

Volume 8

West Storage Area

(Includes HWLB2)

DLS21

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FORM EQP 5111 Template

A1: GENERAL FACILITY DESCRIPTION

(Volume 8)

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A1: General Facility Description

FORM EQP 5111 TEMPLATE

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A6: Preparedness and Prevention or Waiver

FORM EQP 5111 TEMPLATE MODULE A7

A7: CONTINGENCY PLAN

(Volume 8)

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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Attachment A7.1 DLS-8 Evacuation Route Diagram

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Attachment A7.3 DLS-8 & DLS-9 Emergency Equipment Descriptions

Attachment A7.4 Checklist for Tracking Facility Response Actions During and After a Fire/Explosion Incident

INTRODUCTION

A7.A BACKGROUND INFORMATION

A7.A.1 Purpose of the Contingency Plan [R 299.9607 and 40 CFR §264.51 and 264.53]

See Volume 1, Section A7.A.1

A7.A.2 Description of Facility Operations

Reference is made to Volume 1, Section A7.A.2, with the addition of the following information specific to new hazardous waste management unit DLS-21

The building housing DLS-21 will be built of hydrophobic cement and steel, and will have secondary containment in compliance with the containment standards. The entire area will be fully licensed, as it is intended for hazardous waste storage.

DLS-21: This area will be a hazardous waste storage area and will consist of a semi-enclosed roof structure (walled on two sides) to the west of the DLS-20 containment area. This structure provides space for both hazardous waste rack storage and a truck loading bay with slots for two trucks to load or unload.

A7.A.3 Identification of Potential Situations

See volume 1, Section A7.A.3

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]

See Volume 1, Section A7.B.1.

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

See Volume 1, Section A7.B.2.

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

See Volume 1, Table A7.B.1.

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

See Volume 1, Section A7.B.3.

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

See Volume 1, Section A7.C.

A7.D EMERGENCY PROCEDURES
[R 299.9607 and 40 CFR §264.51, 264.52, and 264.56]

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]

See Volume 1, Section A7.D.1.

A7.D.2 Procedures to Be Used for Identification of Releases
[R 299.9607 and 40 CFR §264.51, 264.52, and 264.56]

See Volume 1, Section A7.D.2.

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]

See Volume 1, Section A7.D.3.

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]

Reference is made to Volume 1, Section A7.D.4, with the addition of the following information specific to DLS-21:

- Upon completion, evacuation plans for DLS-21 will be included in Volume 8, Attachment A7-1.

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]

Reference is made to Volume 1, Section A7.D.4, with the addition of the following information specific to DLS-8 & DLS-9:

- Upon completion, DLS-21 Evacuation Diagrams will be provided in Volume 8, Attachment A7-1
- Upon completion, an Emergency Equipment List for DLS-21 will be found in Volume 8, Attachment A7-2.

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)]

See Volume 1, Section A7.D.6.

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)]

See Volume 1, Section A7.D.7.

A7.D.8 Procedures for Cleanup and Decontamination
[R 299.9607 and 40 CFR §264.51, 264.52, and 264.56(h)]

See Volume 1, Section A7.D.8.

A7.E NOTIFICATION AND RECORD KEEPING REQUIREMENTS
[R 299.9607 and 40 CFR §264.51, 264.52, and 264.56(l) and (j)]

A7.E.1 Procedures to Be Used to Notify State and Federal Officials Prior to Commencement of Operations
[R 299.9607 and 40 CFR §264.51, 264.52, and 264.56]

See Volume 1, Section A7.E.1.

A7.E.2 Record Keeping Requirements
[R 299.9607 and 40 CFR §264.51, 264.52, and 264.56(j)]

See Volume 1, Section A7.E.2.

A7.E.2(a) Operating Record

See Volume 1, Section A7.E.2(a)

A7.E.2(b) Written Incident Report

See Volume 1, Section A7.E.2(b)

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)]

See Volume 1, Section A7.F

A7.G PROCEDURES FOR REVIEWING AND AMENDING THE CONTINGENCY PLAN
[R 299.9607 and 40 CFR §264.54]

See Volume 1, Section A7.G.

