

**FORM EQP 5111 ATTACHMENT A11
 CLOSURE AND POSTCLOSURE CARE PLANS**

This document is an attachment to Gage LSF Products Company's (Gage LSF) 2024 RCRA permit renewal application Form EQP 5111. 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 attachment addresses requirements for the proper closure of the limited storage facility hazardous waste management units and the limited storage hazardous waste management facility for Gage LSF Products Company, limited storage facility (Gage LSF) in Ferndale, Michigan. A post-closure plan is not required because this is not a disposal facility, and all wastes will be removed at closure. The information provided in this attachment was used to prepare the closure cost estimate provided in Attachment A12, "Closure and Postclosure Care Cost Estimates."

Gage LSF has prepared a Quality Assurance/Quality Control (QA/QC) plan. A discussion of the QA/QC plan has been provided at the end of the Waste Analysis Plan contained in Attachment A3, Appendix A3-1. The QA/QC Plan follows the written procedures outlined in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," U.S. Environmental Protection Agency (EPA) Publication SW846, Third Edition, Chapter 1 (November 1986), and its updates.

Sections listed in the table of contents below that are not applicable to the Limited Storage Facility (LSF) permit renewal are denoted with a strikethrough and the corresponding section has been deleted from the text. This attachment is organized as follows:

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Appendices

Appendix A11-1

Test Methods

A11.A CLOSURE PLAN

Gage LSF will maintain an on-site copy of the approved closure plan and all revisions of the plan until the certification of closure completeness has been submitted and accepted by the Michigan Department of Environment Great Lakes, and Energy's (EGLE). Gage LSF will notify the Director at least 180 days prior to the date final closure is expected to begin. Upon completion of closure, Gage LSF will submit to the Director a certification by both Gage LSF and an independent registered professional engineer that the facility has been closed in accordance with the specification in the approved closure plan as is required by Michigan Rule 299.9613.

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, post closure 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)

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

^a Not included in the attachment

^b *Not yet included in 40 CFR §264.111; therefore not considered*

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

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

Table A11.A.1 Hazardous Waste Management Units Information

The following table identifies each hazardous waste management unit at the Gage LSF 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 11A.5 below. The maximum amount of hazardous waste stored in these units combined will be 25,000 gallons.

Unit Designation	Maximum Inventory (Include Units)	Waste Codes of Hazardous Wastes Managed	Scheduled Closure Date	Estimated Duration of Closure
Container Storage Building	50 – 55 gallon drums	D001, D002, D005, D006, D007, D008, D011, D018, D019, D021, D035, D038, D039, D040, F001, F002, F003, F005	Unknown	Approximately 6 to 7 months
LSF Tank Farm	3 – 6,000 gallon 1 – 3,250 gallon 1 – 1,000 gallon Tanks	D001, D002, D005, D006, D007, D008, D011, D018, D019, D021, D035, D038, D039, D040, F001, F002, F003, F005	Unknown	Approximately 6 to 7 months

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

The Gage LSF facility:

(Check as appropriate)

- Anticipates completing final closure of the entire facility by Not Applicable
- 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.

Closure Activity	Time Completed
Plant termination of hazardous waste activity	Week 1: Day 0-7
Removal of containerized waste from the hazardous waste drum storage areas	Week 2: Day 7-14 3 days
Removal of waste from bulk storage tanks	Week 2: Day 7-14 4 days
Sampling and analysis of bulk tank sludge	Weeks 3 & 4: Day 14-28 14 days
Removal and disposal of bulk tank sludge	Week 5: Day 28-35 7 days
Decontamination of the bulk tank and container waste storage areas and the loading/unloading area.	Weeks 6, 7, & 8: Day 35-56 21 days
Analysis and removal for disposal of all wash waters (wash water from all site decontamination activities)	Weeks 9, 10, & 11: Day 56-77 21 days

Time required for soil sampling, analysis, and disposal, if required. This represents the contingency portion of the schedule	Weeks 12, 13, 14, 15, 16, 17, & 18: Day 77-126 49 days
Certification of closure by an independent licensed professional engineer and by Gage LSF Project Coordinator for submittal and approval by EGLE. Although an extension for completion of site closure activities is not anticipated, if for some reason additional time is required to complete site closure, Gage LSF's Project Coordinator will request an extension (listing amount of time needed, reason for extension request, and new anticipated completion date) in writing to the EGLE prior to exceedance of the above scheduled closure activity time limits. A clean closure certification will be submitted to the Director by registered mail within 60 days of completing final closure activities.	Weeks 19, 20, 21, & 22 28 days

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)]

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 closure shall follow the schedule specified in Section 11A.3 above. The Director will be notified by Gage LSF 60 days before final closure begins. Final closure will be certified by both Gage LSF 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)]

Gage LSF does not anticipate needing an extension for closure time. In the event that an extension for closure for the facility or any unit is necessary, Gage LSF will request an extension in accordance with the requirements of 40 CFR §264.113(a).

