD. The hydrant was last tested in 2004.

Static pressure:	57 psi
Residual pressure:	50 psi
Gallons per minute at 20 psi:	2607 gpm

A6.B TESTING AND MAINTENANCE OF EQUIPMENT
[R 299.9606 and 40 CFR §264.33]

All facility communication and alarm systems, fire extinguishers, spill control equipment, and decontamination equipment are tested or maintained as necessary to assure proper operation.

Spill control equipment by type, amount, location and usage are as follows:

1. Adsorbents.

a. Oil dry is a granulated clay adsorbent used for spills in which the spilled chemical is an oxidizer. This product is supplied in 50-pound bags and at least one bag is ready for immediate use at all times. Additional 50-pound bags are inventoried in the warehouse.

b. Sawdust is also available. This is the adsorbent of choice for small spills of non-oxidizing chemicals because the spill material adsorbed onto sawdust is acceptable to off-site RCRA incinerators.

c. Hydrophobic adsorbent pads are stored on the loading dock and are used for adsorption of oil spills. These pads, in conjunction with a Type 304 stainless steel cover, are used to seal off the storm drain located outside the loading dock. This cover is stored in the loading dock area. Also, an absorbent boom which is hydrophobic is stored in the loading dock area to aid in the isolation of this storm drain.

In the event of a spill, all associated adsorbents are removed using non-sparking shovels.

2. Mercury Vacuum.

This is a vacuum cleaner specially designed to create suction and at the same time filter the exhaust to prevent the escape of mercury vapors. This piece of equipment is used to clean up mercury spills and is stored in DLS-1.

3. Fire Extinguishers.

There are at least twenty-five Type ABC fire extinguishers (one 20#, twenty-four 10#,) placed in strategic locations throughout the facility. ABC extinguishers have been rated by the National Fire Protection Association for use on Type A materials (such as trash, wood, paper), Type B materials (such as liquids and grease), and Type C materials (such as electrical equipment).

Also available in the Dock office is one purple-K fire extinguisher, used to extinguish alkaline earth metal fires.

4. Suction Pumps.

There are two 110V AC suction pumps, located on the loading dock and DLS-1, for use in the suction of liquids from sump areas not served by compressed air.

5. Hand-operated Pumps.

There are two hand-operated pumps located in DLS-1 for use in the suction of small volumes of liquid from areas not served by compressed air or electricity.

6. Air-driven Vacuum Pumps.

There are two air-driven vacuum pumps, one with a 1½-inch inlet and outlet and one with a 3-inch inlet and outlet. Both can be used for the transfer of both viscous and non-viscous liquids in spill clean-ups.

7. Personal Protection Equipment--Level D.

There is Level D personal protection equipment (hard hats, face shields, rubber gloves, respirators, coveralls) located in the decontamination room for clean up of spills requiring not higher than Level D protection.

8. Personal Protection Equipment--Level C.

There is Level C personal protection equipment (same as Level D plus supplied air) located in the decontamination room for clean up of spills requiring not higher than Level C protection.

A6.C ACCESS TO COMMUNICATIONS OR ALARM SYSTEM
[R 299.9606 and 40 CFR §264.34]

A6.C(1) Multiple Employees Present
[R 299.9606 and 40 CFR §264.34(a)]

Whenever hazardous waste is being poured, mixed, or otherwise handled, all personnel involved in the operation have immediate access to an internal alarm system and also have immediate access to the external communication system (telephone/intercom). Many employees also carry two-way radios.

A6.C(2) Single Employee Present
[R 299.9606 and 40 CFR §264.34(b)]

DLD does not allow an employee to work alone in the waste processing area while the facility is in operation. Although a single employee would have immediate access to communication equipment, it is DLD policy that employees in the waste handling area do not work alone.

A6.D REQUIRED AISLE SPACE
[R 299.9606 and 40 CFR §264.35]

DLD is currently licensed for the storage of 614 55-gallon drums or smaller containers up to 33,770 gallons in equivalent volume. The aisle space necessary for unobstructed movement of personnel and equipment is based on the formula of 1.6 times the diameter of the containers forming the aisle. In those areas where aisles are created by the storage of 55-gallon drums, the aisle space will be maintained at 24 inches. These aisles will be widened whenever requested for the convenience of inspectors. Due to the limited size of the DLD storage area, aisles are never longer than 20 feet which allows for the unobstructed movement of personnel, fire equipment, and decontamination equipment to any area of the facility operation in an emergency. Drums are always stored with labels facing the aisle.

A6.E STATE AND LOCAL AUTHORITIES
[R 299.9606 and 40 CFR §264.37]

A6.E.1 Arrangements with State and Local Authorities
[40 CFR §264.37(a)(1)]

All entities (police, ambulance, hospital, and fire) receive updated copies of DLD's contingency plan whenever pertinent revisions are made. Each one is aware of DLD's location and activities and recognizes the inherent hazards as well as benefits of having such a facility in the community. Representatives of the Plainwell Fire and Police Departments have toured the facility so as to familiarize themselves with the physical layout.

Representatives of the Plainwell Area Ambulance service and the local hospital (Borgess-Pipp Hospital) were invited to a site tour and meeting. They did not come. A packet of information was sent to them which included general facility information, DLD's contingency plan, and the evacuation diagrams. The packets were sent by registered mail. A written response was received from a person representing both Borgess-Pipp Hospital and the Plainwell Area Ambulance service, indicating they had gone over the information DLD had sent and also had discussed a joint response to DLD emergencies with law enforcement (see Attachment A7-1).

A6.E.2 Refusal of State or Local Authorities to Enter into Emergency Response Agreements

[R 299.9606 and 40 CFR §264.37(b)]

A6.F ADDITIONAL PREPAREDNESS / PREVENTION MEASURES

Measures Taken to Prevent Hazards in Loading and Unloading Operations

[R299.9504(1)(c) and CFR 270.14(b)(8)(i)]

The containment volume of the loading area is sufficient to contain all of the liquid from a catastrophic failure of bulk transportation equipment and is more than sufficient for non-bulk shipments. Floors are sealed and a blind sump is available to help in spill control.

All hazardous waste activities are conducted in contained areas minimizing the possibility of release to the environment in the event of a spill. Additionally, eight carbon adsorption filters and a closed loop vapor system have been installed on the tanks to limit the escape of fugitive emissions into the atmosphere.

A vapor control system is in use as part of the tank systems. This system directs vapors from bulk transportation equipment to the tank systems during the tanker loading or unloading operations thus eliminating the escape of fugitive vapors. In the event that a DLD bulk waste shipment is rejected at its destination, the shipment could be returned to DLD and off-loaded back into a storage tank. These liquid transfers are accomplished by use of portable pumps operating from the 100 p.s.i. air pressure which is supplied throughout the facility.

Measures to Prevent Runoff and Flooding

[R299.9504(1)(c) and CFR 270.14(b)(8)(ii)]

The chemical waste processing area is elevated 26 inches above ground level, and is enclosed on three sides by walls, with a fourth side open to provide emergency evacuation access to employees. The waste processing area is bound by a six-inch curb on all 4 sides. As this area is elevated, no water run-on occurs during a storm event. In addition, the area has a 10-foot concrete apron extending outward easterly from the building at ground level to protect against soil contamination in the event of a spill of hazardous waste. The roof of the facility along the open side has been specifically engineered to prevent rainwater blow-in. It has an 18 inch overhang, and is designed with a system of baffles which prevent rainwater from simply running off the roof and blowing back into the building. The baffles divert rainwater into three leads, which in turn channel the water to the ground below the elevated chemical waste processing area.

Measures to Prevent contamination of Water Supplies
[R299.9504(1)(c) and CFR 270.14(b)(8)(iii)]

DLD uses a municipal water source and is not adjacent to any city wells. DLD does not utilize the City of Plainwell's wastewater treatment plant except for sewage. All wastewater from DLD, including that water pumped from blind sumps, run on from storms and water used during processing is sent off-site for disposal.

Measures to Mitigate Effects of Equipments Failures and Power Outages
[R299.9504(1)(c) and CFR 270.14(b)(8)(iv)]

DLD has a full facility backup diesel generator. In addition DLS has several small generators (1500 Watt) that in case of emergencies could be utilized to run pumps and equipment. Hand pumps are available in case of a spill.

Measures to Prevent Undue Exposure to Personnel
[R299.9504(1)(c) and CFR 270.14(b)(8)(v)]

Personal protective equipment (PPE) is utilized by DLD to protect its employees. A hazard assessment is made for each employee's job description and PPE suitable for that job is required. This includes, but is not limited to, respiratory protection, eye protection, hearing protection and protective clothing.

To further protect human health, the power tools used in the DLS-3 waste handling area are air driven rather than electric to prevent sparking. In addition, overhead lighting in all current and future processing areas is rated at least IP67 an/or explosion proof, as required.

Measures Taken to Prevent Releases into the Atmosphere
[R299.9504(1)(c) and CFR 270.14(b)(8)(vi)]

Waste processing takes place either within a closed-loop system or under pollution control devices. All tanks are equipped with carbon filters also to mitigate fugitive emissions while being filled or emptied. DLD abides by PA Act 451, Part 55 and the requirements of 49 CFR Subparts BB and CC.

FORM EQP 5111 TEMPLATE MODULE A7

A7: CONTINGENCY PLAN

(Volume 1)

This document is an attachment to the Michigan Department of Environment, Great Lakes, and Energy's (EGLE) *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), R 299.9501, R 299.9508(1)(b), R 299.9504(1)(c), R 299.9521(3)(b), R 299.9607, and Title 40 of the Code of Federal Regulations (CFR) §§264.50 through 264.56, and 270.14(b)(7), establish requirements for contingency plans 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 a contingency plan at the hazardous waste management facility for *DLD Environmental Services, Inc.* (DLD) in *Plainwell,*, Michigan.
It is recommended that DLD perform annual drill exercises with the local fire department and emergency responders using the contingency plan to make sure all staff are familiar with the plan and determine whether the plan needs any updating.

(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

A7.A BACKGROUND INFORMATION

A7.A.1 Purpose of the Contingency Plan

[R 299.9607 and 40 CFR §§264.51 and 264.53]

This Contingency Plan has been prepared in accordance with the requirements of 40 CFR, Part 264, Subpart D, and R 299.9607. It is designed to establish the necessary planned procedures to be followed in the event of an emergency situation at the DLD facility in Plainwell, Michigan, such as a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or water.

The provisions of this plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

Copies of the Contingency Plan have been provided to emergency response agencies in order to familiarize them with the facility layout, the properties of the material handled, locations of the working areas, access routes into and within the facility, possible evacuation routes from the facility, and types of injuries or illness that could result from releases of materials at the facility. This information has been submitted to:

Plainwell Public Safety (Fire and Police)
141 North Main Street
Plainwell, MI 49080

Borgess-Pipp Hospital
411 Naomi Street
Plainwell, MI 49080

Plainwell Area Ambulance Service
413 Naomi Street
Plainwell, MI 49080

Attachment A7-1 includes documentation that each of these agencies has received a copy of the Contingency Plan. Whenever the Contingency Plan is modified, the facility will provide the agencies with a copy of the modified plan.

A7.A.2 Description of Facility Operations

DLD Environmental Services, Inc. transports, treats, processes and stores a wide variety of small volume chemical wastes generated by small industries, academic institutions, and hospitals. DLD currently operates first and third shifts.

Hazardous wastes accepted at DLD can be classified into four groups:

1. Characteristic Wastes
    - Ignitable (40 CFR 261.21)
    - Corrosive (40 CFR 261.22)
    - Reactive (40 CFR 261.23)
    - Toxic (40 CFR 261.24; R299.9219)

2. Hazardous Waste from Nonspecific Sources (40 CFR 261.31; R299.9221)

3. Hazardous Waste from Specific Sources (40 CFR 261.32; R299.9223)

4. Discarded Commercial Chemical Products, Off-Specification Species, Container Residue, and Spill Residues Thereof (40 CFR 261.33; R299.9226)

DLD acceptable waste codes may be found in Part A, Form 5111.

DLD currently has five hazardous waste management units:

1. Hazardous Waste Loading Bay: Set up specifically as access for incoming and outgoing waste, including temporary storage. Processing of waste filter cakes may also occur here. (See Volume 1, Attachment B6-1.6)

2. DLS-1: Used for DLD's Main PCB storage area, elemental mercury storage, and as a process area for infectious material. This room is climate controlled and used for temporary storage of chemicals that require temperature adjustment before processing. (See Volume 1, Attachment B6-1.2)

3. DLS-2: A fairly small area on the dock containing saws, grinders, shredders, blenders and other electrical equipment. This is where solvent blending and debris shredding takes place. Because of limited room, it is rarely used for storage and used mainly for a processing area. (See Volume 1, Attachment B6-1.3)

4. DLS-3: This area is set up as work area in the center and storage on the perimeter. DLS-3 is also a containment area for three 5,000-gallon stainless steel waste storage tanks. (See Volume 1, Attachment B6-1.4)

5. DLS-4: A containment area for an additional three 5,000-gallon stainless steel waste storage tanks. DLS-4 is not used for waste processing. (See Volume 1, Attachment B6-1.5)

6. DLS-5: This area is currently used to store and treat non-hazardous waste. Upon licensing it will be utilized as both a storage area and a waste processing area. DLS-5 is constructed of steel and concrete. The floor is composed of hydrophobic concrete and the berms along the walls provide for secondary containment. (See Volume 2, Attachment B6-50)

In addition to the currently existing facilities outlined above, DLD is proposing the addition of seven additional hazardous waste units, DLS-7 through DLS-23. Each of these units are addressed in separate volumes included within this license application. DLS-7 through DLS-23 have been designed and DLD is awaiting license approval to begin construction.

A7.A.3 Identification of Potential Situations

This contingency plan could be activated in the event of a fire, an explosion, a tornado or strong wind storm, a direct lightning strike causing electrical or fuel fed fire, an earthquake, or a release of a hazardous chemical in a gaseous form. It could also be activated by a train derailment or collision (DLD is situated between two rail lines).

A7.B EMERGENCY COORDINATORS
[R 299.9607 and 40 CFR §§264.52 and 264.55]

A7.B.1 Identification of Primary and Alternate Emergency Coordinators
[R 299.9607 and 40 CFR §§264.52 and 264.55]

At all times there is at least one employee, either on the facility premises or on call and within reasonable travel distance of the facility, with the responsibility for coordinating all emergency response measures. The list of employees designated as emergency coordinators is contained in Table A7.B.1. The coordinators are listed in the order in which they will assume responsibility.

A7.B.2 Qualifications of the Emergency Coordinators
[R 299.9607 and 40 CFR §264.55]

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Table A7.B.1 Identification of Primary and Alternate Emergency Coordinators

DLD Environmental Services, Inc., Plainwell, MI

Facility Contacts	Name	Address	Work Phone	Mobile Number (24/7)
Primary Coordinator	Robert Pickett	744 109th Ave. Plainwell, MI 49080	(269) 685 - 9824 x236	(269) 806 - 1661
Secondary Coordinator	Elba Fernandez	4618 Bishop Rd. Portage, MI 49002	(269) 685 - 9824 x238	(269) 598 - 7712
Tertiary Coordinator	Charlie Walker	2326 Benton Avenue Kalamazoo, MI 49008	(269) 685 - 9824 x216	(269) 303 - 5765

A7.B.3 Authority to Commit Resources
[R 299.9607 and 40 CFR §264.55]

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All emergency coordinators are authorized to commit any necessary resources of the company that may be needed to carry out the Contingency Plan.

A7.C IMPLEMENTATION OF THE CONTINGENCY PLAN
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The emergency coordinator must be contacted immediately in the occurrence of any situation that may result in potential or actual threats to human health or the environment. The emergency coordinator must implement this plan whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

When the emergency signal is activated, the emergency coordinator will immediately go to the employee gathering place to be apprised of the situation and receive headcount totals. In the event the emergency coordinator is on-duty but not on the premises, DLD's emergency number will be forwarded to their land line or a dedicated cell phone, and the emergency coordinator will appraise the situation, give instructions to personnel present at the site, and immediately proceed to DLD.

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A7.D EMERGENCY PROCEDURES

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The following general procedures have been established for implementation by facility personnel and the emergency coordinator in order to efficiently respond to the release of hazardous waste or hazardous waste constituents that could threaten human health or the environment. The facility's procedure for assessing offsite risk during and after a significant release is provided in Attachment A7-4.

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A7.D.1 Immediate Notification Procedures for Facility Personnel and State and Local Agencies with Designated Response Roles

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The list of emergency contacts in Table A7.D.1 (below) identifies local emergency response agencies and state and federal authorities that must be notified in the event of an imminent or actual emergency situation requiring response. The emergency coordinator will be responsible for ensuring that all appropriate authorities are notified as necessary.

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Table A7.D.1
Federal, State, and Local Response Contacts

Local:

Plainwell Fire Department	911
Plainwell Police Department	911
Allegan County Sheriff Department	911
Plainwell Area Ambulance	(269) 685-6172
Borgess-Pipp Health Center Emergency Dept.	(269) 685-0737
Bronson Methodist Hospital Level I Trauma Unit	(269) 341-6386
Consumers Electric	(800) 477-5050
Michigan Gas Utilities (gas)	(800) 401-6451

State:

MIDEQ's Pollution Emergency Alerting System (PEAS)	(800) 292-4706

National:

National Response Center: (NRC)	(800) 424-8802

A7.D.2 Procedures to Be Used for Identification of Releases

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The emergency coordinator will immediately do the following in the event of an emergency:

1. Activate the internal facility alarm at DLD if it has not already been activated. This is a loud electric buzzer which emits a continuous sound and can be activated from many locations within DLD's facility by any DLD employee. The purpose of the alarm is to alert facility personnel of an actual or imminent danger and for personnel to take appropriate action. This alarm system will be expanded to the proposed hazardous waste management units as they are constructed.

2. If the alarm was activated by someone other than the Emergency Coordinator, that individual must report to the Emergency Coordinator at the regrouping location and convey the circumstances that necessitated the activation of the alarm. If emergency assistance has not already been called, the Support Operations Director will call for emergency assistance if directed to do so by Emergency Coordinator.

3. Identify the character, exact source, amount and extent of released material or determine the reason for activation of the alarm.

During or immediately following evacuation, the emergency coordinator or a person he designates will cut power and gas to the facility if necessary to to mitigate fire and explosion hazards. The shut-off valves are located as follows:

Gas Shut-off Valves: Located on the outside of the building on the east side of the southeast corner of the metals lab.

Electric Panels: Three gray electric panels located on the west wall of the cylinder storage area.

A7.D.3 Procedures to Be Used to Assess Potential Hazards to Human Health and the Environment

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The emergency coordinator will assess possible hazards to human health and the environment that may have resulted from any release of a hazardous material. This assessment will consider both direct and indirect effects of the release, such as the effects of any toxic, irritating, or asphyxiating gases that are generated as well as the effects of any hazardous surface water run-off from water or chemical agents used to control fire.

