CHARTER TOWNSHIP OF VAN BUREN
ENVIRONMENTAL COMMISSION AGENDA

Wednesday, October 18, 2017 – 7:00 PM
Denton Room

CALL TO ORDER

ROLL CALL

ENVIRONMENTAL COMMISSION

Chairman Brownlee	_____	Commissioner Merritt	_____
Commissioner Jahr	_____	Commissioner Emekpe	_____
Commissioner Debuck	_____	Board Representative White	_____
Commissioner Gibson	_____	Director Akers	_____
Deputy Director Best	_____	Recording Secretary McGuire	_____

APPROVAL OF AGENDA

ACCEPTANCE OF THE MINUTES OF THE PREVIOUS MEETING

1. July 19, 2017 Minutes

COMMUNICATIONS

UNFINISHED BUSINESS

Open Discussion

NEW BUSINESS

Open Discussion

a. Site Specific Variance Petition from US Ecology
b. Operating License Major Modification – US Ecology

ANNOUNCEMENTS/COMMENT

a. Septic System Maintenance Workshop
b. Tree Planting Workshop
c. MS4 NPDES Stormwater Permit Progress Report

ADJOURNMENT

***** If you are unable to attend, please contact Developmental Services at 699-8913 before noon on October 18, 2017*****

CHARTER TOWNSHIP OF VAN BUREN
Environmental Commission
Wednesday-July 19, 2017
MINUTES - DRAFT

The meeting was called to order at 7:05 pm in the Denton Room by Chairperson Brownlee.

ROLL CALL:
Present: Brownlee, Jahr, Gibson, Merritt, White
Absent Excused: Debuck, Emekpe, Akers
Staff: Best, McGuire
Audience: 8

APPROVAL OF AGENDA:
Motion Merit, Seconded by Merritt to approve the July 19, 2017 agenda. Motion Carried.

APPROVAL OF MINUTES:
Motion Gibson, Seconded by Jahr to approve the May 17, 2017 Minutes. Motion Carried.

COMMUNICATIONS:

a. **Real Program** – Best explained THE REAL program (Realizing Exceptionally Amazing Leaders), which recognizes exceptional leadership in the real world. Ten youth work as Community Leaders and are working as counselors and desk staff in Parks and Recreation. The second group, Community Ambassadors, are taking care of people in need, helping seniors who cannot maintain their yard, cleaning the cemeteries and cleaning over growth on Denton Rd bridge and Quirk and I-94 interchange to improve vision at turns. As part of this program, the youth have toured and met with community leaders i.e. French Landing Dam, Wayne County Willow Run Airport, and Grace Lake. They are going to Cobo Hall to attend a young professional conference, and will have a professional week were the youth will be working with Van Buren staff.

b. **Recycling Spreadsheet Updated** – Jahr found and updated our local resource recovery guide, which identifies businesses that recycle beyond the normal curbside recycling. Spreadsheet updated and sent for dissemination. As a project for the board, if a member should see recycling done that is beyond the normal curbside recycling and will benefit our residents add it to spreadsheet. Contact Jennifer Price to place information on the Van Buren web site.

c. **Senator Hopgood's Town Hall** – Jahr attended the environment town hall meeting. Huron River Water Shed, MEC, and Serra Club at the meeting. An item discussed was bill that would ban PAH/Coal tar in Michigan. Bill has not been presented to the state

legislators but Christy Pagan will contact Jahr when the bill is up for a vote. Van Buren was given recognition on the work being done identifying the PAH issue and working on correcting it.

UNFINISHED BUSINESS:

a. **Environmental Funding** – Best there is no specific pot of money for grants, the money goes into the general fund. The Township receives two landfill grants, from one from waste management of $50,000 and $10,000 for royalties from US Ecology. The staff cost is about $3,600 per week, the total cost comes out to around $94,000/yr. There are also costs to be a member of Huron River Watershed Council, ADW, ARC, and to publish the Lake Ledger. This publication comes out two times a year. The Environmental committee may be able to post information in the ledger from Environmental committee.

b. **Spill Response** – Best spoke with Jason Wright, Police Chief. The amount of spillage at the marina from the vehicle was not enough to contact Wayne County HAZMAT team. Van Buren has a small spillage containment system and a larger boom on call. If the police and fire departments cannot handle a large spill, they would contact Wayne County HAZMAT unit, whose response time would be negligible compared to ours.

