

## FORM EQP 5111 ATTACHMENT C2 TANK SYSTEMS

This document is an attachment to Gage Products Company's (Gage) 2024 RCRA permit renewal application Form EQP 5111. R 299.9615 and R 299.9627 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), 270.16, 270.24, and 270.27 (Part 264, Subpart J and Part 60, Appendix A) establish requirements for tank systems. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application attachment addresses requirements for tank systems at the Gage Products Limited Storage Facility (Gage LSF) in Ferndale, Michigan. This attachment includes assessments of new and existing tank systems; installation of new tank systems; secondary containment systems and release detection; variances for secondary containment; controls and practices to prevent spills and overfills; inspections; response to leaks or spills and disposition of leaking or unfit-for-use tank systems; closure and postclosure requirements; requirements for storing or treating ignitable, reactive, or incompatible wastes.

(Check as appropriate)

Existing Tank System

New Tank System



EPA 1986. *Technical Resource Document for the Storage and Treatment of Hazardous Waste in Tank Systems*. Document No. 530-SW-86-044. December.

**Note:** Attachment C11, Subpart CC, Air Emissions from Tanks, Containers, and Surface Impoundments, addresses air emissions for tanks. Also note that while specific closure requirements for tank systems are addressed in this attachment, you may reference information in Attachment A11, Closure and Postclosure Care Plans.

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**C2.A ASSESSMENT OF EXISTING TANK SYSTEM**

[R 299.9615(1) and 40 CFR, Part 264, Subpart J]

None of the Gage LSF hazardous waste tanks systems were installed or operational prior to July 14, 1986. Therefore, section C2.A does not apply to any of the hazardous waste tanks located at Gage LSF.

Section C2.A applies to existing tanks. Per 40 CFR 260.10, an Existing Tank system is defined as, “a tank system or component that is used for the storage or treatment of hazardous waste and that is in operation, or for which installation has commenced on or prior to July 14, 1986. Installation will be considered to have commenced if the owner or operator has obtained all Federal, State, and local approvals or permits necessary to begin physical construction of the site or installation of the tank system and if either (1) a continuous on-site physical construction or installation program has begun, or (2) the owner or operator has entered into contractual obligations - which cannot be canceled or modified without substantial loss - for physical construction of the site or installation of the tank system to be completed within a reasonable time”.

**C2.B ASSESSMENT OF NEW TANK SYSTEM**

[R 299.9615(1) and 40 CFR §264.192]

**C2.B.1 Design standards**

[R 299.9615(1) and 40 CFR §264.192(a)(1)]

The tanks are inspected per API 653 tank standards. Engineering drawings and specifications for the tank systems have been provided in Attachment A1, Appendices A1-4 and A1-5.

**C2.B.2 Dimensions and Capacity of Each Tank**

[R 299.9615(1) and 40 CFR §270.16(b)]

**TANK DESCRIPTION**

Tank Name	Shape	Materials of Construction	Dimensions	Date Installed	Capacity (gal.)	Other (see footer)	Wall Thickness (in.)
SWT 72	Cylindrical	Stainless Steel	108" OD X 12'6" H	1991	6,000	1, 2, 3, 4	3/16 <sup>th</sup> shell
SWT 73	Cylindrical	Stainless Steel	108" OD X 12'6" H	1991	6,000	1, 2, 3, 4	3/16 <sup>th</sup> shell
SWT 74	Cylindrical	Stainless Steel	108" OD X 12'6" H	1991	6,000	1, 2, 3, 4	3/16 <sup>th</sup> shell
SWT 75	Cylindrical	Stainless Steel	90" OD X 10' H	1991	3,250	1, 2, 3, 4	3/16 <sup>th</sup> shell
SWT 76	Cylindrical	Stainless Steel	60" OD X 78" H	1991	1,000	1, 2, 3, 4	3/16 <sup>th</sup> shell

- 1: High Level Alarm
- 2: Pressure relief valve w/vacuum breaker
- 3: Carbon Steel Fill, Return and Vapor Recovery Systems.
- 4: Tank used for Hazardous Waste Storage

**APPURTENANCE DESCRIPTION**

Information including engineering drawing and specification on appurtenances associated with tanks SWT 72, 73, 74, 75 and 76 has been provided in Attachment A1, Appendix A1-4 and A1-5. These tanks are inspected per API 653 tank standards. The most recent certified API 653 tanks inspections were performed on March 17, 2021. The next internal API 653 inspection will be due March 2025. Inspection API 653 inspection reports are maintained at the facility.