A11.A.5 Unit-Specific Closure Procedures

The following are unit-specific closure procedures that will be implemented for each unit identified in Section A11.A.2 above.

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 Limited Storage Facility, Container Storage Area. 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 container storage area containment system. Remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed and properly disposed.

B. Specific Closure Procedures

As part of the work necessary to close the plant, contractual arrangements will be made with outside contractors for hazardous waste disposal as well as clean-up and decontamination of the storage area.

This work will be supervised by qualified Gage LSF personnel. It will be required that all contractors involved with removal, disposal and/or decontamination activities be properly equipped with solvent-resistant coverall, boots, and gloves; head protection; and full-face respirators with solvent gases filter cartridges or self-contained breathing apparatus (SCBA), as appropriate. All personnel engaged in work associated with closure of the limited storage facility at the Gage LSF site must be certified as having received and maintained up to date training pursuant to 29 CFR 1910.120. Health and Safety Protocols stipulated by Gage LSF's Site Health and Safety Plan dated April 2023 will be followed at a minimum. Site-specific training will be limited to initial site orientation briefings and periodic safety meetings as deemed necessary by Gage LSF's Project Coordinator or the contractor's field team leader (Project Foreman) during closure activities. The contractor's Project Foreman will be responsible for ensuing worker training certification of all site workers and for ensuring that workers are trained for the specific tasks to be performed. Transporter personnel entering the site will be notified to remain with their vehicle in a designated loading area to limit site traffic for security and safety reasons. All waste sample collection will be performed by trained field crew workers under the direction of the Project Foreman and Gage LSF's Project Coordinator. All sampling activities and analysis will be performed in accordance with the requirements of 40 CFR Part 261, Appendix I, II, and III. All samples that are collected will be preserved in a manner consistent with the analytical procedures stipulated under SW-846 and chain-of-custody documentation will be employed. Representative samples will be analyzed for parameters consistent with the wastes stored within the facility, as necessary to characterize the waste for proper treatment/disposal.

The following procedures will be taken to ensure the clean closure of the container storage area.

All liquid hazardous waste remaining in containers will be shipped off-site for treatment and/or disposal. To reflect a worst case scenario for closure cost estimation purposes, the facility closure plan will assume that the maximum inventory amount possible for stored wastes is present on-site at the time of closure (25,000 gallons). During closure of the facility, wastewaters acceptable for discharge will be released to the Great Lakes Water Authority system, as they have been during the normal operation of the facility. For closure cost estimation purposes however, the closure plan will reflect that any wastewaters generated during closure activities will need to be disposed of off-site at an appropriately licensed treatment and/or disposal facility, at a cost to Gage LSF. Gage LSF will provide appropriate analytical results (e.g., characteristics of waste - ignitable, corrosive, ...) of all wastes removed for disposal at final closure using the detection limits as specified in 40 CFR Part 261 for characteristic wastes. Any additional analytical requirements of the accepting disposal facility will also be met by Gage LSF. All waste solids, including contaminated debris and used personal protective equipment which cannot be decontaminated, will be characterized and placed in properly labeled containers for disposal off-site. Federal, state and local manifesting, transportation and disposal regulations will be complied with during handling and disposal of these wastes.

All hazardous wastes present on-site will be disposed of in accordance with the Resource Conservation and Recovery Act (RCRA), Part 111 and Part 121 of Michigan Public Act 451 of 1994, the Hazardous Waste Management Program and Liquid Industrial Waste Programs, respectively, as appropriate. All hazardous waste shipments to treatment/disposal facilities will follow standard waste manifesting, labeling, and transportation requirements. Any non-hazardous wastes shipped off-site will also be handled in accordance with Part 121, as appropriate. Containerized materials (55 gallon drums) will be loaded onto trucks using a lift truck for transport to a treatment/storage/disposal facility.