FORM EQP 5111 Template

A8: Traffic Information

(Volume 8)

See Volume 1

A8: Traffic Information

A9 - FACILITY LOCATION INFORMATION

40 CFR §270.14(b)(11)

(Volume 8)

See Volume 1

A9: Facility Location Information

A10: PERSONNEL TRAINING PROGRAM

(Volume 8)

See Volume 1

A10: Personnel Training Program

FORM EQP 5111 Template

A11: Closure and Postclosure Plan

(Volume 8)

See Volume 1

A11: Closure and Postclosure Plan

FORM EQP 5111 TEMPLATE

A12: CLOSURE AND POSTCLOSURE CARE COST ESTIMATES

(Volume 8)

(Hazardous Waste Units DLS-21)

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]

Reference is made to Volume 1, Section A12.A, with the addition of the following information specific to DLS-20:

The cost closure information found in Tables A12.A.2, A12.A.3, and A12.A.4, below, shall be cumulative with those tables found in Volume 1 and any other volumes whose hazardous waste management units are approved and operational.

A12.A.1 Closure Cost Estimate Breakdown

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

1.	Container Storage Areas	\$ TBD
2.	Tank Systems	\$ NA
3.	Surface Impoundments	\$ NA
4.	Waste Piles	\$ NA
5.	Landfills	\$ NA
6.	Incinerators	\$ NA
7.	Miscellaneous Units	\$ NA
8.	Boilers and Industrial Furnaces	\$ NA
Total Closure and Postclosure Care Estimate (add lines 1 through 11)		\$ TBD

* 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	\$ TBD
5.	Sampling and Analysis	\$ TBD
6.	Monitoring Well Installation	\$ NA
7.	Transportation	\$ TBD
8.	Treatment and Disposal of Waste Inventory and Other Cleanup Wastes	\$ TBD
9.	Subtotal of Closure Costs (Add lines 1 through 8)	\$ TBD
10.	Engineering Expenses (typically 10% of closure costs, excluding certification of closure.)	\$ TBD
11.	Certification of Closure	\$ TBD
12.	Subtotal (Add Lines 9, 10, and 11])	\$ TBD
13.	Contingency Allowance (typically 20% of closure costs, engineering expenses, and cost of certification of closure.)	\$ TBD
14.	Landfill Closure	\$ NA
Total Closure Cost (Add Lines 12, 13, and 14)		\$ TBD

Table A12.A.3 Tank Systems Closure Cost Estimate

Not applicable to hazardous waste units DLS-21

Table A12.A.4 Miscellaneous Units Closure Cost Estimate

Not applicable to hazardous waste units DLS-21

FORM EQP 5111 TEMPLATE

A13: Topographical Map

(Volume 8)

See Volume 1

A13: Topographical map

A14: LIABILITY MECHANISM

40 CFR §270.14(b)(17)

(Volume 8)

To Be Determined

A15: FINANCIAL ASSURANCE INSTRUMENT

40 CFR §270.14(b)(17)

(Volume 8)

To Be Determined

B1: STATUS OF COMPLIANCE WITH OTHER FEDERAL LAWS

40 CFR §270.14(b)(20)

(Volume 8)

See Volume 1

B1: Status of Compliance With Other Federal Laws

FORM EQP 5111 TEMPLATE

B2: CORRECTIVE ACTION INFORMATION

(Volume 8)

See Volume 1

B2: Corrective Action Information

FORM EQP 5111 Template

B3: HYDROGEOLOGICAL REPORT

(Volume 8)

See Volume 1

B3: Hydrogeological Report

FORM EQP 5111 Template

B4: ENVIRONMENTAL ASSESSMENT

(Volume 8)

See Volume 1

B4: Environmental Assessment

B5: ENVIRONMENTAL MONITORING PROGRAMS

(Volume 8)