**C2.B.3 Description of Feed Systems, Safety Cutoff, Bypass System, and Pressure Controls**

[R 299.9615(1) and 40 CFR §270.16(c)]

Tanks are fitted with high-level alarms and a transfer kill switch to prevent overfilling. Tanks have been fitted with pressure relieve and vacuum breakers. Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5.

**C2.B.3(a) Feed Systems**

[R 299.9615(1) and 40 CFR §270.16(c)]

Waste solvent is fed to the recycling process via above ground pipe and pumps. Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5.

**C2.B.3(b) Safety Cutoff or Bypass Systems**

[R 299.9615(1) and 40 CFR §270.16(c)]

The tanks have safety stop switches at the transfer locations. Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5.

**C2.B.3(c) Pressure Controls**

[R 299.9615(1) and 40 CFR §270.16(c)]

The tanks are provided with both pressure and vacuum relief valves. Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5.

**C2.B.4 Diagram of Piping, Instrumentation, and Process Flow**

[R 299.9615(1) and 40 CFR §270.16(d)]

Piping drawings are included with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5.

**C2.B.5 Characteristics of Waste**

[R 299.9615(1) and 40 CFR §264.192(a)(2)]

The characteristics of the waste managed in these tanks is provided in Attachment A2 Chemical Physical Analysis.

**C2.B.6 External Corrosion Protection**

[R 299.9615(1) and 40 CFR §264.192(a)(3)]

Section C2.B.6 is not applicable because the tanks are constructed of stainless steel, constructed on elevated concrete pads to prevent contact with accumulated water and the containment area is covered to prevent accumulation of precipitation and sustained contact of tanks with water.

**C2.B.7 Protection from Vehicular Traffic**  
[R 299.9615(1) and 40 CFR §264.192(a)(4)]

The facility is secured with a fence to prevent unauthorized traffic. The tanks are located inside a concrete containment dike isolated from traffic. See photographs provide in Attachment A1.

**C2.B.8 Foundation Load and Anchoring**  
[R 299.9615(1) and 40 CFR §§264.192(a)(5)(i) through (iii)]

Tank specifications and drawings consistent with 40 CFR 264.192(a)(5)(i) thru (iii) have been included with the engineering drawing and specifications in Attachment A1, Appendix A1-4 and A1-5. Tanks are placed on foundations designed for the full load of the tank, anchored and designed to withstand frost heave.

**C2.C INSTALLATION OF NEW TANK SYSTEMS**  
[R 299.9615(1) and 40 CFR §§264.192(b) through (g)]

**C2.C.1 Proper Handling Procedures**  
[R 299.9615(1) and 40 CFR §264.192(b)]

The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.1(a) Installation Inspectors**  
[R 299.9615(1) and 40 CFR §264.192(b)]

The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.1(b) Installation Inspection Procedures**  
[R 299.9615(1) and 40 CFR §264.192(b)]

The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.1(c) Repairs**  
[R 299.9615(1) and 40 CFR §264.192(b)]

There were no records of discrepancies or required repairs when the tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.2 Backfilling Underground Tank or Components**  
[R 299.9615(1) and 40 CFR §264.192(c)]

The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.2(a) Backfill Material**  
[R 299.9615(1) and 40 CFR §264.192(c)]

The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.2(b) Backfill Placement**  
[R 299.9615(1) and 40 CFR §264.192(c)]

The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.3 Pre-Service Tank and Ancillary Equipment**  
[R 299.9615(1) and 40 CFR §264.192(d)]

The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.3.a Tanks**  
[R 299.9615(1) and 40 CFR §264.192(d)]

The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.3(b) Piping**  
[R 299.9615(1) and 40 CFR §264.192(d)]

The piping was installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.3(c) Repairs**  
[R 299.9615(1) and 40 CFR §264.192(d)]

There are no records of required repairs prior to placing tanks in service.

