

MODIFICATION 1 - TRANSFER TO EQ DETROIT, INC.

DEQ

State of Michigan Department of Environmental Quality HAZARDOUS WASTE MANAGEMENT FACILITY OPERATING LICENSE

NAME OF LICENSEE: EQ Detroit, Inc.

NAME OF OWNER: EQ Detroit, Inc.

NAME OF OPERATOR: EQ Detroit, Inc.

NAME OF TITLEHOLDER OF LAND: EQ Detroit, Inc.

FACILITY NAME: EQ Detroit, Inc.

FACILITY LOCATION: 1923 Frederick Street, Detroit, Michigan 48211-2603

EPA IDENTIFICATION NUMBER: MID 980 991 566

EFFECTIVE DATE: December 12, 2003

REAPPLICATION DATE: June 15, 2008

EXPIRATION DATE: December 12, 2008

AUTHORIZED ACTIVITIES

Pursuant to Part 111 of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), being §§324.11101 to 324.11152 of the Michigan Compiled Laws, and the hazardous waste management administrative rules (hereafter called the "rules") promulgated thereunder, being R 299.9101 *et seq.* of the Michigan Administrative Code, by the Michigan Department of Environmental Quality (MDEQ), an operating license (hereafter called the "license") is issued to EQ Detroit, Inc. (hereafter called the "licensee") to operate a hazardous waste management facility located in Detroit, Michigan at latitude 42°22'17" and longitude 83°3'11". The licensee is authorized to conduct the following hazardous waste management activities:

☒ STORAGE

- ☒ Container
- ☒ Tank
- ☐ Waste Pile
- ☐ Surface Impoundment
- ☐ Drip Pad

☒ TREATMENT

- ☒ Container
- ☒ Tank
- ☐ Surface Impoundment
- ☐ Incinerator
- ☐ Other:

☐ DISPOSAL

- ☐ Landfill
- ☐ Land Application
- ☐ Surface Impoundment

☐ POST CLOSURE

- ☐ Tank
- ☐ Surface Impoundment
- ☐ Landfill
- ☐ Waste Pile

APPLICABLE REGULATIONS AND LICENSE APPROVAL

The conditions of this license were developed in accordance with the applicable provisions of the rules, effective September 11, 2000. The licensee shall comply with all terms and conditions of this license. This license consists of the 27 pages of conditions attached hereto (including those in any Attachments 1 through 14) and the applicable regulations contained in R 299.9101 through R 299.11008, as specified in the license. For purposes of compliance with this license, applicable rules are those which are in effect on the date of issuance of this license in accordance with R 299.9521(3)(a).

This license is based on the information contained in the license application submitted on September 29, 1999 and any subsequent amendments (hereafter referred to as "the application"). Pursuant to R 299.9519(11)(c), the license may be revoked if the licensee fails, in the application or during the license issuance process, to disclose fully all relevant facts or, at any time, misrepresents any relevant facts. As specified in R 299.9519(1), the facility shall be constructed, operated, and maintained in accordance with Part 111 of Act 451, the rules, and this license.

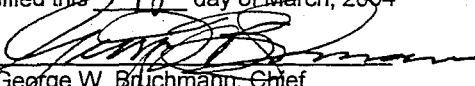
This license is effective on the date of issuance and shall remain in effect for five years from the date of issuance, unless revoked pursuant to R 299.9519 or continued in effect as provided by the Michigan Administrative Procedures Act, 1969 PA 306, as amended (Act 306).

Issued this 12th day of December, 2003

By /s/ George W. Bruchmann
George W. Bruchmann, Chief
Waste and Hazardous Materials Division

This license is hereby modified for transfer from
US Liquids of Detroit, Inc. to EQ Detroit, Inc.

Modified this 18th day of March, 2004

By 
George W. Bruchmann, Chief
Waste and Hazardous Materials Division

EQ DETROIT, INC.

MID 980 991 566

HAZARDOUS WASTE MANAGEMENT FACILITY OPERATING LICENSE

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2	Inspection Schedule	Section O-2
3	Training Outline	Table H-1 and Appendix H-1
4	Contingency Plan	Section G
5	Closure Plan	Section I, except Sections I-10 through I-15, Table I-3, and Appendices I-5 through I-7
6	Engineering Plans	Section D
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14	Ambient Air Monitoring Program	Section E-2

PART I
STANDARD CONDITIONS

A. TERMINOLOGY

Throughout this license, "Act 451" means Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and "rules" means the hazardous waste management administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Act 451, as in effect on the date of issuance of this license. The term "Waste and Hazardous Materials Division" means the division within the Michigan Department of Environmental Quality (MDEQ) responsible for administering Part 111 of Act 451 and the rules. Throughout this license, "Director" means the Director of the MDEQ or the Director's duly authorized designee such as the Chief of the Waste and Hazardous Materials Division of the MDEQ.

B. EFFECT OF LICENSE

Except as otherwise provided by law, any treatment, storage, or disposal of hazardous waste not specifically authorized in this license is prohibited. Issuance of this license does not convey property rights of any sort or any exclusive privilege {R 299.9516(7) and 40 Code of Federal Regulations (CFR) §270.30(g), which is adopted by reference (ABR) in R 299.11003}; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of federal, state, or local law or regulations {R 299.9516(8)}; nor does it obviate the necessity of obtaining such permits or approvals from other units of government as may be required by law. Compliance with the terms of this license does not constitute a warranty or representation of any kind by the MDEQ, nor does the MDEQ intend that compliance with this license constitutes a defense to any order issued or any action brought under Act 451 or any other applicable state statute or Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) {42 USC 9606(a)}, the Resource Conservation and Recovery Act of 1976, as amended (RCRA), and its rules, or any other applicable federal statute. The licensee, however, does not represent that it will not argue that compliance with the terms of this license may be a defense to such future regulatory actions. Each attachment to this license is a part of, and is incorporated into, this license and is deemed an enforceable part of the license.

C. LICENSE ACTIONS

This license may be modified or revoked in accordance with R 299.9519. The filing of a request for a license modification or revocation, or the notification of planned changes or anticipated noncompliance on the part of the licensee does not stay the applicability or enforceability of any license condition. {R 299.9519, R 299.9521(1)(a) and 40 CFR §270.30(f), which is ABR in R 299.11003}

D. SEVERABILITY

The provisions of this license are severable, and if any provision of this license, or the application of any provision of this license to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this license shall not be affected thereby.

E. RESPONSIBILITIES

1. The licensee shall comply with Part 111 of Act 451, the rules, and all conditions of this license, except to the extent authorized by the MDEQ pursuant to the terms of an emergency operating license, including, but not limited to: {R 299.9521(1)(a) and (3)(a) and (b), and 40 CFR §270.30(a), which is ABR in R 299.11003}

- (a) Duty to Reapply. If the licensee wishes to continue an activity regulated by this license after the expiration date of this license, the licensee shall submit a complete application for a new license to the Chief of the Waste and Hazardous Materials Division at least 180 days before this license expires, December 12, 2008, unless an extension is granted pursuant to R 299.9510(5). {R 299.9521(1)(a) and (c) and (3)(a), and 40 CFR §270.30(b), which is ABR in R 299.11003}
- (b) License Expiration. To the extent the licensee makes a timely and sufficient application for renewal of this license, this license and all conditions herein will remain in effect beyond the license expiration date and shall not expire until a decision on the application is finally made by the MDEQ, and if the application is denied or the terms of the new license are limited, until the last day for applying for judicial review of the new license or a later date fixed by order of the reviewing court consistent with Section 91(2) of Act 306. {Section 91 of Act 306, R 299.9521(1)(c) and (3)(a)}
- (c) Inspection and Entry. The licensee shall allow the Chief of the Waste and Hazardous Materials Division, or any authorized representative, upon the presentation of credentials and other documents as may be required by law, to sample or monitor, at reasonable times, any substances or parameters at any location for the purpose of determining:
 - (i) Whether the management of hazardous waste may present an imminent and substantial hazard to the health of persons or to the natural resources, or is endangering or causing danger to public health or the environment;
 - (ii) Whether cause exists for an enforcement action, license revocation, license modification, denial of a license renewal application, or to determine compliance with this license.

If samples are taken for analysis, duplicate samples and a copy of the analytical results shall be furnished to the licensee upon request.

{Sections 11146(1) and (2) and 11148(1) of Act 451, R 299.9521(1)(a), and 40 CFR §270.30(i), which is ABR in R 299.11003}
- (d) Specific Monitoring Requirements. The Chief of the Waste and Hazardous Materials Division reserves authority to modify the license pursuant to R 299.9519 to require specific monitoring for hazardous wastes or hazardous waste constituents, in addition to those requirements detailed in this license, if the Chief of the Waste and Hazardous Materials Division finds that additional monitoring is needed to demonstrate compliance with this license, Part 111 of Act 451 and the rules. {R 299.9611(5)}
- (e) Notice of Facility Modifications. The licensee shall give notice to the Chief of the Waste and Hazardous Materials Division as soon as possible prior to any planned physical alterations or additions to the licensed facility. {R 299.9519(1)}
- (f) License Amendments for Facility Modifications. The licensee shall request and obtain a license amendment prior to undertaking any modifications to the facility. Except as otherwise authorized by Part 111 of Act 451 and the rules, the licensee shall obtain a construction permit prior to expanding, enlarging, or altering the facility. {R 299.9501(1), R 299.9519, and R 299.9521(1)(b)(i)}

- (g) Submission of Statements and Certifications for Construction and Capability. The licensee shall submit to the Chief of the Waste and Hazardous Materials Division, by certified mail or hand delivery, a letter signed by the licensee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the license and approved plans and the certifications of construction and capability required pursuant to Section 11123(3) of Act 451. The licensee shall not treat, store, or dispose of hazardous waste in the modified portion of the facility until one of the following conditions is met:
- (i) The Chief of the Waste and Hazardous Materials Division, or the authorized representative, has inspected the modified facility and finds it is in compliance with the conditions of the license;
 - (ii) If within 15 days after the date of submission of the letter in Condition I.E.1.(g) of this license, the licensee has not received notice from the Chief of the Waste and Hazardous Materials Division of his or her intent to inspect, prior inspection is waived, and the licensee may commence treatment, storage, or disposal of hazardous waste.

{R 299.9521(1)(b)(ii)}

- (h) Anticipated Noncompliance. The licensee shall give advance notice to the Chief of the Waste and Hazardous Materials Division as soon as the licensee becomes aware of any planned changes or activity in the licensed facility which may result in noncompliance with license requirements. {R 299.9521(1)(a) and 40 CFR §270.30(l)(2), which is ABR in R 299.11003}
- (i) Transfer of License. The licensee shall obtain the approval of the Chief of the Waste and Hazardous Materials Division, by a modification to the license, prior to transferring ownership or operation of the facility to another person. The licensee shall comply with the requirements of R 299.9605 when transferring the ownership of the facility. The new owner/operator shall not accept hazardous waste at the facility unless the license modification has been issued by the Chief of the Waste and Hazardous Materials Division. In addition, the licensee shall provide any new owners or operators of the facility with a copy of the notice required pursuant to R 299.9525. {R 299.9522}
- (j) Other Information. Whenever the licensee becomes aware that he/she failed to submit any relevant facts in the license application, or submitted incorrect information in a license application or in any report to the Chief of the Waste and Hazardous Materials Division, the licensee shall promptly submit such facts or information. {R 299.9521(1)(a), R 299.9525, and 40 CFR §270.30(l)(11), which is ABR in R 299.11003}

2. The licensee shall comply with the requirements of 40 CFR §270.30(c)-(e) and (h)-(j), including those requirements pertaining to:

- (a) Need to halt or reduce activity not a defense,
- (b) Duty to mitigate,
- (c) Proper operation and maintenance,
- (d) Duty to provide information,
- (e) Inspection and entry,
- (f) Monitoring and records.