A7.D.4 Procedures to Determine if Evacuation Is Necessary and Immediate Notification of Michigan Pollution Emergency Alerting System and the National Response Center

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

If the emergency coordinator's assessment indicates that evacuation of facility areas may be advisable, he will implement the evacuation plan for the facility. If the emergency coordinator's assessment indicates that evacuation of the surrounding local areas is also advisable, the appropriate local authorities will be immediately notified (see Table A7.D.1). The National Response Center will also be notified (see Table A7.D.1, above), and the following information will be provided:

1. Name and telephone number of the reporting individual
2. Name and address of the facility
3. Time and type of incident
4. Type and quantity of materials involved
5. Possible hazards to human health or the environment
6. Extent of injuries, if applicable

The facility's evacuation plan is included in this Contingency Plan as Attachment A7.2.

A7.D.5 Procedures to Be Used to Ensure that Fires, Explosions, and Releases Do Not Occur, Reoccur, or Spread During the Emergency

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(e), 264.227, and 264.200]

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Whenever there is an imminent or actual emergency situation where the potential or actual release of hazardous waste or hazardous waste constituents may threaten human health or the environment, the facility will implement the following procedures.

During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, or releases do not recur or spread to other areas of the facility, or off site. A fire suppression system will be activated upon evidence of a fire.

These measures will include stopping processes, collecting and containing released waste and removing or isolating containers. At DLD, containing released hazardous waste is automatic since all hazardous waste containment units have secondary containment structures. Household Hazardous Waste (HHW) is, at times, stored in containers on the warehouse loading dock. These areas have concrete floors and enclosed drains. All actions necessary to prevent spills from reaching the outside environment must be taken. Additionally, the emergency coordinator will monitor for leaks, pressure buildups, gas generation, or ruptures in primary containment vessels, valves, pipes, or equipment whenever appropriate.

The emergency coordinator will ensure that in the affected areas of the facility no waste incompatible with released material will be treated, stored, or disposed of until cleanup procedures are completed and emergency equipment listed in this plan is cleaned and fit for its intended use.

For DLS1, DLS-2, DLS-3, DLS-4, & HWLB:

- Evacuation Diagrams can be found in Volume 1, Attachment A7-2
- An Emergency Equipment List can be found in Volume 1, Attachment A7-3.

A7.D.6 Procedures to Be Used to Monitor Equipment Should Facility Operations Cease

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(f)]

The emergency coordinator will coordinate staff to monitor for leaks, pressure buildup, gas generating, or ruptures in valves, pipes, or other equipment, should the facility operations cease.

A7.D.7 Procedures to Provide Proper Treatment, Storage, and Disposal for Any Released Materials

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(g)]

Immediately after an emergency, the emergency coordinator must coordinate the treating, storing, or disposing of recovered waste, contaminated soil, surface water, or any other recoverable material that has resulted from a release or fire at the facility. This recovered material will be managed as necessary to comply with all applicable rules and regulations and to prevent harm to human health and the environment.

A7.D.8 Procedures for Cleanup and Decontamination

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(h)]

After any release of hazardous waste that has required the implementation of the contingency plan, the owner or operator of DLD will do all of the following:

1. Assure that the affected part of the facility and affected equipment has been repaired, if necessary, and is in compliance with all regulations.

2. Certify that any necessitated repairs have been completed to current industrial and/or good practice standards.

3. Notify the EPA Region 5 Administrator and State authorities that the facility is in compliance with all regulations and is ready to resume operations.

4. Note in the operating log the time, date, and details of the incident that required implementation of the contingency plan.

A7.E RESUMPTION OF OPERATIONS AND RECORD KEEPING REQUIREMENTS

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(h) and (i)]

The following subsections identify procedures that must be followed to meet the notification and record keeping requirements.

A7.E.1 Procedures to Be Used Prior to Resuming Operations

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(h)]

Before operations are resumed, an inspection of all emergency equipment will be conducted. The emergency coordinator must notify the EPA, MDEQ, and local authorities that post-emergency equipment maintenance has been performed and operations at the facility will be resumed.

Within fifteen days submit a written report of the incident to the EPA Region 5 Administrator and State authorities. The report will include:

a.

Facility name:	DLD Environmental Services, Inc.
Address:	331 Broad Street, Plainwell, MI 49080
Telephone number:	269-685-9824
EPA ID number:	MID092947928
Owner/Operator:	Brent W. Walter

b. Date, time, and type of incident (e.g., fire, release, etc.).

c. Name and quantity of materials involved.

d. Extent of injuries, if any.

e. An assessment of actual or potential hazards to human health or the environment.

f. Estimated quantities and disposition of recovered material that resulted from the incident, including the likely route of migration of any release and the type characteristics of surrounding soil if a surface release has occurred.

g. The results of monitoring and/or sampling that may have been necessary due to the release.

h. The proximity of downgradient drinking water sources, surface water, and population areas, as applicable to the release.

i. A description of response actions taken or those actions deemed necessary based on observation and/or monitoring and sampling of the release area.

A7.E.2 Record Keeping Requirements

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(i)]

A7.E.2(a) Operating Record

In the event of an emergency situation that requires implementation of the Contingency Plan, the emergency coordinator will record in the facility's operating record the time, date, and description of the event. The operating record is maintained by DLD Environmental Services, Inc. and can be found at the following location: 331 Broad Street, Plainwell, MI 49080.

A7.E(2)(b) Written Incident Report

Within 15 days of an incident requiring implementation of the Contingency Plan, the DLD facility will submit a written incident report to EGLE at the following address:

Chief of the Office of Materials Management Division
Department of Environment, Great Lakes, and Energy
P.O. Box 30241
Lansing, MI 48909

The report will contain the following information:

1. Name, address, telephone number, and site identification number of the facility and the owner/operator.
2. Date, time, and type of incident.
3. Type and quantity of materials involved.
4. Assessment of actual or potential hazards to human health and the environment.
5. Extent of injuries, if applicable.
6. Estimated quantity and disposition of recovered materials that resulted from the incident.

A7.F PROCEDURE FOR ASSESSING OFFSITE RISK DURING AND AFTER A FIRE/EXPLOSION INCIDENT OR SIGNIFICANT RELEASE

[R 299.9521(3)(b) and R 299.9607 and 40 CFR §264.56(d)]

Air Monitoring During Incident

1.a If possible, model dispersion and deposition of the release with real time parameters to determine likely extent of plume and assist local authorities making shelter-in-place or evacuation recommendations.

1.b Establish air monitoring equipment in locations upwind and downwind of the incident using visual/meteorological data, and update, as needed, with modeling results. Monitoring should continue until downwind data is consistent with upwind values.

1.c Air monitoring should be conducted utilizing approved methods and include as many of the identified substances as possible. In the event of a fire/explosion, continuous particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) should be monitored as well. The Contingency Plan should indicate what kind of monitoring equipment may be necessary (e.g., $PM_{2.5}$ meters for fire events, SUMMA canisters/Tedlar bags for volatile organic compounds released from ruptured tanks), and which ones will be readily available.

Record Incident Parameters

2.a Document the time the incident began and the duration of the overall incident. Identify the specific location(s) where the incident began.

2.b Identify employees/witnesses having direct involvement or direct knowledge of the incident.

2.c Identify any relevant witnesses to the incident.

2.d Gather local meteorological data from the National Weather Service (point-specific data are available at the National Oceanic and Atmospheric Administration web site) and identify any characteristics noted by personnel directly involved with the incident or recorded elsewhere.

Develop Narrative

3.a Determine the sequence of events and time line leading up to and throughout the incident. Review the incident with employees directly involved and other on-site peripheral witnesses such as office staff, truck drivers, etc. Access other tools and resources, as available (automated data records, surveillance cameras, etc.).

3.b Identify specific event locations, materials, substances, and equipment involved in incident.

3.c Identify and characterize, to the extent possible, the size and scope of incident.

Comprehensive List of Materials or Substances Involved

4.a Identify all of the materials/substances that may have been involved in the incident, using the information obtained in the previous steps, inventory records and/or container/tank logs, laboratory data, approval records, material safety data sheets, or any other means available. Use a generic list initially, and then develop a final list from off-site records. Verify that the most up-to-date records are used.

4.b Determine the volume, concentration, and weight of substances identified above, and determine how they may have been altered by the incident (e.g., pyrolysis products, decomposition, degradation, and both known and potential mixture reactions). Based on this information, begin developing a list of substances of potential concern.

4.c Ensure that information critical to the response activity is kept in the information repository identified by EGLE.

Post-Incident Sample Collection

5.a Develop a sampling plan, as appropriate, for the collection of waste, groundwater, soil, ash, airborne dust, debris, surface water, and/or wipe samples. The plan may take into account fallout density, air monitoring data, visual observation, or air modeling. A statistical sampling design may not be necessary for the screening evaluation. Post-incident, off-site sampling may not be necessary based on air monitoring data and lack of off-site migration or deposition.

5.b Collect a sufficient number of samples to identify and characterize concentrations of substances involved in the incident. Include sampling for background concentrations.

5.c Complete the analysis of collected samples and review by comparison to relevant environmental protection standards. Environmental protection standards may have to be developed for some chemicals or environmental media.

5.d Identify and document any substances found to be present in levels that exceed environmental protection standards.

Evaluate Data for Screening Potential Risk

6.a Compare existing data to relevant environmental protection standards.

6.b Prepare risk assessment report and submit it to EGLE, Materials Management Division (MMD) within 90 days after the incident.

6.c If less than environmental protection standards, no further action is needed for off-site potential releases upon approval of the OWMRP.

6.d If the data is greater than the environmental protection standards, proceed with corrective action after notification from EGLE.

Corrective Action

Perform corrective action based on results of information gathered in previous steps in accordance with Part VIII, Corrective Action Conditions, of this license.

A checklist is provided for in Attachment A7-4.

Any of the actions incorporated into this procedure are to be performed by DLD personnel to the extent possible. However, much of the offsite sampling and monitoring will, in all likelihood, have to be performed by a duly authorized governmental agency as such activities can present legal barriers to DLD.

A7.G PROCEDURES FOR REVIEWING AND AMENDING THE CONTINGENCY PLAN

[R 299.9607 and 40 CFR §264.54]

This contingency plan will be reviewed, and immediately amended if necessary, whenever:

1. The facility permit is revised.
2. The plan fails in an emergency.
3. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste constituents, or changes the response necessary in an emergency.
4. The list of emergency coordinators changes.
5. The list of emergency equipment changes.

Training of all employees will take place as necessary whenever the Contingency Plan is changed for one of the above reasons.

Contingency Plan & Contingency Plan Quick Reference

Receipt Acknowledgement

The undersigned hereby acknowledges confidential receipt of Drug & Laboratory Disposal, Inc.'s:

- Contingency Plan; and
- Contingency Plan – Quick Reference Guide.

It is understood and acknowledged that this plan document is to be held in complete confidence by:

Plainwell Area Ambulance Service

413 Naomi Street
Plainwell, MI 49080

It is further acknowledged that this plan document shall only be used to familiarize the entity named above with DLD's facility layout, the properties of the material handled, locations of the working areas, access routes into and within the facility, possible evacuation routes from the facility, and types of injuries or illness that could result from releases of materials at the facility.

This acknowledgement is made on behalf of the Plainwell Area Ambulance Service.

Ryan Cronk
Print

Manager, Emergency Services
Title

Signature

8/2/2022
Date

Contingency Plan & Contingency Plan Quick Reference

Receipt Acknowledgement

The undersigned hereby acknowledges confidential receipt of Drug & Laboratory Disposal, Inc.'s:

- Contingency Plan; and
- Contingency Plan – Quick Reference Guide.

It is understood and acknowledged that this plan document is to be held in complete confidence by:

Ascension Borgess-Pipp Hospital

411 Naomi Street
Plainwell, MI 49080

It is further acknowledged that this plan document shall only be used to familiarize the entity named above with DLD's facility layout, the properties of the material handled, locations of the working areas, access routes into and within the facility, possible evacuation routes from the facility, and types of injuries or illness that could result from releases of materials at the facility.

This acknowledgement is made on behalf of the Ascension Borgess-Pipp Hospital.

RYAN GRONK
Print

MANAGER, EMERGENCY SERVICES
Title

Signature

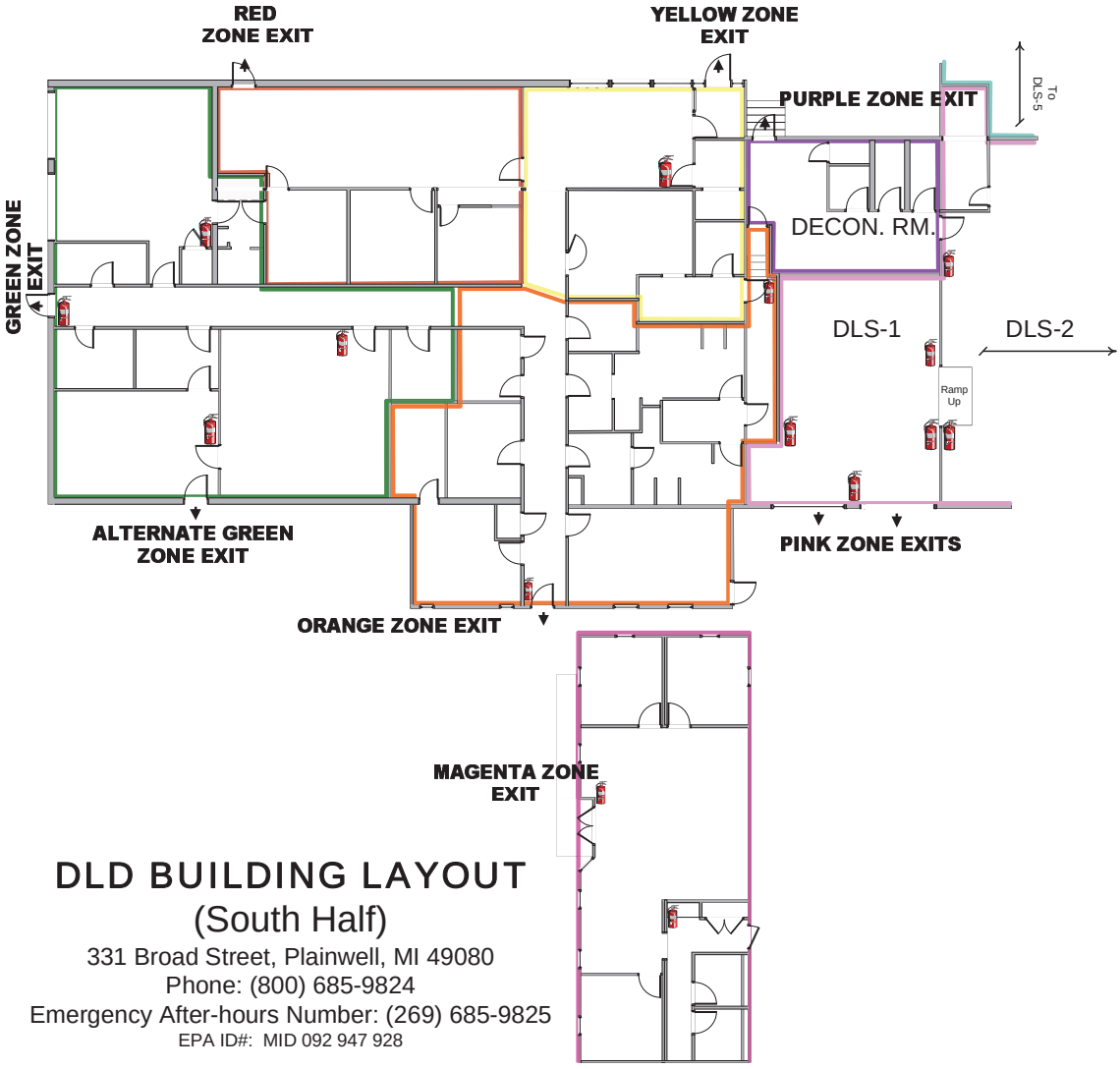
8/2/2022
Date

Drug & Laboratory Disposal Written Evacuation Plan

Evacuation routes are based on the zone occupied and zones are identified by color designations. The zone descriptions and associated exits for each area are as follows:

NAME AND DESCRIPTION OF ZONE	LOCATION OF EXIT
Green Zone: Support Operations Director's office, President's office, main laboratory, metals laboratory, laboratory office, GC room, records room, south garage, and mechanical room	Exit located at south end of north-south corridor. Alternate Exit for metals laboratory and main laboratory located on northeast wall of metals laboratory.
Red Zone: Main office	Exit located at the southwest corner of main office
Orange Zone: Hazardous Materials Director's office, Hazardous Waste Director's office, IT office and server room, conference room, Marketing office, connecting corridors, locker rooms, and laundry room	Exit located at east end of east-west corridor
Yellow Zone: Reception area, break room, canteen, Hazardous Materials Chemist office	Exit located on west side of building (main entrance)
Purple Zone: Decontamination room, rest rooms, Dock Supervisor's office	Exit located on west side of decontamination room
Pink Zone: DLS-1, DLS-2, DLS-3, DLS-4	Exit located on east side of processing dock
Blue Zone: RCRA loading dock, maintenance garage	Exit located on west side of blue zone areas, any one of four garage doors
Amber Zone: Warehouse	Exit located on north side, any one of four garage doors. Alternate exits are west garage door.
Teal Zone: DLS-5	North door; open wall on northwest end; South door.
Magenta Zone: Annex 1	South door; past laboratory through Gate 5.

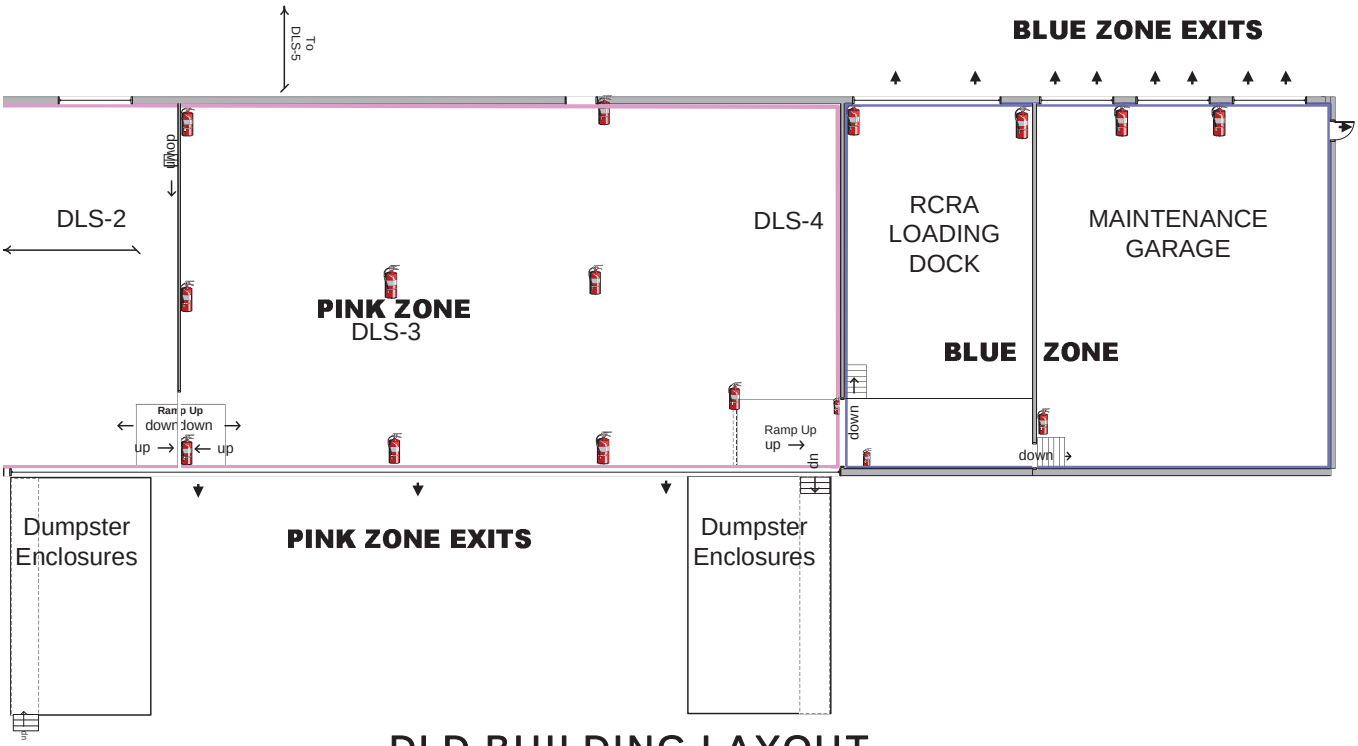
See Pages 2-5 of this attachment A7-2 for evacuation diagrams which are color coded as shown above.