c. **Belleville Road Bridge** – An inspection was done with Matt Best and Wayne County. A broken drainage pipe appears to be coming out of a conduit pipe at Belleville Bridge. This was referred to Wayne County for repair.

d. **Algae Sampling** – Brownlee is assisting in a study with a consortium of several colleges that are monitoring HAB/harmful algae blooms and zebra mussels in Lake Erie and local lakes. Zebra mussels are taking the nutrients from the lake providing a perfect medium for the harmful algae blooms. Brownlee will contact the consortium to verify how many people from our community they can receive photos via a photo app. Photos need to be 3 ft. away from algae, 90% of picture's frame, and the picture is blocked from the light.

e. **Tyler Rd Dam**– Best update initial cleaning and preparing has been done by American Center for Mobility. Their final planned use will include a sedimentation pond. There has been some work already done that has reduced the standing water issue.

NEW BUSINESS:

a. **Recycling** – Jahr identified that Canton has a 15% rate for recycling and Van Buren is at 10%. Wanting to know if there is any way that we can improve our percentage and what is Canton doing that Van Buren is not. Best, stated that one reason Cantons might be at 15% is that residents pay for garbage pickup so people recycle to reduce their amount of garbage. An inquiry was made on how we could educate residents about everything that is recyclable. Several ideas mentioned and how to finance.

White stated that if committee pick a project and presented the project to the board, they could approve it.

b. **Grants for Recycling programs** – Not discussed

c. **Lake Drawdown** – Best stated that the supervisor asked for the ability to draw down lake so that the shoreline, sea walls, and docks repairs can be completed. This does not to include stump removal, as it would be cost prohibitive. The plan is to have 1 week for draw down, 2 weeks for repair and 1 week to return. The proposed date would be in 2019.

d. **Haggerty Road Issue** – Gibson stated that there is an eyesore on Haggerty Rd going toward railroad tracks where teenagers were doing things that were inappropriate. The Police's solution was to place big cinder blocks to prevent access. However, that area has become eyesore. Gibson wondered if there a way that indigenous plants could be planted to improve the view. Upon further investigation, the property belongs to the railroad and any improvements would have to come through them.

ANNOUNCEMENTS/COMMENT: None

Motion Merritt, seconded by White to adjourn at 8:30

Respectfully submitted,

Laura McGuire, Recording Secretary

Site-Specific Land Disposal Restrictions Treatability Variance Petition

Strebor Inc., Kalamazoo, Michigan

November 2016
Revision 00

Prepared for:

Strebor Inc.
2305 Superior Avenue
Kalamazoo, Michigan 49001

Prepared by:

Bay West
Customer-Focused Environmental & Industrial Solutions

Bay West LLC
5 Empire Drive
St. Paul, Minnesota 55103

Acronyms and Abbreviation

%	percent
ACT 451	Natural Resources and Environmental Protection Act, 1994 PA 451, as amended
Aptus	Aptus Environmental Services
Bay West	Bay West LLC
BDAT	best demonstrated available technology
CAS	Chemical Abstract Service
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
Dow	Dow Chemical Company
Enforceable Agreement	Agreement for a Limited Industrial Remedial Action Plan
ETG	ETG Environmental, Inc.
FR	Federal Register
ft	feet
GAC	granular activated carbon
GWTS	groundwater treatment system
HxCDD	hexachlorodibenzo-p-dioxin
HxCDF	hexachlorodibenzofuran
IC	institutional control
ID	identification
lb	pound or pounds
KP	klozur persulfate
Laidlaw	Laidlaw Environmental Services
LDR	land disposal restriction
LNAPL	light non-aqueous phase liquid
MDEQ	Michigan Department of Environmental Quality
MDNR	Michigan Department of Natural Resources
MDNRE	Michigan Department of Natural Resources and Environment
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
Michigan Program	Michigan Hazardous and Liquid Industrial Waste Management Program
MTTD/BCD	medium temperature thermal desorption and base-catalyzed decomposition
NA	not analyzed
OU	operable unit
PCP	pentachlorophenol
PeCDD	pentachlorodibenzo-p-dioxin
PeCDF	pentachlorodibenzo-furan
ppb	parts per billion
PPE	personal protective equipment
ppm	parts per million
ppt	parts per trillion
RCRA	Resource Conservation and Recovery Act
RGIS	Revetment Groundwater Interception System
RRD	Remediation and Redevelopment Division
SOU	soil operable unit
SSOU	subsurface soil operable unit
Strebor	Strebor Inc.
Swan Hills	Swan Hills Treatment Center
TCDD	tetrachlorodibenzo-p-dioxin
TCDF	tetrachlorodibenzofuran
TCLP	toxicity characteristic leachate procedure
TEF	toxicity equivalence factor
TEQ	toxicity equivalence
USEPA	United States Environmental Protection Agency