{R 299.9521(1)(a) and 40 CFR §270.30(c)-(e) and (h)-(j), which are ABR in R 299.11003}

3. Any license noncompliance, except to the extent authorized by the MDEQ pursuant to the terms of an emergency operating license, constitutes a violation of Part 111 of Act 451 and is grounds for enforcement

action, license revocation, license modification, or denial of a license renewal application.
{R 299.9521(1)(a) and 40 CFR §270.30(a), which is ABR in R 299.11003}

F. SIGNATORY REQUIREMENT

The licensee shall ensure that all reports required by this license or other information requested by the Chief of the Waste and Hazardous Materials Division, or authorized representative, are signed and certified in accordance with R 299.9610(4), by a responsible corporate officer, as defined in 40 CFR §270.11, which is ABR in R 299.11003.
{R 299.9521(1)(a) and 40 CFR §270.30(k), which is ABR in R 299.11003}

G. SUBMITTAL DUE DATES AND DEADLINES

When the due date or deadline for submission of applications, reports, records, and monitoring results required under this license falls on a weekend or legal state holiday, the due date or deadline shall be extended to the next regular business day, and reports, records, and monitoring results shall be considered submitted on a timely basis if submitted by the next regular business day. This extension does not apply to the submittal due date or deadline for financial mechanisms, and associated renewals, replacements, and extensions of financial mechanisms required under this license. The licensee may request extension of the due dates or deadlines for submittals required under this license. The licensee shall submit such requests at least five business days prior to the existing due date or deadline for review and approval by the Chief of the Waste and Hazardous Materials Division. Written extension requests shall include justification for each extension. {R 299.9521(3)(a)}

PART II

GENERAL OPERATING CONDITIONS

A. DESIGN AND OPERATION OF FACILITY

The licensee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the environment, including air, soil, or waters of the State which could threaten human health or welfare or the environment. {R 299.9602, R 299.9604, R 299.9606, R 299.9607, and 40 CFR §§264.31 and 264.51, which are ABR in R 299.11003}

B. REQUIRED NOTICE

1. The licensee shall notify the Chief of the Waste and Hazardous Materials Division in writing at least four weeks in advance of the date the licensee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source is not required. When receiving such hazardous waste, the licensee shall comply with applicable laws, including, but not limited to, any treaties or other agreements entered into between the country in which the foreign source is located and the United States. {R 299.9605(1) and 40 CFR §264.12(a), which is ABR in R 299.11003}
2. When the licensee is to receive hazardous waste from an off-site source (except where the licensee is also the generator), he must inform the generator in writing that he has the appropriate license for, and will accept, the waste the generator is shipping. The licensee must keep a copy of this written notice as part of the operating record (see Condition II.L.1. of this license). {R 299.9605(1) and 40 CFR §264.12(b), which is ABR in R 299.11003}

C. GENERAL WASTE ANALYSIS

The licensee shall ensure that any waste stored, treated, or disposed at the facility has been properly characterized pursuant to R 299.9302, and comply with the procedures described in the attached waste analysis plan, Attachment 1 of this license. {R 299.9605(1), and 40 CFR §264.13, which is ABR in R 299.11003}

D. QUALITY ASSURANCE/QUALITY CONTROL REQUIREMENTS

The licensee shall ensure that all samples collected for the purposes of waste characterization and environmental monitoring are collected, transported, analyzed, stored, and disposed of by trained and qualified individuals in accordance with their Quality Assurance/Quality Control (QA/QC) Plan. The QA/QC Plan shall at a minimum include the written procedures outlined in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," United States Environmental Protection Agency (U.S. EPA) Publication SW-846, Third Edition, Chapter 1 (November 1986), and its Updates I (July 1992), II (September 1994), IIA (August 1993), IIB (January 1995), III (December 1996), and IIIA (April 1998), and any facility or contractor's written standard operating procedures (SOPs) which are equivalent or more stringent than SW-846, Chapter 1. The licensee shall make the written QA/QC Plan available to the Chief of the Waste and Hazardous Materials Division or an authorized representative upon request. {R 299.9521(3)(a) and (b), R 299.9611(2), and R 299.11005}

E. SECURITY

The licensee shall comply with the security requirements of R 299.9605(1) and 40 CFR §264.14, which is ABR in R 299.11003.

F. GENERAL INSPECTION REQUIREMENTS

1. The licensee shall inspect the hazardous waste management facility, remedy any deterioration or malfunction of equipment or structures, and document inspections and remedies in accordance with the attached inspection schedule, Attachment 2 of this license, and the provisions of 40 CFR §264.15 which is ABR in R 299.11003. {R 299.9605(1)}

2. The licensee shall develop and implement a procedure to ensure compliance with the requirements of R 299.9605(2).
3. The licensee shall inspect at least weekly all paved areas of the facility, remedy any deterioration such as cracks or gaps that would allow a release of hazardous waste to reach underlying soils, and document the inspections and remedies in the facility inspection log.

G. PERSONNEL TRAINING

The licensee shall conduct personnel training as required by R 299.9605(1) and 40 CFR §264.16, which is ABR in R 299.11003. This training program shall, at a minimum, cover all items in the attached outline, Attachment 3 of this license. The licensee shall maintain training documents and records as required by R 299.9605 and 40 CFR §264.16(d), which is ABR in R 299.11003.

H. PREPAREDNESS AND PREVENTION

The licensee shall comply with the preparedness and prevention requirements of R 299.9606, including, but not limited to, required equipment, testing, and maintenance of equipment, access to communications and alarm systems, required aisle space, and arrangements with emergency response teams. {R 299.9606 and 40 CFR Part 264, Subpart C, which is ABR in R 299.11003}

I. CONTINGENCY PLAN

The licensee shall comply with the contingency plan requirements of R 299.9607. The contingency plan, Attachment 4 of this license, and the prescribed emergency procedures shall be immediately implemented by the licensee whenever there is a fire, explosion, or other release of hazardous waste or hazardous waste constituents which threatens or could threaten human health or the environment, or if the licensee has knowledge that a spill has reached surface water or groundwater. {R 299.9607 and 40 CFR Part 264, Subpart D, which is ABR in R 299.11003}

J. DUTY TO MITIGATE

Upon notification from the Chief of the Waste and Hazardous Materials Division or his or her designee that an activity at the facility may present an imminent and substantial endangerment to human health or the environment, the licensee shall immediately comply with an order issued by the Chief of the Waste and Hazardous Materials Division pursuant to Section 11148(1) of Act 451 to halt such activity and conduct other activities as required by the Chief of the Waste and Hazardous Materials Division to eliminate the said endangerment. The licensee shall not resume the halted activity without the prior written approval from the Chief of the Waste and Hazardous Materials Division. {Section 11148 of Act 451 and R 299.9521(3)(b)}

K. MANIFEST SYSTEM

The licensee shall comply with the manifest requirements of R 299.9304, R 299.9305, and R 299.9608.

L. RECORDKEEPING AND REPORTING

1. Operating Record. The licensee shall maintain a written operating record at the facility, until closure of the facility. {R 299.9609 and 40 CFR §264.73 and Part 264, Appendix I, which are ABR in R 299.11003}
2. Biennial Report. The licensee shall comply with the biennial report requirements of R 299.9610. A single copy of the biennial report shall be submitted to the Chief of the Waste and Hazardous Materials Division by March 1 of each even numbered year by mailing it to: Biennial Report Coordinator, Department of Environmental Quality, Waste and Hazardous Materials Division, P.O. Box 30241, Lansing, Michigan 48909-7741. {R 299.9521(1)(a) and R 299.9610 and 40 CFR §270.30(l)(9), which is ABR in R 299.11003}
3. Monthly Report. The licensee shall comply with the monthly reporting requirements of R 299.9610(3). The monthly report shall be submitted on a form provided by the Chief of the Waste and Hazardous Materials Division, or an equivalent form which has been approved by the Chief of the Waste and Hazardous Materials Division.
4. Environmental Monitoring Reports. The licensee shall submit the results of all environmental monitoring required by this license in the form of an Environmental Monitoring Report to the Chief of the Waste and Hazardous Materials Division within 60 days after sample collection. {R 299.9521(1)(a) and 40 CFR §270.30(l)(4), which is ABR in R 299.11003}
5. Environmental Monitoring Data Availability. The licensee shall provide environmental monitoring information or data which it is required to generate pursuant to this license, to an authorized representative of an environmental or emergency response department of the City of Detroit or Wayne County, who requests such information or data and that has jurisdiction over the facility. Such information or data shall be made available on the same day the licensee forwards this information to the Chief of the Waste and Hazardous Materials Division.. {R 299.9521(3)(b)}
6. Additional Environmental Sampling and Analysis. If the licensee conducts any additional environmental sampling or analysis beyond that required by this license, the results of such sampling or analysis shall be reported in accordance with Condition II.L.4. of this license. Such increased frequency shall also be indicated in the Environmental Monitoring Report. {R 299.9521(1)(a), R 299.9521(3)(b), and 40 CFR §270.30(l)(4), which is ABR in R 299.11003}
7. Reporting of Noncompliance. The licensee shall immediately report to the Chief of the Waste and Hazardous Materials Division any noncompliance with the license that may endanger human health or the environment. The licensee shall fulfill this reporting requirement by doing both of the following:
 - (a) The licensee shall immediately contact the Chief of the Waste and Hazardous Materials Division at **517-335-2690**, if the noncompliance occurs during the period 8:00 a.m. to 5:00 p.m., Monday through Friday, except State holidays, or by calling the Department of Environmental Quality Pollution Emergency Alerting System (PEAS) telephone number 1-800-292-4706 during all other times. This report shall include the following:
 - (i) Information concerning the release or discharge of any hazardous waste or hazardous waste constituent which may endanger public drinking water supplies or the environment;
 - (ii) Information concerning the fire, explosion, or other release or discharge of any hazardous waste or hazardous waste constituent which could threaten human health or the environment or a spill that has reached surface water or groundwater;
 - (iii) A description of the occurrence and its cause, including all of the information outlined in R 299.9607(2)(a)-(i).
 - (b) The licensee shall also follow up the verbal report by providing a written report to the Chief of the Waste and Hazardous Materials Division within five days after the time the licensee becomes aware of the circumstances. The written report shall contain all of the information in

Condition II.L.7.(a)(i)-(iii) of this license along with a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected and, if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance and when those activities occurred or will occur. The licensee need not comply with the five-day written notice requirement if the Chief of the Waste and Hazardous Materials Division waives the requirement and the licensee submits a written report containing this information within 15 days after the time the licensee becomes aware of the circumstances.

{R 299.9521(1)(a) and R 299.9607 and 40 CFR §270.30(l)(10), which is ABR in R 299.11003}

8. Other Noncompliance. The licensee shall report all other instances of noncompliance with this license, Part 111 of Act 451, the rules, and any other applicable environmental laws or rules that apply to the licensed facility, at the time monitoring reports required by this license are submitted or within 30 days, whichever is sooner. The reports shall contain the information listed in Condition II.L.7. of this license. {R 299.9521(1)(a) and 40 CFR §270.30(l)(10), which is ABR in R 299.11003}
9. Form Modification. The licensee may make minor modifications to the forms contained in the attachments to this license. The modifications may include changing the format, updating existing references and information, adding necessary information, and changing certification and notification information in accordance with Part 111 of Act 451 and its rules, and RCRA and its regulations. The licensee shall submit the modifications to the Chief of the Waste and Hazardous Materials Division prior to implementing the use of the modified form(s). If the Chief of the Waste and Hazardous Materials Division does not reject or require revision of the modified form(s) within 14 days after receipt, the licensee shall implement use of the modified form(s) and the form(s) shall be incorporated into this license as a replacement for the existing form(s).

M. CLOSURE

The licensee shall comply with the closure requirements of R 299.9613, including, but not limited to, performance standards, amendment of closure plans, notification of closure, time allowed for closure, disposal or decontamination of equipment, and certification of closure. The licensee shall close the facility in accordance with the closure plan, Attachment 5 of this license, all other applicable requirements of this license, and all other applicable laws. The licensee shall submit a proposed amended copy of the closure plan to the Chief of the Waste and Hazardous Materials Division at the same time such a license modification is requested. {R 299.9613 and 40 CFR Part 264, Subpart G, except 40 CFR §§264.112(d)(1), 264.115, and 264.120, which is ABR in R 299.11003}

N. COST ESTIMATE FOR FACILITY CLOSURE

1. At the time of issuance of this license, the closure cost estimate is \$1,148,210.00.
2. The licensee shall comply with the closure cost estimate requirements of R 299.9702, including, but not limited to, adjustment of the closure cost estimate and maintenance of the latest cost estimate at the facility. {R 299.9702 and 40 CFR §264.142, which is ABR in R 299.11003}.