As Recommended

B6: ENGINEERING PLANS

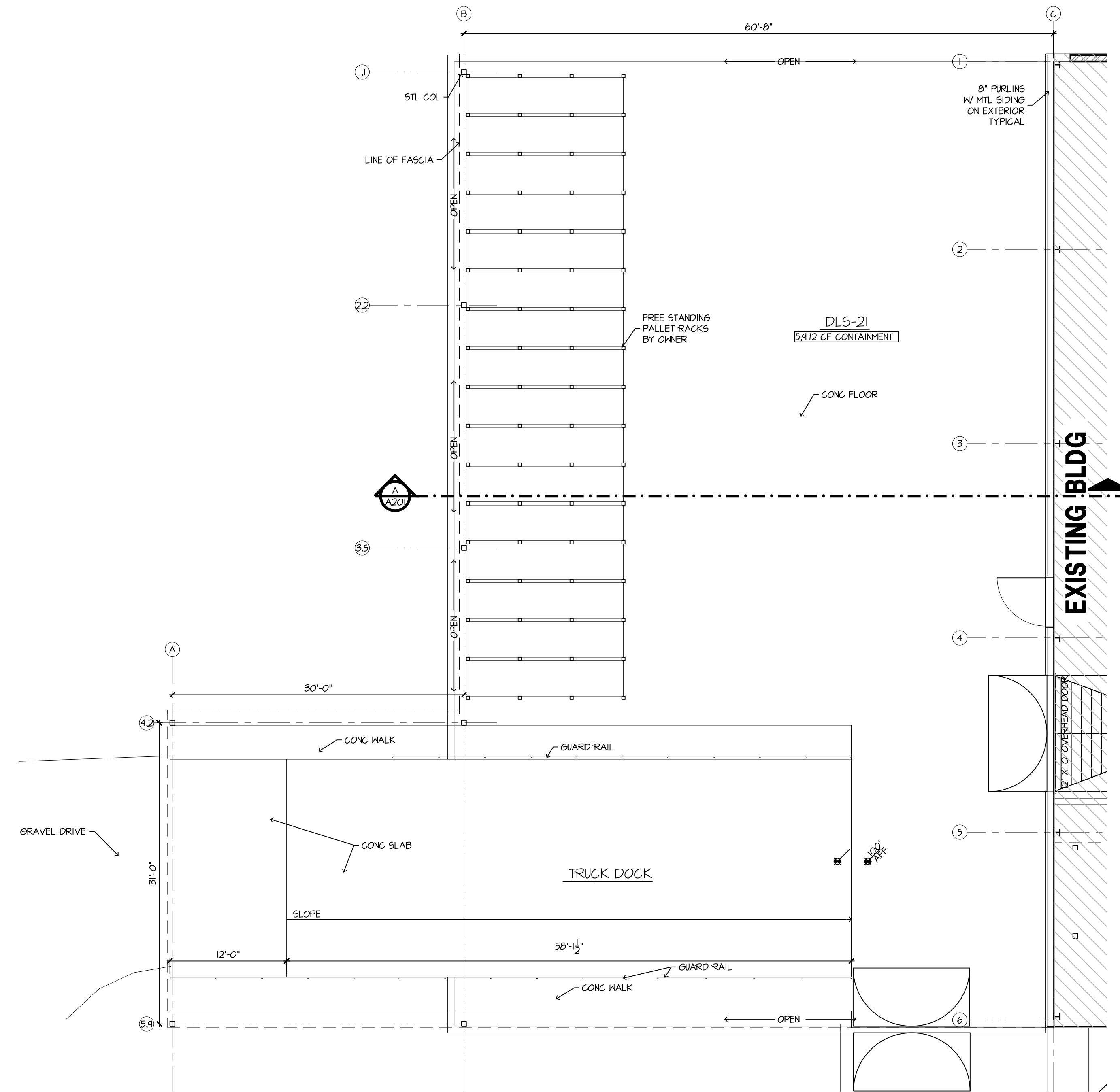
(Volume 8)