DLD BUILDING LAYOUT

(South Half)

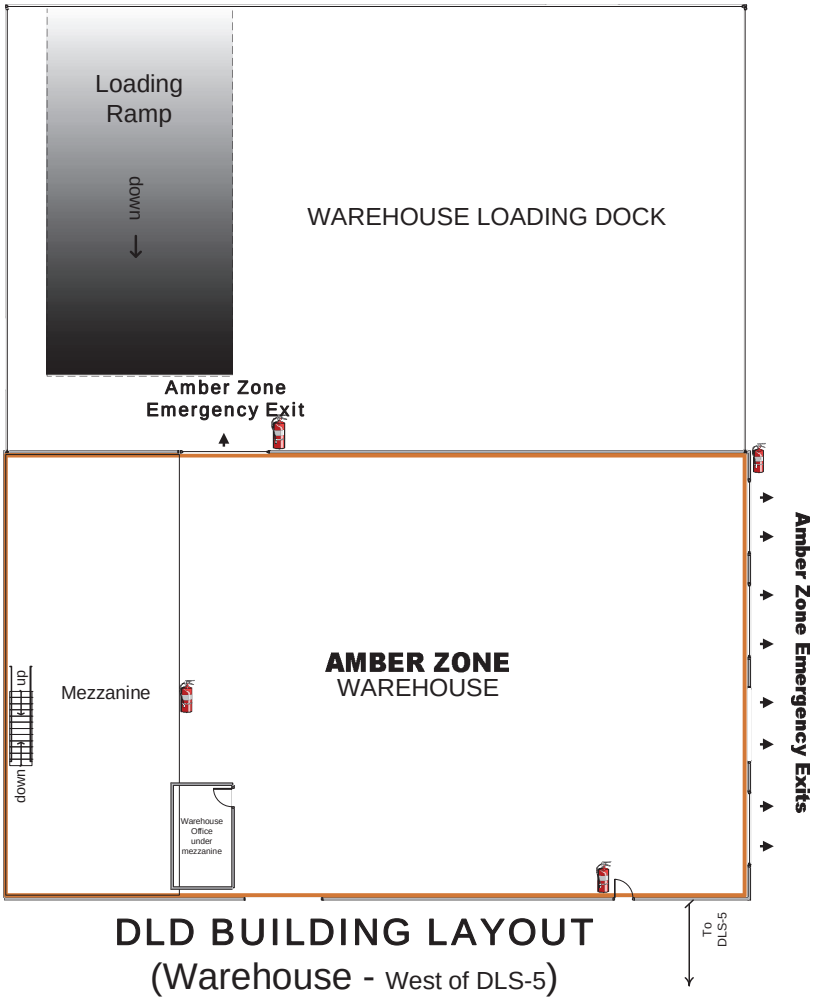
331 Broad Street, Plainwell, MI 49080
Phone: (800) 685-9824
Emergency After-hours Number: (269) 685-9825
EPA ID#: MID 092 947 928



DLD BUILDING LAYOUT

(North Half)

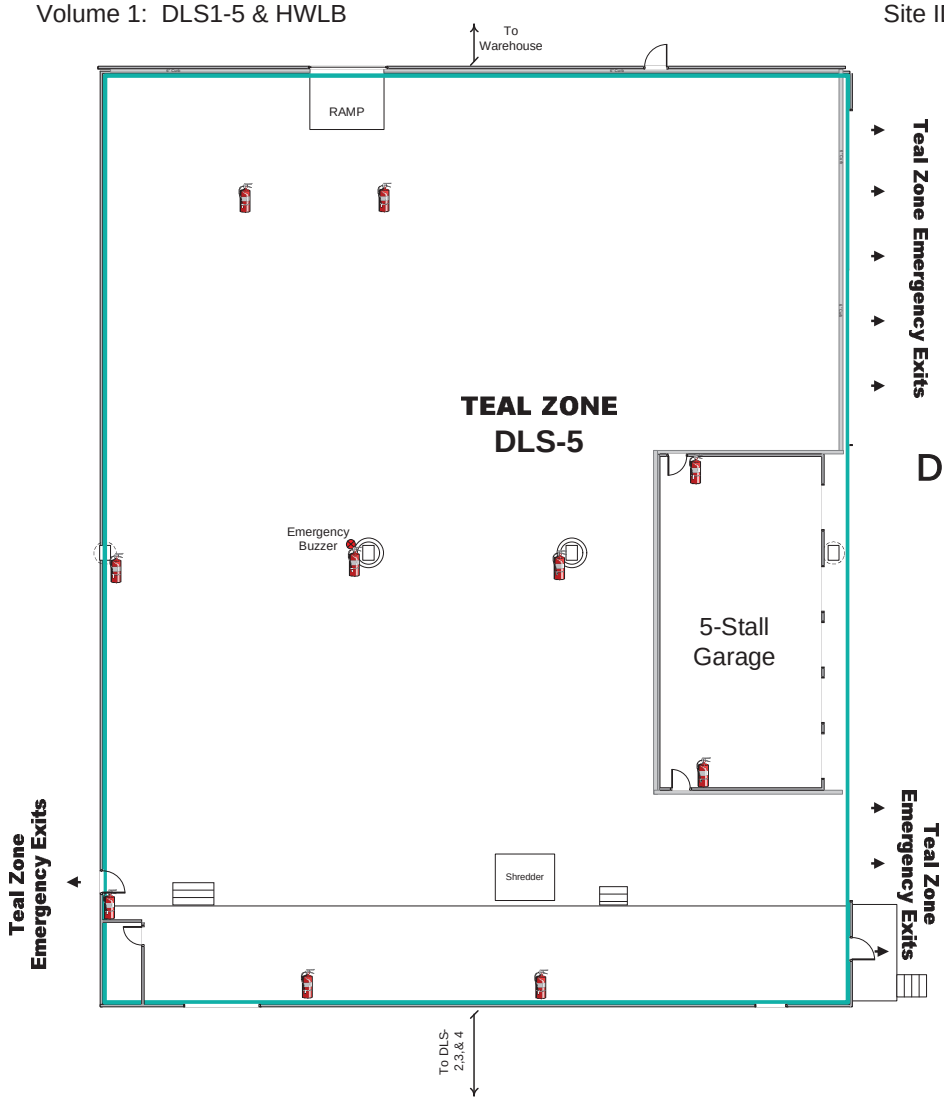
331 Broad Street, Plainwell, MI 49080
Phone: (800) 685-9824
Emergency After-hours Number: (269) 685-9825
EPA ID#: MID 092 947 928



DLD BUILDING LAYOUT

(Warehouse - West of DLS-5)

331 Broad Street, Plainwell, MI 49080
Phone: (800) 685-9824
Emergency After-hours Number: (269) 685-9825
EPA ID#: MID 092 947 928

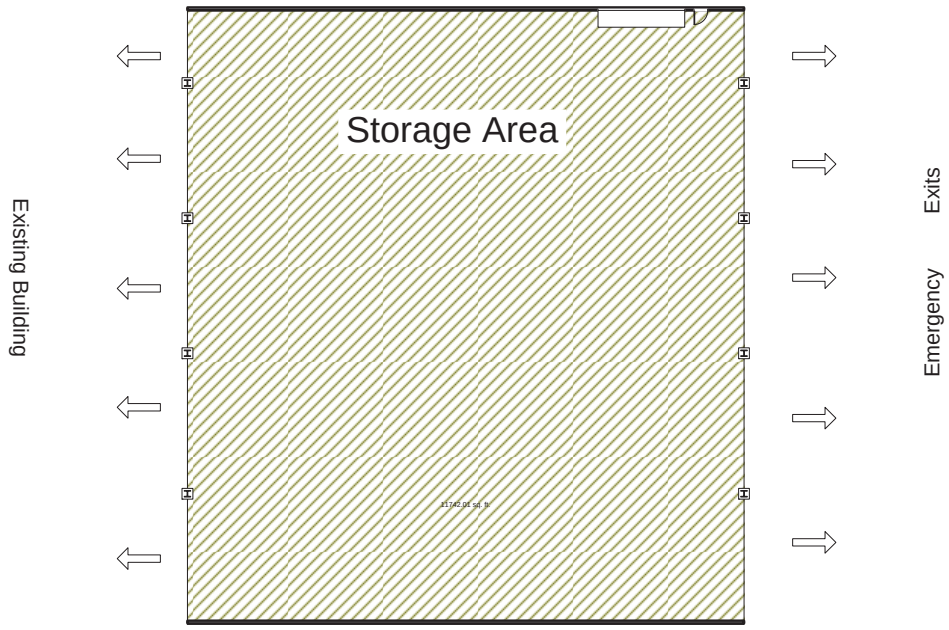


DLD BUILDING LAYOUT

(DLS 5 - West of North half)

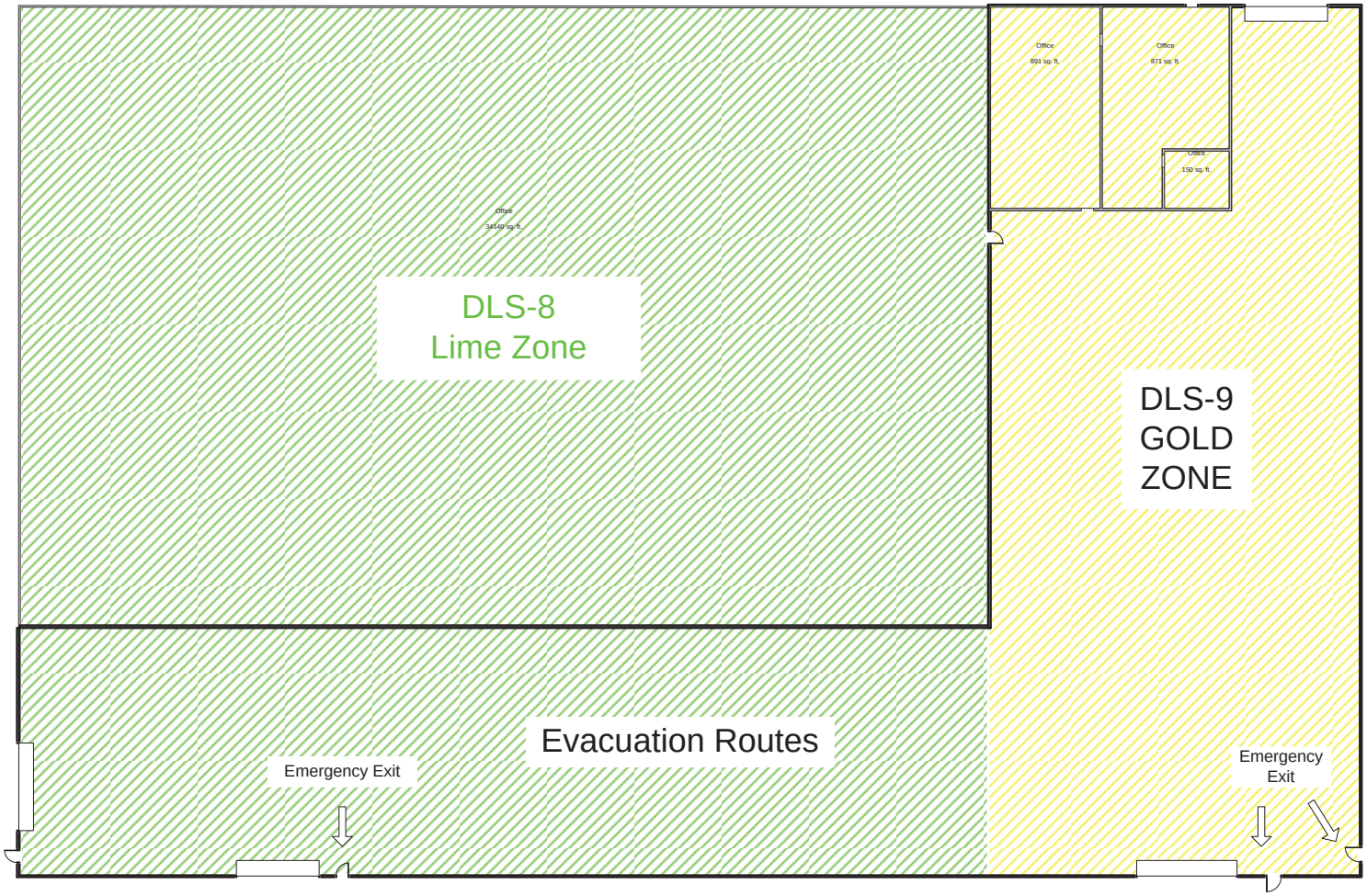
331 Broad Street
Plainwell, MI 49080
Phone: (800) 685-9824
After-hours Emergency Number:
(269) 685-9825
EPA ID#: MID 092 947 928