O. FINANCIAL ASSURANCE FOR FACILITY CLOSURE

1. The licensee shall provide and continuously maintain closure financial assurance in accordance with R 299.9703 in an amount at least equal to the cost estimate required by Condition II.N. of this license. The licensee shall submit all proposed changes in the mechanism(s), other than renewals, extensions, or increases in the amount of assurance, to the Chief of the Waste and Hazardous Materials Division and obtain his approval prior to implementation. The licensee shall provide the Chief of the Waste and Hazardous Materials Division with a signed original of all revisions and renewals within 60 days after such revision or renewal, by the applicable deadlines specified in R 299.9704 through R 299.9709, and prior to the anniversary of the establishment of the financial mechanism(s) provided to satisfy the requirements of this condition.

2. Whenever the current closure cost estimate increases to an amount greater than the current amount of the associated financial mechanism(s), the licensee shall, within 60 days after the increase, either increase the amount of the mechanism(s) to an amount at least equal to the increased closure cost estimate, or provide an additional financial mechanism approved by the Chief of the Waste and Hazardous Materials Division for an amount at least equal to the difference between the current amount of financial assurance and the increased closure cost estimate. Evidence of such increased financial assurance must be submitted to the Chief of the Waste and Hazardous Materials Division during the 60-day period.

P. LIABILITY REQUIREMENTS

The licensee shall continuously maintain liability coverage for sudden and accidental occurrences, as required by R 299.9710. The licensee shall submit to the Chief of the Waste and Hazardous Materials Division a signed original pollution liability insurance amendatory endorsement or other financial mechanism approved by the Chief of the Waste and Hazardous Materials Division prior to the anniversary date of the establishment of the mechanism(s) used to satisfy the requirements of this condition. In the case of the financial test or corporate guarantee, the licensee shall submit the updated financial information within 90 days after the close of each succeeding fiscal year.

Q. WASTE MINIMIZATION

The licensee shall certify, at least annually, that the licensee has a program in place to reduce the volume and toxicity of hazardous waste that the licensee generates to the degree determined by the licensee to be economically practicable; and the proposed method of treatment, storage, or disposal is the practicable method currently available to the licensee which minimizes the present and future threat to human health and the environment. The certification shall be recorded, as it becomes available, and maintained in the operating record until closure of the facility. {R 299.9609(1)(a), 40 CFR §264.73(b)(9), which is ABR in R 299.11003, and Section 3005(h) of RCRA, 42 U.S.C. Section 6925(h)}

R. LAND DISPOSAL RESTRICTIONS

The licensee shall comply with all of the requirements of 40 CFR Part 268. {R 299.9627 and 40 CFR Part 268, which is ABR in R 299.11003}

S. AIR EMISSION STANDARDS

1. The licensee shall comply with the requirements of 40 CFR Part 264, Subpart CC, regarding air emission standards for tanks and containers. {R 299.9634 and 40 CFR Part 264, Subpart CC, which is ABR in R 299.11003}
2. Until the licensee is authorized to store or treat hazardous waste in the proposed Flammable Liquids 600 Series Tanks and CC Vaults in accordance with Condition I.E.1.(g) of this license, the licensee shall not accept hazardous wastes that are subject to the requirements of 40 CFR Part 264, Subpart CC, except the licensee may temporarily store containers of hazardous waste which are subject to the requirements of 40 CFR Part 264, Subpart CC, prior to shipment offsite.
3. The licensee shall notify the Chief of the Waste and Hazardous Materials Division of any waste management units which become subject to the requirements of 40 CFR Part 264, Subparts AA, BB, and CC within 30 days after the start of the regulated activity. {R 299.9630, R 299.9631, R 299.9634, and 40 CFR Part 264, Subparts AA, BB, and CC, which are ABR in R 299.11003}

T. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The licensee shall maintain at the facility the following documents and amendments required by this license, until closure/postclosure is completed, certified by an independent registered professional engineer, and the facility is released from financial assurance requirements for closure/postclosure by the Director:

1. Waste analysis plan, including QA/QC plan.
2. Inspection schedules.
3. Personnel training documents and records.
4. Contingency plan.
5. Closure plan.
6. Cost estimates for facility closure and copies of related financial assurance documents.
7. Operating record.
8. Site security plan.
9. Facility engineering plans and specifications.
10. Recordkeeping procedures.
11. Environmental monitoring plans, including sampling and analysis plans and QA/QC plans.
12. Environmental monitoring data and statistical records.
13. Preventive procedures (personnel protection plan).

{R 299.9521(3)(a)}

U. TRACK-OUT

The licensee shall prevent the trackout of hazardous waste from the facility by doing all of the following:

1. Remove hazardous waste residues from vehicles exiting the active portions of the facility; and
2. Develop and implement a daily cleanup program within 30 days after the effective date of this license which includes, at a minimum, sweeping and washing all traffic routes, staging areas, and loading and unloading areas as necessary.

{R 299.9604(1)(c)}

V. ENGINEERING PLANS

The licensee shall construct, operate, and maintain the facility in accordance with the Engineering Plans, Attachment 6 of this license, and any modifications to those plans made in accordance with this license.

PART III
CONTAINER STORAGE AND TREATMENT CONDITIONS

A. COVERAGE OF LICENSE

1. The hazardous waste container storage areas at the facility shown on Drawings C-2F and C-2G are covered by this license. Any expansion or enlargement beyond the facility boundary shown on Drawing C-4 or beyond the 614,110 gallon storage design capacity requires a construction permit from the Director. {R 299.9521(1)(b)}
2. Drawings C-2F, C-2G, and C-4 are incorporated into this license as part of the "Entire Facility" engineering plans in Attachment 6.

B. WASTE IDENTIFICATION AND QUANTITY

1. The licensee may store no more than a total volume of 614,110 gallons of the hazardous wastes listed in Attachment 7 in containers at the facility, subject to the terms of this license. The individual capacities and maximum number of containers of hazardous waste that may be stored at the facility are shown for each container storage unit in Attachment 8. {R 299.9521(2)(d)}
2. The licensee shall not store regulated PCB wastes or explosive wastes in containers at the facility.

C. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., rusting, apparent structural defects) or if it begins to leak, the licensee shall transfer the hazardous waste from such container to a container that is in good condition, or otherwise manage the waste in compliance with the conditions of this license. {R 299.9614(1)(a) and 40 CFR §264.171, which is ABR in R 299.11003}

D. COMPATIBILITY OF WASTE WITH CONTAINERS

The licensee shall ensure that the ability of the containers to contain the waste is not impaired. {R 299.9614 and 40 CFR §264.172, which is ABR in R 299.11003}

E. MANAGEMENT OF CONTAINERS

1. The licensee shall keep all containers holding hazardous waste closed during storage except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner which may rupture the containers or cause them to leak. {R 299.9614 and 40 CFR §264.173, which is ABR in R 299.11003}
2. The licensee shall ensure that each container of hazardous waste in the container storage areas referenced in Condition III.A. of this license is labeled or clearly marked with the words "Hazardous Waste," the hazardous waste number, and the date it was accepted for storage so that compliance with the one-year storage limit can be assessed. The labels on each container shall be visible for inspection. {R 299.9521(3)(b), R 299.9614, R 299.9627, and 40 CFR §268.50(a)(2)(i), which is ABR in R 299.11003}
3. The licensee shall only place containers into the hazardous waste container storage areas referenced in Condition III.A. of this license in accordance with the configurations specified in Attachment 8 of this license or an alternate configuration approved by the Chief of the Waste and Hazardous Materials Division. {R 299.9521(3)(b)}
4. The licensee shall not stack containers of hazardous waste greater than two high or higher than nine feet, whichever is greater. {R 299.9521(3)(b)}
5. The licensee shall maintain a minimum of 2 feet of aisle space between each row of containers. {R 299.9521(3)(b), R 299.9606, and 40 CFR 264.35, which is ABR in R 299.11003}

6. The licensee shall not store any container of hazardous waste for more than one year in the container storage areas referenced in Condition III.A. of this license prior to treatment of its contents on-site or shipment off-site to another appropriately licensed hazardous waste treatment or disposal facility, except as approved by the Chief of the Waste and Hazardous Materials Division based on a petition demonstrating that such storage is solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal. {R 299.9521(3)(b), R 299.9627, and 40 CFR Part 268, which is ABR in R 299.11003}

F. CONTAINMENT

The licensee shall construct, operate and maintain the containment systems in accordance with the requirements of R 299.9614 and 40 CFR §264.175, which is ABR in R 299.11003, and the attached plans and specifications in Attachment 6 of this license, and as specified in the unit-specific conditions in Attachment 8 of this license.

G. SPECIAL REQUIREMENTS FOR IGNITABLE AND REACTIVE WASTES

1. The licensee shall not locate containers holding ignitable or reactive wastes within 15 meters (50 feet) of the facility's property line. {R 299.9614 and 40 CFR §264.176, which is ABR in R 299.11003}
2. The licensee shall take precautions to prevent the accidental ignition or reaction of ignitable or reactive wastes by following the procedures specified in Attachment 9 of this license. {R 299.9605 and 40 CFR §264.17(a), which is ABR in R 299.11003}
3. The licensee shall document compliance with Condition III.G.2. of this license and place this documentation in the operating record (Condition II.L.1. of this license). {R 299.9605 and 40 CFR §264.17(c), which is ABR in R 299.11003}
4. The licensee is prohibited from storing reactive wastes in the hazardous waste container storage areas referenced in Condition III.A. of this license, except under either of the following conditions:
 - a. The wastes are reactive due to cyanide or sulfide content only and will not be commingled or treated at the facility.
 - b. The wastes are wastewaters or sludges that are reactive due to cyanide or sulfide content only and it has been demonstrated that the wastes can be treated at the facility without generating toxic fumes. {R 299.9521(2)(d) and (3)(b)}
5. The licensee is prohibited from storing ignitable wastes and flammable and combustible liquids in the hazardous waste container storage areas referenced in Condition III.A. of this license, except as provided in Attachment 8 of this license. {R 299.9521(2)(d) and (3)(b)}

H. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES OR MATERIALS

1. The licensee is prohibited from placing incompatible wastes or incompatible wastes and materials in the same container. {R 299.9521(2)(d) and (3)(b)}
2. The licensee shall prevent the placement of hazardous waste in an unwashed container that previously held an incompatible waste or material. {R 299.9614 and 40 CFR §264.177(b), which is ABR in R 299.11003}
3. The licensee shall separate containers of incompatible wastes as indicated in the procedures contained in Attachment 9 of this license. {R 299.9614 and 40 CFR §264.177(c), which is ABR in R 299.11003.}
4. The licensee shall document compliance with Conditions III.H.1. and III.H.2. of this license and place this documentation in the operating record (Condition II.L.1. of this license). {R 299.9605 and 40 CFR §264.17(c), which is ABR in R 299.11003}

I. DISPOSITION OF ACCUMULATED LIQUIDS

The licensee shall remove all liquids accumulated in the containment system within the earliest practicable time and no later than 48 hours after detection and manage the liquids in accordance with the requirements of Part 111 of Act 451 and the rules. The liquids shall be characterized and treated on-site as necessary to meet the discharge limits prior to discharge to the sewer. In the event that snow or ice accumulates in the containment system, the licensee shall reduce the amount of hazardous waste stored in containers proportionately such that the available containment volume is adequate for the volume of hazardous wastes stored in containers. {R 299.9521(3)(b), R 299.9614(1)(a) and 40 CFR §264.175(b)(5), which is ABR in R 299.11003}

J. COMPLIANCE WITH AIR EMISSION AND WASTE MANAGEMENT REQUIREMENTS FOR STORAGE IN CONTAINERS

The licensee shall operate the facility in a manner that will prevent air emissions in violation of Part 55 of Act 451. {R 299.9602(1)(b)}

K. TREATMENT IN CONTAINERS

The licensee may conduct treatment in containers in the Chemical Fixation Facility only and in accordance with the procedures in Attachment 12 of this license.

L. BULKING AND CONSOLIDATION

The licensee may bulk or consolidate the hazardous wastes in Attachment 7 in containers subject to the following:

1. The bulking and consolidation may occur only in authorized container storage areas at the facility;
2. The bulking and consolidation is done in accordance with the preparedness and prevention procedures of Attachment of 9; and
3. The bulking and consolidation of dry solids must be conducted in the Chemical Fixation Facility.

PART IV

TANK SYSTEM STORAGE AND TREATMENT CONDITIONS

A. COVERAGE OF LICENSE

1. The hazardous waste tank system storage and treatment areas at the facility shown on Drawings C-2B and C-2E are covered by this license. Any expansion or enlargement beyond the facility boundary shown on Drawing C-4 or beyond the 1,552,531 gallon tank system storage design capacity requires a construction permit from the Director. {R 299.9521(1)(b)}
2. Drawings C-2B, C-2E, and C-4 are incorporated into this license as part of the "Entire Facility" engineering plans in Attachment 6.