CERTIFICATION

The following certification is made pursuant to the requirements of 40 Code of Federal Regulations (CFR) 268.44 for a variance from a treatment standard:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this petition and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Strebor Inc.

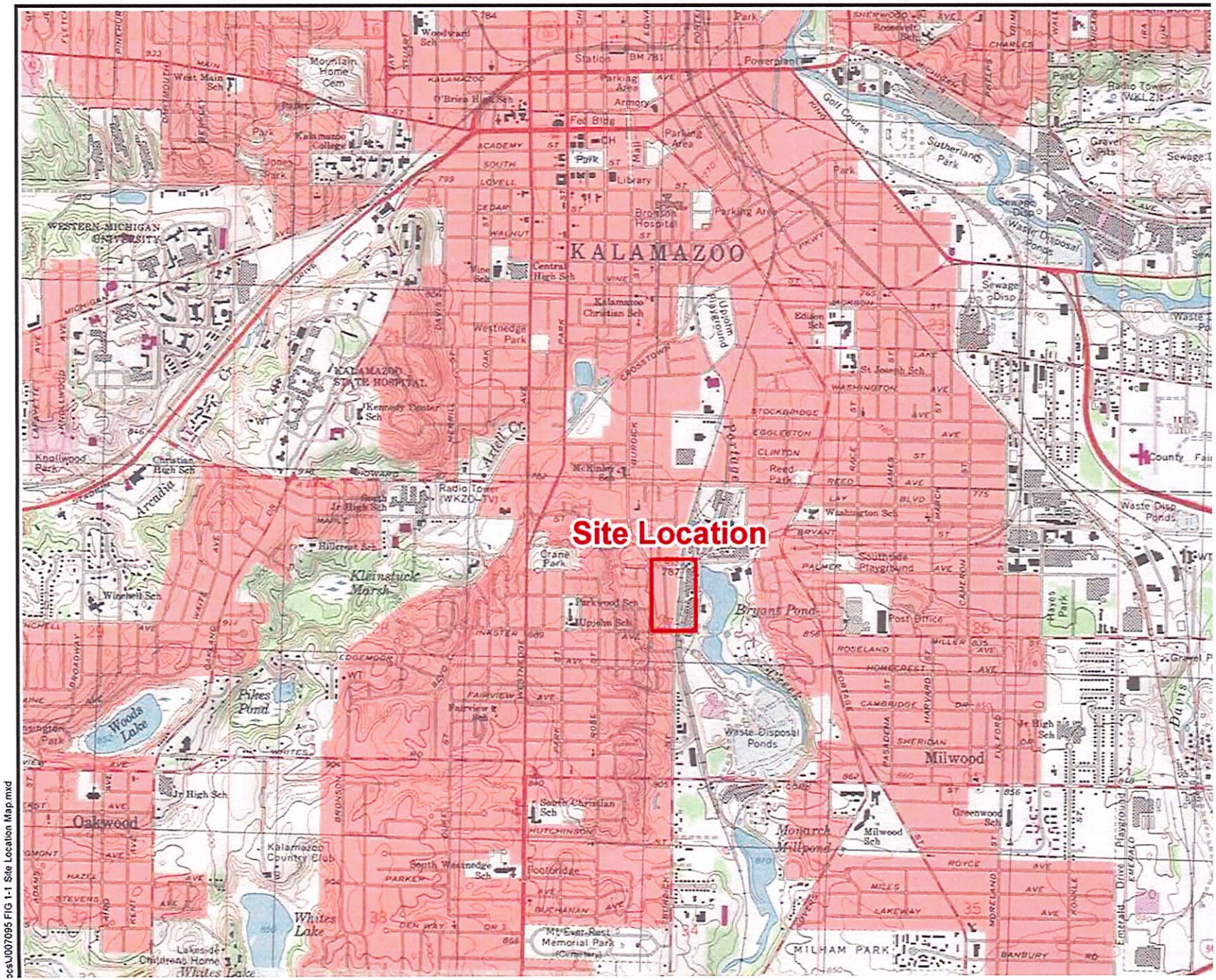
Lorraine Cancro

Signature

Lorraine Cancro

Vice President

Date 10/12/16



pcs\J007095 FIG 1-1 Site Location Map.mxd

and investigations. In September 1988, all facility operations were discontinued and the facility was closed. Investigation results suggested that surface soils in the drainage ditch bordering the eastern site boundary, subsurface soils, and groundwater were impacted by PCP and various petroleum-based compounds from accidental spills and releases of the wood treating solutions that were formerly mixed and packaged at the Strebor facility. Cleanup of the impacted soil and groundwater is regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), which is administered and overseen by MDEQ. On October 15, 2009, the MDEQ and Strebor executed the Agreement for a Limited Industrial Remedial Action Plan for the site in Kalamazoo County, Michigan (Enforceable Agreement; MDEQ, 2009). The Enforceable Agreement was modified on June 30, 2015 (MDEQ, 2015), to address various updates and changes to site activities and planning documents that have occurred since the Enforceable Agreement was originally executed. The Enforceable Agreement provides for the continued implementation of the Proposed Remedial Action Plan for Strebor (Bay West, 1993).

The Proposed Remedial Action Plan addresses three operable units (OUs); the groundwater operable unit, the surface soil operable unit (SOU), and the subsurface soil operable unit (SSOU). Actions taken at each of the OUs are described below, along with waste characterization and disposal of waste generated during implementation of these actions.

1.3.1 Groundwater Treatment System