Evacuation Route for Khaki Zone DLS-11



DLD
MID 092 947 928

DLD
MID 092 947 928

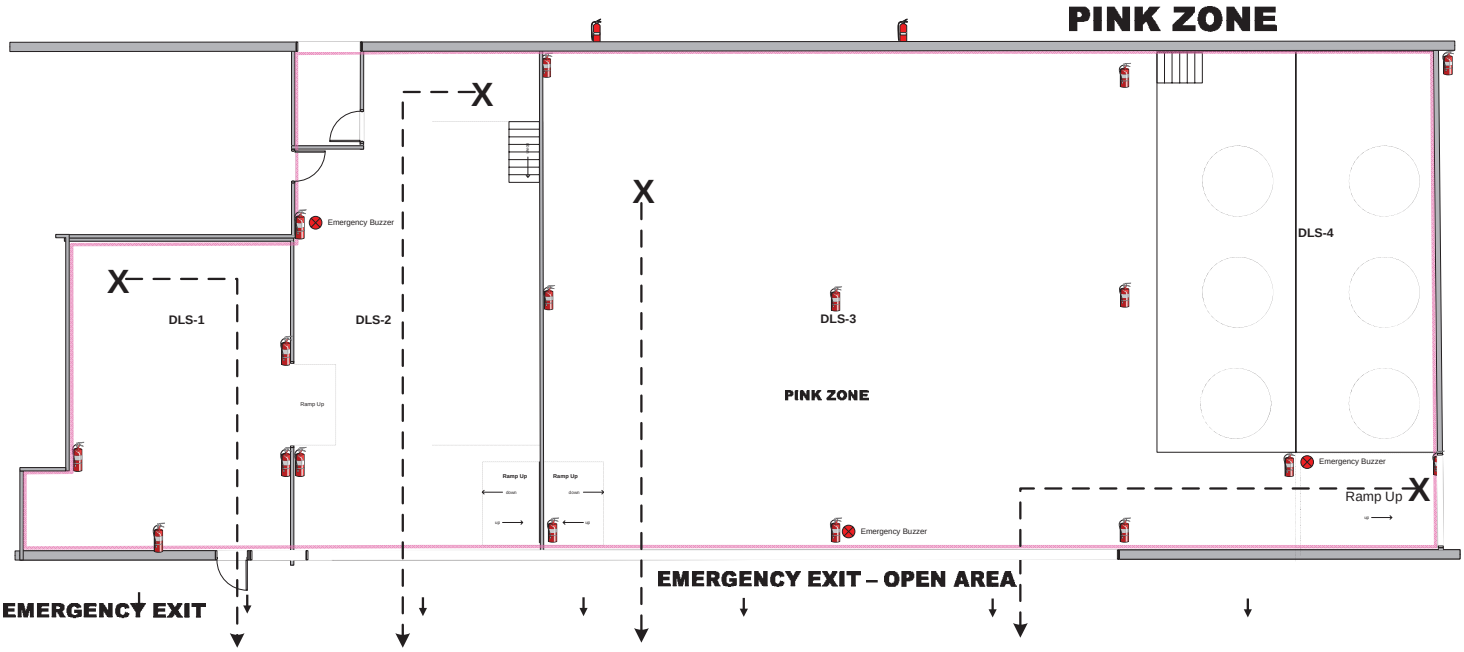


EVACUATION ROUTE FOR LIME ZONE DLS-8

Overhead doors 1, 4, 7 have Emergency escape doors built-in

DLD
MID 092 947 928

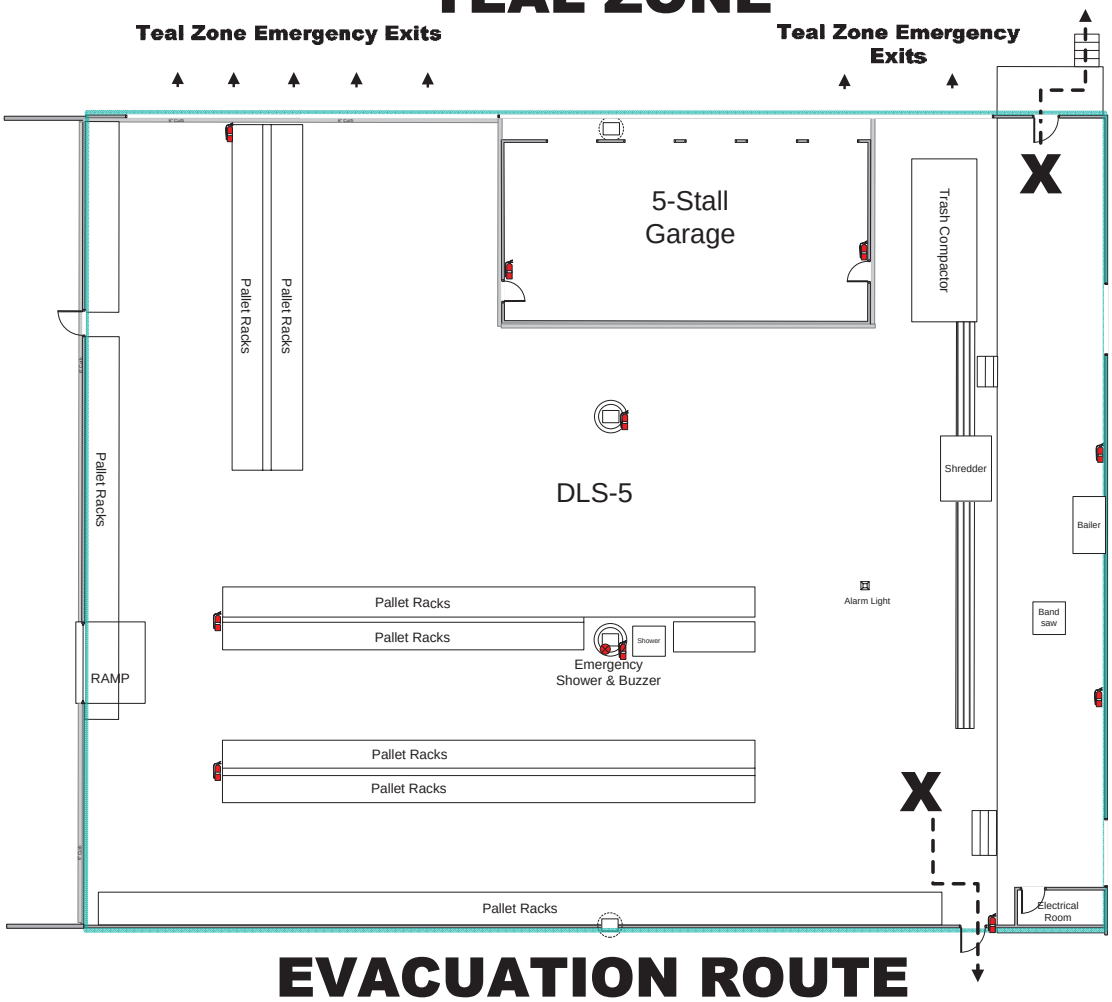
DLD



EVACUATION ROUTE

X = Your Current Position

TEAL ZONE

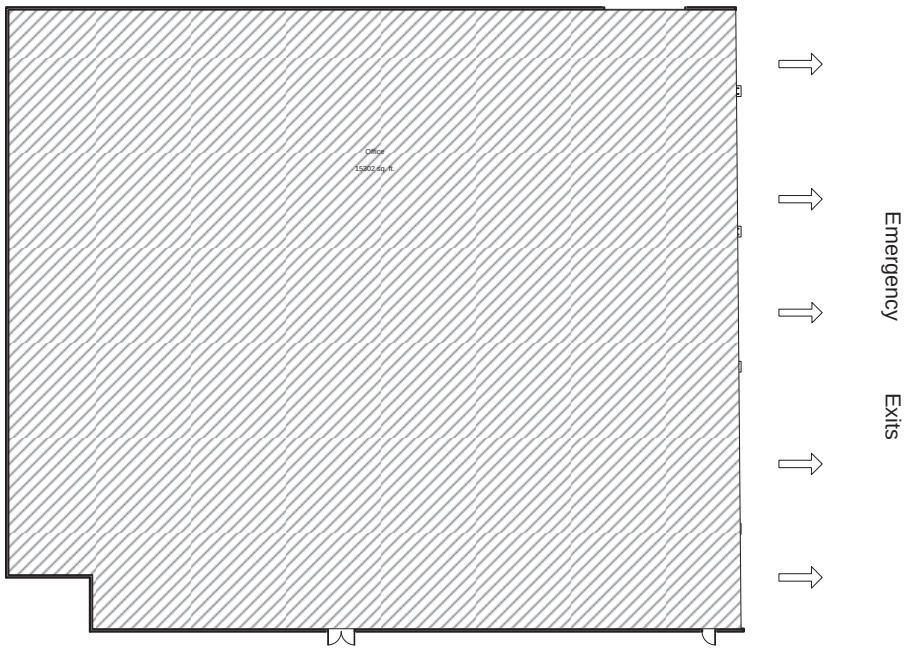


DLD

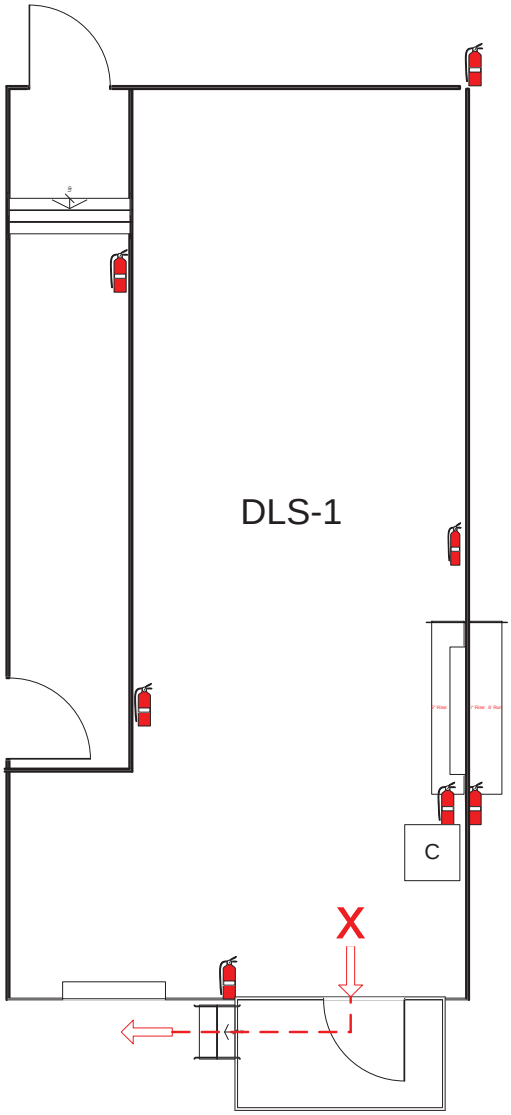
EVACUATION ROUTE

X = Your Current Position

EVACUATION ROUTES DLS-10 GREY ZONE



DLD
MID 092 947 928



Evacuation Route

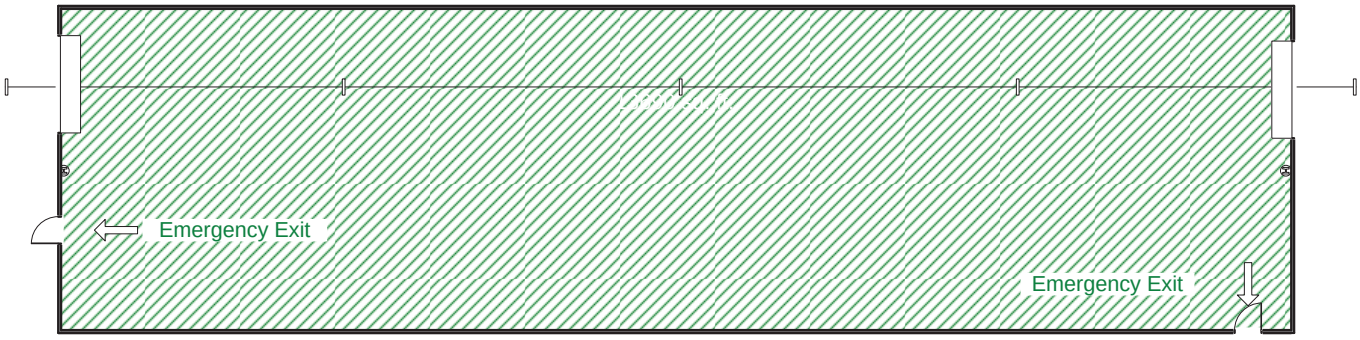
C Trash Compactor

DLS-1 Evacuation Route

X = Your current Position

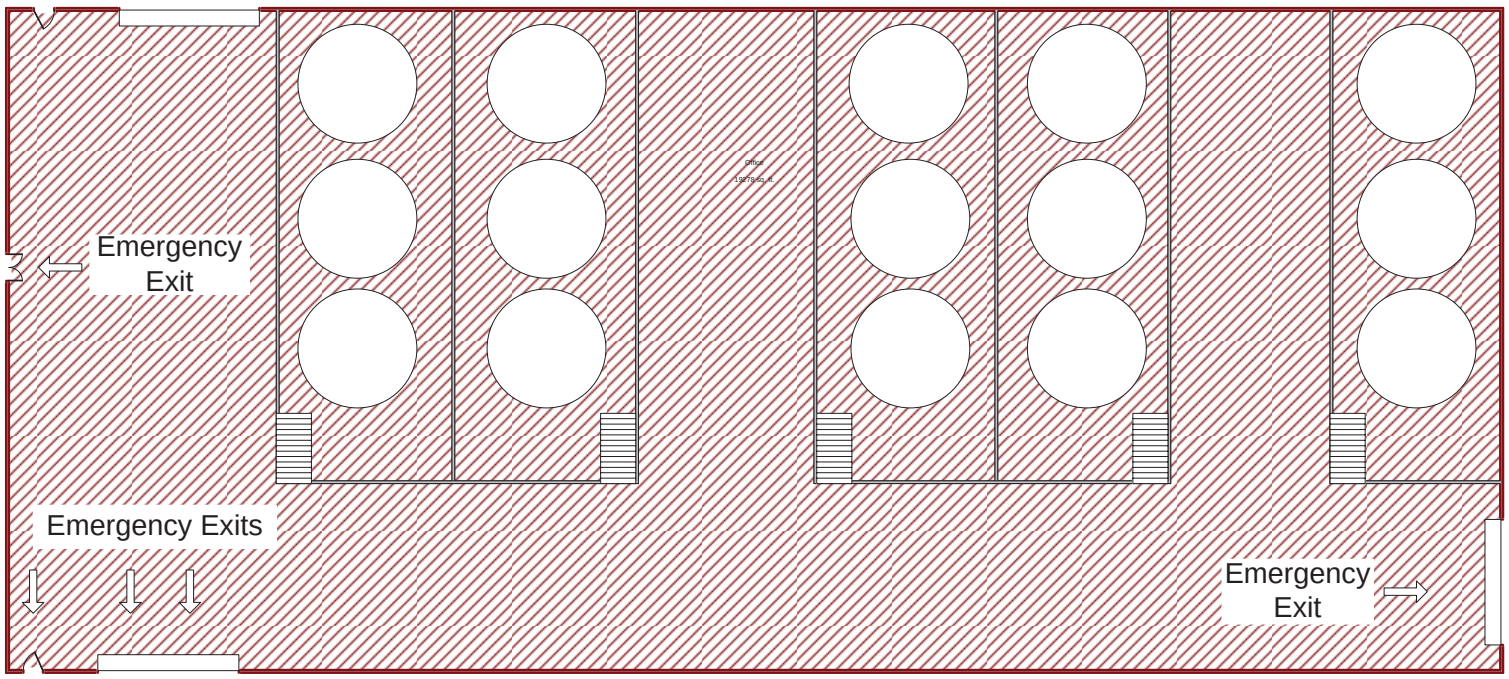
EVACUATION ROUTES DLS-12 OLIVE ZONE

Rail Spur



DLD
MID 092 947 928

EVACUATION ROUTE FOR BROWN ZONE
DLS-7



DLD

Attachment A7-3

Emergency Equipment

Emergency Equipment

Emergency equipment available at DLD includes the following:

EQUIPMENT DESCRIPTION	LOCATION	
1. Twenty-nine Type ABC fire extinguishers		Extinguishers (types of fires) Type A (e.g. trash, wood, paper) Type B (e.g. liquids and grease) and Type C (e.g. electrical equipment) fires.
• Three 10#	DLS-1	
• Three 10#	DLS-2	
• Eight 10#	DLS-3	
• One 10#	DLS-4	
• Three10#	RCRA Loading Dock	
• Three 10#	Vehicle Maint. G.	
• One 20#	Warehouse	
• Two 10#	Warehouse Dock	
• One 10#	Main Lab	
• Three 6#	Lobby/Halls	
• One 11#	Server Room	
• Two 20#	5-Car Garage	
• Four 10#	DLS-5	
2. One 30# D-type fire extinguisher	Dock Office	Extinguishing alkaline earth metal fires.
3. One Halon fire extinguisher	Metals Lab	Extinguishing Type A, B, & C fires.
4. Two 110 V AC suction Pumps	DLS-1 RCRA Loading Dock	Suction of liquids from sump area if not served by compressed air.
5. Two hand-operated pumps	DLS-1	Suction of small volumes of liquid from areas not served by compressed air or electricity.
6. Two air-driven vacuum pumps with 1½" inlet and outlet.	DLS-1 or DLS-3	Transfer of liquids, both viscous and non-viscous, as in spill clean-up.
7. One air-driven vacuum pump with 3" inlet and outlet	DLS-1 or DLS-3	Transfer of liquids, both viscous and non-viscous, as in spill clean-up.

EQUIPMENT DESCRIPTION	LOCATION	EMERGENCY RESPONSE USAGE
8. Spill clean-up material: Oil dry, sawdust, brooms, pads, booms	DLS-3 , RCRA Loading Dock, Warehouse	As appropriate to the type of material spilled. Sawdust is not used on spills with potential for oxidation.
9. Personnel equipment—modified Level C (hard hats, face shields, rubber gloves, respirators, coveralls)	Decontamination Room	Clean-up of spills requiring not higher than Level C protection.
10. Personal equipment—modified Level C (same as # 9 plus supplied air)	Decontamination Room	Clean-up of spills requiring not higher than Level C protection.
11. Telephone/Intercom • Driver's Phones • Two-way radio set • Radio System (5)	Twenty-five office locations, five locations outside	Communication with office via intercom and with emergency responders.
12. Alarm system consisting of seven loud horns and seven activation locations	Entire Facility	Evacuation signal
13. Two visual alarms consisting of flashing red lights	West side of maintenance garage roof and west side of warehouse (outside west door)	Additional evacuation signal for outside areas when noise is a factor.
14. Mercury Vacuum	DLS-1	Clean-up of mercury spills
15. Decontamination Equipment: bucket, 1A2 drum, brushes, pump	DLS-1, DLS-2, or DLS-3	Clean-up of PCB spills
16. Emergency Gate Opener	Right side of west door of warehouse	Emergency evacuation of employees and access to facility by emergency vehicles

Attachment A7-4

Checklist for Tracking Facility Response Actions During and After a Fire/Explosion Incident

1. Record Incident Parameters
Owner/Operator - As soon as access is available to employees/witnesses

DLD Reference	Date Completed	ACTION
Module A7 - Contingency Plan		(a.) Document the time the incident began and the duration of the overall event. Identify the specific location(s) where the incident began.
		(b.) Identify employees/witnesses having direct involvement or direct knowledge of the incident.
		(c.) Identify any relevant witnesses to the event.
		(d.) Gather local meteorological data from the National Weather Service (point-specific data are available at the National Oceanic and Atmospheric Administration [NOAA] Web site) and any characteristics noted by personnel directly involved with the incident or recorded elsewhere.

Comments:

2. Develop Event Narrative
Owner/Operator - As soon as access is available to employees/witnesses

DLD Reference	Date Completed	ACTION
Module A7 - Contingency Plan, Section A7.E.2, Attachment A7-3, and Attachment A7-4.		(a.) Determine the sequence of events and time line leading up to and throughout the incident by reviewing with employees directly involved, other on-site peripheral witnesses (office staff, truck drivers, maintenance staff, etc.), and access other tools and resources, as available (automated data records, surveillance cameras, etc.).
		(b.) Identify specific event locations, materials, and equipment involved in the incident.
		(c.) Identify and characterize, to the extent possible, the size and scope of the event.

Comments:

3. Develop a Comprehensive List of Materials or Substances Involved
Owner/operator in combination with regulatory and health agencies and hazardous materials (hazmat) response teams - As soon as possible

DLD Reference	Date Completed	ACTION
Module A7 - Contingency Plan, Section A7.E.2, and Attachment A7-4.		(a.) Identify all of the materials/substances that may have been involved in the event, using the information obtained in the previous steps, inventory records and/or container/tank logs, laboratory data, approval records, material safety data sheets, or any other means available. Use a generic list initially, and then develop a final list from off-site records. Verify that the most up-to-date records are used.
		(b.) Determine the volume, concentration, and weight of substances identified above, and determine how they may have been altered by the event (e.g., pyrolysis products, decomposition, degradation, and both known and potential mixture reactions). Based on this information, begin developing a list of compounds of potential concern.
		(c.) The Waste and Hazardous Materials Division (WHMD) shall identify the primary location where information and documents used to in previous steps 3.1 and 3.2 will be housed and ensure that information critical to response an activity is kept in that location.

Comments:

4. Air Monitoring During Incident
Owner/operator (if the facility is equipped with monitoring instruments), in combination with Federal (Environmental Protection Agency - EPA, National Oceanic and Atmospheric Administration - NOAA) and local hazmat response teams - As soon as can be mobilized

DLD Reference	Date Completed	ACTION
		(a.) If possible, model dispersion and deposition of the release with real time parameters to determinelikely extent of plume and to assist local authorities making shelter-in-place or evacuation recommendations.
		(b.) Establish air monitoring equipment in locations upwind and downwind of the incident (assign locations as soon as possible, using visual/meteorological data and update, as needed, with modeling results). Monitoring should continue until downwind data is consistent with upwind values.
		(c.) Air monitoring should be conducted utilizing approved methods and should include as many of the identified substances as possible. In the event of a fire/explosion, continuous particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) should be monitored as well. The Contingency Plan should indicate what kind of monitoring equipment may be necessary (e.g., SUMMA canisters/Tedlar bags for volatile organic compounds released from ruptured tanks), and which ones will be readily available.

Comments:

5. Post-Incident Sample Collection
Owner/Operator, in combination with EPA, Michigan Department of Environmental Quality (EGLE), Department of Community Health (DCH) - During and/or immediately following the incident

DLD Reference	Date Completed	ACTION
A Sampling and Analysis Plan (SAP) will be developed post- incident.		(a.) Develop a sampling plan for the collection of waste, groundwater, soil, ash, airborne dust, debris, surface water, and/or wipe samples, as appropriate. The plan, or the need for one, may take into account fallout density, air monitoring data, visual observation, or air modeling. A statistical sampling design may not be necessary for the screening evaluation. Post-incident, off-site sampling may not be necessary based on air monitoring data and lack of off-site migration or deposition.
Sampling specifics will be covered in post-incident SAP.		(b.) Collect a sufficient number of samples to identify and characterize concentrations of substances involved in the incident. Include sampling for background concentrations.
		(c.) Complete the analysis of collected samples and review by comparison to relevant screening levels. Screening levels may have to be developed for some chemicals or environmental media.
		(d.) Identify and document any substances found to be present in levels that exceed screening levels.

Comments:

6. Evaluate Data for Screening Potential Risk Yes/No (determines next step)
Owner/Operator – As soon as possible

DLD Reference	Date Completed	ACTION
Sampling and reporting specifics will be covered in the post-incident SAP		(a.) Screen existing data against relevant screening levels.
		(b.) Prepare RA Screening Report and submit it to the EGLE WHMD, for review as soon as possible but no more than 90 days after the incident.
		(c.) If less than screening levels, no further action is needed for off-site potential releases upon approval of the WHMD.
		(d.) If greater than screening levels, proceed immediately to Step 7.0, after notification from the EGLE.