B. WASTE IDENTIFICATION AND QUANTITY

1. The licensee may store no more than a total volume of 1,552,531 gallons of the hazardous wastes listed in Attachment 7 in the tank systems identified in Attachment 10, subject to the terms of this license. {R 299.9521(2)(d)}
2. The licensee shall not store regulated PCB wastes or explosive wastes in tanks at the facility.

C. WASTE TREATMENT CAPACITY AND METHODS

The licensee may treat the hazardous wastes listed in Attachment 7 in tank systems in accordance with Attachment 10, subject to the terms of this license. Process capacities are limited to the following:

- | | |
|---|---------------------------------------|
| • Biological Treatment | 675,000 gallons per day |
| • Chemical Fixation | 300 tons per hour |
| • Chemical Precipitation, Corrosive Treatment, and Secondary and Tertiary Treatment | Collectively, 432,000 gallons per day |
| • Filtration and Carbon Adsorption | Collectively, 430,000 gallons per day |

{R 299.9521(2)(d) and (3)(a) and (b)}

D. DESIGN, CONTAINMENT, AND ASSESSMENT OF TANK SYSTEMS

1. The licensee shall construct, operate, and maintain all tank systems in accordance with the applicable requirements of R 299.9615 and 40 CFR §§264.191, 264.192, 264.193, and 264.194, which are ABR in R 299.11003, and in accordance with the attached plans and specifications in Attachment 6 of this license.
2. The licensee shall submit for approval of the Chief of the Waste and Hazardous Materials Division final engineering plans and specifications and tank system assessments for all tank system modifications, upgrades, and replacements prior to initiating construction in accordance with Attachment 10.
3. The licensee shall submit for plan review and approval under Michigan's Flammable and Combustible Liquids rules the final engineering plans and specifications for the 600 Series tanks.
4. The licensee shall obtain and maintain on file certifications that all tank system modifications, upgrades, and replacements were properly installed.

{R 299.9615 and 40 CFR §§264.191, 264.192, 264.193, and 264.194, which are ABR in R 299.11003}

E. MANAGEMENT OF TANK SYSTEMS

1. The licensee shall manage the tank systems in accordance with the requirements of R 299.9615 and 40 CFR §§264.194 and 264.196 which are ABR in R 299.11003, and in accordance with the spill and overfill prevention procedures specified in Attachment 11 of this license.

2. The licensee shall not add hazardous wastes to the chemical fixation vaults (T-701 through T-706) in such a manner that would damage the structural integrity of the steel liner.
3. The licensee shall conduct the treatment of hazardous wastes in accordance with the methods and procedures specified in Attachment 12 of this license. {R 299.9633}}
4. The licensee shall construct, operate, and maintain all tanks in compliance with the requirements of R 29.4101 to R 29.4504 pursuant to the provisions of the Fire Prevention Act, 1941 PA 207, as amended. {R 299.9615}
5. The licensee shall label tank systems in accordance with the provisions of National Fire Protection Association (NFPA) Standard No. 704. {R 299.9615(5)}
6. The licensee shall clearly mark each tank containing land disposal restricted waste with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or record such information for each tank system in the facility operating record. {R 299.9627 and 40 CFR §268.50(a)(2)(ii), which is ABR in R 299.11003}
7. The licensee shall not store any hazardous waste in the tanks referenced in Condition IV.A. of this license for more than one year prior to treatment of its contents on-site or shipment off-site to another appropriately-licensed hazardous waste treatment or disposal facility. The licensee may store hazardous waste in a tank for more than the one-year period based upon a petition approved by the Chief of the Waste and Hazardous Materials Division demonstrating that such storage is solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal. {R 299.9521(3)(b), R 299.9627, and 40 CFR Part 268, which is ABR in R 299.11003}
8. The licensee is prohibited from having or operating any loading/unloading connections and tank systems which would enable the direct discharge of hazardous waste from a tanker truck or containers into the sewer. All hazardous waste that is ultimately discharged to the sewer must be first offloaded into authorized tank systems and managed in accordance with this license.

F. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

1. The licensee shall not place ignitable or reactive waste in a tank system unless the procedures described in Attachment 9 of this license are followed. {R 299.9615 and 40 CFR §264.198(a), which is ABR in R 299.11003}
2. The licensee shall document compliance with Condition IV.F.1. of this license and place this documentation in the operating record (Condition II.L.1. of this license). {R 299.9605, R 299.9609, and 40 CFR §§264.17(c) and 264.73(b)(3), which are ABR in R 299.11003}
3. The licensee shall maintain the protective distances between the tank systems and any public ways, streets, alleys, or adjoining property lines that can be built upon, as required in Tables 2-1 through 2-6 of the NFPA's "Flammable and Combustible Liquids Code" (1977 or 1981) as specified in Attachment 9 of this license, and as required by R 299.9615 and 40 CFR §264.198(b), which is ABR in R 299.11003.
4. The licensee is prohibited from storing and treating reactive wastes in the hazardous waste tank systems referenced in Condition IV.A. of this license, except the licensee may store and treat wastewaters and sludges that are reactive solely due to the sulfide or cyanide content and it has been demonstrated that the wastes can be safely treated at the facility without generating toxic fumes. {R 299.9521(2)(d) and (3)(b)}
5. The licensee is prohibited from managing flammable and combustible liquids in the existing 600 Series tanks, and the licensee shall render the tanks temporarily out-of-service, as outlined in NFPA 30, Section 2-3.8.1, "Tanks that are out of service shall be emptied of liquid, cleaned to a vapor-free condition, and safeguarded against trespassing".

G. SPECIAL REQUIREMENTS FOR STORAGE OR TREATMENT OF INCOMPATIBLE WASTES OR MATERIALS

1. The licensee shall not place incompatible wastes or incompatible wastes and materials, in the same tank system or place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material unless the procedures specified in Attachment 9 of this license are followed, as required by R 299.9615 and 40 CFR §264.17(b), which is ABR in R 299.11003. {R 299.9615 and 40 CFR §264.199, which is ABR in R 299.11003}
2. The licensee shall document compliance with Condition IV.G.1. of this license, as required by R 299.9605 and 40 CFR §264.17(c), and place this documentation in the operating record. The provisions of 40 CFR §264.17(c) are ABR in R 299.11003. {R 299.9609 and 40 CFR §264.73(b)(3), which is ABR in R 299.11003}

H. DISPOSITION OF ACCUMULATED LIQUIDS

The licensee shall remove all liquids accumulated in the containment system within the earliest practicable time and no later than 48 hours after detection and manage the liquids in accordance with the requirements of Part 111 of Act 451 and the rules. The liquids shall be characterized and treated on-site as necessary to meet the discharge limits prior to discharge to the sewer. In the event that snow or ice accumulates in the containment system, the licensee shall reduce the amount of hazardous waste stored in the tanks proportionately such that the available containment volume is adequate for the volume of hazardous wastes stored in the tanks. {R 299.9521(3)(b), R 299.9615, and 40 CFR §264.193(c)(4), which is ABR in R 299.11003}

I. COMPLIANCE WITH AIR EMISSION AND WASTE MANAGEMENT REQUIREMENTS FOR STORAGE AND TREATMENT IN TANK SYSTEMS

1. The licensee shall operate the facility in a manner that will prevent air emissions in violation of Part 55 of Act 451.
2. The licensee shall operate and maintain the air emissions control system for the Chemical Fixation Facility specified on Drawings M-1 and M-3 of the "Chemical Fixation Facility" engineering plans of Attachment 6. The air emissions control system shall maintain a negative pressure on the Chemical Fixation Facility at all times when wastes are being stored, treated, or transferred within the building, and no more than one bay door to the Chemical Fixation Facility may be open at any one time during operation, except during unloading, at which time up to two bay doors may be open. {R 299.9602(1)(b)}

PART V

ENVIRONMENTAL MONITORING CONDITIONS

A. AMBIENT AIR MONITORING PROGRAM

1. The licensee shall conduct ambient air monitoring in accordance with the program specified in Attachment 14 of this license by April 14, 2004. {R 299.9611(2)(c)}
2. The licensee shall report ambient air monitoring results as required by Condition II.L.4. of this license.

B. EFFLUENT MONITORING PROGRAM

1. The licensee shall conduct monitoring of the treated effluent discharged to the sewer system in accordance with the permit issued to the facility by the city of Detroit Water and Sewerage Department. The licensee shall comply with the city of Detroit discharge limitations.
2. The licensee shall provide written notification to the Chief of the Waste and Hazardous Materials Division of any anticipated changes in the approved effluent monitoring program or discharge limitations.
3. The licensee shall report the effluent monitoring results as set forth in Condition II.L.4. of this license.

{R 299.9521(3)(a) and (b) and R 299.9611(5)}

PART VI

CORRECTIVE ACTION CONDITIONS

A. CORRECTIVE ACTION AT THE FACILITY

1. The licensee shall implement corrective action for all releases of a contaminant from any waste management units at the facility, regardless of when the contaminant may have been placed in or released from the waste management unit. For the purposes of this license, the term "corrective action" means an action determined by the Chief of the Waste and Hazardous Materials Division to be necessary to protect the public health, safety, welfare, or the environment, and includes, but is not limited to, investigation, evaluation, cleanup, removal, remediation, monitoring, containment, isolation, treatment, storage, management, temporary relocation of people, and provision of alternative water supplies, or any corrective action allowed under Title II of the federal Solid Waste Disposal Act, or regulations promulgated pursuant to that act. For the purposes of this license, the remedial process associated with the environmental protection standards of Part 201, Environmental Remediation, of Act 451 (Part 201) or a substantially equivalent process approved by the Chief of the Waste and Hazardous Materials Division shall satisfy the corrective action obligations under this license. {Sections 11102, 11115a, 20120a and 20120b of Act 451 and R 299.9629}
2. To the extent that a release of a hazardous substance, as defined in Section 20101(t) of Act 451, that is not also a contaminant, as defined in Section 11102(2) of Act 451, is discovered while performing corrective action under this license, the licensee shall take concurrent actions as necessary to address the Part 201 remedial obligations for that release. {Part 201 of Act 451}

B. CORRECTIVE ACTION BEYOND THE FACILITY BOUNDARY

The licensee shall implement corrective action beyond the facility boundary if the release of a contaminant has or may have migrated or has or may have been emitted beyond the facility boundary, unless the licensee demonstrates to the satisfaction of the Chief of the Waste and Hazardous Materials Division that, despite the licensee's best efforts, the licensee was unable to obtain the necessary permission to undertake this corrective action. The licensee shall not be relieved of all responsibility to clean up a release that has migrated or has been emitted beyond the facility boundary where off-site access is denied. On-site measures to address such releases shall be addressed under this part of the license, as determined to be necessary on a case-by-case basis. {Section 11115a of Act 451 and R 299.9629}

C. IDENTIFICATION OF EXISTING WASTE MANAGEMENT UNITS

The waste management units (WMUs) that have been identified at the facility are listed in Attachments 8, 10, and 13 of this license.

1. The following WMUs require further corrective action which includes, at a minimum, further investigation to determine if a release of a contaminant has occurred, and if a release has occurred, the nature and extent of the release.

None
2. The following WMUs do not require corrective action at this time:
 - (a) The WMUs identified in Attachments 8 and 10 of this license do not require further corrective action at this time. No further corrective action is required at this time because the units are proposed or currently operating pursuant to the act and its rules with no evidence of a release of any contaminants. Corrective action may be required when any of the units undergo final closure.
 - (b) The WMUs identified in Attachment 13 of this license do not require further corrective action at this time. As shown in Attachment 13, no further corrective action is required at this time either because the units are closed or currently undergoing closure pursuant to the act and its rules, or because of the design of the units and available information which indicates that no known or

suspected release of contaminants from the units has occurred. Corrective action may be required upon completion of final closure of any of the units.

3. Within 30 days after discovery of a new release of a contaminant from a WMU, the licensee shall provide written notification to the Chief of the Waste and Hazardous Materials Division. The written notification shall include all available information pertaining to the release. Based on a review of all of the information, the Chief of the Waste and Hazardous Materials Division may require corrective action for the newly identified release. The licensee shall submit a written Remedial Investigation (RI) Work Plan to the Chief of the Waste and Hazardous Materials Division within 60 days after written notification by the Chief of the Waste and Hazardous Materials Division that corrective action for the release is required.