**C2.C.4 Ancillary Equipment Installation**  
[R 299.9615(1) and 40 CFR §264.192(e)]

Ancillary equipment was installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.5 Corrosion Protection Installation**  
[R 299.9615(1) and 40 CFR §264.192(f)]

The tanks are constructed of stainless steel. The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction



of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

**C2.C.6 Certification of Design and Installation**  
[R 299.9615(1) and 40 CFR §264.192(g)]

The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

An independent, qualified registered professional engineer from Hands and Associates, Inc. performed an onsite inspection of the tanks systems, and provided a certified written assessment certified by, attesting that the tank system has sufficient structural integrity and is acceptable for the storing of hazardous waste in 2013. Barr Engineering performed an onsite inspection of the tanks systems on September 6, 2024, reviewed the previous engineer's data and calculations to confirm the tanks were capable of managing hazardous waste.

Tanks are managed according to the API 635 standard and are inspected every 5 years. All of the historic API reports are maintained onsite.

**C2.C.7 Description of Tank System Installation**  
[R 299.9615(1) and 40 CFR §270.16(f)]

The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5.

**C2.C.8 Tank Labels**  
[R 299.9615]

Tanks have been properly labeled per hazardous waste and NFPA standards. See photographs provided in Attachment A1.

**C2.D SECONDARY CONTAINMENT SYSTEMS AND RELEASE DETECTION**  
[R 299.9615(1) and 40 CFR §264.193(a)]

The bulk tank storage containment system is constructed of concrete with high silica concrete liner. The system is maintained free of cracks or gaps. It is sufficiently impervious to contain any spills until the material is detected and removed. A micro silica fill concrete floor and retaining wall liner is used. (See Attachment A1, Appendix A1-4 and Appendix A1-5). This impervious barrier provides a barrier appropriate for all materials and wastes to be stored in this area. The secondary containment volume of the bulk tank area is 18,000 gallons. This represents 300 percent of the largest tank's volume within the bulk tank storage area.

Attachment A1, Appendix A1-4 contains the volume calculations of the secondary containment system. The containment areas are inspected daily to detect any leaks or spills. In the unlikely event that any accumulated liquids are present, these liquids will be removed within 24 hours. If the source of the liquids is known to contain hazardous waste constituents, the liquids will be drummed and stored in the area until arrangements have been made for disposal at a licensed hazardous waste disposal facility. If the source of the liquid is not known, or if it is suspected that the liquid does not contain hazardous waste constituents, the liquid will be analyzed for hazardous waste constituents, as described in the Attachment A2 (Chemical

Physical Analysis) and Attachment A3 (Waste Analysis Plan), of this application. If no hazardous constituents are detected in the analysis, the waste is pumped to the City of Detroit's treatment plant for treatment prior to release to the Detroit River. If the accumulated liquid is found to contain hazardous constituents, the liquid is drummed and stored in the area until arrangements have been made for disposal at a licensed hazardous waste disposal facility.

**C2.D.1 Secondary Containment Implementation Schedule**  
[R 299.9615(1) and 40 CFR §264.193(a)]

The secondary containment system was installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5.

**C2.D.2 Secondary Containment Type and Performance Criteria**  
[R 299.9615(1) and 40 CFR §264.193(b)]

- Concrete Containment / Liner external to the tank*
- Vault*
- Double-walled tank*
- Device approved by the director*

**C2.D.3 Design Parameters**  
[R 299.9615(1) and 40 CFR §264.193(c)]

The secondary containment system was designed in 1991 by a professional engineer. A certification sealed by licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5. The tanks are constructed of stainless steel.

**C2.D.3(a) Compatibility and Strength**  
[R 299.9615(1) and 40 CFR §264.193(c)(1)]

The secondary containment was designed in 1991 by a professional engineer's to be compatible with the materials and weights stored in the tanks. A certification sealed by licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5. The tanks are constructed of stainless steel.