Comments:

7. If Needed, Conduct off-Site RCRA Facility Investigation (RFI) and Prepare Full Remedial Action (RA) Report
Owner/Operator (Steps 7.(b.) through 7.(c.) to be completed within 180 days, if at all possible

DLD Reference	Date Completed	ACTION
RA Report will be prepared post-incident if necessary.		(a.) Prepare off-site RFI Work Plan and submit for review to the WHMD. Submit within 30 days from step 6.(d) notification from the EGLE.
		(b.) Commence RFI immediately after EGLE approval of step 7.1 RFI Work Plan.
		(c.) Conduct a RA on RFI data.
		(d.) Prepare and submit RFI Report to the WHMD.
Corrective Measures Study (CMS) and Corrective Measures Implementation (CMI) Plans will be prepared post-incident if necessary		(e.) Upon EGLE approval of RFI, prepare a combined CMS and CMI Plan, and submit for review to the WHMD, if directed.
		(f.) Upon EGLE approval of the CMS/CMI, implement the CMI Plan as directed.
		(g.) Provide a report to the EGLE upon completion of the CMI Plan.

Comments:

A8: TRAFFIC INFORMATION

(Volume 1)

The vehicular movements associated with activities at DLD Environmental Services, Inc (DLD), have little impact on the City of Plainwell. DLD is located in an industrial area which it shares with one other business. Total traffic count, including employees, deliveries, and incoming and outgoing waste shipments, would average 120 movements per 24-hour period. DLD has limited operations on weekends.

The main access road to DLD is Broad Street, which is a new paved, curbed and guttered roadway, ending in a cul-de-sac in front of DLD. The other access road, Oak Street, is a local, non-rated street. All loading and unloading of waste and waste handling supplies is done at DLD's two secure, contained loading docks. Both are accessed from the west by way of electronically controlled gates located on an unpaved access driveway west of the facility. Other supplies are delivered to the office area off of Broad Street.

All guest parking is in the DLD parking lot west of the office area, outside the secured loading dock and hazardous waste handling areas. Employee parking for staff is either in the same parking lot as guest parking or inside the secured area on the east side of DLD. Broad Street and Oak Street are the only accesses to DLD. These accesses are not controlled by stop signs or traffic signals. Active rail lines are located on the West, South and East of DLD. Please see Attachment A1-1 for the Master Site Plan.

DLD's trucking fleet consists of semi tractors, straight trucks, cargo tanks, and cargo trailers ranging in length from 30-53 feet. Commercial motor vehicles are encouraged to use Broad Street as their primary DLD access road. Parking for waste handling and transportation vehicles is located on the north side of the facility within the secured area.

As DLD grows and its trucking fleet expands, additional truck parking will be added north of the current structure. A new maintenance garage is planned, as well as a new loading dock with multiple loading bays (see Volume 4 of this application for details).

A9 - FACILITY LOCATION INFORMATION

40 CFR §270.14(b)(11)

(Volume 1)

DLD Environmental Services, Inc. is located in the City of Plainwell, County of Allegan, State of Michigan. This area is not listed in 40 CFR §264 Appendix VI.

FORM EQP 5111 TEMPLATE MODULE A10

A10: PERSONNEL TRAINING

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 the Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), R 299.9501, R 299.9605 and Title 40 Code of Federal Regulations (CFR) §§264.16 and 270.14(b)(12), establish requirements for personnel training programs 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 a personnel training program at the hazardous waste management facility for the DLD Environmental Services, Inc. in Plainwell, Michigan. The information included in the template demonstrates how the facility meets the personnel training requirements for hazardous waste management facilities.

(Check as appropriate)

☐ Personnel Training Program: Applicant for Operating License for Existing Facility

☒ Personnel Training Program: Applicant for Operating License for New, Altered, Enlarged, or Expanded Facility

Table of Contents

This template is organized as follows:

A10.A CONTENT OF INTRODUCTORY AND CONTINUING EDUCATION TRAINING PROGRAMS

[R 299.9605 and 40 CFR §264.16(a)]

A10.A.1 Outline for Introductory Training Program

[R 299.9605 and 40 CFR §§264.16(a)(1) and 264.16(d)(3)]

DLD Environmental Services, Inc. (DLD) provides new employees with all regulatory required initial training. Since initial training requirements vary based on the employee's duties, each individual job title has a customized Initial Training Program. Initial Training Program checklists for all positions which relate to hazardous waste management have been included in Attachment A10-2. A summary of initial training by job title has also been provided in Attachment A10-1. These documents are subject to change based on changes in regulations and business need.

A10.A.2 Outline for Continuing Education

[R 299.9605 and 40 CFR §§264.16(a)(1) and 264.16(d)(3)]

DLD provides employees with all regulatory required continuing education. Since continuing education requirements vary based on the employee's duties, each individual job title has a customized Continuing Education Program. Continuing Education Program checklists for all positions which relate to hazardous waste management have been included in Attachment A10-4. A summary of continuing education by job title has also been provided in Attachment A10-3. These documents are subject to change based on changes in regulations and business need.

A10.B PERSONNEL SUBJECT TO TRAINING REQUIREMENTS

[R 299.9605 and 40 CFR §§264.16(a),(d)]

A10.B.1 Job Titles and Job Descriptions

[R 299.9605 and 40 CFR §§264.16(d)(1),(2)]

Job descriptions for all facility personnel whose positions relate to hazardous waste management are included in Section A10.B.2. At present, these positions include the following job titles:

- Logistics Director
- Field Service Chemist
- Field Service Manager
- Hazardous Waste Assistant
- Hazardous Waste Chemist
- Hazardous Waste Director
- Hazardous Waste Driver
- Shipping / Receiving Manager
- Temporary Hazardous Waste Assistant
- Waste Processing Aide
- Waste Processing Coordinator
- Waste Processing Director
- Waste Processing Manager

A10.B.2 Description of How Training is Designed to Meet Actual Job Tasks

[R 299.9605 and 40 CFR §§264.16(a)(1) and (d)(3)]

Initial Training

All facility personnel complete an initial training program which teaches the hazardous waste management procedures relevant to each employee's job title and duties. This initial training program also includes instruction for and familiarization with contingency plan implementation, emergency procedures, emergency equipment and emergency systems as applicable to the employee's position and our facility. The initial training program is completed within six months of an employee's date of hire or assignment to a new position at the facility, whichever is later.

The Initial Training Program Checklists (customized to each job title) which are summarized in Attachment A10-1 and attached in Attachment A10-2 provide a description of both the types of training provided and the timing in which training is completed.

Initial training methods include, but are not limited to, classroom instruction, internet-based training, and written instruction (i.e., Training Manual). New employees receive additional initial training through closely-supervised on-the-job training. While Initial Training Program Checklists are tailored to the duties of each job title, all Checklists include:

- Safety training that makes employees aware of the hazards in their jobs, how to effectively respond to emergencies in the facility, and what the Personal Protective Equipment (PPE) requirements are for their job
- Relevant hazardous waste management procedures
- Training regarding DLD's most commonly reported accidents and strategies for avoiding injury
- All OSHA training requirements
- All RCRA training requirements
- All DOT training requirements

Upon completion of each training requirement, the employee and instructor/trainer sign a certificate as required.

Initial Emergency Response Training for Hazardous Waste Management Personnel

All facility personnel performing tasks related to hazardous waste management must know the location of and be able to use the following:

- Intercom
- Two-way radios
- Fire extinguishers (including notifying appropriate persons when they need refilling)

- Absorbent and other emergency materials (for cleaning up spills)
- Filters and respirators as well as other personal safety articles such as gloves, face shields, hard hats
- Emergency buzzer (for emergency assistance or contingency plan evacuation and/or activation)

Specifically, the waste management procedures instruction includes the following **job title requirements**:

Field Service Chemist:

- Read Federal Motor Carrier Safety Regulations
- Pass written and driving road test
- Know DOT regulations regarding hazardous waste
- Know proper segregation of hazardous waste and materials
- Know how to read a hazardous waste manifest
- Know proper packaging procedures
- Know spill clean-up procedures and location of needed materials
- Know how to placard

Field Service Manager:

- Read Federal Motor Carrier Safety Regulations
- Pass written and driving road test
- Know DOT regulations regarding hazardous waste
- Know proper segregation of hazardous waste and materials
- Know how to read a hazardous waste manifest
- Know proper packaging procedures
- Know spill clean-up procedures and location of needed materials
- Know how to placard

Hazardous Waste Chemist

- Know location of reference materials
- Know location of all hazardous waste types stored at facility
- Know how to operate glass grinder and tank piping system
- Know proper segregation of hazardous waste chemicals
- Know guidelines of various disposal facilities (in order that packaged wastes are compatible and will be accepted)

- Know processing procedures for appropriate waste streams
- Know how to fill out inspection check sheet
- Know proper sampling procedures
- Know how to test waste (including miscibility and pH testing)
- Know storage and labeling requirements of all pertinent regulations, including DOT, RCRA and OSHA
- Know spill clean-up procedures and location of needed materials
- Know standard operating procedures for cutting and cleaning drums

Hazardous Waste Assistant:

- Know how to operate baling machine, container crushing machine, shredder and glass grinder
- Know processing procedures for appropriate nonhazardous waste
- Know storage and labeling requirements of all pertinent regulations, including DOT, RCRA and OSHA
- Know spill clean-up procedures and location of needed materials
- Know standard operating procedures for cutting and cleaning drums

Hazardous Materials Chemist

- Read Federal Motor Carrier Safety Regulations
- Pass written and driving road test
- Know DOT regulations regarding hazardous waste
- Know proper segregation of hazardous waste materials
- Know how to complete hazardous waste manifest
- Know proper packaging procedures
- Know spill clean-up procedures and location of needed materials
- Know how to placard

Shipping / Receiving Manager

- Know processing procedures for appropriate nonhazardous waste
- Know DOT regulations regarding hazardous waste
- Know proper segregation of hazardous waste materials
- Know how to use refrigerant recovery equipment
- Know proper sampling procedures
- Know proper packaging procedures

- Know how to placard
- Know storage and labeling requirements of all pertinent regulations, including DOT, RCRA and OSHA
- Know spill clean-up procedures and location of needed materials
- Know standard operating procedures for cutting and cleaning drums

Waste Processing Coordinator

- Know location of reference materials
- Know location of all hazardous waste types stored at facility
- Know how to operate glass grinder and tank piping system
- Know proper segregation of hazardous waste chemicals
- Know guidelines of various disposal facilities (in order that packaged wastes are compatible and will be accepted)
- Know processing procedures for appropriate waste streams
- Know how to fill out inspection check sheet
- Know proper sampling procedures
- Know how to test waste (including waster miscible and pH testing)
- Know storage and labeling requirements of all pertinent regulations, including DOT, RCRA and OSHA
- Know spill clean-up procedures and location of needed materials
- Know standard operating procedures for cutting and cleaning drums

Waste Processing Manager:

- Know location of reference materials
- Know location of all hazardous waste types stored at facility
- Know how to operate glass grinder and tank piping system
- Know proper segregation of hazard classes
- Know guidelines of various disposal facilities (in order that packaged wastes are compatible and will be accepted)
- Know processing procedures for appropriate waste streams
- Know how to fill out inspection check sheet
- Know proper sampling procedures
- Know how to test waste (including water miscibility and pH testing)
- Know storage and labeling requirements of all pertinent regulations, including DOT, RCRA and OSHA
- Know spill clean-up procedures and location of needed materials

- Know standard operating procedures for cutting and cleaning drums

Waste Processing Director:

- Know location of reference materials
- Know location of all hazardous waste types stored at facility
- Know how to operate glass grinder and tank piping system
- Know proper segregation of hazardous waste chemicals
- Know guidelines of various disposal facilities (in order that packaged wastes are compatible and will be accepted)
- Know processing procedures for appropriate waste streams
- Know how to fill out inspection check sheet
- Know proper sampling procedures
- Know how to test waste (including water miscibility and pH testing)
- Know storage and labeling requirements of all pertinent regulations, including DOT, RCRA and OSHA
- Know spill clean-up procedures and location of needed materials
- Know standard operating procedures for cutting and cleaning drums

Since DLD does not have automatic waste feed systems and does not conduct any operations that would require a shutdown of operations other than simply ceasing that particular process, such information is not applicable and, therefore, not included in the above. Additionally, employees are instructed to report any emergency or monitoring equipment found to be needing attention during the inspections described in Section A5 to the appropriate persons for remediation and documentation on the inspection schedule.

All employees are required to read and review the contingency plan which is located in the office and posted at each building exit. Any person designated as an emergency coordinator must be familiar with the contingency plan and both initial and annual review of the plan is documented.

Continuing Education

All facility personnel take part in an annual review of the initial training described above. For every job title at DLD there is a Continuing Education Program Checklist (see Section A10.A.2 and Attachment A10-4) which provides a description of both the types of training provided and the timing in which training is completed.

The Continuing Education Program reviews initial training (at a minimum) and is presented by inside or outside experts and DLD employees with regulatory expertise or hazardous waste management experience. Additionally, emergency coordinators reread the contingency plan in its entirety as part of their annual review.

Keeping up with current technologies, processing methods and regulations is vitally important to DLD. DLD continually strives to maintain a high level of knowledge. Some of the methods we have used to maintain that knowledge have been subscribing to the Federal Register, maintaining a full-time position for screening and communicating regulations, making various industry subscriptions readily accessible to employees (especially Chemists), and assigning specific areas of the regulations to specific employees to foster in-house expertise.

DLD employees frequently attend seminars which focus on industry and regulatory topics. Seminar topics have included hazardous/toxic waste management, hazardous materials transportation, safety, PPE and miscellaneous regulatory updates. In addition to the scheduled continuing education sessions, in-house training is provided for both regulatory and waste processing procedures. In-house training might include such topics as safety in processing a specific waste stream, proper manifesting under a new DOT regulation, or correct usage of new personal protection equipment. All seminar attendance is documented.

The training now required for TSDF's under OSHA further complements the EPA-required training as does the documentation required under DOT regulations. The requirements of these three agencies, additional seminars attended, industry publications, regulation reading and review, and continuing job knowledge all combine to comprise continuing education.

A10.C FREQUENCY OF REQUIRED TRAINING

[R 299.9605 and 40 CFR §§264.16(b), (c)]

A10.C.1 Initial Training

[R 299.9605 and 40 CFR §264.16(b)]

The Initial Training Program Checklists (customized to each job title) which are referenced in A10.A.1 and attached in Attachment A10-2 provide a description of both the types of training provided and the timing in which training is completed. All training required as part of initial training will be completed within six months of the employee's date of hire or assignment to a new position at the facility, whichever is later.

.A10.C.2 Continuing Education

[R 299.9605 and 40 CFR §264.16(c)]

All facility personnel take part in an annual review of the initial training as described in A10.B.2.

A10.D TRAINING DIRECTOR

[R 299.9605 and 40 CFR §264.16(a)(2)]

DLD's training directed by a person trained in hazardous waste management procedures and will teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are imployed.

Facility personnel who assist in the execution of these responsibilities have either direct hazardous waste management experience or specific regulatory knowledge and expertise.

A10.E DOCUMENTATION AND RECORD KEEPING REQUIREMENTS

[R 299.9605 and 40 CFR §§264.16(d) and (e)]

A10.E.1 Documentation

[R 299.9605 and 40 CFR §264.16(d)]

DLD maintains training records for current personnel until closure of the facility. For former employees, training records are kept until at least three years after the date the employee last worked at the facility. Both Initial and Continuing Education Program Checklists (which are customized to each individual job title) are used to ensure that all required training is given and received (see Attachments A10-1 through A10-4).

All employees receive an individual training record which consists of the following documentation:

- Job title and name of the employee filling the job
- A written job description
- A written description of the type and amount of training required for each position
- Documentation showing that required training (initial and continuing education) has been received by each employee

A10.E.1(a) Job Titles and Names of Employees Filling Each Job

[R 299.9605 and 40 CFR §264.16(d)(1)]

DLD maintains a report which lists the job title for each position at the facility related to hazardous waste management and the name of the employee filling each job. Furthermore, documentation of each employee's job title and full name is included in his or her individualized training record.

A10.E.1(b) Written Job Descriptions

[R 299.9605 and 40 CFR §264.16(d)(2)]

A written job description is contained in the individualized training record of all employees.

A10.E.1(c) Written Description of Type and Amount of Training Given to Each Position
[R 299.9605 and 40 CFR §264.16(d)(3)]

DLD maintains a record of training given to all employees, which includes a description of the type and amount (hours) of training provided. A summary report of this information is included in each employee's individualized training record.

A10.E.1(d) Documentation That Training Has Been Given to and Completed by Facility Personnel
[R 299.9605 and 40 CFR §264.16(d)(4)]

DLD documents all required training that has been given by in-house trainers. When required, the method of documentation is a certificate which is signed by both the employee and the trainer. For training provided by trainers who are not DLD employees, DLD obtains a copy of the certificate, attendance sheet, seminar brochure or other documentation which shows that training has been given to and completed by the employee. All in-house documentation and outside training documentation are kept in the employee's individualized training record.

A10.E.2 Record Keeping
[R 299.9605 and 40 CFR §264.16(e)]

It is DLD's policy to maintain training records for current personnel as long as regulatory required. For former employees, training records are kept until at least three years after the date the employee last worked at the facility. Both Initial and Continuing Education Program Checklists (which are customized to each individual job title) are used to ensure that all required training is given and received (see Attachments A10-1 through A10-4).

Summary of Initial Training by Job Title

	Logistics Director	Field Service Chemist	Field Service Manager	Hazardous Waste Assistant	Hazardous Waste Chemist	Hazardous Waste Director	Hazardous Waste Driver	Shipping / Receiving Manager	Temporary Hazardous Waste Assistar	Waste Processing Aide	Waste Processing Coordinator	Waste Processing Director	Waste Processing Manager
EPA Training													
Contingency Plan Review	X	X	X	X	X	X	X	X	X	X	X	X	X
Emergency Education	X	X	X	X	X	X	X	X	X	X	X	X	X
Hazardous Waste Management Procedures		X	X	X	X	X	X	X	X	X	X	X	X
TSCA (PCB) Regulations	X	X	X	X	X	X	X	X	X	X	X	X	X
TSDF Regulations Review	X	X	X	X	X	X	X	X	X	X	X	X	X
DOT Training													
General Awareness Training	X	X	X	X	X	X	X	X	X	X	X	X	X
Function-Specific Training	X	X	X	X	X	X	X	X	X	X	X	X	X
Safety Training	X	X	X	X	X	X	X	X	X	X	X	X	X
Security Awareness Training	X	X	X	X	X	X	X	X	X	X	X	X	X
In-Depth Security Training	X	X	X	X	X	X	X	X	X	X	X	X	X
Indicators of Probable Drug Use	X		X			X		X			X	X	X
Indicators of Probable Alcohol Use	X		X			X		X			X	X	X
Entry-Level Driver Training (If Applicable)		X	X				X						
CDL Training (Tank or HazMat Endorsement)		X	X				X						

Attachment A10-2

Logistics Director
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	
Indicators of Probable Drug Use – Supervisors	1	
Indicators of Probable Alcohol Use – Supervisors	1	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

DLD
Drug & Laboratory Disposal, Inc.

Field Service Chemist
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	
Entry-Level Driver Training (If Applicable)	1	
CDL Training (Tank or HazMat Endorsement)	10	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	
Respiratory Protection	7	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

DLD
Drug & Laboratory Disposal, Inc.