{Sections 11102 and 11115a of Act 451 and R 299.9629}

D. IDENTIFICATION OF NEW WASTE MANAGEMENT UNITS

1. Within 30 days after discovery of a new WMU or a release of a contaminant from a new WMU, the licensee shall provide written notification to the Chief of the Waste and Hazardous Materials Division. The written notification shall include all of the following information:
 - (a) The location of the unit on the facility topographic map.
 - (b) The designation of the type of unit.
 - (c) The general dimensions and structural description, including any available drawings of the unit.
 - (d) The date the unit was operated.
 - (e) Specification of all waste(s) that have been managed in the unit.
 - (f) All available information pertaining to any release of a contaminant from the unit.
2. Based on a review of all of the information provided in Condition VI.D.1. of this license, the Chief of the Waste and Hazardous Materials Division may require corrective action for the newly identified WMU. The licensee shall submit a written RI Work Plan to the Chief of the Waste and Hazardous Materials Division within 60 days after written notification by the Chief of the Waste and Hazardous Materials Division that corrective action for the unit is required.

{Sections 11102 and 11115a of Act 451, R 299.9629, and 40 CFR §270.14(d), which is ABR in R 299.11003}

E. REMEDIAL INVESTIGATION

The licensee shall conduct an investigation that conforms with, or that is substantially equivalent to, the RI in accordance with the provisions of Part 201 of Act 451 and Conditions VI.E.1.-VI.E.5. below to determine if a release of a contaminant(s) from any of the WMUs identified in Condition VI.C.1. or VI.D.2. of this license has occurred, and if a release(s) has occurred, evaluate the nature and extent of the release(s).

1. The licensee shall submit a written RI Work Plan to the Chief of the Waste and Hazardous Materials Division for review and approval within 60 days after the written notification of the Chief of the Waste and Hazardous Materials Division that corrective action is required.
2. The Chief of the Waste and Hazardous Materials Division will approve or modify and approve the RI Work Plan, or provide a written Notice of Deficiency on the RI Work Plan. The licensee shall modify the RI Work Plan in accordance with the Notice of Deficiency and submit a new RI Work Plan or revisions to the RI Work Plan to the Chief of the Waste and Hazardous Materials Division for approval within 30 days after receipt of the Notice of Deficiency. Upon approval by the Chief of the Waste and Hazardous Materials Division, the RI Work Plan becomes an enforceable condition of this license.

3. The licensee shall implement the approved RI Work Plan within 60 days after receipt of the Chief of the Waste and Hazardous Materials Division's written approval of the RI Work Plan.
4. The licensee shall submit a written RI Final Report to the Chief of the Waste and Hazardous Materials Division for review and approval within 60 days after the completion of the RI. The RI Final Report shall document compliance with the approved RI Work Plan and support further corrective action at the facility.
5. The Chief of the Waste and Hazardous Materials Division will approve the RI Final Report or provide a written Notice of Deficiency on the RI Final Report. The licensee shall modify the RI Final Report in accordance with the Notice of Deficiency and submit a new RI Final Report or revisions to the RI Final Report to the Chief of the Waste and Hazardous Materials Division for approval within 30 days after receipt of the Notice of Deficiency.
6. The licensee shall submit quarterly written RI progress reports to the Chief of the Waste and Hazardous Materials Division.
7. The licensee shall comply with the time frames specified in Conditions VI.E.1.-VI.E.6. of this license unless otherwise approved in writing by the Chief of the Waste and Hazardous Materials Division.

{Sections 11102 and 11115a of Act 451, R 299.9629, and Part 201 of Act 451}

F. INTERIM RESPONSE ACTIVITIES

The licensee shall conduct interim response activities (IRA) at the facility, if determined necessary by the licensee or the Chief of the Waste and Hazardous Materials Division, to clean up or remove a released contaminant or to take other actions, prior to the implementation of a remedial action, as may be necessary to prevent, minimize, or mitigate injury to the public health, safety, or welfare, or to the environment. The licensee shall conduct interim response activities that conform with or that are substantially equivalent to the IRA provisions of Part 201 of Act 451 and Conditions VI.F.1.-VI.F.7. of this license.

1. The licensee shall submit a written IRA Work Plan to the Chief of the Waste and Hazardous Materials Division for review and approval within 60 days after the licensee receives written notification by the Chief of the Waste and Hazardous Materials Division that IRA are necessary.
2. The Chief of the Waste and Hazardous Materials Division will approve or modify and approve the IRA Work Plan, or provide a written Notice of Deficiency on the IRA Work Plan. The licensee shall modify the IRA Work Plan in accordance with the Notice of Deficiency and submit a new IRA Work Plan or revisions to the IRA Work Plan to the Chief of Waste and Hazardous Materials Division for approval within 30 days after receipt of the Notice of Deficiency. Upon approval by the Chief of the Waste and Hazardous Materials Division, the IRA Work Plan becomes an enforceable condition of this license.
3. The licensee shall implement the approved IRA Work Plan within 30 days after receipt of the Chief of the Waste and Hazardous Materials Division's written approval of the IRA Work Plan.
4. The licensee shall submit a written IRA Final Report to the Chief of the Waste and Hazardous Materials Division for review and approval within 60 days after the completion of the IRA. The IRA Final Report shall document compliance with the approved IRA Work Plan and support further corrective action at the facility.
5. The Chief of the Waste and Hazardous Materials Division will approve the IRA Final Report or provide a written Notice of Deficiency on the IRA Final Report. The licensee shall modify the IRA Final Report in accordance with the Notice of Deficiency and submit a new IRA Final Report or revisions to the IRA Final Report to the Chief of the Waste and Hazardous Materials Division for approval within 30 days after receipt of the Notice of Deficiency.
6. The licensee shall submit monthly written IRA progress reports to the Chief of the Waste and Hazardous Materials Division.

7. The licensee shall comply with the time frames specified in Conditions VI.F.1.- VI.F.6. of this license unless otherwise approved in writing by the Chief of the Waste and Hazardous Materials Division.

{Sections 11102 and 11115a of Act 451, R 299.9629, and Part 201 of Act 451}

G. DETERMINATION OF NO FURTHER ACTION

1. The licensee shall continue response activities to the extent necessary to ensure that the applicable environmental protection standards established under Part 201 of Act 451, as adopted in Part 111 of Act 451, are met, if the limits are not less stringent than allowed pursuant to the provisions of RCRA.
2. Based on the results of the RI and other relevant information, the licensee shall submit a written request for a minor license modification to the Chief of the Waste and Hazardous Materials Division if the licensee wishes to terminate corrective action for a specific WMU identified in Condition VI.C.1. or VI.D.2. of this license. The licensee must demonstrate that there have been no releases of a contaminant(s) from the WMU and that the WMU does not pose a threat to public health, safety, welfare, or the environment.
3. Based on the results of the RI and other relevant information, the licensee shall submit a written request for a major license modification to the Chief of the Waste and Hazardous Materials Division if the licensee wishes to terminate facility-wide corrective action. The licensee must conclusively demonstrate that there have been no releases of a contaminant(s) from any of the WMUs at the facility and that none of the WMUs pose a threat to public health, safety, welfare, or the environment.
4. If, based upon a review of the licensee's request for a license modification pursuant to Condition VI.G.2. or VI.G.3. of this license, the results of the completed RI, and other relevant information, the Chief of the Waste and Hazardous Materials Division determines that the releases or suspected releases of a contaminant(s) do not exist and that the WMU(s) do not pose a threat to public health, safety, welfare, or the environment, the Chief of the Waste and Hazardous Materials Division will approve the requested modification.
5. A determination of no further action shall not preclude the Chief of the Waste and Hazardous Materials Division from requiring continued or periodic monitoring of air, soil, groundwater, or surface water, if necessary to protect public health, safety, welfare, or the environment, when facility-specific circumstances indicate that potential or actual releases of a contaminant(s) may occur.
6. A determination of no further action shall not preclude the Chief of the Waste and Hazardous Materials Division from requiring further corrective action at a later date, if new information or subsequent analysis indicates that a release or potential release of a contaminant(s) from a WMU at the facility may pose a threat to public health, safety, welfare, or the environment. The Chief of the Waste and Hazardous Materials Division will initiate the necessary license modifications if further corrective action is required at a later date.

{Sections 11102, 11115a and 20120a of Act 451 and R 299.9629}

H. FEASIBILITY STUDY

If the Chief of the Waste and Hazardous Materials Division determines, based on the results of the RI and other relevant information, that response activities are necessary, the Chief of the Waste and Hazardous Materials Division will notify the licensee in writing that a Feasibility Study (FS) is required. If required by the Chief of the Waste and Hazardous Materials Division, the licensee shall conduct an FS to develop and evaluate the response activity alternative(s) necessary to address the release(s) of a contaminant(s) or hazardous substances and the WMU(s) that are identified in the approved RI Final Report as requiring final response activities. The licensee shall conduct an FS that conforms with or that is substantially equivalent to the FS provisions of Part 201 of Act 451 and with Conditions VI.H.1.-VI.H.7. of this license.

1. The licensee shall submit a written FS Work Plan to the Chief of the Waste and Hazardous Materials Division for review and approval within 60 days after receipt of written notification that an FS is required.

2. The Chief of the Waste and Hazardous Materials Division will approve or modify and approve the FS Work Plan, or provide a written Notice of Deficiency on the FS Work Plan. The licensee shall modify the FS Work Plan in accordance with the Notice of Deficiency and submit a new FS Work Plan or revisions to the FS Work Plan to the Chief of the Waste and Hazardous Materials Division for approval within 30 days after receipt of the Notice of Deficiency. Upon approval by the Chief of the Waste and Hazardous Materials Division, the FS Work Plan becomes an enforceable condition of this license.
3. The licensee shall implement the approved FS Work Plan within 60 days after receipt of the Chief of the Waste and Hazardous Materials Division's written approval of the FS Work Plan.
4. The licensee shall submit a written FS Final Report to the Chief of the Waste and Hazardous Materials Division for review and approval within 60 days after the completion of the FS. The FS Final Report shall document compliance with the approved FS Work Plan and support final response activity at the facility.
5. The Chief of the Waste and Hazardous Materials Division will approve the FS Final Report or provide a written Notice of Deficiency on the FS Final Report. The licensee shall modify the FS Final Report in accordance with the Notice of Deficiency and submit a new FS Final Report or revisions to the FS Final Report to the Chief of the Waste and Hazardous Materials Division for approval within 30 days after receipt of the Notice of Deficiency.
6. The licensee shall submit quarterly written FS progress reports to the Chief of the Waste and Hazardous Materials Division.
7. The licensee shall comply with the time frames specified in Conditions VI.H.1.-VI.H.6. of this license unless otherwise approved in writing by the Chief of the Waste and Hazardous Materials Division.

{Sections 11102 and 11115a of Act 451, R 299.9629, and Part 201 of Act 451}

I. REMEDIAL ACTION PLAN

The licensee shall conduct final response activities based on the FS Final Report approved by the Chief of the Waste and Hazardous Materials Division. The final response activities shall be conducted in accordance with Conditions VI.I.1.-VI.I.7. of this license.

1. If the final response activities are based on criteria in categories provided for in Section 20120a(1)(a) to (j) or (2) of Act 451, which are adopted by reference in R 299.9629(3)(a)(iii), the licensee shall submit a written remedial action plan (RAP) that conforms with or that is substantially equivalent to the RAP provisions in Section 20120b of Act 451 to the Chief of the Waste and Hazardous Materials Division for review and approval within 60 days after the approval of the FS Final Report by the Chief of the Waste and Hazardous Materials Division.
2. The Chief of the Waste and Hazardous Materials Division will approve or modify and approve the RAP, or provide a written Notice of Deficiency on the RAP. The licensee shall modify the RAP in accordance with the Notice of Deficiency and submit a new RAP or revisions to the RAP to the Chief of the Waste and Hazardous Materials Division for approval within 30 days after receipt of the Notice of Deficiency. The Waste and Hazardous Materials Division will provide notice of its draft decision on the RAP to persons on the facility mailing list and an opportunity for a public hearing. Upon approval by the Chief of the Waste and Hazardous Materials Division, the RAP becomes an enforceable condition of this license.
3. The licensee shall implement the approved RAP within 60 days after receipt of the Chief of the Waste and Hazardous Materials Division's written approval of the RAP.
4. The licensee shall submit a written Completion Report to the Chief of the Waste and Hazardous Materials Division for review and approval within 60 days after the remedial actions have been completed and the cleanup criteria have been met. The Completion Report shall document compliance with the completion criteria and provide justification that the remedial actions may cease.