**C2.D.3(b) Foundation Integrity**  
[R 299.9615(1) and 40 CFR §264.193(c)(2)]

The secondary containment and tank foundation was designed in 1991 by a professional engineer. A certification sealed by licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5. The tanks are constructed of stainless steel

**C2.D.3(c) Leak Detection Capability**  
[R 299.9615(1) and 40 CFR §264.193(c)(3)]

The tanks are elevated on concrete pads. Leaks will be visually detected. The secondary containment / leak inspection program is provided in Attachment A5 Inspection Schedules.

**C2.D.3(d) Adequate Drainage**  
[R 299.9615(1) and 40 CFR §264.193(c)(4)]

The tank system and containment area is covered to prevent the accumulation of rainwater. What rainwater does make it into the containment system is drained away from the tanks and inspected and tested if needed, prior to discharge.

The secondary containment system was designed in 1991 by a professional engineer. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5. The tanks are constructed of stainless steel.

**C2.D.4 External Liner Requirements**  
[R 299.9615(1) and 40 CFR §264.193(e)(1)]

**C2.D.4(a) Capacity**  
[R 299.9615(1) and 40 CFR §264.193(e)(1)(i)]

Tank farm secondary containment capacity calculations are included in Attachment A1, Appendix A1-4. The secondary containment system was designed in 1991 by a professional engineer. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5. The tanks are constructed of stainless steel.

**C2.D.4(b) Storm Water Control**  
[R 299.9615(1) and 40 CFR §264.193(e)(1)(ii)]

The tank farm has been fitted with a roof to limit the accumulation of stormwater in the containment system.

**C2.D.4(c) Free from Cracks and Gaps**  
[R 299.9615(1) and 40 CFR §264.193(e)(1)(iii)]

The secondary containment system is regularly inspected to ensure it is free of cracks or gaps. Additional

discussion of the inspections is provided in Attachment A5, Inspection Schedule.

The secondary containment was designed in 1991 by a professional engineer. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5. The tanks are constructed of stainless steel.

**C2.D.4(d) Coverage Around Tank**  
[R 299.9615(1) and 40 CFR §264.193(e)(1)(iv)]

The secondary containment system was designed and installed to surround the tank completely and prevent the surrounding earth from coming into contact with the waste if the waste is released from the tank(s) (i.e., containment system is capable of preventing lateral as well as vertical migration of the waste).

The secondary containment was designed in 1991 by a professional engineer. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5. The tanks are constructed of stainless steel.

**C2.D.7 Ancillary Equipment with Secondary Containment**  
[R 299.9615(1) and 40 CFR §264.193 (f)]

**C2.D.7(a) Secondary Containment Type and Performance Criteria**  
[R 299.9615(1) and 40 CFR §264.193(f)]

Ancillary equipment has been provided secondary containment in the form of concrete berms or catchment systems. The secondary containment for ancillary equipment was designed in 1991 by a professional engineer. A certification sealed by licensed a professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5.

**C2.D.7(b) Design Parameters**  
[R 299.9615(1) and 40 CFR §264.193(f)]

The ancillary equipment was designed in 1991 by a professional engineer to meet 40 CFR 264.193(f) requirements. A certification sealed by a licensed professional engineer verifying that construction of the limited storage facility proceeded according to plans, was submitted upon completion of the facility in June of 1995.

Additional information is provided with the engineering drawing and specifications. See Attachment A1, Appendix A1-4 and A1-5. The tanks are constructed of stainless steel.

**C2.D.7(c) Exempted Ancillary Equipment and Inspections**  
[R 299.9615(1) and 40 CFR §264.193(f)]

The facility does not have exempt ancillary equipment.

**C2.D.8 Requirements for Tank Systems That Are Not in Compliance With Secondary Containment**  
[R 229.9615(2)]

All of the tanks used to store hazardous waste at the Gage LSF comply with secondary containment requirements. As a result, all of Section C2.D.8 does not apply.

**C2.D.8(b) Underground Tanks**  
[R 229.9615(2)(a)]

The Gage LSF does not operate any hazardous waste underground storage tanks. Therefore, Section C2.D.8(b) is not applicable.

**C2.E VARIANCES FOR SECONDARY CONTAINMENT**  
[R 299.9615(1) and 40 CFR §264.193(g)]

The facility does not intend to apply for either variance from secondary containment. Therefore, all of Section C2.E is not applicable.