Index of Attachments

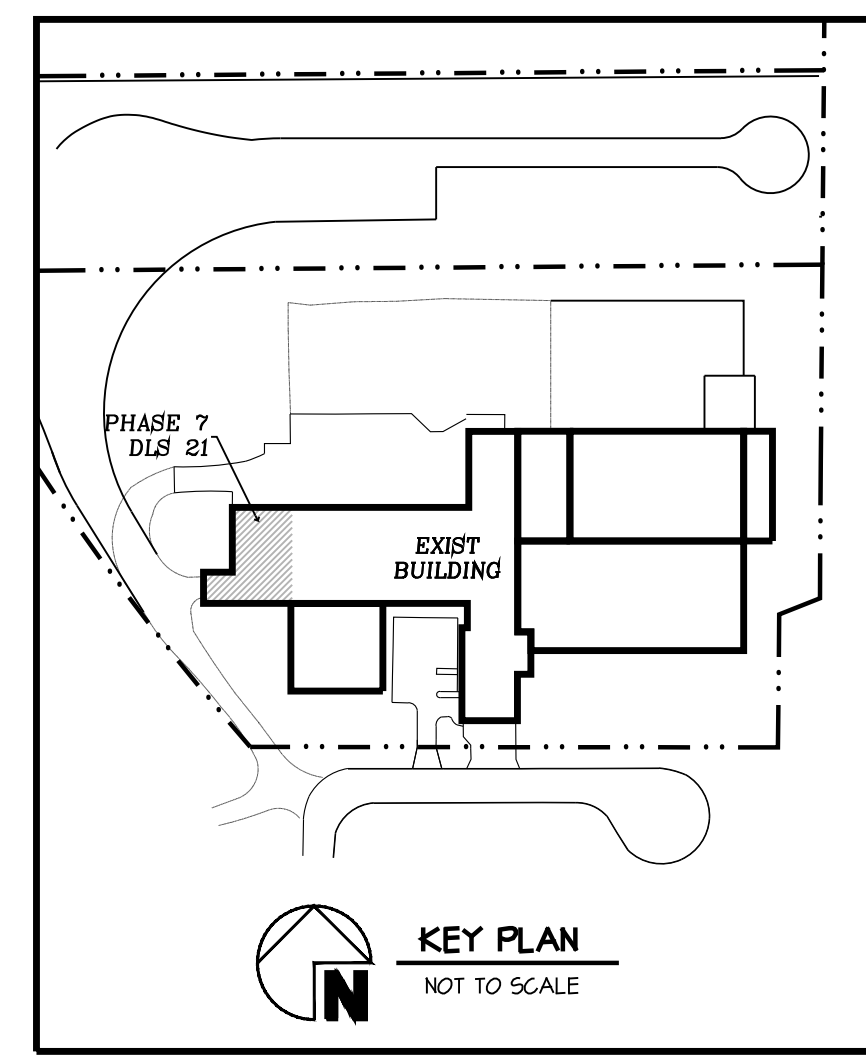
ATTACHMENT	DESCRIPTION
B6-210.0	Sheet Index DLS-21 West Storage and HWLB2
B6-210.2	Drawing A101, Blueprint 21084QA101.dwg DLS-21 Floor Plan
B6-210.3	Drawing A201, Blueprint 21084QA201.dwg DLS-21 Exterior Elevations

Attachment B6-210.2 (Volume 8)

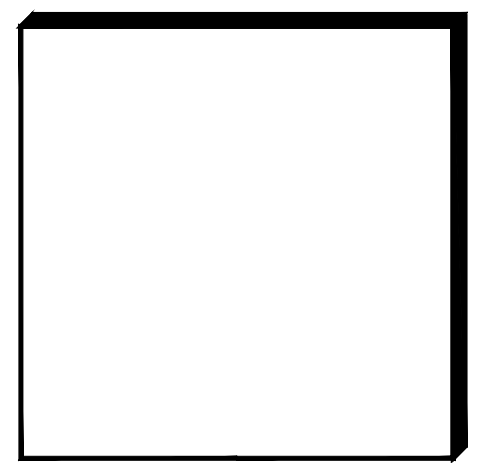
- GENERAL NOTES:**
1. ALL CUTTING AND PATCHING SHALL BE BY THE TRADE INVOLVED IN THE WORK.
 2. SEE WALL KEY FOR WALL CONSTRUCTION.
 3. VERIFY ALL DIMENSIONS IN THE FIELD BEFORE ORDERING ANY MATERIALS.
 4. PROVIDE SOLID WOOD BLOCKING @ DOORS, CABINETS, SHELVING, BORROWED LITES, GRAB BARS, AND BEHIND DOOR STOPS, ETC.
 5. ALL DIMENSIONS ARE NOMINAL TO FINISHED SURFACES UNLESS NOTED OTHERWISE.
 6. THE CONTRACTOR SHALL VISIT THE SITE AND EXAMINE THE PREMISES.
 7. IT IS THE RESPONSIBILITY OF THE CONTRACTORS TO OBTAIN CLARIFICATION OF ANY DISCREPANCIES.
 8. ALL FIRE EXTINGUISHERS TO BE FINAL PLACED BY THE LOCAL FIRE MARSHAL.