5. The Chief of the Waste and Hazardous Materials Division will approve or modify and approve the Completion Report, or provide a written Notice of Deficiency on the Completion Report. The licensee shall modify the Completion Report in accordance with the Notice of Deficiency and submit a new Completion Report or revisions to the Completion Report to the Chief of the Waste and Hazardous Materials Division for approval within 30 days after receipt of the Notice of Deficiency. Upon approval by the Chief of the Waste and Hazardous Materials Division, the Completion Report becomes an enforceable condition of this license.
6. The licensee shall submit quarterly written progress reports during the implementation of the RAP to the Chief of the Waste and Hazardous Materials Division, unless a modified frequency for submittal of the progress reports is approved in writing by the Chief of the Waste and Hazardous Materials Division.
7. The licensee shall comply with the time frames specified in Conditions VI.I.1.-VI.I.6. of this license unless otherwise approved in writing by the Chief of the Waste and Hazardous Materials Division.

{Sections 11102, 11115a, 20120a and 20120b of Act 451 and R 299.9629}

J. COST ESTIMATE FOR CORRECTIVE ACTION

1. The licensee shall prepare a detailed written cost estimate for implementing final response activity at the facility. {R 299.9712}
2. The licensee shall submit the detailed written cost estimate for implementing final response activity to the Chief of the Waste and Hazardous Materials Division for review and approval in conjunction with the RAP required in Condition VI.I.1. of this license. {R 299.9712}
3. The Chief of the Waste and Hazardous Materials Division will approve the cost estimate for implementing final response activity or provide a written Notice of Deficiency on that cost estimate. The licensee shall modify the cost estimate in accordance with the Notice of Deficiency and submit a new cost estimate to the Chief of the Waste and Hazardous Materials Division for approval within 30 days after receipt of the Notice of Deficiency. Upon approval by the Chief of the Waste and Hazardous Materials Division, the cost estimate becomes an enforceable condition of this license. {R 299.9712}
4. Until the Director notifies the licensee in writing that the licensee is no longer required by R 299.9713 to maintain financial assurance for implementing final response activity at the facility, the licensee shall adjust the cost estimate for inflation within 60 days prior to the anniversary of the date of the establishment of the financial mechanism(s) used to demonstrate financial assurance for implementing final response activity. If the financial mechanism used is the financial test or corporate guarantee, the licensee shall adjust the cost estimate for inflation within 30 days after the close of the firm's fiscal year and before submission of updated financial information to the Chief of the Waste and Hazardous Materials Division. Whenever the current cost estimate increases to an amount greater than the current value of the associated financial mechanism for reasons other than inflation, the licensee shall, within 60 days, increase the value of the mechanism to an amount at least equal to the adjusted cost estimate. Evidence of such increases shall be submitted to the Chief of the Waste and Hazardous Materials Division during the 60-day period. {R 299.9712}
5. The licensee shall recalculate the cost estimate for implementing final response activity within 30 days after the Chief of the Waste and Hazardous Materials Division has approved a modification of the RAP. Until the Director notifies the licensee in writing that the licensee is no longer required to maintain financial assurance for implementing final response activity, the licensee shall revise the cost estimate whenever there is a change in the facility's RAP, if the change in the RAP increases the cost of implementing final response activity. {R 299.9712}
6. The licensee shall keep the latest cost estimate for implementing final response activity at the facility. {R 299.9609}

K. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

1. The licensee shall establish and maintain corrective action financial assurance in accordance with R 299.9713. The licensee shall submit in conjunction with the RAP the financial assurance mechanism(s) approved by the Chief of the Waste and Hazardous Materials Division in an amount at least equal to the cost estimate required by Condition VI.J.1. of this license. If more than one mechanism is used, or if more than one facility is covered by the mechanism(s), the total amount of financial assurance provided for the facility shall at least equal the amount of the cost estimate required by Condition VI.J.1. of this license. The licensee shall submit all proposed changes in the mechanism(s), other than renewals, extensions, or increases in the amount of assurance, to the Chief of the Waste and Hazardous Materials Division and obtain approval prior to implementation. The licensee shall provide the Chief of the Waste and Hazardous Materials Division with a signed original of all revisions and renewals within 60 days after such revision or renewal and at least 30 days prior to the anniversary of the establishment of the financial mechanism(s) provided to satisfy the requirements of this condition.
2. The licensee shall establish an approved renewal or replacement financial mechanism(s) at least 30 days prior to the expiration date of the current mechanism(s), and obtain the Chief of the Waste and Hazardous Materials Division's approval of such replacements, for all financial mechanisms provided to satisfy the requirements of this condition. Failure to provide such documentation is a violation of this license and shall be cause for the Chief of the Waste and Hazardous Materials Division to access all funds provided in any financial mechanism not renewed or replaced in accordance with this condition and to initiate revocation of this license.
3. Whenever the current cost estimate for implementing final response activity increases to an amount greater than the current amount of the associated financial mechanism(s) for reasons other than inflation, the licensee shall, within 60 days after the increase, either increase the amount of the mechanism(s) to an amount at least equal to the increased cost estimate, or provide an additional financial mechanism approved by the Chief of the Waste and Hazardous Materials Division for an amount at least equal to the difference between the current amount of financial assurance and the increased cost estimate. Evidence of such increased financial assurance must be submitted to the Chief of the Waste and Hazardous Materials Division during the 60-day period.

L. CORRECTIVE ACTION MANAGEMENT UNITS

If applicable, the licensee shall comply with the requirements of R 299.9635 in order to designate an area at the facility as a corrective action management unit for implementation of response activities. {R 299.9521(3)(a)}

M. TEMPORARY UNITS

If applicable, the licensee shall comply with the requirements of R 299.9636 in order to designate tank or container storage units used for the treatment or storage of remediation wastes as temporary units for implementation of response activities. {R 299.9521(3)(a)}

N. SUMMARY OF CORRECTIVE ACTION SUBMITTALS

The licensee shall submit required corrective action documents in accordance with the schedule below.

CORRECTIVE ACTION DOCUMENT	SUBMITTAL DEADLINE
Written notification of a new release of a contaminant from an existing WMU, a new WMU, or a release of a contaminant from a new WMU	Within 30 days after discovery
RI Work Plan for a newly identified release of a contaminant from an existing WMU, a new WMU, or a release of a contaminant from a new WMU	Within 60 days after receipt of written notification that response activity is required

O. CORRECTIVE ACTION DOCUMENTS RETENTION

The licensee shall maintain all corrective action documents required by this license at the facility. The documents shall be maintained for the operating life of the facility or until the facility is released from financial assurance requirements for corrective action by the Chief of the Waste and Hazardous Materials Division, whichever is longer. The licensee shall offer such documents to the Chief of the Waste and Hazardous Materials Division prior to discarding those documents.

{Sections 11102 and 11115a of Act 451 and R 299.9629}

PART VII

SCHEDULE OF COMPLIANCE

A. COMPLIANCE SCHEDULE

The licensee shall complete the facility upgrades, modifications, and replacements in accordance with the following schedule. The licensee may elect to not complete the requirements shown in italics and shading. If the licensee does not complete a requirement shown in italics and shading by the specified deadline, then any replacement units or individual unit expansions associated with the requirement are no longer authorized and a construction permit and operating license are required to regain the authorized process capacity for the replacement units and individual unit expansions unless construction begins before the deadline, proceeds in a continuous manner, and is completed prior to submittal of the operating license renewal application.

No.*	Requirement	Referenced Drawings Included in License Attachment 6	Deadline From Effective Date of License
1*	Construct the Liquid Storage Truck Unloading – Area 1 – Phase 1.	P-21A	30 days
2*	<i>Construct the Liquid Storage Truck Unloading Area 1.</i>	<i>P-21, P-26, S-5</i>	<i>2 years</i>
3*	<i>Construct the 800-Series Biological Treatment tank system (including the 800-Series Effluent Holding and Discharge tanks).</i>	<i>PFD-23A, PFD-23B, PFD-25, P-10, P-10A, P-20, P-22, P-23, P-24, P-25, P-26, P-27, S-1, S-2, S-3, S-4</i>	<i>2 years</i>
4	Decontaminate and seal the floor and containment trench in the existing Biological Treatment Building.		180 days
5	Clean, seal all cracks, and add a chemical-resistant liner to the Process Waste Sump in the Main Plant.	P-1	30 days
6	Line or replace the floor drain piping to the Process Waste Sump in the Main Plant with chemical-resistant pipe.	P-1	30 days
7	Apply epoxy-based sealant on the 7-inch high containment curb in Main Plant Process Area 1, and on all sumps and trenches that have not yet been sealed.	P-1 and P-1A	30 days
8*	Complete the Phase I Chemical Precipitation system modifications.	PFD-22A	180 days
9	<i>Relocate the Chemical Precipitation Drum Pad.</i>	<i>C-2G, P-1A, P-9</i>	<i>2 years</i>
10*	<i>Complete Proposed Chemical Precipitation system modifications.</i>	<i>P-1A, P-1B, P-9, PFD-22</i>	<i>2 years</i>
11	Relocate the corrosive treatment tanks alarm panel to the Corrosive Treatment Room.		180 days
12	Replace flexible hose with hard piping in the Corrosive Treatment Room.	PFD-21	180 days
13*	Modify the secondary containment in the corrosive treatment room and Corrosive Drum Pad.	C-2G, P-1A, P-8	180 days
14*	<i>Construct Proposed Secondary and Tertiary Treatment System</i>	<i>P-1A, P-1F, P-2, P-2A, P-10B, PFD-27</i>	<i>1 year</i>
15*	<i>Construct Proposed Sludge Dewatering system.</i>	<i>P-1F, P-2, P-10B, PFD-26</i>	<i>1 year</i>
16	Install the squirt protection barrier on the existing rail siding.	P-5 and P-5A	180 days

17*	Upgrade and extend rail siding.	C-2G, P-5, P-5A, P-9	2 years
18*	Construct Drum Storage Area A – Proposed	C-2G, P-4B, P-10	2 years
19*	Construct Drum Storage Area B – Proposed	C-2G, P-4C, P-10	2 years
20*	Construct Drum Storage Area C – Phase I Addition.	P-4AA, P-10	2 years
21*	Complete construction of Drum Storage Area C – Proposed.	C-2G, P-4D, P-10	2 years
22*	Construct Drum Storage Area D – Proposed.	C-2G, P-4A, P-4E, P-10	2 years
23*	Construct Bulking Room and air emission controls.	C-2G, P-4A, P-4J, P-10	3 years
24*	Construct Subpart CC storage and treatment vaults V-1 and V-2 and air emission controls.	C-2E, PFD-24B, P-4J, P-10	3 years
25*	Construct outdoor Chemical Fixation Portable Containers Pad.	C-2G, P-7A, P-7B, P-10	2 years
26*	Subdivide chemical fixation vaults.	C-2E, P-4H, CF-P-1	2 years
27*	Construct Proposed Flammables Management tank system.	C-2E, PFD-24A, P-8	3 years
28	Modify the on-site parking, traffic areas, and drainage systems consistent and concurrent with requirement numbers 1, 2, 3, 17 through 25, and 27 above.	C-2C, C-2D	2 years

*Modifications and construction must be certified and authorized in accordance with Condition I.E.1.(g) of this license prior to being put into service.

B. REPORTING

No later than 14 days following each deadline in Condition VII.A. of this license, the licensee shall notify the Chief of the Waste and Hazardous Materials Division of compliance or noncompliance with each requirement.

{R 299.9508(1)(g), R 299.9521(2)(a), and 40 CFR §270.33 as ABR in R 299.11003}

ATTACHMENT 8

CONTAINER STORAGE UNITS

This table identifies the regulated hazardous waste container storage units, their capacities, and certain conditions that must be satisfied for their operation at the US Liquids of Detroit, Inc., facility at 1923 Frederick Street, Detroit, Michigan. Additional requirements are detailed in the hazardous waste management operating license. Existing units that are authorized at the time of license issuance are shown in regular type without shading. Proposed modifications and alterations are shown in italics with shading.