A groundwater/LNAPL recovery system and a groundwater treatment system (GWTS) were installed to capture and remediate the LNAPL and groundwater plumes. The GWTS has been in operation since 1990 and has received numerous upgrades to enhance the capture of LNAPL and the capture and treatment of impacted groundwater using an oil/water separator for pretreatment and a combination mixed media filtration and granular activated carbon (GAC) adsorption system for groundwater treatment. Routine GWTS operation and groundwater monitoring have been performed at the site since 1990. Since start-up, the GWTS has resulted in an estimated 98 to 99 percent (%) reduction in the size of the LNAPL plume and a 74% reduction in the size of the dissolved plume, respectively (Bay West, 2015). Wastes generated by GWTS operation include spent GAC, spent bag filters, spent sorbent pads, PPE, disposable sampling equipment/supplies, general debris, and recovered LNAPL. For the remainder of this petition, these waste streams are referred to as spent carbon, PPE/debris, and recovered product.

In situ chemical oxidation has been under evaluation as a potential remedial technology to expedite groundwater remediation efforts at the site. Two pilot studies involving injection of sodium persulfate and post-injection monitoring were performed to evaluate the efficacy of using this technology to treat groundwater in an area of historically high PCP concentrations. The first pilot study was conducted between December 2012 and February 2013. Based on recommendations from the first pilot study, a second pilot study was conducted between July and October 2014.

In March 2013, a laboratory bench-scale study was conducted for Strebor by FMC Environmental Solutions to evaluate the effectiveness of Klozur® Activated Persulfate for treating spent activated carbon from the GWTS. In February 2013, prior to the laboratory bench-scale study, the MDEQ approved a request from Strebor to grant an extension of the RCRA 90-day storage limit for the spent carbon contained within two covered roll-off boxes on-site. This extension was required to provide the time needed to conduct the laboratory bench-scale study. On March 1, 2013, prior to the test, in a conference call between Strebor, Bay West, and MDEQ, the MDEQ acknowledged that if chemical oxidation reduced contaminant concentrations in the spent carbon to a level below the LDR limits, landfilling at an appropriately permitted facility would be an acceptable disposal alternative. The laboratory bench-scale study proceeded on this basis.