Field Service Manager
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	
Entry-Level Driver Training (If Applicable)	1	
CDL Training (Tank or HazMat Endorsement)	10	
Indicators of Probable Drug Use – Supervisors	1	
Indicators of Probable Alcohol Use – Supervisors	1	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	
Respiratory Protection	7	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

DLD
Drug & Laboratory Disposal, Inc.

Hazardous Waste Assistant
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Confined Space	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	
Respiratory Protection	7	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Hazardous Waste Chemist
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Confined Space	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	
Respiratory Protection	7	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Hazardous Waste Director
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	
Indicators of Probable Drug Use – Supervisors	1	
Indicators of Probable Alcohol Use – Supervisors	1	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Confined Space	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	
Lockout/Tagout	7	
Respiratory Protection	7	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Hazardous Waste Driver
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	
Entry-Level Driver Training (If Applicable)	1	
CDL Training (Tank or HazMat Endorsement)	10	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	
Respiratory Protection	7	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Shipping / Receiving Manager
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	
Indicators of Probable Drug Use – Supervisors	1	
Indicators of Probable Alcohol Use – Supervisors	1	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Confined Space	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	
Respiratory Protection	7	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Temporary Hazardous Waste Assistant
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Waste Processing Aide
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Confined Space	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	
Respiratory Protection	7	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Waste Processing Coordinator
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	
Indicators of Probable Drug Use – Supervisors	1	
Indicators of Probable Alcohol Use – Supervisors	1	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Confined Space	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	
Lockout/Tagout	7	
Respiratory Protection	7	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Waste Processing Director
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	
Indicators of Probable Drug Use – Supervisors	1	
Indicators of Probable Alcohol Use – Supervisors	1	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Confined Space	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	
Lockout/Tagout	7	
Respiratory Protection	7	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Waste Processing Manager
Initial Training Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	6	
Emergency Education	6	
Hazardous Waste Management Procedures	2	
TSCA (PCB) Regulations	2	
TSDF Regulations	2	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	1	
Function-Specific Training	1	
Safety Training	1	
Security Awareness Training	1	
In-Depth Security Training	1	
Indicators of Probable Drug Use – Supervisors	1	
Indicators of Probable Alcohol Use – Supervisors	1	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Introductory Safety Training	6	
Bloodborne Pathogens Training	7	
Confined Space	7	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	8	
Hazard Communication	6	
Lockout/Tagout	7	
Respiratory Protection	7	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Summary of Continuing Education by Job Title

	Logistics Director	Field Service Chemist	Field Service Manager	Hazardous Waste Assistant	Hazardous Waste Chemist	Hazardous Waste Director	Hazardous Waste Driver	Shipping / Receiving Manager	Temporary Hazardous Waste Assistant	Waste Processing Aide	Waste Processing Coordinator	Waste Processing Director	Waste Processing Manager
EPA Training													
Contingency Plan Review	X	X	X	X	X	X	X	X	X	X	X	X	X
Emergency Coordinator Review of Cont. Plan						X					X	X	
Hazardous Waste Management Procedures		X	X	X	X	X	X	X	X	X	X	X	X
TSCA (PCB) Regulations	X	X	X	X	X	X	X	X	X	X	X	X	X
TSDF Regulations Review	X	X	X	X	X	X	X	X	X	X	X	X	X
DOT Training (Recurs every 3 years)													
General Awareness Training	X	X	X	X	X	X	X	X	X	X	X	X	X
Function-Specific Training	X	X	X	X	X	X	X	X	X	X	X	X	X
Safety Training	X	X	X	X	X	X	X	X	X	X	X	X	X
Security Awareness Training	X	X	X	X	X	X	X	X	X	X	X	X	X
In-Depth Security Training	X	X	X	X	X	X	X	X	X	X	X	X	X
Indicators of Probable Drug Use	X		X			X		X			X	X	X
Indicators of Probable Alcohol Use	X		X			X		X			X	X	X
Driver Wellness		X	X				X						
CDL Training (Tank or HazMat Endorsement)		X	X				X						
OSHA Training													
Bloodborne Pathogens	X	X	X	X	X	X	X	X	X	X	X	X	X
Confined Space				X	X	X		X		X	X	X	X
Fire Safety	X	X	X	X	X	X	X	X	X	X	X	X	X
Haz. Waste Operations & Emergency Response	X	X	X	X	X	X	X	X	X	X	X	X	X
Hazard Communication	X	X	X	X	X	X	X	X	X	X	X	X	X
Hearing Protection		X	X	X	X		X	X	X	X	X	X	X
Lockout/Tagout						X					X	X	X
Respiratory Protection		X	X	X	X	X	X	X	X	X	X	X	X

DLD
Drug & Laboratory Disposal, Inc.

Logistics Director
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	
Indicators of Probable Drug Use – Supervisors	5	
Indicators of Probable Alcohol Use – Supervisors	5	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Field Service Chemist
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	
Driver Wellness	5	
CDL Training (Tank or HazMat Endorsement)	10	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Hearing Protection	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Field Service Manager
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	
Driver Wellness	5	
CDL Training (Tank or HazMat Endorsement)	10	
Indicators of Probable Drug Use – Supervisors	5	
Indicators of Probable Alcohol Use – Supervisors	5	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Hearing Protection	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Hazardous Waste Assistant
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Confined Space	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Hearing Protection	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Hazardous Waste Chemist
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Confined Space	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Hearing Protection	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Hazardous Waste Director
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Emergency Coordinator Review of Cont. Plan	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	
Indicators of Probable Drug Use – Supervisors	5	
Indicators of Probable Alcohol Use – Supervisors	5	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Confined Space	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Lockout/Tagout	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Hazardous Waste Driver
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	
Driver Wellness	5	
CDL Training (Tank or HazMat Endorsement)	10	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Hearing Protection	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Shipping / Receiving Manager
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	
Indicators of Probable Drug Use – Supervisors	5	
Indicators of Probable Alcohol Use – Supervisors	5	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Confined Space	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Hearing Protection	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Temporary Hazardous Waste Assistant
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Hearing Protection	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Waste Processing Aide
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Confined Space	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Hearing Protection	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Waste Processing Coordinator
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Emergency Coordinator Review of Cont. Plan	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	
Indicators of Probable Drug Use – Supervisors	5	
Indicators of Probable Alcohol Use – Supervisors	5	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Confined Space	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Hearing Protection	3	
Lockout/Tagout	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Waste Processing Director
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Emergency Coordinator Review of Cont. Plan	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	
Indicators of Probable Drug Use – Supervisors	5	
Indicators of Probable Alcohol Use – Supervisors	5	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Confined Space	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Hearing Protection	3	
Lockout/Tagout	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

Drug & Laboratory Disposal, Inc.

Waste Processing Manager
Continuing Education Program

Environmental Protection Agency Training

Training	Timing Code	Completion Date
Contingency Plan Review	3	
Hazardous Waste Management Procedures	3	
TSCA (PCB) Regulations	3	
TSDF Regulations Review	3	

Department of Transportation Training

Training	Timing Code	Completion Date
General Awareness Training	5	
Function-Specific Training	5	
Safety Training	5	
Security Awareness Training	5	
In-Depth Security Training	5	
Indicators of Probable Drug Use – Supervisors	5	
Indicators of Probable Alcohol Use – Supervisors	5	

Michigan Occupational Health and Safety Administration Training

Training	Timing Code	Completion Date
Bloodborne Pathogens Training	3	
Confined Space	3	
Fire Safety	9	
Haz. Waste Operations & Emergency Response	3	
Hazard Communication	6	
Hearing Protection	3	
Lockout/Tagout	3	
Respiratory Protection	3	

Timing Codes

Code	Definition	Code	Definition
1	3 Months (90 Days)	6	Before beginning work or when hazards change
2	6 Months (180 Days)	7	Before performing tasks covered by the training
3	12 Months/Annually	8	Before working without close supervision
4	Bi-Annually	9	Voluntary
5	Tri-Annually	10	Varies

FORM EQP 5111 TEMPLATE MODULE A11

A11: CLOSURE AND POSTCLOSURE CARE PLANS

(Volume 1)

This document is an attachment to the Michigan Department of Environment, Great Lakes, and Energy's (EGLE) 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), R 299.9613 and Title 40 of the Code of Federal Regulations (CFR), Part 264, Subpart G, establishes requirements for the closure and, if necessary, postclosure care of 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 the proper closure and, if necessary, postclosure care of the hazardous waste management units and the hazardous waste management facility for the **DLD Environmental Services, Inc. (DLD) facility in Plainwell, Michigan**. The information provided in this template was used to prepare the closure and postclosure care cost estimate provided in Template A12, "Closure and Postclosure Care Cost Estimates."

Table of Contents

This template is organized as follows:

Since no hazardous waste will be left behind at closure, Section A11.B is not applicable.

A11.A CLOSURE PLAN

A11.A.1 Closure Performance Standard
[R 299.9613 and 40 CFR §264.111]

This Closure Plan is designed to ensure that the facility will be closed in a manner that achieves the following:

a. Minimizes the need for further maintenance; and

b. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, postclosure escape of hazardous wastes, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition byproducts to the groundwater, surface water, or atmosphere; and, as applicable

c. Complies with the unit-specific closure requirements for each of the following units:

(Check as appropriate)

☒ Use and management of containers	R 299.9614 and 40 CFR §264.178
☒ Tank systems	R 299.9615 and 40 CFR §264.197
☐ Surface impoundments	R 299.9616 and 40 CFR §264.228
☐ Waste piles	R 299.9617 and 40 CFR §264.258
☐ Land treatment [a]	R 299.9618 and 40 CFR §264.280
☐ Landfill	R 299.9619 and 40 CFR §264.310
☐ Incinerators	R 299.9620 and 40 CFR §264.351
☐ Drip pads [b]	R 299.9621 and 40 CFR §264.575
☒ Miscellaneous units	R 299.9623 and 40 CFR §264.601-603
☐ Hazardous waste munitions and storage[b]	R 299.9637 and 40 CFR §264.1202 explosive
☐ Boilers and industrial furnaces	R 299.9808 and 40 CFR §266.102(e)(11)

[a] Not included in the template
[b] *Not yet included in 40 CFR §264.111; therefore not considered*

Unit-specific closure procedures are discussed in Section A11.A.5 of this template for each unit type indicated above.

A11.A.2 Unit-Specific Information
[R 299.9613 and 40 CFR §264.112(b)(3) and (6)]

The following table identifies each hazardous waste management unit at the DLD facility subject to the closure requirements of this hazardous waste management facility operating license. The table also includes each unit's maximum licensed hazardous waste inventory, a list of the waste codes managed in the unit, the anticipated date of closure (if known), and the estimated duration of closure activities once closure begins. Unit-specific methods for closure and detailed schedules are discussed in Section A11.A.5 of this template.

Table A11.A.1
Hazardous Waste Management Units Information

Current Unit Designation	Maximum Inventory (Include Units)	Waste Codes of Hazardous Wastes Managed	Scheduled Closure Date	Estimated Duration of Closure
DLS-1	2,860 gallons	All codes (Part A, pages 5-21)	N/A	N/A
DLS-2	3,300 gallons	All codes (Part A, pages 5-21)	N/A	N/A
DLS-3	27,500 gallons	All codes (Part A, pages 5-21)	N/A	N/A
DLS-4	15,000 gallons	All codes (Part A, pages 5-21)	N/A	N/A
Loading Dock	4,020 gallons	All codes (Part A, pages 5-21)	N/A	N/A
DLS-5	11,440 gallons	All codes (Part A, pages 5-21)	N/A	N/A
Planned Unit Designation	**Maximum Inventory (Include Units)**	**Waste Codes of Hazardous Wastes Managed**	**Scheduled Closure Date**	**Estimated Duration of Closure**
DLS-6a	1,595 gallons	All codes (Part A, pages 5-21)	N/A	N/A
DLS-6b	10,780 gallons	All codes (Part A, pages 5-21)	N/A	N/A
DLS-7	90,000 gallons	All codes (Part A, pages 5-21)	N/A	N/A
DLS-8	3,300 gallons	All codes (Part A, pages 5-21)	N/A	N/A
DLS-9	28,160 gallons	All codes (Part A, pages 5-21)	N/A	N/A
DLS-10	93,500 gallons	All codes (Part A, pages 5-21)	N/A	N/A
DLS-11	52,250 gallons	All codes (Part A, pages 5-21)	N/A	N/A
DLS-12	26,000 gallons	All codes (Part A, pages 5-21)	N/A	N/A
Explosive Bunker	50 pounds	All codes (Part A, pages 5-21)	N/A	N/A

A11.A.3 Schedule of Final Facility Closure
[R 299.9613 and 40 CFR §264.112(b)(6)]

The DLD facility:

(Check as appropriate)

☐ Anticipates completing final closure of the entire facility by *[insert estimated date]*

☒ Has not determined when the facility will close and does not anticipate completing final closure of the entire facility prior to expiration of the facility's hazardous waste operating license.

Detailed Closure Schedule for Facility Closure: Provide a detailed breakdown showing the closure schedule with the anticipated time of completion for each activity below.

Closure Activity	Time Completed
A written closure notification plan will be sent to the Michigan Department of Natural Resources and the City of Plainwell 180 days prior to the projected date of final closure. During this period of time decreasing amounts of waste will be received. The closure notification will include the following: 1. The proposed date of closure. 2. A list of types and amounts of wastes on site and its location. 3. An inventory reduction plan detailing projected waste receipt during the 180-day period preceding closure and projected inventory at the end of each 60-day period prior to closure.	45 days before projected date of final closure
Removal of waste and soil sampling	Within 90 days from date of final closure
Decontamination of all hazardous waste units	Within 135 days from date of final closure
Write reports, compile analytical results, inspection	Within 180 days from date of final closure

A11.A.4 Notification and Time Allowed for Closure
[R 299.9613 and 40 CFR §264.112(d)(2) and 264.113(a) and (b)]

DLD will notify the director, in writing, not less than 60 days before the date on which DLD expects to begin partial or final closure of any or all hazardous waste management units at the facility. Final closure activities will be initiated within 90 days of receipt of the final volume of hazardous wastes and completed within 180 days of receipt of the final volume of waste. The tasks and estimated time required for partial closure shall follow the schedule specified in Section 11.A.3. Final closure will be certified by both DLD and an independent, qualified, registered professional engineer of the state of Michigan.

A11.A.4(a) Extensions for Closure Time
[R 299.9613 and 40 CFR §264.113(a) and (b)]

In the event that an extension for closure for the facility or any unit is necessary, the DLD facility will request an extension in accordance with the requirements of 40 CFR §264.113(a).

A11.A.5 Unit-Specific Closure Procedures

Unit-specific closure procedures are provided for each unit identified in Section A11.A.2 of this template.

A11.A.5(a) Closure of Container Storage Areas
[R 299.9614 and 40 CFR §264.178]

This section describes the procedures for closure of the container storage portion of DLD. The general closure requirement and specific closure procedures are discussed below.

A. General Closure Requirement

At closure, all hazardous waste and hazardous waste residues will be removed from the containment system. Remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed.

B. Specific Closure Procedures

Specific procedures for inventory management, unit inspection, decontamination, sampling and analysis, and additional waste management are discussed below.

1. Inventory and Remedial Waste Management Procedures

The specific procedures for closure would begin with DLD setting a date for the last off-site delivery of waste entering the facility. After this date, DLD would take a complete inventory of all containerized waste. All incoming waste would be treated and transported off site to the appropriate facilities for disposal. Since the life expectancy of DLD is difficult to determine, the

final disposal sites of waste generated during closure is also difficult to determine. If closure were to occur during calendar year 2022, the off-site facilities listed in Attachment A11-1 would be used. During closure, all packaging and/or loading will be done in those areas having secondary containment. This will minimize the potential for escape of hazardous waste into the environment. All containers from commingling and other processes would be cleaned and recycled, including glass, plastic and metal.

2. Unit Inspection Procedures

The DLD operating license requires that the integrity of the containment areas be maintained. This requirement is documented by the use of inspection sheets (refer to Section A5). Completed inspection sheets become part of the operating log. This system of inspection and documentation will be continued until closure is completed. Prior to decontamination of these containment areas, an inspection will be made to verify the integrity of all containment structures. If defects are found, they will be sealed or otherwise made secure to assure that there will be no loss of contaminants through the concrete containment structures. If defects are found, their location will be documented so that soil samples of the area can be taken after decontamination.

3. Decontamination Procedures

Decontamination will consist of water blasting and steam cleaning followed by a second water blasting to meet the triple rinse clause and, finally, a visual inspection to confirm that all visible hazardous waste residues have been removed. The areas to be decontaminated will be those licensed areas identified on DLD engineering plans as treatment or storage areas (refer to Volume 1, Section B6). Additionally, storage tanks and all components which make up the tank system and Subpart X regulated equipment such as the shredder, glass grinder, and assorted pumps will be decontaminated. Water and residues (40 CFR 264.197) from this decontamination process will be considered hazardous waste and/or analyzed for waste constituents prior to shipment off site to a final disposal site.

4. Sampling and Analysis Procedures

Since all hazardous waste activities at DLD occur in contained, covered areas, it is unlikely that soil or water contamination will have occurred; however, to document the completeness of decontamination and waste removal, soils will be tested as described below for those metals processed by DLD, including, but not limited to mercury, lead, and arsenic.

Starting at a distance 15 feet from the licensed area and every 20 feet along the East side of the waste processing area, and on the South side of the loading dock approach ramp within 12 inches of the hard surfaced driveway, a discrete soil sample will be taken at a 6- to 12-inch depth. A minimum of 4 discrete soil samples will be taken from the 6- to 12-inch level.

If detectable levels of contaminants are found, and if these levels exceed the statutory limits, sampling will be repeated at a location ten feet outward from the waste processing area and the loading dock ramp, thus establishing a grid to fix the location for remediation. After establishing the lateral boundaries, vertical boundaries will be established by sampling at the 20- to 24-inch

level, with each sample being analyzed for the same parameters as at the 6- to 12-inch level. This will establish the real location and depth of contamination. The soil will be removed to a depth of one foot (or deeper as determined by analysis) and disposed of in an appropriate facility or the contamination will be remediated by in-situ biodegradation or other methods which are acceptable at that time, unless it can be successfully demonstrated that the levels of contaminants are low enough as to not warrant remediation. If soil removal is chosen as the remediation process, confirmation sampling using the sampling and grid system outlined above will be performed to verify that contaminated materials have been adequately removed.

The ground water monitoring plan approved as part of the 1985 Hazardous Waste Treatment and Storage Facility Operating License, and as modified by this application, and subsequent applications, will be maintained until closure is complete. Storm water run-on and run-off are not factors in this closure plan because the active waste processing areas are under cover and do not experience run-on or run-off of storm water.

5. Additional Waste Management Procedures

All hazardous waste residues and waste waters, generated during the containment decontamination operation will be sent off site as hazardous waste, as will materials that cannot be decontaminated.

A11.A.5(b) Closure of Tank Systems
[R 299.9615 and 40 CFR §264.197]

This section describes the procedures for closure of the tank storage portions of DLD. The general closure requirement and specific closure procedures are discussed below.

A. General Closure Requirement

At closure of the tank system, the DLD facility will remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), contaminated soils, and structures and equipment contaminated with waste, and manage them as hazardous waste, unless 40 CFR §264.3(d) applies.