Unit Designation	Referenced Drawings Included In License Attachment 6	Conditions	Capacity	Maximum Number Of Containers
Rail Container – Existing	C-2F, P-9	Requires construction of squirt protection barrier shown on Drawings P-5 and P-5A in accordance with Part VII of this license.	207,000 gallons	9 rail tanker cars
<i>Rail Container – Proposed</i>	<i>C-2G, P-5, P-5a, P-9</i>	<i>(1) Consists of upgrade and on-site extension of existing Rail Container storage area, no change in rail container storage capacity. (2) Ignitable wastes may be stored on the new extension no less than 50 feet from the property boundary. (3) Construction according to Drawings P-5, P-5a, and P-9.</i>		
Drum Storage Area A (North Drum Storage)	C-2F, P-4, P-10	(1) Container configuration shown on Drawing P-4 (2) Storage of ignitable wastes is allowed until Drum Storage Area B is available.	100,430 gallons	1,826 55-gallon drums

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CONTAINER STORAGE UNITS

Unit Designation	Referenced Drawings Included In License Attachment 6	Conditions	Capacity	Maximum Number Of Containers
<i>Drum Storage Area A – Proposed</i>	<i>C-2G, P-4B, P-10</i>	<p>(1) Modification of existing drum storage area; no change in location or capacity.</p> <p>(2) Construction according to Drawings P-4B and P-10.</p> <p>(3) Configuration of containers shown on Drawing P-4B.</p> <p>(4) Storage of ignitable wastes is allowed until Drum Storage Area B is available.</p>		
<i>Drum Storage Area B</i>	<i>C-2G, P-4C, P-10</i>	<p>(1) Construction according to Drawings P-4C and P-10.</p> <p>(2) Storage of ignitable wastes and flammable and combustible liquids is not prohibited.</p> <p>(3) Configuration of containers shown on Drawing P-4C.</p>	<i>88,880 gallons</i>	<i>1,616 55-gallon drums</i>

ATTACHMENT 8
CONTAINER STORAGE UNITS

Unit Designation		Referenced Drawings Included In License Attachment 6	Conditions	Capacity		Maximum Number Of Containers		
Drum Storage Area C	North Drum Storage/Staging Area	C-2F, P-4, P-10	(1) Configuration of containers shown on Drawing P-4. (2) Storage of ignitable wastes is allowed for up to two weeks until Drum Storage Area B is available.	54,340 gallons		67,430 gallons	988 55-gallon drums	1,226 55-gallon drums
	Area C Expansion	Phase I Addition	P-4AA, P-10	(1) Construction according to Drawings P-4AA and P-10. (2) Configuration of containers shown on Drawing P-4AA. (3) Storage of ignitable wastes is allowed for up to 48 hours after Drum Storage Area B is available.	5,500 gallons	13,090 gallons	100 55-gallon drums	238 55-gallon drums
		Phase II	C-2G, P-4D, P-10	(1) Remaining work to complete Area C Expansion after completion of Phase I. (2) Construction according to Drawings P-4D and P-10. (3) Configuration of containers shown on Drawing P-4D. (4) Storage of ignitable wastes is allowed for up to 48 hours after Drum Storage Area B is available.	7,590 gallons		138 55-gallon drums	

ATTACHMENT 8

CONTAINER STORAGE UNITS

Unit Designation	Referenced Drawings Included In License Attachment 6	Conditions	Capacity	Maximum Number Of Containers
<i>Drum Storage Area D - Proposed</i>	<i>C-2G, P-4A, P-4E, P-10</i>	<i>(1) Construction according to Drawings P-4A, P-4E and P-10. (2) Configuration of containers shown on Drawing P-4E.</i>	<i>30,030 gallons</i>	<i>546 55-gallon drums</i>
Corrosive Drum Pad - Existing	C-2F, P-1, P-8	The storage of incompatible wastes contemporaneously in this area is prohibited.	6,600 gallons	120 55-gallon drums
<i>Corrosive Drum Pad - Proposed</i>	<i>C-2G, P-1A, P-8</i>	<i>(1) Consists of modification of existing Corrosive Drum Pad; no change in storage area location and capacity. (2) Construction according to Drawings P-1A and P-8. (3) Incompatible wastes must be separated by the containment trench. (4) Configuration of containers depicted on Drawing P-1A.</i>		
Chemical Precipitation Drum Pad - Existing	C-2F, P-1, P-9	Requires application of epoxy-based sealant on containment curb in Main Plant Process Area 1 in accordance with Part VII of this license.	6,600 gallons	120 55-gallon drums

ATTACHMENT 8
CONTAINER STORAGE UNITS

Unit Designation	Referenced Drawings Included In License Attachment 6	Conditions	Capacity	Maximum Number Of Containers
<i>Chemical Precipitation Drum Pad - Proposed</i>	<i>C-2G, P-1A, P-9</i>	<i>(1) Consists of relocating existing Chemical Precipitation Drum Pad within the Main Plant; no change in storage area capacity. (2) Construction according to Drawings P-1A and P-9.</i>		
<i>Bulking Room – Proposed</i>	<i>C-2G, P-4A, P-4C, P-10</i>	<i>(1) Construction according to Drawings P-4C and P-10. (2) Also requires installation of collection hoods and ducting to filter and thermal destruction unit for control of air emissions as shown on Drawing PFD-24B.</i>	<i>2,200 gallons</i>	<i>40 55-gallon drums</i>

ATTACHMENT 8

CONTAINER STORAGE UNITS

Unit Designation		Referenced Drawings Included In License Attachment 6	Conditions	Capacity		Maximum Number Of Containers	
Chemical Fixation Portable Containers	Existing	C-2F, P-7.1, P-10	(1) Storage within the Chemical Fixation Facility. (2) Configuration of containers depicted on Drawing P-7.1.	16,160 gallons	100,980 gallons	4 20-cubic yard portable containers	No more than 7 20-cubic yard portable containers outside and no more than 18 20-cubic yard portable containers inside. 73 55-gallon drums may be substituted for a 20-cubic yard portable container inside, for a maximum of 1,314 55-gallon drums if there are no 20-cubic yard portable containers inside.
	Proposed	C-2G, P-7A, P-7B, P-10	(1) Construction according to drawings P-7A, P-7B, and P-10. (2) Configuration of containers shown on Drawing P-7A and P-7B. (3) Outside storage cannot occur without ambient air monitoring program for particulates and heavy metals.				
Chemical Fixation Staging – Existing		C-2F, P-7.1, P-10	Configuration of containers shown on Drawing P-7.1.	3,960 Gallons		72 55-gallon drums	
Total Container Storage Capacity				614,110 gallons			

ATTACHMENT 10

TANK SYSTEMS

This table identifies the regulated hazardous waste tank systems, their capacities, authorized management methods, and certain conditions that must be satisfied for their operation at the US Liquids of Detroit, Inc., facility at 1923 Frederick Street, Detroit, Michigan. Additional requirements are detailed in the hazardous waste management operating license. Existing units that are authorized at the time of license issuance are shown in regular type without shading. Proposed modifications and alterations are shown in italics with shading.

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**	
Biological Treatment	T-800	Listed Waste Aerobic Digester	Activated Sludge Wastewater Treatment	PFD-23A, PFD-23B, PFD-25, P-10, P-10A, P-20, P-22, P-23, P-24, P-25, P-26, P-27, S-1, S-2, S-3, S-4	Final engineering plans and specifications and tank assessments must be submitted for approval of the Chief of the Waste and Hazardous Materials Division (WHMD) prior to construction.	176,000 gallons (T)	675,000 gallons per day
	T-801	Listed Waste Sequential Batch Reactor	Activated Sludge Wastewater Treatment			176,000 gallons (T)	
	T-802	Listed Waste Sequential Batch Reactor	Activated Sludge Wastewater Treatment			176,000 gallons (T)	
	T-803	Listed Waste Equalization	Storage			176,000 gallons	
	T-804	Characteristic Waste Equalization	Storage			176,000 gallons	
	T-805	Characteristic Waste Sequential Batch Reactor	Activated Sludge Wastewater Treatment			176,000 gallons (T)	
	T-806	Characteristic Waste Sequential Batch Reactor	Activated Sludge Wastewater Treatment			176,000 gallons (T)	

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TANK SYSTEMS

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**	
	T-807	Characteristic Waste Equalization	Storage			176,000 gallons	
	T-810	Characteristic Waste Sequential Batch Reactor	Activated Sludge Wastewater Treatment			176,000 gallons (T)	
	T-811	Characteristic Waste Sequential Batch Reactor	Activated Sludge Wastewater Treatment			176,000 gallons (T)	
	T-812	Characteristic Waste Aerobic Digester	Activated Sludge Wastewater Treatment			176,000 gallons (T)	
Chemical Fixation	T-701	Batch Treatment Vault	Stabilization, Solidification, and Storage	C-2B, C-2E, P-4H, CF-P-1		41,804 gallons	300 tons per hour (maximum collective amount processed through pug mill, shredder, vaults, and containers)
	T-702	Chemical Fixation Vault		C-2B, C-2E, P-4H, CF-P-1		101,788 gallons	
	T-702A	Chemical Fixation Vault		C-2E, P-4H, CF-P-1	Construction according to Drawing P-4H.	50,894 gallons	
	T-702B	Chemical Fixation Vault				50,894 gallons	
	T-703	Chemical Fixation Vault		C-2B, C-2E, P-4H, CF-P-1		101,788 gallons	
	T-703A	Chemical Fixation Vault		C-2E, P-4H, CF-P-1	Construction according to Drawing P-4H.	50,894 gallons	
	T-703B	Chemical Fixation Vault				50,894 gallons	

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TANK SYSTEMS

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**		
	T-704	Chemical Fixation Vault		C-2B, C-2E, P-4H, CF-P-1		92,700 gallons	92,700 gallons	
	T-704A	Chemical Fixation Vault		C-2E, P-4H, CF-P-1	Construction according to Drawing P-4H.	46,350 gallons		
	T-704B	Chemical Fixation Vault				46,350 gallons		
	T-705	Batch Treatment Vault		C-2B, C-2E, P-4H, CF-P-1		51,904 gallons		
	T-706	Batch Treatment Vault		C-2B, C-2E, P-4H, CF-P-1		32,919 gallons		
		Pugmill	Mechanical Mixing for Stabilization and Solidification	CF-P-1, CF-P-3		150 tons per hour		
		Shredder	Mechanical Shredding and Mixing for Stabilization and Solidification	CF-P-1		75 tons per hour		
	H-1	Silo	Dry Solids Storage	C-2B, P-4H, P-10A, CF-P-2, CF-P-4		41,140 gallons		

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TANK SYSTEMS

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**	
	V-1	Batch Treatment Vault	Stabilization, Solidification, and Storage of Subpart CC Wastes	C-2E, PFD-24B, P-4J, P-10	(1) Final engineering plans and specifications and tank assessments must be submitted for approval of the Chief of the WHMD prior to construction. (2) Requires installation of collection hoods and ducting to filter and thermal destruction unit for control of air emissions as shown on drawing PFD-24B.	30,294 gallons	
	V-2	Batch Treatment Vault	Stabilization, Solidification, and Storage of Subpart CC Wastes			30,294 gallons	
Chemical Precipitation	T-201	Batch Treatment, Holding and Storage Tank	Oxidation, Reduction, Precipitation, and Storage	C-2B, P-1, P-1E, P-7, P-9, PFD-2, PFD-22A	(1) Requires piping modifications in accordance with Drawing PFD-22A and Part VII of this license. (2) Requires application of epoxy-based sealant on containment curb in Main Plant Process Area 1 in accordance with Part VII of license.	20,000 gallons	432,000 gallons per day (includes chemical precipitation, corrosive treatment, and secondary and tertiary treatment)

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TANK SYSTEMS

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**	
	T-202	Batch Treatment, Holding and Storage Tank	Oxidation, Reduction, Precipitation, and Storage	P-1A, PFD-22	Additional tank system modifications.		
				C-2B, P-1, P-1E, P-7, P-9, PFD-2, PFD-22A	(1) Requires piping modifications in accordance with Drawing PFD-22A and Part VII of this license. (2) Requires application of epoxy-based sealant on containment curb in Main Plant Process Area 1 in accordance with Part VII of this license.	20,000 gallons	
				P-1A, PFD-22	Additional tank system modifications.		