Following removal of all containers (drums) from the container storage area for transportation to a treatment/storage/disposal facility, the container storage area and loading/unloading area will be cleaned and triple-rinsed by use of a floor sweeper equipped with hydro-blasting and scouring attachments. Surfactants (alconox or similar detergent) will be used in the wash water. Rinse waters will be directed to blind sumps for collection using a pump or vac-truck for containment and transportation to a treatment/storage/disposal facility.

All rinse waters generated from the cleaning of the container storage and loading/unloading area will be tested for hazardous constituents specific to materials stored at the site (refer to sampling parameters listed in Appendix A11-1) to ensure that these areas are adequately decontaminated.

Any liquids in the sumps in the container storage and loading/unloading area will be removed. The sumps will be cleaned and triple-rinsed with a portable hotsy-type pressure sprayer with detergent. The rinse water will be collected using pumps or a vac-truck for containment and transportation to a treatment/storage/disposal facility.

Following the removal of all wastes, the concrete pads at the container storage building and loading/unloading area will be inspected for major cracks, deterioration, and pad integrity. The pads are sealed with materials compatible to the wastes being stored (refer to manufacturers specification sheets for coating materials in Attachment A1, Appendix A1-4 and A1-5). The pads are presently in good condition and there is no record that spills have occurred in these storage areas. Therefore, it is highly unlikely that it will be necessary to sample the concrete or the underlying soil. If, however, any of these pads have been significantly structurally compromised so as to have provided questionable protection against, or possible leakage of material into the soil beneath the pads, sampling of the underlying soil in questionable areas will be performed.

The analytical methods used for analysis of soil and wash water samples will be those listed in Appendix A11-1. All contaminated wash waters generated will be disposed of at an appropriately licensed hazardous/liquid industrial waste treatment/storage/disposal facility.

Prior to leaving the clean-up site location, decontamination of personal protective clothing will be conducted by removing all loose materials from the boots and spraying, washing and scrubbing with an alconox detergent solution all outside protective clothing materials as well as exposed skin surfaces (i.e., facial areas). Contaminated equipment and solid residues to be disposed of will be loaded and transported to an appropriately licensed disposal facility.

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 Limited Storage Facility Tank Farm System. The general closure requirement and specific closure procedures are discussed below.

A. General Closure Requirement

At closure of the tank system, Gage LSF 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. If the Gage LSF determines that not all contaminated soils can be practicably removed or decontaminated, then the tank system will be managed in accordance with the closure and postclosure care requirements that apply to landfills.

B. Specific Closure Procedures

As part of the work necessary to close the plant, contractual arrangements will be made with outside contractors for hazardous waste disposal as well as clean-up and decontamination of the storage area. This work will be supervised by qualified Gage LSF personnel. It will be required that all contractors involved with removal, disposal and/or decontamination activities be properly equipped with solvent-resistant coverall, boots, and gloves; head protection; and full-face respirators with solvent gases filter cartridges or self-contained breathing apparatus (SCBA), as appropriate. All personnel engaged in work associated with closure of the limited storage facility at the Gage LSF site must be certified as having received and maintained up to date training pursuant to 29 CFR 1910.120. Health and Safety Protocols stipulated by Gage LSF's Site Health and Safety Plan, dated April 2023 will be followed at a minimum.

Site-specific training will be limited to initial site orientation briefings and periodic safety meetings as deemed necessary by Gage LSF's Project Coordinator or the contractor's field team leader (Project Foreman) during closure activities. The contractor's Project Foreman will be responsible for ensuing worker training certification of all site workers and for ensuring that workers are trained for the specific tasks to be performed. Transporter personnel entering the site will be notified to remain with their vehicle in a designated loading area to limit site traffic for security and safety reasons. All waste sample collection will be performed by trained field crew workers under the direction of the Project Foreman and Gage LSF's Project Coordinator. All sampling activities and analysis will be performed in accordance with the requirements of 40 CFR Part 261, Appendix I, II, and III. All samples that are collected will be preserved in a manner consistent with the analytical procedures stipulated under SW-846 and chain-of-custody documentation will be employed. Representative samples will be analyzed for parameters consistent with the wastes stored within the facility, as necessary to characterize the waste for proper treatment/disposal.