FLOOR PLAN
SCALE: 1/8" = 1'-0"



DLD Environmental Services, Inc.
Phase 7 - DLS 21 West Storage & HNLB2
Broad Street
Plainwell, Michigan 49080



ISSUED	
01-29-2010	FOR STATE SUBMITTAL
09-08-2022	FOR STATE SUBMITTAL

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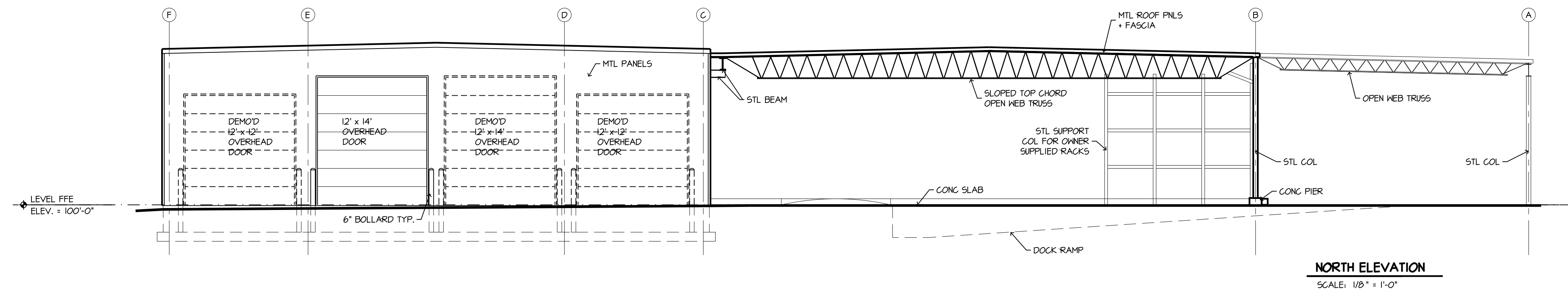
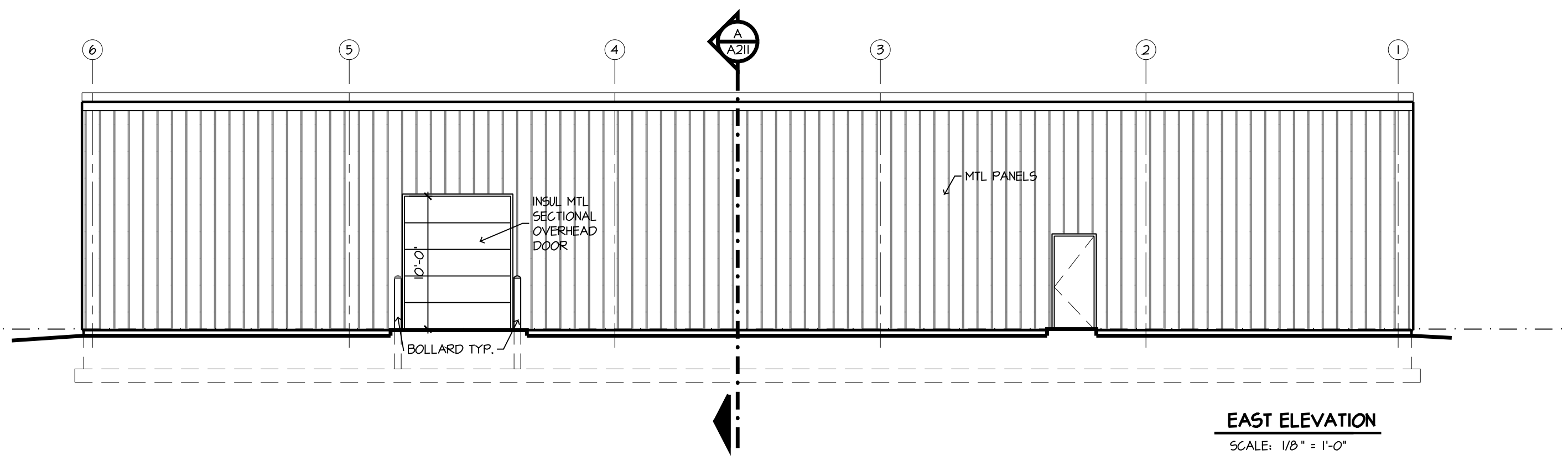
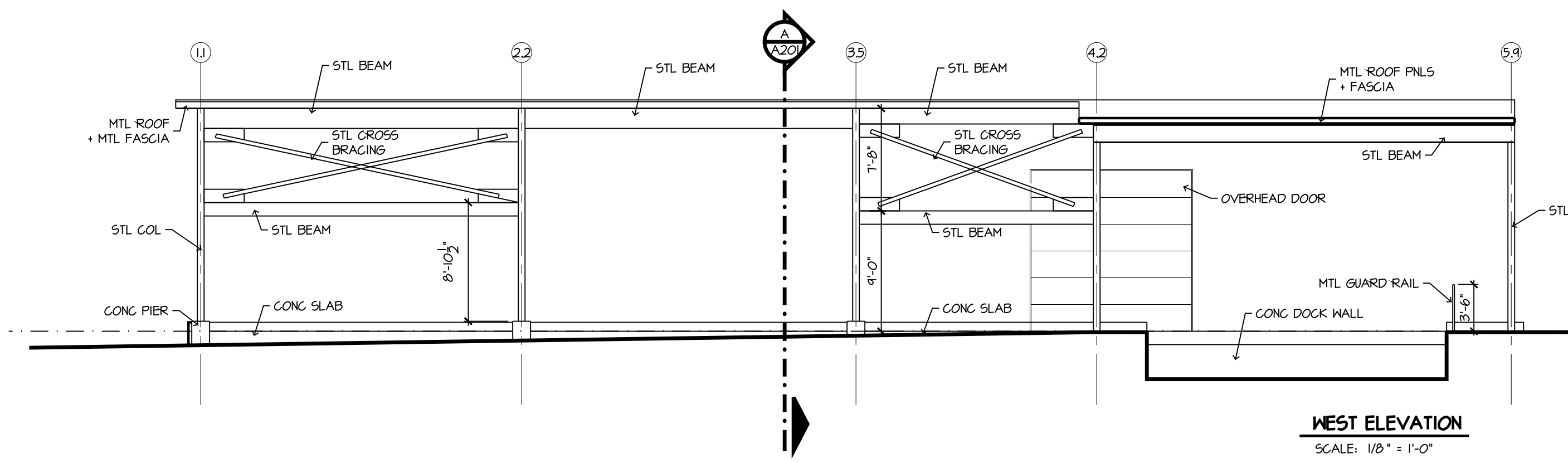
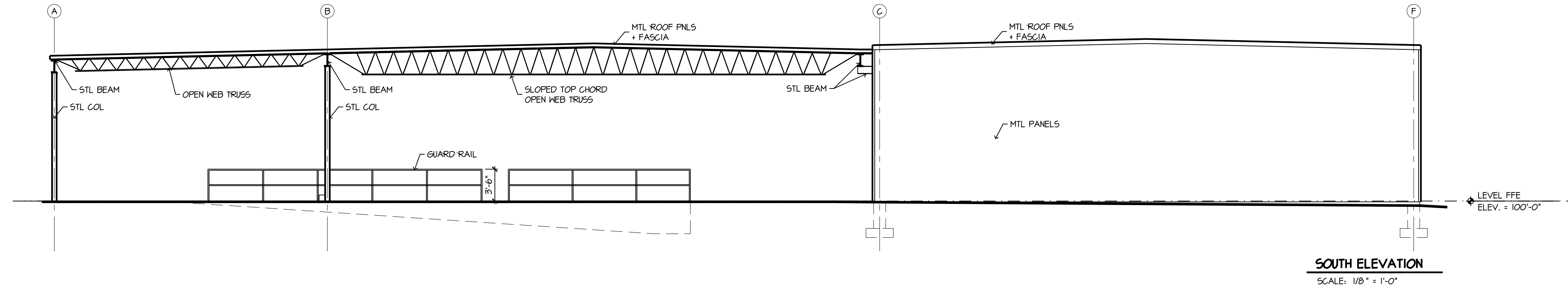
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FLOOR PLAN