1.3.2 Surface and Subsurface Soil Excavation and Disposal

During the late 1980s and early 1990s, soil excavated to accommodate GWTS installation (and believed to be impacted) was placed in roll-off boxes and 55-gallon drums and was stored within an on-site containment area under an interim RCRA storage permit while a viable disposal option was identified. To address the SOU, impacted near-surface soils within the drainage ditch bordering the site's east property line were excavated in November 1991 and the drainage ditch was capped. The excavated soil was also stored in the on-site containment area.

In February 1994, Strebor implemented a comprehensive soil sampling and analysis program to determine if the stored soil met the Michigan Environmental Response Act, 1982 PA 307 (Act 307), Type B cleanup criteria, with the objective of disposing of soil that met the criteria at the Strebor site by direct land application rather than off-site. The cleanup criteria in place at the time were specified in the Michigan Environmental Response Act Operational Memorandum #8, Revision 3. Sample collection and analysis were conducted in accordance with MDNR guidance documents relevant at the time. PCP was detected in several samples, with concentrations ranging from below the reporting limit to 1,400 mg/kg, exceeding the 11 mg/kg cleanup criterion in many samples. Four samples were also analyzed for dioxins and furans. Several dioxin and furan concentrations in each sample exceeded the corresponding Type B criteria (Bay West, 1995). Based on the analytical results, the stored soil would require incineration or other additional treatment before direct land application.

At the time the soils were generated, there were no commercial facilities within the United States permitted to treat F027 waste. Beginning in 1993, Aptus Environmental Services (Aptus) in Coffeyville, Kansas, was permitted by the USEPA to treat and dispose of F027 waste via incineration. Strebor identified and screened several soil remedial technologies in order to identify a more technically appropriate and environmentally sound treatment alternative to incineration at the Aptus facility. To be considered in the screening process, the technology had to be suitable for on-site implementation and be capable of removing/destroying the compounds identified during the comprehensive soil sampling and analysis program.

Based on the screening activities and two bench-scale treatability studies, physical/chemical soil treatment via medium temperature thermal desorption and base-catalyzed decomposition (MTTD/BCD) showed the greatest potential to treat the soil to Act 307 cleanup criteria. With MDNR concurrence, ETG Environmental, Inc. (ETG) set up and operated MTTD/BCD equipment at the Strebor facility from October 1996 through March 1997 to treat the stored soil. Initial post-treatment soil analytical results indicated MDNR's Type B criteria for dioxins and furans were not being met consistently. To improve the performance of the MTTD/BCD equipment, ETG adjusted batch size and process time, but ultimately approximately 80% of the treatment batches were above the MDNR's type B criteria for dioxins and furans.

During the execution of its work, ETG failed to adequately segregate the treatment batches, so soil meeting MDNR's type B criteria could not be separated from soil requiring disposal as F027 waste. In March 1997, the entire lot (approximately 210 cubic yards) of treated, stored soil and test batches was transported to the Laidlaw Environmental Services (Laidlaw) facility in Pecatonica, Illinois, as hazardous waste. Laidlaw subsequently transported the soil for disposal to Laidlaw Environmental Services, Sarnia/Corunna, Lambton County, Ontario, Canada. Following the disposal of the excavated soil, MDEQ approved closure of the three on-site RCRA hazardous waste storage areas (MDEQ, 1999, 2000).

records, the manufacturing, production, packaging, and storage of PCP-containing wood treating solutions was discontinued by March 1987, prior to the effective LDR date (November 8, 1988) for PCP (USEPA, 1986). Additionally, all remaining PCP-containing product was shipped off-site and all USTs that contained a PCP-based wood treating solution were cleaned by that date as well. As such, all historical releases of PCP-containing wood treating solutions occurred prior to the effective LDR date for PCP. Consistent with CFR and FR language, as well as USEPA hazardous waste guidance, LDRs do not apply to media impacted by releases that occurred prior to the effective LDR date. Therefore, as stated in the letter dated September 10, 2010, the historic approach of classifying remediation waste materials generated at Strebor that are known or suspected to include unused, discarded wood treating solutions as a F027 waste is viewed to be overly conservative. However, the Environmental Resource Management Division of the Michigan Department of Natural Resources and Environment (MDNRE), a predecessor agency of the MDEQ, responded that it had not yet been determined that the concrete material is non-hazardous (MDNRE, 2010). While Strebor did not and does not agree with this conclusion, Strebor voluntarily chose to dispose of the concrete material as a F027 waste rather than wait on MDNRE's determination. The concrete material was profiled as an F027 waste with Veolia Environmental Services (Veolia) and shipped to Veolia's Menomonee Falls, Wisconsin, facility on January 27, 2011. Veolia subsequently transported the waste to Swan Hills in Alberta, Canada, for incineration. Along with the concrete material, used PPE and soil cuttings from a post-demolition monitoring well installation were profiled as a second and third waste stream with Veolia and were shipped to Swan Hills for incineration.