The following procedures will be taken to ensure the clean closure of the Limited Storage Facility bulk tank system storage area.

All liquid hazardous waste remaining in the bulk storage tanks will be shipped off-site for treatment and/or disposal. To reflect a worst-case scenario for closure cost estimation purposes, the facility closure plan will assume that the maximum inventory amount possible for stored wastes is present on-site at the time of closure (25,000 gallons). During closure of the facility, wastewaters acceptable for discharge will be released to the Great Lakes Water Authority system, as they have been during the normal operation of the facility. For closure cost estimation purposes however, the closure plan will reflect that any wastewaters generated during closure activities will need to be disposed of off-site at an appropriately licensed treatment and/or disposal facility, at a cost to Gage LSF. The sludge remaining in the tanks, estimated to be 3.5 cubic yards, will be dewatered on-site and shipped by a licensed hazardous waste transporter to a licensed hazardous waste facility for disposal at a cost to Gage LSF. Gage LSF will provide appropriate analytical results (e.g., characteristics of waste - ignitable, corrosive, ...) of all wastes removed for disposal at final closure using the detection limits as specified in 40 CFR Part 261 for characteristic wastes. Any additional analytical requirements of the accepting disposal facility will also be met by Gage LSF. All waste solids, including contaminated debris and used personal protective equipment which cannot be decontaminated, will be characterized and placed in properly labeled containers for disposal off-site. Federal, state and local manifesting, transportation and disposal regulations will be complied with during handling and disposal of these wastes.

All hazardous wastes present on-site will be disposed of in accordance with the Resource Conservation and Recovery Act (RCRA), Part 111 and Part 121 of Michigan Public Act 451 of 1994, the Hazardous Waste Management Program and Liquid Industrial Waste Programs, respectively, as appropriate. All hazardous waste shipments to treatment/disposal facilities will follow standard waste manifesting, labeling, and transportation requirements. Any non-hazardous wastes shipped off-site will also be handled in accordance with Part 121, as appropriate. Liquid wastes contained within the bulk tanks will be loaded using existing piping into tanker trucks that will transport the materials to an appropriately licensed treatment/disposal facility. Containerized materials (55 gallon drums) will be loaded onto trucks using a lift truck for transport to a treatment/storage/disposal facility.

Following liquid removal from the bulk storage tanks and associated piping and pumps, the following procedures will be used to decontaminate and close the storage tanks, pumps, connected piping and secondary dike containment area:

Empty tanks, pumps and piping will be pressure washed using a portable hot-water-type sprayer unit using alconox or a similar detergent. Access to the tank interiors for cleaning will be gained through existing hatches/man-ways. Cleaning methods will include pressure washing, scraping, use of a detergent and triple rinsing to accomplish removal of all waste residual from the tank walls, sides and bottom. Sludge and sludge-water materials will be removed from the tanks using pumps and flexible hosing already on-site or through use of a vac-truck for containment and transportation of the waste materials to a treatment/storage/disposal facility. All ancillary equipment (e.g., piping, pumps, and hoses) used during

decontamination activities will be decontaminated following use. All wash water generated will be bulked and transported to a treatment/storage/disposal facility. If possible, cleaning of the tanks will be conducted without entering the tanks. If, however, tank entry is required to thoroughly clean the interior, Gage LSF's confined space entry procedures will be followed.

The bulk tank concrete dike pad will be cleaned and triple-rinsed with a portable hotsy-type pressure sprayer with detergent. All materials in the dike area will be washed toward the blind sump to aid in collection of the wash waters using a pump or vac-truck for containment and transportation to a treatment/storage/disposal facility. The collection spill containment sumps will also be cleaned and triple-rinsed with the water being collected using pumps or a vac-truck for containment and transportation to a treatment/storage/disposal facility.

All rinse water will be discharged to the city sanitary sewer system provided that the rinse water meets the restrictions of the Great Lakes Water Authority Discharge Limits. If the rinse water does not meet the restrictions, it will be shipped off-site by a licensed hazardous waste transported to an approved treatment/storage/disposal facility. For purposes of estimating the cost of site closure, it is assumed that all wash waters generated during closure activities will be transported off-site for treatment/disposal at a cost to Gage LSF.