**C2.F CONTROLS AND PRACTICES TO PREVENT SPILLS AND OVERFILLS**  
[R 299.9615(1) and 40 CFR §264.194(b)]

Incoming Hazardous wastes destined for temporary storage at the Gage LSF are characterized to ensure that the wastes can be safely stored, handled, mixed, and made acceptable to Gage LSF for their recycling process facilities. D002 wastes are not accepted for storage in the bulk tanks (D002 wastes are accepted for storage in containers of 55-gallon size or smaller); therefore, there is no potential for mixing incompatible wastes. A detailed description of the compatibility testing procedures and characterization scheme is contained in Attachment A2, (Chemical Physical Analysis) and Attachment A3, (Waste Analysis Plan), of this application.

Trucks entering the tank truck loading/unloading area are properly grounded prior to loading/unloading. If the waste in the trucks is to be pumped directly into the recycle process, the truck is connected to unloading Pump Nos. 93 or 94. If the waste is to be pumped into one of the hazardous waste storage tanks, the truck is connected to unloading Pump Nos. 91 or 92. The majority of the wastes received at Gage LSF are immediately pumped directly into the tanks before going to the recycle process. In the event that a spill occurs in the unloading area, the material will accumulate in the blind sump area that is located in the center of the loading/unloading area.

**C2.F.1 Spill Prevention Controls**  
[R 299.9615(1) and 40 CFR §264.194(b)]

Engineered controls are utilized to prevent spills and overflows from the bulk storage tanks. Each tank is equipped with a high-level alarm. At 90% of tank capacity, an audible alarm is activated for operators to take action to stop the flow of material into the tank. However, if the level continues to increase, the pump and tank inlet valve actuator are automatically closed, stopping the flow of material into the tank before it reaches 95%.

**C2.F.2 Overfill Prevention Controls**  
[R 299.9615(1) and 40 CFR §264.194(b)]

In addition, each bulk waste tank has a separate dedicated liquid level transmitter. The transmitter provides continuous indication of actual tank liquid levels. For operating purposes, predetermined values are assigned to provide high liquid level alarm signals to the operator. Upon seeing the high level achieved, the

operator would immediately cease filling the tank.

**C2.F.3 Freeboard Maintenance**  
[R 299.9615(1) and 40 CFR §264.194(b)]

The facility does not have any open top or uncovered tanks that would require monitoring of freeboard to prevent overtopping.

**C2.G INSPECTIONS**  
[R 299.9615(1) and 40 CFR §264.195(a)]

Gage conducts regular inspections of the Limited Storage Facility, including its associated tank farm and all ancillary equipment. The facility's structures and equipment, including monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment, are inspected routinely by plant personnel so as to identify malfunctions, deterioration, operator errors, and any other situation which may lead to the release of hazardous materials or be a threat to human health or the environment. Several forms have been developed to facilitate facility inspections. The forms show the areas to be inspected, the frequency of each type of inspection, and the type of issues for which to look. The inspector, when identifying an issue, is required to specify the type of issue identified and any actions taken to remedy the issue. Completed inspection report forms and the frequency of inspections are kept at the facility. The types of issues for which personnel look during the inspection in each area of the facility are outlined in Attachment A5. Copies of current inspection forms can be found in Attachment A5 Appendix A5-4 and A5-6.

**C2.G.1 Schedule and Procedures for Overfill Control System Inspections**  
[R 299.9615(1) and 40 CFR §264.195(a)]

Inspection and schedule of inspections for the tank systems, including the overfill control systems, has been provided in Attachment A5.

**C2.G.2 Daily Inspections of Aboveground Portions of Tank Systems and Monitoring and Leak Detection Data**  
[R 299.9615(1) and 40 CFR §264.195(b)]

Where appropriate, daily inspection of the tank systems is discussed in Attachment A5.

**C2.G.3 Daily Inspection of Construction Materials, Local Areas, and Secondary Containment System for Erosion and Leakage**  
[R 299.9615(1) and 40 CFR §264.195(b)(3)]

Where appropriate, daily inspection of the tank secondary containment systems is discussed in Attachment A5.