There are currently approximately 1,200 gallons of recovered product in storage at the site. Historically, Strebor transported seven shipments of recovered product to Wheeler Consolidated Industries (Wheeler) in Whitewood, South Dakota, for beneficial reuse. Wheeler has since discontinued accepting the recovered product for beneficial reuse.

From closure of the Strebor facility in 1988 to the first shipment of Strebor's F027 waste in 1993 to Aptus's newly licensed incinerator in Coffeyville, Kansas, Strebor's F027 hazardous waste streams were stored on-site under provisions of a RCRA-Part A (interim) permit. Following the opening of the Coffeyville facility until approximately 1996, Strebor's F027 waste streams were incinerated at the Coffeyville facility. After 1996, intermittent incineration and disposal of Strebor's F027 waste at the Coffeyville facility continued until the facility's final closure in 2001. From approximately 1996 to Canada's implementation of LDRs in 2010, most of Strebor's F027 waste was disposed at the landfill located in Sarnia, Ontario, Canada, which is currently owned by Clean Harbors. The exception being the soil generated during the 2001 lagoon excavation project described in **Section 1.3.2**, which was incinerated and disposed of at the Recupère Sol incinerator located in Quebec, Canada. Since 2010, incineration and disposal of Strebor's F027 hazardous waste streams has been at Swan Hills.

Historically, regulatory oversight of hazardous waste operations at the Strebor facility has been performed by the MDEQ or one its predecessor agencies. Since the closure of the Strebor facility in 1988, numerous site compliance inspections have been conducted to evaluate Strebor's compliance with Part 111, Hazardous Waste Management, and Part 121, Liquid Industrial By-Products, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; Subtitle C of RCRA; and any administrative rules or regulations promulgated pursuant to these acts. The latest inspection was conducted by the MDEQ, Office of Waste Management and Radiological Protection on October 6, 2016. Consistent with previous inspections, results of the October 6, 2016 inspection found Strebor to be in compliance with applicable rules and regulations. A copy of the MDEQ inspection report from the October 6, 2016 inspection is provided in **Appendix B**.

1.5.2 Alternative Treatment Standard

Soil, spent carbon, and filter bags that contain relatively low PCP, dioxin, and furan concentrations are significantly different materials than F027 waste, described as discarded unused formulations containing specific pentachlorophenols or containing compounds derived from these chlorophenols. However, the "derived from" rule states that residuals derived from the treatment, storage, or disposal of listed hazardous waste must continue to be regulated as hazardous waste (see 40 CFR 261.3[c][2]; USEPA, 2001).

It is not technically or environmentally appropriate to manage soil and GWTS waste streams as if they were discarded, unused formulations; therefore, an alternate treatment standard is being pursued. In 40 CFR 268.44, it is stated that a site-specific variance from an applicable treatment standard may be approved if it is not physically possible to treat the waste to the level specified in the treatment standard or by the method specified as the treatment standard, or it is technically or environmentally inappropriate to require the waste to be treated to the specified level or by the specified method, even though such treatment is technically possible. For example, treatment resulting in combustion of large amounts of mildly contaminated environmental media, where the treatment standard is not based on combustion of such media, would be technically inappropriate. Treatment of remediation wastes to the specified level or by the specified method may be deemed environmentally inappropriate if it would likely discourage aggressive remediation (CFR, 2015).