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TANK SYSTEMS

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**
	T-203	Batch Treatment, Holding and Storage Tank	Oxidation, Reduction, Precipitation, and Storage	C-2B, P-1, P-1E, P-7, P-9, PFD-2, PFD-22A	(1) Requires piping modifications in accordance with Drawing PFD-22A and Part VII of this license. (2) Requires application of epoxy-based sealant on containment curb in Main Plant Process Area 1 in accordance with Part VII of this license.	20,000 gallons
	T-240	Batch Treatment, Holding and Storage Tank	Oxidation, Reduction, Precipitation, and Storage	P-1A, PFD-22	Additional tank system modifications.	20,000 gallons
	T-241	Batch Treatment, Holding and Storage Tank	Oxidation, Reduction, Precipitation, and Storage	P-1A, P-1B, P-9, PFD-22	(1) Final engineering plans and specifications and tank assessments must be submitted for approval of the Chief of the WHMD prior to construction.	20,000 gallons
	T-242	Batch Treatment, Holding and Storage Tank	Oxidation, Reduction, Precipitation, and Storage			20,000 gallons

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TANK SYSTEMS

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**
Corrosive Treatment	T-301	Batch Treatment Tank	Neutralization, Oxidation, and Reduction	C-2, C-2B, PFD-1, PFD-21, P-1, P-1A, P-6, P-6A, P-7, P-8,	(1) Requires relocation of tank overflow alarm panel to the Corrosive Treatment Room in accordance with Part VII of this license.	8,000 gallons
	T-302	Batch Treatment Tank	Neutralization, Oxidation, and Reduction		(2) Requires piping modifications shown on Drawing PFD-21 in accordance with Part VII of this license.	8,000 gallons
	T-303	Holding Tank	Storage		(3) No incompatible wastes stored in tanks or containers contemporaneously in the Corrosive Treatment Room until containment system modifications are completed as shown on Drawing P-1A in accordance with Part VII of this license.	6,800 gallons
	T-304	Holding Tank	Storage			6,800 gallons
	T-305	Batch Treatment Tank	Neutralization, Oxidation, and Reduction			15,000 gallons
						432,000 gallons per day (includes chemical precipitation, corrosive treatment, and secondary and tertiary treatment)

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TANK SYSTEMS

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**	
Secondary and Tertiary Treatment	T-226	Batch Treatment Tank	Oxidation, Reduction, and Precipitation	P-1A, P-1F, P-2, P-2A, P-10B, PFD-27	Upgrades to conform to new discharge limits. Final engineering plans and specifications and tank assessments must be submitted for approval of the Chief of the WHMD prior to construction.	20,000 gallons (T)	432,000 gallons per day (includes chemical precipitation, corrosive treatment, and secondary and tertiary treatment)
	T-227	Batch Treatment Tank	Oxidation, Reduction, and Precipitation			20,000 gallons (T)	
	T-228	Batch Treatment Tank	Oxidation, Reduction, and Precipitation			20,000 gallons (T)	
	T-229	Batch Treatment Tank	Oxidation, Reduction, and Precipitation			20,000 gallons (T)	
	T-230	Batch Treatment Tank	Oxidation, Reduction, and Precipitation			20,000 gallons (T)	
	T-231	Batch Treatment Tank	Oxidation, Reduction, and Precipitation			20,000 gallons (T)	
Sludge Dewatering	T-206	Filtrate Holding Tank	Storage	C-2B, PFD-2, P-1, P-6A, P-7	For Filter Press 1. To be closed upon completion of modifications depicted on Drawing PFD-22A.	10,600 gallons	
	T-207	Filtrate Surge Tank	Storage	C-2B, PFD-2, P-1	For Filter Press 1. To be closed when secondary and tertiary treatment is added and filter press is relocated.	1,200 gallons	

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TANK SYSTEMS

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**
	T-232	Listed Waste Sludge Storage and Conditioning Tank	Sludge Conditioning and Storage	P-1F, P-2, P-10B, PFD-26	Final engineering plans and specifications and tank assessments must be submitted for approval of the Chief of the WHMD prior to construction.	20,000 gallons
	T-233	Listed Waste Sludge Storage and Conditioning Tank	Sludge Conditioning and Storage			20,000 gallons
	T-234	Characteristic Waste Sludge Storage and Conditioning Tank	Sludge Conditioning and Storage			20,000 gallons
	T-235	Characteristic Waste Sludge Storage and Conditioning Tank	Sludge Conditioning and Storage			20,000 gallons
	T-236	Characteristic Waste Filtrate Holding Tank	Storage			12,000 gallons
	T-237	Characteristic Waste Filtrate Holding Tank	Storage			12,000 gallons
	T-238	Characteristic Waste Filtrate Holding Tank	Storage			12,000 gallons

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TANK SYSTEMS

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**
	T-239	Listed Waste Filtrate Holding Tank	Storage			12,000 gallons
	T-243	Listed Waste Filtrate Surge Tank	Storage			500 gallons
	T-244	Characteristic Waste Filtrate Surge Tank	Storage			500 gallons
	T-245	Characteristic Waste Filtrate Surge Tank	Storage			500 gallons
		Filter Press 1	Sludge Dewatering	C-2B, PFD-2, P-10B		20 tons per hour
		Filter Press 2	Sludge Dewatering	C-2E, PFD-26, P-1F, P-10B		
		Filter Press 3	Sludge Dewatering	C-2E, PFD-26, P-1F, P-10B		

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TANK SYSTEMS

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**	
						12,000 gallons	Discharge to sewer limited by permit from the Detroit Water and Sewerage Department (currently 624,000 gallons per day)
Effluent Holding and Discharge	T-401	Clarifier	Storage	C-2, C-2B, PFD-5, P-3, P-7, P-10	To be removed when T-808 and T-809 are operational.	12,000 gallons	
	T-402	Clarifier	Storage			12,000 gallons	
	B-1	Sand Filter	Filtration	PFD-5, P-3, P-10	430,000 gallons per day		
	B-2	Carbon Column	Carbon				
	B-3	Carbon Column	Adsorption				
	T-808	Listed Waste Effluent Holding Tank	Storage	PFD-23A, PFD-23B, PFD-25, P-10, P-10A, P-20, P-22, P-23, P-24, P-25, P-26, P-27, S-1, S-2, S-3, S-4	Final engineering plans and specifications and tank assessments must be submitted for approval of the Chief of the WHMD prior to construction.	70,000 gallons	
	T-809	Characteristic Waste Effluent Holding Tank	Storage		70,000 gallons		

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TANK SYSTEMS

Process	Unit	Description	Authorized Methods	Referenced Drawings Included in License Attachment 6*	Conditions	Unit, Process, or Group Capacity**
Flammables Management	T-601	Holding/Storage Tank	Storage	C-2E, PFD-24A, P-8	Final engineering plans and specifications and tank assessments must be submitted for approval of the Chief of the WHMD prior to construction. Plan review and approval under Michigan's Flammable and Combustible Liquids Rules is also required.	10,000 gallons
	T-602	Holding/Storage Tank	Storage			10,000 gallons
	T-603	Holding/Storage Tank	Storage			10,000 gallons
Total Tank Storage Capacity						1,552,531 gallons

* Unless otherwise noted, drawing numbers correspond to the engineering drawings package for the entire facility. Drawings from the engineering drawings package for the chemical fixation facility are identified with a "CF" prefix.

** Tanks with a "(T)" shown next to the capacity are for treatment only. No storage or holding is allowed unless the amount held or stored in these tanks is matched with a reduction in the amount held or stored in authorized storage tanks at the facility such that the combined volume stored in all tanks at the facility does not exceed the authorized total tank storage capacity. The tank capacities are not included in the total tank storage capacity for the facility.

ATTACHMENT 13

WASTE MANAGEMENT UNITS

This table identifies the known waste management units that are subject to corrective action at the US Liquids of Detroit, Inc., facility at 1923 Frederick Street, Detroit, Michigan. The locations of the units are shown on Drawing C-2 which is included in Attachment 6 to the operating license.

Unit Designation	Description	Capacity or Dimensions	Comment	No Further Corrective Action Recommended	
				Closed or Closing Regulated Unit	Adequate Design and No Information of a Release
Building E	Household Hazardous Waste Facility				X
C-1	Corrosive treatment batch treatment tank	11,500 gallons	Converting to nonhazardous service and to be removed. Soil investigation and remediation required at final closure of facility.	X	
T-1	Sludge dewatering filtrate holding tank	20,000 gallons	To be removed. Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-2	Sludge dewatering filtrate holding tank	20,000 gallons	To be removed. Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	

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WASTE MANAGEMENT UNITS

Unit Designation	Description	Capacity or Dimensions	Comment	No Further Corrective Action Recommended	
				Closed or Closing Regulated Unit	Adequate Design and No Information of a Release
T-3	Sludge dewatering holding and storage tank	78,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-4	Sludge dewatering holding and storage tank	78,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-5	Oil reclamation tank	20,000 gallons	To be removed		X
T-6	Oil reclamation tank	17,000 gallons	To be removed		X
T-7	Grease reclamation tank	10,000 gallons	To be removed		X
T-8	Biological treatment clarifier	22,000 gallons	Converting to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-9	Biological treatment clarifier	2,500 gallons	Converting to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-10	Biological treatment clarifier	500 gallons	Converting to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	

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WASTE MANAGEMENT UNITS

Unit Designation	Description	Capacity or Dimensions	Comment	No Further Corrective Action Recommended	
				Closed or Closing Regulated Unit	Adequate Design and No Information of a Release
T-11	Biological treatment clarifier	500 gallons	Converting to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-12	Biological treatment clarifier	5,000 gallons	Converting to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-13	Biological treatment holding and storage tank	150,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-14	Biological treatment holding and storage tank	100,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-15	Biological treatment holding and storage tank	150,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	

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WASTE MANAGEMENT UNITS

Unit Designation	Description	Capacity or Dimensions	Comment	No Further Corrective Action Recommended	
				Closed or Closing Regulated Unit	Adequate Design and No Information of a Release
T-16	Biological treatment holding and storage tank	100,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-17	Biological treatment holding and storage tank	150,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-18	Biological treatment holding and storage tank	100,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-19	Effluent holding tank	78,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	

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WASTE MANAGEMENT UNITS

Unit Designation	Description	Capacity or Dimensions	Comment	No Further Corrective Action Recommended	
				Closed or Closing Regulated Unit	Adequate Design and No Information of a Release
T-20	Effluent holding tank	78,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-21	Effluent holding tank	78,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-22	Effluent holding tank	78,000 gallons	Decontaminated and converted to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-23	Oil holding and storage tank	20,000 gallons	Converting to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-24	Chemical precipitation listed waste sludge storage/conditioning tank	17,000 gallons	To be removed. Soil investigation and remediation required at final closure of facility.	X	

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WASTE MANAGEMENT UNITS

Unit Designation	Description	Capacity or Dimensions	Comment	No Further Corrective Action Recommended	
				Closed or Closing Regulated Unit	Adequate Design and No Information of a Release
T-25	Chemical precipitation listed waste sludge storage/conditioning tank	17,000 gallons	To be removed. Soil investigation and remediation required at final closure of facility.	X	
T-26	Chemical fixation holding and storage tank and trough	140,000 gallons	Converting to nonhazardous service. Soil investigation and remediation required at final closure of facility.	X	
T-204	Chemical precipitation batch treatment tank/sludge holding tank	9,000 gallons	To be removed. Soil investigation and remediation required at final closure of facility.	X	
T-205	Chemical precipitation batch treatment tank/sludge conditioning tank	9,000 gallons	To be removed. Soil investigation and remediation required at final closure of facility.	X	
T-210	Chemical precipitation solids mix tank	500 gallons	To be removed.	X	
T-601	Flammable liquids holding and storage tank	10,000 gallons	Existing tank not authorized for hazardous waste or flammable or combustible liquids. Soil investigation and remediation required at final closure of facility. To be replaced.	X	

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WASTE MANAGEMENT UNITS

Unit Designation	Description	Capacity or Dimensions	Comment	No Further Corrective Action Recommended	
				Closed or Closing Regulated Unit	Adequate Design and No Information of a Release
T-602	Flammable liquids holding and storage tank	10,000 gallons	Existing tank not authorized for hazardous waste or flammable or combustible liquids. Soil investigation and remediation required at final closure of facility. To be replaced.	X	
T-603	Flammable liquids holding and storage tank	10,000 gallons	Existing tank not authorized for hazardous waste or flammable or combustible liquids. Soil investigation and remediation required at final closure of facility. To be replaced.	X	