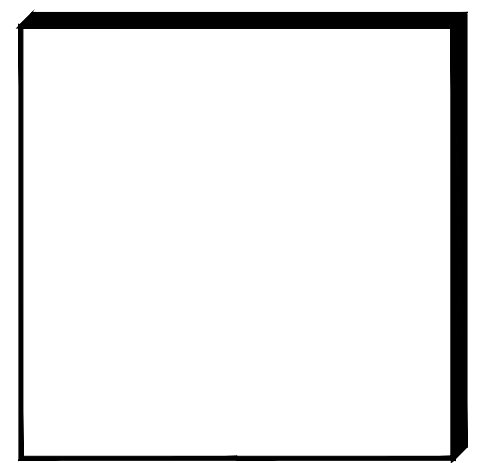
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Attachment B6-210.3 (Volume 8)



DLD Environmental Services, Inc.
 Phase 7 - DLS 21 West Storage & HNLB2
 Broad Street
 Plainwell, Michigan 49080



ISSUED	
01-29-2010	FOR STATE SUBMITTAL
09-08-2022	FOR STATE SUBMITTAL

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JOB NUMBER
210842

EXTERIOR
 ELEVATIONS +
 BUILDING SECTION

A201

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FORM EQP 5111 TEMPLATE

C1: USE AND MANAGEMENT OF CONTAINERS

(Volume 8)

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.

R 299.9614 of 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 29.4101 to R 29.4505 promulgated pursuant to the provisions of the Michigan Fire Protection Act, PA 207, as amended (Act 207); and Title 40 of the Code of Federal Regulations (CFR) §§270.14(d), 270.15, and Part 264, Subpart I, establish requirements for the use and management of containers. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application template addresses requirements for the use and management of containers at the DLD Environmental Services, Inc. (DLD) facility in Plainwell, Michigan. This template addresses the condition of containers, compatibility of waste with containers, management of containers, inspections, containment, special requirements for ignitable or reactive waste, special requirements for incompatible wastes, and closure.

(Check as appropriate)

Applicant for Operating License for Existing Facility:

R 299.9614 use and management of containers

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

R 299.9614 use and management of containers

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This template is organized as follows:

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C1.A DESCRIPTION OF CONTAINERS

C1.B CONDITION OF CONTAINERS

C1.C COMPATIBILITY OF WASTE WITH CONTAINERS

C1.D MANAGEMENT OF CONTAINERS

C1.E INSPECTIONS

C1.F CONTAINMENT

C1.F.1 Secondary Containment System Design and Operation for Containers with Free Liquids

- C1.F.1(a) Requirement for Base or Liner
- C1.F.1(b) Containment System Drainage
- C1.F.1(c) Containment System Capacity
- C1.F.1(d) Control of Run-on
- C1.F.1(e) Removal of Liquids from Containment System

C1.F.2 Secondary Containment System Design and Operation for Containers with No Free Liquids

- C1.F.2(a) Containment System Drainage
- C1.F.2(b) Container Management

C1.G SPECIAL REQUIREMENTS OF IGNITABLE OR REACTIVE WASTE

C1.H SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

C1.I CLOSURE

INTRODUCTION

Reference is made to Volume 1, Attachment "Introduction"

C1.A DESCRIPTION OF CONTAINERS

[R 299.9614 and 40 CFR §264.171]

Reference is made to Volume 1, Attachment C1.A

C1.B CONDITION OF CONTAINERS

[R 299.9614 and 40 CFR §264.171]

Reference is made to Volume 1, Attachment C1.B

C1.C COMPATIBILITY OF WASTE WITH CONTAINERS

[R 299.9614 and 40 CFR §264.172]

Reference is made to Volume 1, Attachment C1.C

C1.D MANAGEMENT OF CONTAINERS

[R 299.9614 and 40 CFR §264.173]

Reference is made to Volume 1, Attachment C1.D

C1.E INSPECTIONS

[R 299.9614 and 40 CFR §264.174]

Reference is made to Volume 1, Attachment C1.E

C1.F CONTAINMENT

[R 299.9614 and 40 CFR §264.175 and 270.15]

Note that the primary purpose of the DLS-21 containment area is to function as high density rack storage area and an additional hazardous waste loading bay (HWLB2) for loading and unloading vehicles. Secondary containment is provided as a precaution in the event that a vehicle is carrying a leaky or ruptured container.