In the case of Strebor, additional technical factors to consider are that there are currently no known facilities permitted to accept F027 waste in the United States. Additionally, since Canada began phasing in LDRs in 2007, beginning with Ontario, F027 waste streams can no longer be landfilled in Canada. This leaves incineration in a foreign country as the only current disposal option, even for relatively large qualities of waste with relatively low levels of contamination, unless an LDR variance is granted. An important health and safety factor to consider with respect to waste disposal in Canada is the additional human health and environmental risk associated with potential accidents during international over-the-road transportation of wastes long distances.

The approach for establishing alternative treatments standards for the Strebor site closely follows an established precedent set by the variance request that was made by Dow in 1996 (Dow, 1996) and was extended and revised in 2008 (Dow, 2008). Additional information regarding the Dow variance request, regulatory approvals, and relevance to the alternative treatment standard approach detailed for Strebor are presented in **Section 2.1**. USEPA guidance on alternative treatment standards (USEPA, 2002) and management of dioxin contaminated soils (USEPA, 2011) was also reviewed during development of this variance request. To establish an alternate treatment standard, USEPA guidance Superfund LDR Guide #6A (USEPA, 1990a) and Superfund LDR Guide #6B (USEPA, 1990b) were used to develop this treatability variance request. Highlight 2 in either document, entitled "Alternative Treatability Variance Levels and Technologies for Structural/Functional Groups," shows the concentration ranges or percentage reduction ranges that can be used to establish the alternative standards depending on the concentrations of the constituents in the waste. The guidance documents state that (1) if the concentration of a restricted constituent is less than a specified threshold concentration, the waste should be treated to within a specified concentration range, and (2) if the waste concentration is above the threshold, the waste should be treated to reduce the concentration of the waste to within the specified percentage reduction range. In both these cases, it is presumed that the starting waste concentration is above the specified concentration range. Therefore, wastes with concentrations that are already within the specified concentration range do not require further treatment, as they already meet the criteria (1). This is the basis for the alternative treatment standards presented below and summarized in **Table 1-3**, based on these guidance documents.

2.0 RATIONALE FOR SEEKING A TREATABLITY VARIANCE

2.1 Regulatory Framework and USEPA Policy

The Michigan Program regulates companies and businesses that generate, store, treat, and dispose of hazardous waste in Michigan. The Michigan Program administers the hazardous waste management requirements of Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). State authorization is a rulemaking process through which the USEPA delegates the primary responsibility of implementing the RCRA hazardous waste program to individual states in lieu of the USEPA. The Michigan Program is authorized to administer the federal RCRA hazardous waste requirements on behalf of the USEPA, Region 5 Administrator, including reviewing and approving or denying delisting petitions and LDR treatability variance petitions.

As summarized in the LDR Variance Assistance Document, the Hazardous and Solid Waste Amendments of 1984, require the USEPA to promulgate regulations restricting the land disposal of untreated hazardous waste. This effort is generally referred to as the LDR program. The LDR program identifies levels or methods of treatment that substantially reduce the toxicity of a waste or the likelihood of migration of hazardous constituents from the waste.

To handle cases where the waste cannot meet the LDR standards, the USEPA has established equivalent treatment and treatability variance procedures. These two types of variances correspond to the two basic types of LDR standards. Determination of equivalent treatment applies to LDR standards expressed as a specific technology; a treatability variance applies to numerical LDR standards. Per 40 CFR 268.40, for F027 wastes, only numeric LDR standards have been promulgated. Technology standards for F027 have not been promulgated. With respect to numerical standards, treatability variances may be granted for wastes that have LDR standards that are expressed as concentrations of hazardous constituents in the waste or waste extract. The requirements for treatability variance petitions are contained in 40 CFR 268.44.