Following the removal of all wastes, the concrete pad at the bulk tank area and loading/unloading area will be inspected for major cracks, deterioration, and pad integrity. The pads are sealed with materials compatible to the wastes being stored (refer to manufacturers specification sheets for coating materials in Attachment A1, Appendix A1-4 and A1-5). The pads are presently in good condition and there is no record that spills have occurred in these storage areas. Therefore, it is highly unlikely that it will be necessary to sample the concrete or the underlying soil. Because the tank trailer loading/unloading area is also paved it is unlikely that it will be necessary to sample the concrete or the underlying soil in this area. If, however, any of these pads have been significantly structurally compromised so as to have provided questionable protection against, or possible leakage of material into the soil beneath the pads, sampling of the underlying soil in questionable areas will be performed.

At closure, tanks and connected piping equipment is not intended to be removed from the site. Following cleaning, the tanks and equipment present at the facility are intended to be left intact for utilization in other productive processes. Sampling of the soil, if deemed necessary because of suspect integrity of pad(s), will be conducted by coring the concrete using a six-inch diameter drill according to applicable ASTM standards. The concrete will be pulverized and packaged into plastic containers. The soil samples will be obtained with a hand auger from a depth of one foot, using the procedures outlined in ASTM D1452-80, "Standard Practice for Soil Investigation and Sampling by Auger Borings". The soil and concrete samples will be analyzed for the parameters listed in Appendix A11-1, based on the types of wastes that were stored in these areas. In the event that sampling will be necessary and contamination is found at any of the sample locations, the EGLE will be contacted for guidance prior to proceeding with site closure activities.

The analytical methods used for analysis of soil and wash water samples will be those listed in Appendix A11-1. All contaminated wash waters generated will be disposed of at an appropriately licensed hazardous/liquid industrial waste treatment/storage/disposal facility.

Prior to leaving the clean-up site location, decontamination of personal protective clothing will be conducted by removing all loose materials from the boots and spraying, washing and scrubbing with an alconox detergent solution all outside protective clothing materials as well as exposed skin surfaces (i.e., facial areas). Contaminated equipment and solid residues to be disposed of will be loaded and transported to an appropriately licensed disposal facility.

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)}

Gage LSF has not identified any other closure activities.

A11.A.6 Certification of Closure
[R 299.9613]

Within 60 days of completion of closure Gage LSF 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 Gage LSF 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 following documentation will also be included with the closure certification:

- Manifests or waste removal summaries (for non-hazardous wastes) which indicate how much waste was shipped off-site and to where.
- A summary of any procedures that deviated from the approved closure plan.
- Field reports of closure activities, including a daily time table, weather conditions, and other relevant observations.
- Results of all analytical results used to certify clean closure (lab sheets, chain-of-custody reports, QA/QC report, and summary tables).
- A copy of the approved closure plan and letter of closure approval.
- Summary of decontamination procedures (pressure wash, stream cleaning, etc.) and how waste water was disposed.
- Summary analysis (including conditions of haul roads, time table, soil and ground water results, weather conditions, runoff controls, equipment decontamination, etc).

The following documentation may be included, depending upon the extent of testing required:

- Statistical comparisons on sampling results compared to background. This should include full computations on background and statistical analysis).
- Sampling and analysis procedures (specify references).
- Final depth and evaluations of excavations of wastes and soils.
- Properly labeled and easily identified sampling grid stations (map): including background stations.

Gage LSF will maintain financial assurance for closure until the Director releases Gage LSF from the financial assurance requirements for closure under R 299.9703. The closure certification will include the following:

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 §270.14(b)(14)]

Gage LSF will 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 §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.

Applicable:

- Contingent plan
- Landfill unit



Appendix A11-1

Test Methods

**TEST METHODS FOR DETERMINATION OF
DECONTAMINATION COMPLETENESS**

Based upon Gage LSF's waste acceptance screening criteria, the wastes removed from site for disposal at site closure will be analyzed for the following parameters in accordance with U.S. EPA Method SW-846 or any equivalent method approved by the EGLE.

<u>Parameter</u>	<u>Test Method</u>
Flashpoint	1010 or 1020 (Pensky-Martens Closed Cup Method or Setaflash Closed Cup Method for determining ignitability) or equivalent. ¹ .
Corrosivity	9040 (Electrometric) ¹ .

References:

(1) SW-846, U.S. EPA, "Test Methods for Evaluation of Solid Wastes – Physical/Chemical Methods," 1986

* Any equivalent method proposal will be pre-approved by EGLE.