C1.F.1 Secondary Containment System Design and Operation for Containers with Free Liquids

[R 299.9614 and 40 CFR §264.175(a) and 270.15(a)]

Detailed design drawings for the secondary containment systems, container storage area, and hazardous waste loading bays, are provided in Volume 8, Section B6.

C1.F.1(a) Requirement for Base or Liner
[R 299.9614 and 40 CFR §264.175(b)(1) and 270.15(a)(1)]

Reference is made to Volume 1, Attachment C1.F.1(a) with the following additional information.

Given that the DLS-21 containment area is already in existence, including a poured concrete floor, it is anticipated that new curbing will be poured with the calcium stearate hydrophobic formulation disclosed in Volume 1, C1.,F.1(a). The existing floors will be improved as follows:

1. A waterproof/chemical resistant petroleum based sealer will be applied to the floor.
2. Caulk as described in Volume 1, C2-V1 Attachment C2-7.5 (or equivalent) will be used to seal all seems and or cracks.

C1.F.1(b) Containment System Drainage
[R 299.9614 and 40 CFR §264.175(b)(2) and 270.15(a)(2)]

Liquids that accumulate as the result of a leak or spill will be removed immediately upon detection and returned to a container for reprocessing. Accumulation due to precipitation is removed within 24 hours of detection and put in containers for analysis and/or processing. Accumulation due to floor condensation is removed as soon as possible after a thaw and put in containers for analysis and/or processing.

C1.F.1(c) Containment System Capacity
[R 299.9614 and 40 CFR §§264.175(b)(3) and 270.15(a)(3)]

Containment area DLS-21 will be limited to a maximum of 114,840 gallons of hazardous waste. Following regulation 40 CFR §264.175(b)(3), this area would require a total containment capacity of 11,484 gallons (10% of the volume of containers). The total containment capacity for DLS-21 is 44,674 gallons, which exceeds what is required. (See DLS-21 floor plan drawings in Volume 8, Attachment B6-210.2.)

C1.F.1(d) Control of Run-on
[R 299.9614 and 40 CFR §§264.175(b)(4) and 270.15(a)(4)]

Reference is made to Volume 1, Attachment C1.F.1(d)

C1.F.1(e) Removal of Liquids from Containment System
[R 299.9614 and 40 CFR §§264.175(b)(5) and 270.15(a)(5)]

Reference is made to Volume 1, Attachment C1.F.1(e)

C1.F.2 Secondary Containment System Design and Operation for Containers with No Free Liquids

[R 299.9614 and 40 CFR §264.175 and 270.15(b)(1)]

Within DLS-21, DLD shall manage containers with no free liquids using the operating guidelines presented in Volume 8, Section C1.F.1.

C1.F.2(a) Containment System Drainage

[R 299.9614 and 40 CFR §264.175 and 270.15(b)(2)]

Within DLS-21, DLD shall manage containers with no free liquids using the operating guidelines presented in Volume 8, Section C1.F.1.

C1.F.2(b) Containment Management

[R 299.9614 and 40 CFR §264.175 and 270.15(b)(2)]

Within DLS-21, DLD shall manage containers with no free liquids using the operating guidelines presented in Volume 8, Section C1.F.1.

C1.G SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE

[R 299.9614 and 40 CFR §264.176 and 270.15(b)(2)]

Reference is made to Volume 1, Attachment C1.G

C1.H SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

[R 299.9614 and 40 CFR §264.177(c) and 270.15(b)(2)]

Reference is made to Volume 1, Attachment C1.H

C1.I CLOSURE

[R 299.9614 and 40 CFR §264.178]

Reference is made to Volume 1, Attachment C1.I

C4: TREATMENT
(Volume 8)

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C4. A LAB PACKING

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C4: TREATMENT
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C4.A LAB PACKING

Lab packing conducted in the DLS-21 Containment Areas will follow the guidelines presented in Volume 1, Section C4.A: Lab Packing.

C4.B COMMINGLING

Reference is made to Volume 1, Section C4.B.

C4.G STORAGE

See Volume 4, Attachment C1, Containers, for storage information.

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**C13: AIR EMISSIONS FROM EQUIPMENT LEAKS,
TANKS, AND CONTAINERS**

(Volume 8)

See Volume 1

**C13: Air Emissions from Equipment Leaks,
Tanks, and Containers**