**C2.G.4 Inspection of Cathodic Protection Systems**  
[R 299.9615(1) and 40 CFR §264.195(c)]

The facility has installed stainless steel tanks. Cathodic protection is intrinsic and therefore, this section is not applicable.

**C2.G.5 Inspection Requirements before Full Secondary Containment is Provided**  
[R 299.9615(1) and 40 CFR §264.193(i)]

All of Section C2.G.5 is not applicable. Secondary containment was provided when the tanks were installed

in 1991.

### **C2.G.6 Reporting Requirements**

[R 299.9615(1) and 40 CFR §264.193(i)(4)]

The tanks were installed in 1991 following the engineer's installation procedures. A certification sealed by a licensed professional engineer verifying that construction of the LIMITED STORAGE FACILITY proceeded according to plans, was submitted upon completion of the facility in June of 1995.

An independent, qualified registered professional engineer from Hands and Associates, Inc. performed an onsite inspection of the tanks systems, and provided a certified written assessment certified by, attesting that the tank system has sufficient structural integrity and is acceptable for the storing of hazardous waste in 2013. Barr Engineering performed an onsite inspection of the tanks systems on September 6, 2024, reviewed the previous engineer's data and calculations to confirm the tanks were capable of managing hazardous waste.

Tanks are managed according to the API 635 standard and are inspected every 5 years. Records of these inspections are maintained at the facility as part of the operating record.

### **C2.H RESPONSE TO LEAKS OR SPILLS AND DISPOSITION OF LEAKING OR UNFIT-FOR-USE TANK SYSTEMS**

[R 299.9615(1) and 40 CFR §264.196]

#### **C2.H.1 Response Actions for Leaks and Spills**

[R 299.9615(1) and 40 CFR §264.196(a)]

Response actions are described in the facility's Preparedness and Prevention Plan (Attachment A6) and Contingency Plan (Attachment A7).

#### **C2.H.1(a) Waste Flow Stoppage**

[R 299.9615(1) and 40 CFR §264.196(a)]

Response actions including stoppage of waste flow is described in the facility's Preparedness and Prevention Plan (Attachment A6) and Contingency Plan (Attachment A7). The facility will immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

#### **C2.H.1(b) Waste Removal**

[R 299.9615(1) and 40 CFR §264.196(b)]

Response actions including removal of waste is described in the facility's Preparedness and Prevention Plan (Attachment A6) and Contingency Plan (Attachment A7).

The facility will remove any spilled waste within 24 hours after detection of the leak or, if the the facility demonstrates that it is not possible, at the earliest practicable time, remove as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed. In addition, if the material released was to a secondary containment system, all released materials will be removed within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment.

#### **C2.H.1(c) Visible Release Containment**

[R 299.9615(1) and 40 CFR §264.196(c)]

The containment is inspected daily and, in the unlikely event that any accumulated liquids are present, these liquids are analyzed for hazardous waste constituents. If no hazardous constituents are detected in the analysis, the liquid is pumped to the Great Lakes Water Authority (GLWA)'s combined storm water/sanitary sewer line where it would flow to the GLWA's wastewater treatment plant for treatment prior to discharge into the Detroit River. If the accumulated liquid is found to contain hazardous constituents, the liquid is drummed and stored in the area until arrangements have been made for disposal at a licensed hazardous waste disposal facility. Emergency response equipment is located in the immediate area to facilitate immediate cleanup and response activities in the unlikely event of a material release.

Response actions are also described in the facility's Preparedness and Prevention Plan (Attachment A6) and Contingency Plan (Attachment A7).

**C2.H.1(d) Repair, Replacement, or Closure**  
[R 299.9615(1) and 40 CFR §264.196(e)]

If a spill has been observed to secondary containment the facility will determine the cause of the spill, repair the component of the system and confirm the spill has not damaged the integrity of the system prior to placing the tank back into service, in compliance with 40 CFR 264.196(e). Tanks systems that cannot be repaired will be removed from service and closed in accordance with 264.197.

The tanks are managed under API 653 inspection and repair standard.

**C2.H.1(e) Certification of Major Repairs**  
[R 299.9615(1) and 40 CFR §264.196(f)]

Tanks that have undergone major repairs will not be placed back into service until they have been inspected by a Professional Engineer in accordance with 40 CFR 270.11(d).