B. Specific Closure Procedures

Specific procedures for inventory management, unit inspection, decontamination, sampling and analysis, and additional waste management are discussed below.

1. Inventory and Remedial Waste Management Procedures
   See section A11.A.5(a)(B)(1)

2. Unit Inspection Procedure
   See section A11.A.5(a)(B)(2)

3. Decontamination Procedures
   See section A11.A.5(a)(B)(3)

4. Sampling and Analysis Procedures
   Random wipe samples will be taken to determine if the tanks are clean. The procedures listed in section A11.A.5(a)(B)(4) will be followed.

5. Additional Waste Management Procedures
   See section A11.A.5(a)(B)(5)

A11.A.5(c) Closure of Surface Impoundments
[R 299.9616 and 40 CFR §264.228(a)(1) and (2)]

DLD does not have and does not expect to have surface impoundments.

A11.A.5(d) Closure of Waste Piles
[R 299.9617 and 40 CFR §264.258]

DLD does not have and does not expect to have waste piles.

A11.A.5(e) Closure of Landfills
[R 299.9619 and 40 CFR §264.310(a)]

DLD does not have and does not expect to have landfills.

A11.A.5(f) Closure of Incinerators
[R 299.9620 and 40 CFR § 264.351]

DLD does not have and does not expect to have incinerators.

A11.A.5(g) Closure of Miscellaneous Units
[R 299.9623 and 40 CFR §264.601 through 264. 603]

This section describes the procedures for closure of the filter press and the container shredders. The general closure requirement and specific closure procedures are discussed below.

A. General Closure Requirement

At closure DLD will ensure protection of human health and the environment by preventing releases of hazardous waste constituents into the groundwater or subsurface environment; onto soils; into surface waters or wetlands; and into the air.

B. Specific Closure Procedures

Specific procedures for inventory management, unit inspection, decontamination, sampling and analysis, and additional waste management are discussed below.

1. Inventory and Remedial Waste Management Procedures

The container shredders are located within processing areas and portable filter presses are operated under processing hoods. This equipment is cleaned after use in hazardous waste processing.

2. Unit Inspection Procedures

Prior to decontamination, the filter presses and the shredders will be inspected to assure that no extraneous hazardous waste is contained within the equipment.

3. Decontamination Procedures

Decontamination will consist of water blasting and steam cleaning followed by a second water blasting to meet the triple rinse clause and, finally, a visual inspection to confirm that all visible hazardous waste residues have been removed. Water and residues (40 CFR §264.197) from this decontamination process will be considered hazardous waste and analyzed for waste constituents prior to shipment off-site to a final disposal site.

4. Sampling and Analysis Procedures

Not applicable.

A11.A.5(h) Closure of Boilers and Industrial Furnaces (BIF)

[R 299.9808 and 40 CFR §266.102(e)(11)]

DLD has no boilers or industrial furnaces.

A11.A.5(i) Other Closure Activities

[R 299.9504(1)(c), R 299.9508(1)(b), and R 299.9613(1) and 40 CFR §270.14(b)(13) and 264.112(b)(5)}

DLD will sample groundwater a final time to verify that the licensed facility did not release materials harmful to human health or the environment.

A11.A.6 Certification of Closure

[R 299.9613]

Within 60 days of completion of closure, DLD will submit to the Director, by registered mail, a certification that the hazardous waste management unit or facility, as applicable, has been closed in accordance with the specifications in the approved closure plan. The certification will be signed by DLD and by an independent registered professional engineer. Documentation supporting the independent registered engineer's certification will be furnished to the Director in accordance with R 299.9613(3), including:

1. The results of all sampling and analysis;
2. Sampling and analysis procedures;
3. A map showing the location where samples were obtained;
4. Any statistical evaluations of sampling data;
5. A summary of waste types and quantities removed from the site and the destination of these wastes; and
6. If soil has been excavated, the final depth and elevation of the excavation and a description of the fill material used.

The DLD facility will maintain financial assurance for closure until the Director releases the DLD facility from the financial assurance requirements for closure under R 299.9703. The certification will be worded as follows:

> 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 fine and imprisonment for knowing violations.

A11.A.7 Postclosure Notices Filed

[R 299.9504(1)(c) and R 299.9508(1)(b) and 40 CFR, Section 270.14(b)(14)]

The applicant must provide documentation that the postclosure notices required under 40 CFR §264.119 have been filed for hazardous waste disposal units that have been closed at the facility.

A11.B POSTCLOSURE PLAN

[R 299.9613 and 40 CFR, Section 264.118]

A11.B.1 Applicability

(Check as appropriate)

☒ **Not applicable**: Hazardous waste will not be left behind at closure. A survey plat, postclosure care, postclosure certifications, and other notices are not required.

Attachment A11 - 1

DLD Approved Facility List		
	Facility Name, Address, and EPA ID Number	**Disposal Method**
1	Clean Harbors of Arkansas 309 American Circle El Dorado, AR 71730 ARD 069 748 192	Incineration
2	Clean Harbors of Texas 2027 Battleground Road La Porte, TX 77571 TXD 055 141 378	Incineration
3	Clean Harbors Aragonite LLC 11600 North Aptus Road Grantsville, UT 84029 UTD981552177	Retort/ Incineration
4	Covanta Indianapolis, Inc. 2425 South Belmon Avenue Indianapolis, IN 46221 IND984882365	Incineration
5	Ross Environmental Services 36790 Giles Road Grafton, OH 44044 OHD 048 415 665	Incineration
6	Heritage-WTI, Inc. 1250 Saint George Street East Liverpool, OH 49320 OHD 980 613 541	Incineration
7	Louis Padnos Iron & Metal Company 2150 Turner Avenue NW Grand Rapids, MI 49544	Recycling
8	WM Mercury Waste, Inc. 21211 Durand Avenue Union Grove, WI 53182 WIR 000 000 356	Retort / Reclamation
9	Michigan Disposal Waste Treatment Plant 49350 North I-94 Service Drive Belleville, MI 48111 MID 000 724 831	Solidification
10	Petro-Chem Processing, Inc. Division 421 Lycaste Detroit, MI 48214 MID 980 615 298	Fuel Blending
11	Fielding Chemical Technologies Inc. 3575 Mavis Road Mississauga, ON L5C 1T7 A220143	Fuel Blending
12	Veolia Environmental Services #7 Mobile Avenue Sauget, IL 62201 ILD 098 642 424	Incineration
13	Veolia Environmental Services Hwy 73 - 3.5 miles west of Taylor's Bay Port Arthur, TX 77640 TXD 000 838 896	Incineration
14	EQ - Detroit, Inc. 1923 Fredrick Street Detroit, MI 48211 MID980991566	Treatment & Stabilization
15	ENPRO Services of Vermont, Inc. 54 Avenue D Williston, VT 05495 VTR0000517052	Incineration
16	Lehigh Cement Company 3084 W County Road 225 S Logansport, IN 46947	Fuel Blending
17	Environmental Enterprises Inc. 4650 Spring Grove Avenue Cincinnati, OH 45232 OHD083377010	Recycling
18	Tradebe Treatment and Recycling, LLC 4343 Kennedy Avenue East Chicago, IN 46312 IND000646943	Incineration/Fuel Blending /Recycling
19	SET Environmental, Inc/TX 5742 Cheswood Street Houston, TX 77087 TXD055135388	Incineration

FORM EQP 5111 TEMPLATE MODULE A12

A12: CLOSURE AND POSTCLOSURE CARE COST ESTIMATES

(Volume 1)

Current DLD Licensed Facility

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), R 299.9702 and Title 40 of the Code of Federal Regulations (CFR), Part 264, Subpart H, establishes requirements for providing financial assurance for closure and, if necessary, postclosure care. Specifically, R 299.9702(1) requires the preparation of associated cost estimates. This license application template addresses the requirement for preparing a closure cost estimate and, if necessary, a postclosure care cost estimate. The cost estimates provided in this attachment are based on the closure and postclosure care activities detailed in Template A11. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This template is organized as follows:

A12.A CLOSURE COST ESTIMATE

A12.A.1 Closure Cost Estimate Breakdown

Table A12.A.1 Facility Closure Cost Estimate Breakdown by Unit

Table A12.A.2 Container Storage Areas Closure Cost Estimate

Table A12.A.3 Tank Systems Closure Cost Estimate

Table A12.A.4 Miscellaneous Units Closure Cost Estimate

A12.B POSTCLOSURE COST ESTIMATE

(Since no hazardous waste will be left behind at closure, the following template sections are not applicable)

A12.A CLOSURE COST ESTIMATE

[R 299.9702(1) and 40 CFR §264.142]

The closure cost estimate covers the corresponding closure activities in the approved closure plan. These activities may include, but are not limited to, removal of waste inventory, decontamination, sampling and analysis, and closure certification. Unless otherwise specified in Section A11.A.2, the date of closure of the hazardous waste management units has not been determined. As such, it is not possible to predict, with any high degree of certainty, actual facility conditions or regulatory requirements at time of closure. Therefore, this closure cost estimate is based on closure of the unit within the next six months and includes a contingency estimate to account for media sampling and analysis, and removal based on current conditions.

The estimate assumes closure procedures are completed by a third party at the time facility closure would be most expensive (e.g., with a maximum inventory). The cost estimate for disposal assumes wastes will be treated and contaminated equipment disposed rather than recovered or salvaged. The closure cost estimate breakdown by unit is provided in Section A12.A.1. Unit-specific work sheets are provided, as applicable, in Tables A12.A.2, A12.A.3, and A12.A.4, below.

Additional cost estimate assumptions are listed below.

1. All hazardous waste will be transported off site to a permitted facility in accordance with all applicable state and federal regulations.
2. Costs are based on current year costs. All labor rates reflect commercial rates and include fringe benefits, payroll burden, and taxes.
3. Total costs include a 0 percent contingency for administrative and a 0 percent contingency for miscellaneous operating costs. However, it does include a six percent contingency for engineering fees and a three percent contingency allowance.

This closure cost estimate will be maintained at the facility. It will be revised whenever a change in the closure plan affects the cost of closure. It will be adjusted annually as required by pertinent regulations or when the types and quantity of wastes received at the facility change.

A12.A.1 Closure Cost Estimate Breakdown

Table A12.A.1 Facility Closure Cost Estimate Breakdown by Unit*

1.	Container Storage Areas	$ 197,847
2.	Tank Systems	$ 61,224
3.	Surface Impoundments	$ NA
4.	Waste Piles	$ NA
5.	Landfills	$ NA
6.	Incinerators	$ NA
7.	Miscellaneous Units	$ 3,815
8.	Boilers and Industrial Furnaces	$ NA
Total Facility Closure and Postclosure Care Estimate (add lines 1 through 11)		$ 262,886

* Tables not included at this time for Land Treatment Units, Drip Pads, and Hazardous Waste Munitions and Explosives Storage Units

Table A12.A.2 Container Storage Areas Closure Cost Estimate

	Activity If certain activities are not expected to be performed, enter "NA" as the Estimated Cost.	**Estimated Cost**
1.	Demolition and Removal of Containment	$ NA
2.	Removal of Soil	$ NA
3.	Backfill	$ NA
4.	Decontamination	$ 22,184
5.	Sampling and Analysis	$ 8,020
6.	Monitoring Well Installation	$ NA
7.	Transportation	$ 29,700
8.	Treatment and Disposal of Waste Inventory and Other Cleanup Wastes	$ 125,770
9.	**Subtotal of Closure Costs** (Add lines 1 through 8)	**$ 185,674**
10.	Engineering Expenses (typically 10% of closure costs, excluding certification of closure.)	$ 10,810
11.	Certification of Closure	$ 100
12.	**Subtotal** (Add Lines 9, 10, and 11])	**$ 196,584**
13.	Contingency Allowance (typically 20% of closure costs, engineering expenses, and cost of certification of closure.)	$ 5,763
14.	Landfill Closure	$ NA
	Total Closure Cost (Add Lines 12, 13, and 14)	**$ 202,347**

Table A12.A.3 Tank Systems Closure Cost Estimate

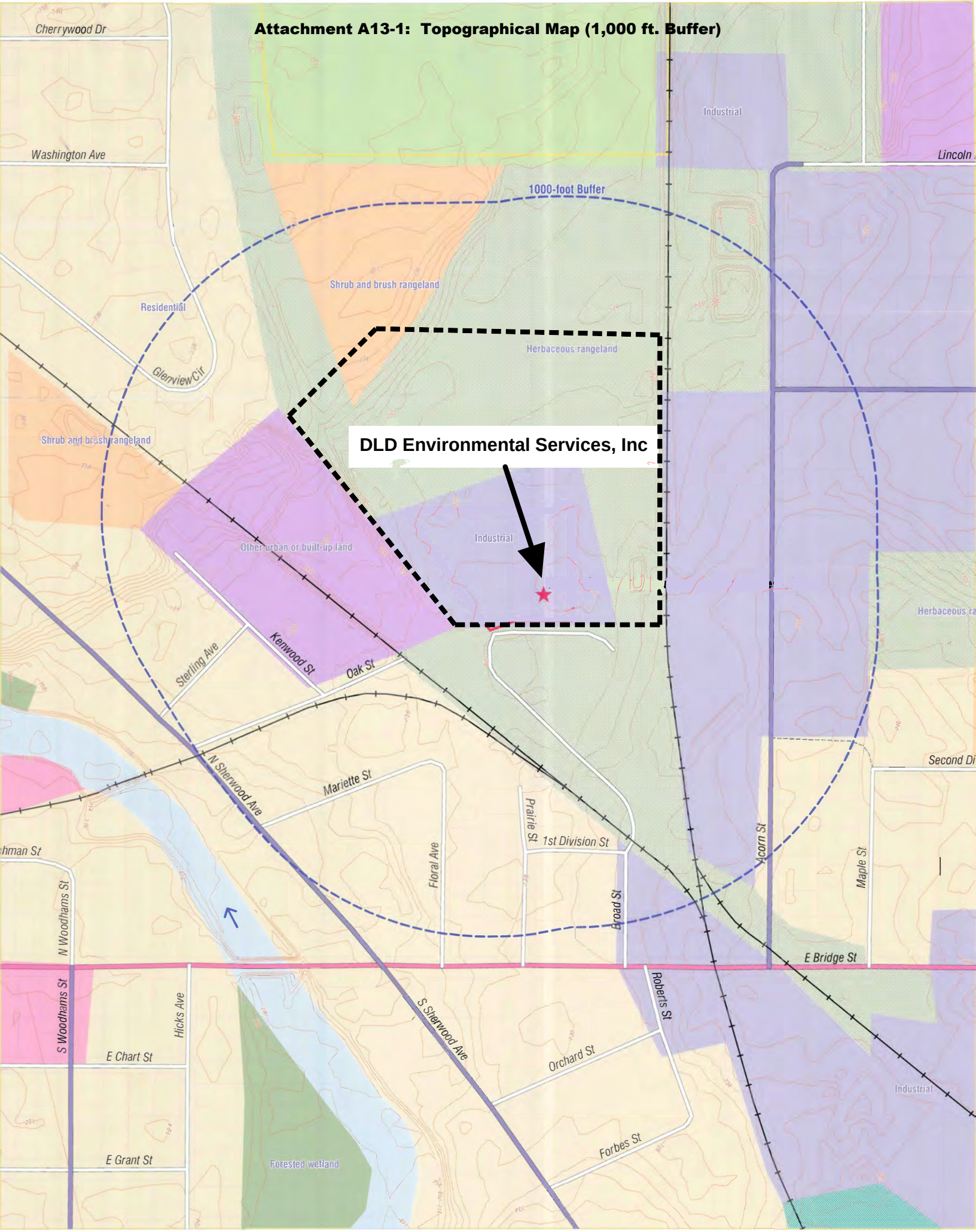
	Activity If certain activities are not expected to be performed, enter "NA" as the Estimated Cost.	**Estimated Cost**
1.	Removal of Waste	$150
2.	Tank System Purging (ignitable wastes *only*)	$ 100
3.	Flushing of Tank and Piping	$ 100
4.	Excavation, Disassembly, and Loading	$ NA
5.	Demolition and Removal of Containment System	$ NA
6.	Removal of Soil	$ NA
7.	Backfill	$ NA
8.	Decontamination	$ 732
9.	Sampling and Analysis	$ 900
10.	Monitoring Well Installation	$ NA
11.	Transportation	$ 30,000
12.	Treatment and Disposal of Waste Inventory and Cleanup Wastes	$ 24,000
13.	**Subtotal of Closure Costs** (Add Lines 1 through 12)	$ 55,982
14.	Engineering Expenses (typically 10% of closure costs, excluding certification of closure.)	$ 3,359
15.	Certification of Closure	$ 100
16.	**Subtotal** (Add Lines 13, 14, and 15)	$ 59,441
17.	Contingency Allowance (typically 20% of closure costs, engineering expenses, and cost of certification of closure.)	$ 1,783
18.	Landfill Closure	$ NA
	Total Cost of Closure (Add lines 16, 17, and 18)	$ 61,224

Table A12.A.4 Miscellaneous Units Closure Cost Estimate

DLD Environmental Services, Inc.