**C2.H.2 Required Notifications and Reports**  
[R 299.9615(1) and 40 CFR §264.194(d)]

The facility will comply with notification and reports as required under 40 CFR 264.196(d). Response actions are also described in the facility's Preparedness and Prevention Plan (Attachment A6) and Contingency Plan (Attachment A7).

**C2.I CLOSURE AND POST CLOSURE REQUIREMENTS**  
[R 299.9615(1) and 40 CFR §270.14(b)]

*(Check as appropriate)*

- Category A - where decontamination is practical and secondary containment is provided.
- Category B - where decontamination or removal is not practical and where secondary containment is provided and tank system will be closed as a landfill.
- Category C - where decontamination is practical and where secondary containment is not provided.
- Category D - where decontamination or removal is not practical, and where secondary containment is not provided, and tank system will be closed as a landfill.



**C2.I.1 Category A**

[R 299.9615(1) and 40 CFR §264.197]

The facility plans to clean-close all of the tanks in compliance with 40 CFR 264.197 requirements. The closure plan for the tank system has been provided in Attachment A11.

**C2.I.1(a) Closure Plan**

[40 CFR §264.112, except 264.112(d)(1)]

The closure plan consistent with 40 CFR 264.197 for the tank system has been provided in Attachment A11.

**C2.I.1(b) Closure Activities**

[40 CFR §264.111 through 114 and R 299.9613(3)]

The closure plan consistent with 40 CFR 264.197 for the tank system has been provided in Attachment A11.

**C2.I.1(c) Cost Estimate for Closure**

[R 299.9702 and 40 CFR §264.142]

The closure estimate for the tank system has been provided in Attachment A12.

**C2.I.1(d) Financial Assurance for Closure**

[R 299.9703 and 40 CFR §264.143]

Financial assurance in the form of a Letter of Credit from CIBC Bank USA, amended in 2022, for the closure of the tank system and container storage area has been provided in Attachment A1, Appendix A1-8.

**C2.I.2 Category B**

[R 299.9615(1) and 40 CFR §264.197]

This section is not applicable.

**C2.I.3 Category C**

[R 299.9615(1) and 40 CFR §264.197]

This section is not applicable.

**C2.I.4 Category D**

[R 299.9615(1) and 40 CFR §264.197]

This section is not applicable.

## **C2.J SPECIAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES**

[R 299.9615(1) and 40 CFR §270.16(j)]

Tanks are managed in a way that protects the waste from being ignited or reacting with other incompatible materials/wastes. The tanks are located more than 50 feet from the property line and comply with NFPA fire code. Additional discussion regarding the handling of ignitable or reactive wastes has been provided in the Preparedness and Prevention Plan provided in Attachment A6 and specifically in Attachment A6, Appendix A6-1 and A6-2, Procedures for Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes.

### **C2.J.1 Ignitable or Reactive Wastes Precautions**

[R 299.9615(1) and 40 CFR §264.198]

Tanks are managed in a way that protects the waste from being ignited or reacting with other incompatible materials/wastes. The tanks are located more than 50 feet from the property line and comply with NFPA fire code. Additional discussion regarding the handling of ignitable or reactive wastes has been provided in the Preparedness and Prevention Plan provided in Attachment A6 and specifically in Attachment A6, Appendix A6-1 and A6-2, Procedures for Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes.

### **C2.J.2 Distance Requirements for Ignitable or Reactive Wastes**

[R 299.9615(1) and 40 CFR §264.198(a) and (b)]

Tanks are managed in a way that protects the waste from being ignited or reacting with other incompatible materials/wastes. The tanks are located more than 50 feet from the property line and comply with NFPA fire code. Additional discussion regarding the handling of ignitable or reactive wastes has been provided in the Preparedness and Prevention Plan provided in Attachment A6 and specifically in Attachment A6, Appendix A6-1 and A6-2, Procedures for Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes.

### **C2.J.3 Incompatible Wastes**

[R 299.9615(1) and 40 CFR §264.199]

The facility does not accept or process incompatible solvent waste streams. The facility tests waste stream to confirm material compatibility per the waste analysis plan provided in Attachment A3.