	Activity If certain activities are not expected to be performed, enter "NA" as the Estimated Cost.	**Estimated Cost**
1.	Removal of Free Liquid	$ NA
2.	Removal of Sludge	$ NA
3.	Stabilization of Waste	$ NA
4.	Removal of Containment System Components	$ NA
5.	Removal of Concrete Structures	$ NA
6.	Removal of Soil	$ NA
7.	Backfill	$ NA
8.	Decontamination	$ 3,320
9.	Sampling and Analysis	$ NA
10.	Monitoring Well Installation	$ NA
11.	Transportation	$ 24
12.	Treatment and Disposal of Waste Inventory and Cleanup Wastes	$ 24
13.	**Subtotal of Closure Costs** (Add Lines 1 through 12)	**$ 3,368**
14.	Engineering Expenses (typically 10% of closure costs, excluding certification of closure.)	$ 270
15.	Certification of Closure	$ NA
16.	**Subtotal** (Add Lines 13, 14, and 15)	**$ 3,638**
17.	Contingency Allowance (typically 20% of closure costs, engineering expenses, and cost of certification of closure.)	$ 77
18.	Landfill Closure	$ NA
	Total Cost of Closure (Add lines 16, 17, and 18)	**$ 3,715**

Attachment A13-1: Topographical Map (1,000 ft. Buffer)

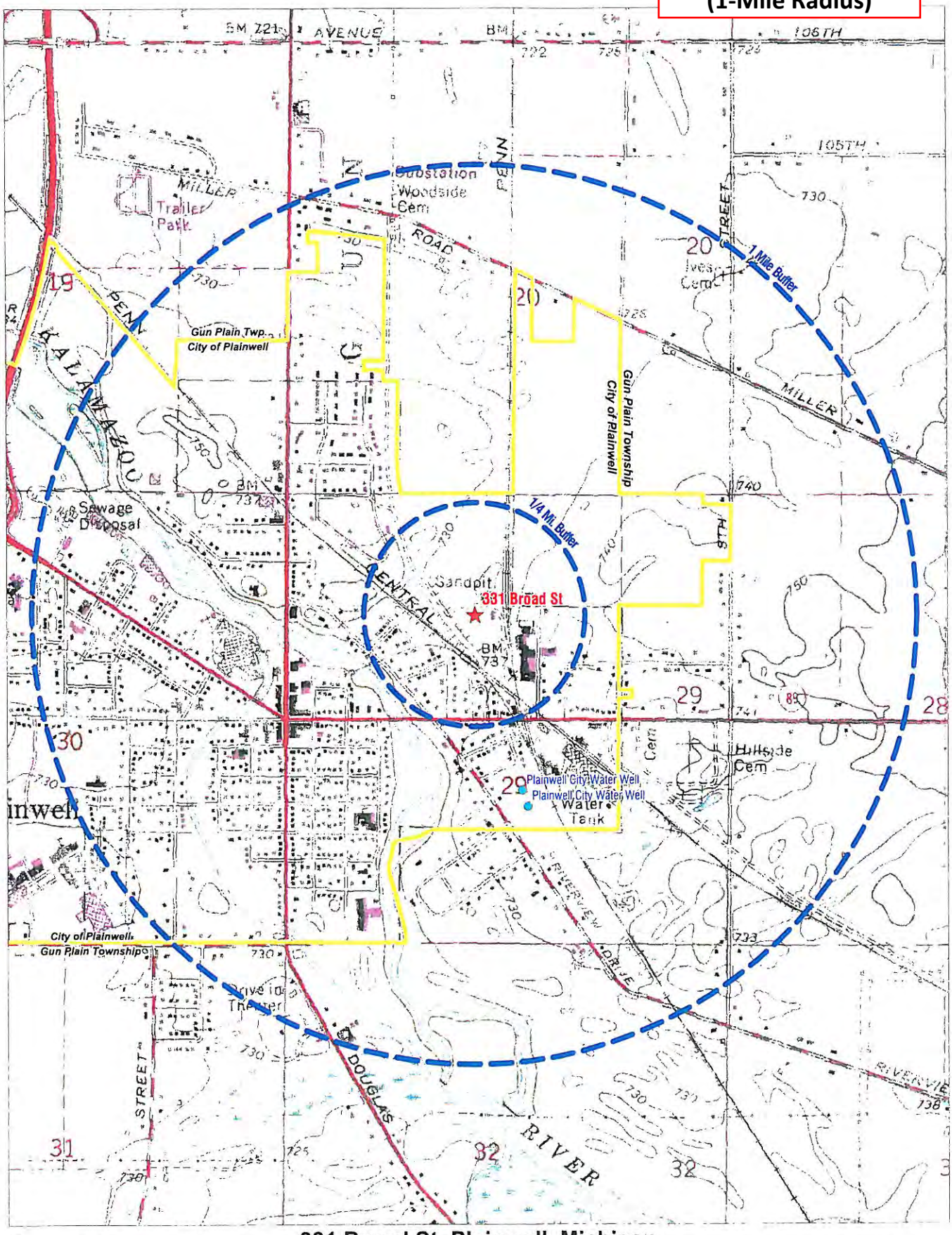


Drug & Laboratory Disposal, Inc.
331 Broad St, Plainwell, Michigan
42° 26' 41" North, 85° 38' 5" West
Including 1,000-Foot Buffer Around Property

Map Scale: 1 inch = 100 feet
Contour Interval: 2 Feet
Map Printed: November 14, 2008

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

Attachment A13-2
Topographical Map
(1-Mile Radius)

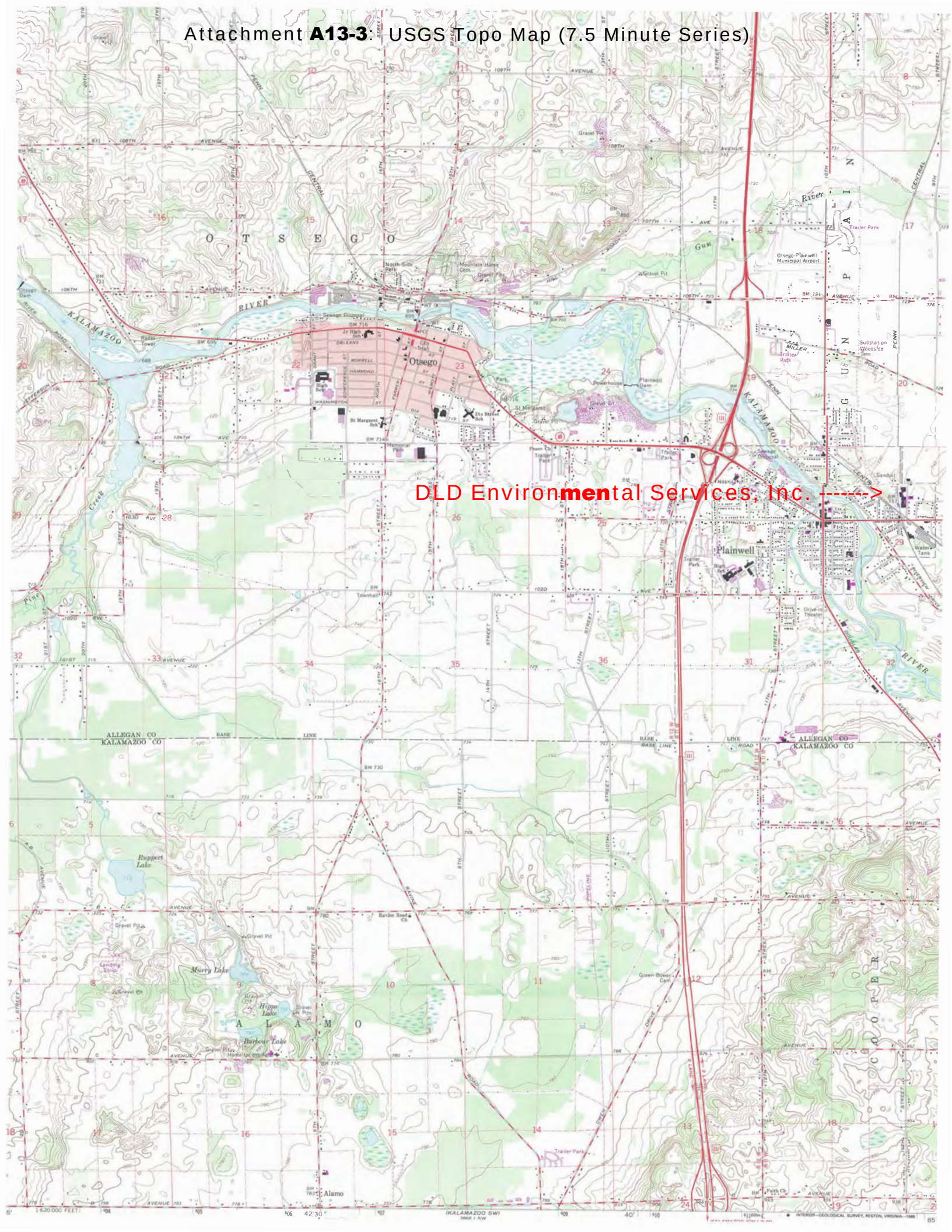


331 Broad St, Plainwell, Michigan
Including 1-Mile Buffer Around Site

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 **A13-3**: USGS Topo Map (7.5 Minute Series)



A14: LIABILITY MECHANISM

(Volume 1)

40 CFR §270.14(b)(17)

The owner and operator of DLD Environmental Services, Inc. (DLD) has demonstrated financial responsibility for bodily injury and property damage to third parties caused by sudden and accidental occurrences arising from the operation of its facility by maintaining liability insurance coverage for sudden and accidental occurrences in an amount equal to or greater than $1,000,000 per occurrence with an annual aggregate of $2,000,000, exclusive of legal defense costs. DLD currently carries pollution legal liability insurance in the amount of $6,000,000 per occurrence with an annual aggregate of $7,000,000.

This policy has been amended by attachment of the State of Michigan's Hazardous Waste Management Facility Amendatory Endorsement and is issued by an insurer which is eligible to provide insurance as an excess and surplus lines insurer in the state of Michigan. Refer to Volume 1, Attachment A14-1 for a copy of the endorsement and proof of insurance.

ACORD®

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): 12/21/2021

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER
Coldbrook Insurance Group LLC
2000 Oak Industrial Drive NE
Suite B
Grand Rapids MI 49505

CONTACT NAME: Kelly Wilmoth
PHONE (A/C, No, Ext): (616) 301-6757 **FAX (A/C, No):** (616) 913-3353
E-MAIL ADDRESS: kellyw@coldbrookins.com

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A : AIG Specialty Insurance Company	26883
INSURER B : Commerce and Industry Insurance Company	19410
INSURER C : Accident Fund General Insurance Company	12304
INSURER D :	
INSURER E :	
INSURER F :	

INSURED
Drug & Laboratory Disposal, Inc.
331 Broad Street
Plainwell MI 49080

COVERAGES **CERTIFICATE NUMBER:** 22-23 **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	[X] COMMERCIAL GENERAL LIABILITY [ ] CLAIMS-MADE [X] OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: [X] POLICY [ ] PRO-JECT [ ] LOC [ ] OTHER:			EG17714151	01/01/2022	01/01/2023	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG Employee Benefits	$ 1,000,000 $ 300,000 $ 25,000 $ 1,000,000 $ 2,000,000 $ 2,000,000 $ 1,000,000
B	AUTOMOBILE LIABILITY [X] ANY AUTO [ ] OWNED AUTOS ONLY [ ] SCHEDULED AUTOS [X] HIRED AUTOS ONLY [X] NON-OWNED AUTOS ONLY			CA7666230	01/01/2022	01/01/2023	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident) Uninsured motorist	$ 1,000,000 $ $ $ 500 $ 1,000,000
A	[X] UMBRELLA LIAB [X] OCCUR [ ] EXCESS LIAB [ ] CLAIMS-MADE [ ] DED [X] RETENTION $ 10,000			EGU3779132	01/01/2022	01/01/2023	EACH OCCURRENCE AGGREGATE	$ $
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) Y / N [ ] If yes, describe under DESCRIPTION OF OPERATIONS below	N / A		WCV8011030	01/01/2022	01/01/2023	[X] PER STATUTE [ ] OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	 $ 1,000,000 $ 1,000,000 $ 1,000,000
A	Pollution (CPL & PPL)			EG17714151	01/01/2022	01/01/2023	Each Loss Aggregate	$1,000,000 $2,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Total Limit for General Liability/Pollution Liability $6,000,000 each occurrence, $7,000,000 aggregate. Total Limit Auto Liability $6,000,000 each accident.

CERTIFICATE HOLDER

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Jeff Darter

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A15: FINANCIAL ASSURANCE INSTRUMENT

40 CFR §270.14(b)(18)

(Volume 1)

The owner and operator of DLD Environmental Services, Inc. currently fulfills the requirements for a financial mechanism to fund Closure and Cleanup activities through the provision of a Certificate of Deposit (CD).

The CD is issued in an amount in excess of the current closure cost estimate (which covers DLS-1, DLS-2, DLS-3, DLS-4, DLS-5 & HWLB) and is in the name of the Director of the Department of Environmental Quality. Please refer to Attachment A15-1 to view a copy.

As funding becomes necessary for the estimated closure cost estimates for future licensed areas of the facility, it will be provided through increases to the existing CD and/or through the usage of additional financial mechanisms allowed by the regulations. At this time, some combination of certificates of deposit and/or letters of credit would likely be used. DLD's bank has expressed a willingness to provide an Irrevocable Standby Letter of Credit that would meet the requirements of 40 CFR 264.151(d) (which contains the required wording).

Future financial mechanisms will be issued in the name required by the Michigan Department of Natural Resources and Environment at that time.

CERTIFICATE OF DEPOSIT/TIME DEPOSIT ACCOUNT
HAZARDOUS WASTE MANAGEMENT

The Agreement of Acceptance required under R 299.9707 must be worded as follows, except that instructions in brackets are to be replaced with the relevant information and the brackets deleted:

AGREEMENT AND ACCEPTANCE OF
CERTIFICATE OF DEPOSIT

Facility: Drug & Laboratory Disposal, Inc.
Address: 331 Broad Street
Plainwell, MI 49080
EPA ID: MID092947928

It is agreed between the State of Michigan, Department of Environmental Quality, and Drug and Laboratory Disposal, Inc., hereinafter the Company, that Certificate of Deposit # 31002215 in the amount of $ 149,000.00, issued by First National Bank of Michigan on October 3, 2007 in the name of and for the sole benefit of the Director of the Michigan Department of Environmental Quality, hereinafter the Director, is accepted as financial assurance for *Closure* of the above referenced facility as required by Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and its administrative rules.

1. The certificate or account will mature on October 3, 2008. The certificate or account *will* be renewed automatically.

2. All interest accruing to the certificate or account shall be *maintained as part of a renewed certificate or continuing account.*

3. The Director or his authorized representative are the only persons who may cash the certificate or make withdrawals from the account. The Director or his authorized representative may cash the certificate or make withdrawals from the account in the event that:

   a) the Director, in accordance with the administrative rules promulgated under Part 111 of Act 451, issues a notice of violation or order indicating that the Company has failed to properly execute its *closure* responsibilities; or

   b) the Company fails to renew, extend or replace the certificate or account in a manner approved by the Director at least sixty (60) days prior to maturity of the certificate or account.

4. In the event that the certificate or account is cashed by the Director prior to maturity, all accrued interest shall be paid to the Director.

CERTIFICATE OF DEPOSIT/TIME DEPOSIT ACCOUNT
HAZARDOUS WASTE MANAGEMENT

5. Should cashing of the certificate or account result in surplus funds (i.e., funds in excess of the immediate *closure* costs), these funds will be held by the State Treasurer to be invested at a rate or rates of interest to be determined at his sole discretion. These funds will be use solely for purposes relating to *closure* of the facility identified herein.

Michigan Department of Environmental Quality

By: _____
Title: Chief, Waste and Hazardous Materials Division
Date: 10-31-07

Company

By: Burt W. Watts
Title: President
Date: 10-03-07

Acknowledged

Issuing Institution:

By: _____ Adam E. Wade
Title: Commercial Relationship Manager
Date: 10-3-07

Rev 8/97

Certificate of Deposit Receipt

RETAIL-n100-1 YR

Member Number:
Account Number: 31002215
IRA Number:

This receipt is issued to:

State of Michigan, Director DEQ
331 Broad Street
Plainwell MI 49080

Amount	$ 149,000.00
Date Opened	10/03/07
Term	12 Months
Maturity Date	10/03/08
Interest Rate	4.74 %
Annual Percentage Yield	4.85 %

First National Bank of MI
348 W Michigan Ave
Kalamazoo, MI 49007

The account evidenced by this receipt is subject to and further explained in the terms and conditions contained in the account agreement and account disclosures. The account is Not Negotiable and Not Transferable. Only the items checked apply.

☒ **Fixed Interest Rate** ☐ **Variable Interest Rate**
☐ **Additions Permitted**
☒ **Automatically Renewable** ☐ **Single Maturity** (not automatically renewable) ☐ **Callable** ☐ **Notice Account**

Interest will be:
- ☐ mailed to the owner(s).
- ☒ added to principal (compounded).
- ☐ paid to _____ account No. _____.
- ☒ Interest will be paid monthly.

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First Nat'l Bank of Michigan BR-01 ------ TEMPORARY STATEMENT

DATE 9/01/10 ACCOUNT NO. 00031002215

State of Michigan, MIDEQ - WHMD
c/o Drug and Laboratory Disposal
331 Broad St
Plainwell MI 49080

****

ORIGINAL PRINCIPAL 149,000.00

CURRENT BALANCE 161,954.78

****

DATE	AMOUNT	BALANCE	TC	
10/03/07	4.740%	.00	151	RATE CHANGE
10/03/07	149,000.00CR	149,000.00	10	REGULAR DEPOSIT
11/02/07	601.01CR	149,601.01	171	INTEREST ADDED BACK
12/03/07	583.93CR	150,184.94	171	INTEREST ADDED BACK
1/03/08	605.79CR	150,790.73	171	INTEREST ADDED BACK
2/01/08	608.23CR	151,398.96	171	INTEREST ADDED BACK
3/03/08	571.21CR	151,970.17	171	INTEREST ADDED BACK
4/03/08	612.99CR	152,583.16	171	INTEREST ADDED BACK
5/02/08	595.57CR	153,178.73	171	INTEREST ADDED BACK
6/03/08	617.86CR	153,796.59	171	INTEREST ADDED BACK
7/03/08	600.30CR	154,396.89	171	INTEREST ADDED BACK
8/01/08	622.78CR	155,019.67	171	INTEREST ADDED BACK
9/03/08	625.29CR	155,644.96	171	INTEREST ADDED BACK
10/03/08	607.52CR	156,252.48	171	INTEREST ADDED BACK
10/03/08	2.710%	156,252.48	151	RATE CHANGE
11/03/08	360.04CR	156,612.52	171	INTEREST ADDED BACK
12/03/08	349.21CR	156,961.73	171	INTEREST ADDED BACK
1/02/09	361.67CR	157,323.40	171	INTEREST ADDED BACK
2/03/09	362.51CR	157,685.91	171	INTEREST ADDED BACK
3/03/09	328.14CR	158,014.05	171	INTEREST ADDED BACK
4/03/09	364.10CR	158,378.15	171	INTEREST ADDED BACK
5/01/09	353.15CR	158,731.30	171	INTEREST ADDED BACK
6/03/09	365.75CR	159,097.05	171	INTEREST ADDED BACK
7/03/09	354.75CR	159,451.80	171	INTEREST ADDED BACK
8/03/09	367.41CR	159,819.21	171	INTEREST ADDED BACK
9/03/09	368.26CR	160,187.47	171	INTEREST ADDED BACK
10/02/09	357.19CR	160,544.66	171	INTEREST ADDED BACK
10/02/09	1.050%	160,544.66	151	RATE CHANGE
11/03/09	143.23CR	160,687.89	171	INTEREST ADDED BACK
12/03/09	138.73CR	160,826.62	171	INTEREST ADDED BACK
1/01/10	143.48CR	160,970.10	171	INTEREST ADDED BACK
2/03/10	143.61CR	161,113.71	171	INTEREST ADDED BACK
3/03/10	129.82CR	161,243.53	171	INTEREST ADDED BACK
4/02/10	143.86CR	161,387.39	171	INTEREST ADDED BACK
5/03/10	139.34CR	161,526.73	171	INTEREST ADDED BACK
6/03/10	144.11CR	161,670.84	171	INTEREST ADDED BACK
7/02/10	139.58CR	161,810.42	171	INTEREST ADDED BACK

First Nat'l Bank of Michigan BR-01 ------ TEMPORARY STATEMENT

DATE 9/01/10 ACCOUNT NO. 00031002215

DATE	AMOUNT	BALANCE	TC	
8/03/10	144.36CR	161,954.78	171	INTEREST ADDED BACK

B1: STATUS OF COMPLIANCE WITH OTHER FEDERAL LAWS

40 CFR §270.14(b)(20)

The following federal regulations have not impacted the DLD Environmental Services, Inc. facility site:

1. The Wild and Scenic Rivers Act.
2. The National Historic Preservation Act of 1966
3. The Endangered Species Act.
4. The Coastal Zone Management Act.
5. The Fish and Wildlife Coordination Act