In addition to applicable federal and state regulations, correspondence relating to an LDR variance petition submitted by Dow to the USEPA and a follow-up Dow petition for a treatability variance submitted to MDEQ were used in preparation of this Strebor LDR variance petition. The original Dow petition was submitted on January 4, 1996, and approved by USEPA on June 10, 1997 (USEPA, 1997). Since the time of the USEPA's approval of the original Dow LDR variance petition, the LDR regulations were amended and MDEQ received USEPA authorization to review and approve site-specific LDR variance petitions. The second Dow petition, to extend and revise the original petition that was set to expire 10 years from the approval date, was submitted on October 1, 2007, revised on January 22, 2008, and approved by MDEQ on July 2, 2008 (MDEQ, 2008). While some of the specific issues addressed in the Dow petitions do not apply to the Strebor LDR variance petition, the following portions of the Dow petition were used by Strebor in support of developing the alternative treatment standards:

- Similarities between the Dow and Strebor LDR variance petitions are that they both include soil that was contaminated by listed hazardous wastes and that some of the soil contains dioxin/furan concentrations that exceed the Universal Treatment Standards (UTS) tabulated in 40 CFR 268.40.
- The 1996 Dow petition used Superfund LDR guidance (USEPA, 1990a, 1990b) to establish an alternative treatment standard of 50 ppb in soil or debris for each dioxin and furan congener group as listed in **Table 1-3**, which is equivalent to 50 times the UTS for non-wastewater.

3.0 DESCRIPTION OF THE MATERIAL SUBJECT TO TREATIBLITY VARIANCE

3.1 Previous Characterization of Material Subject to Treatability Variance

Sampling of soil associated with the former settling lagoon was conducted between 1999 and 2000 to delineate the extent of contamination and to characterize the excavated material for disposal. Additional sampling of soil outside of the limits of the excavation was conducted between 2000 and 2002. Analytical results for the soil that remains in place are presented on **Figure 3-1** and are summarized in **Table 3-1**. Analytical laboratory reports, including samples of material that was removed during the excavation, are included as **Appendix C**.

Table 3-1 shows that the PCP concentration in one sample of residual soil was 200 mg/kg, which exceeds the proposed alternative LDR treatment standard by a factor of 2.7. This indicates that although the majority of the contaminated soil that remains in place will meet the alternative treatment standards, a limited amount of soil may exceed the proposed standards. However, it is possible that naturally occurring processes such as dissolution/infiltration and biodegradation may have reduced concentrations to below the proposed standards. Further evaluation may be necessary, including consideration of possible statistical treatment of random sampling data, as discussed in MDEQ guidance entitled *Sampling Strategies and Statistics Training Materials for Part 201 Cleanup Criteria* (MDEQ, 2002b) to quantify the amount of soil that may exceed the proposed alternative treatment standards. Once an LDR variance is granted for this material, Strebor will evaluate additional source removal as an option to facilitate site cleanup. If additional source removal is pursued, a sampling plan will be submitted to MDEQ for approval prior to removal action implementation. Potential additional sampling associated with the SSOU is further discussed in **Section 3.3**.

Sampling of spent carbon was conducted for waste disposal characterization in 1993, 2012, and 2013. Three carbon contactors, with a total combined carbon loading of 35,000 pounds (lb) are periodically backwashed to maintain their maximum hydraulic efficiency. Polyester filter bags are used to filter out GAC fines during these periodic backwash events. Filter bags are only used during the periodic carbon contactor backwash events and are, therefore, considered to be adequately characterized by the analytical results for the spent carbon. PPE and general debris contaminated by soil or spent carbon are also considered to be adequately characterized by soil and spent carbon analytical results. Analytical results from the most recent spent carbon change-out event in 2012 are summarized in **Table 3-2**. Carbon sampling results, including those from 1993, are included in **Appendix C**. The spent carbon from the most recent carbon change-out event was sampled twice, once for characterization in 2012 and again in 2013 as the control sample for the alternative treatment approach using sodium persulfate, which was being considered at the time **(Section 1.3.1)**. **Table 3-2** shows that the spent carbon from the most recent carbon change-out event exceeded the proposed alternative LDR treatment standards for a limited number of individual dioxin and furan congeners, but met the treatment standard when expressed as TEQ and, therefore, met the alternative treatment standard. As documented in the annual reports and summarized in **Section 1.3.1**, the GWTS has significantly reduced the LNAPL and dissolved plumes and concentrations of PCP, dioxins, and furans in groundwater since 1990. Therefore, results from the most recent carbon change-out event have been presented as representative of the spent carbon that is generated during current remedial operations. Using the TEQ approach for dioxins and furans, the 2012 and 2013 analytical results for spent carbon demonstrate that the spent carbon will meet the alternative treatment standard.

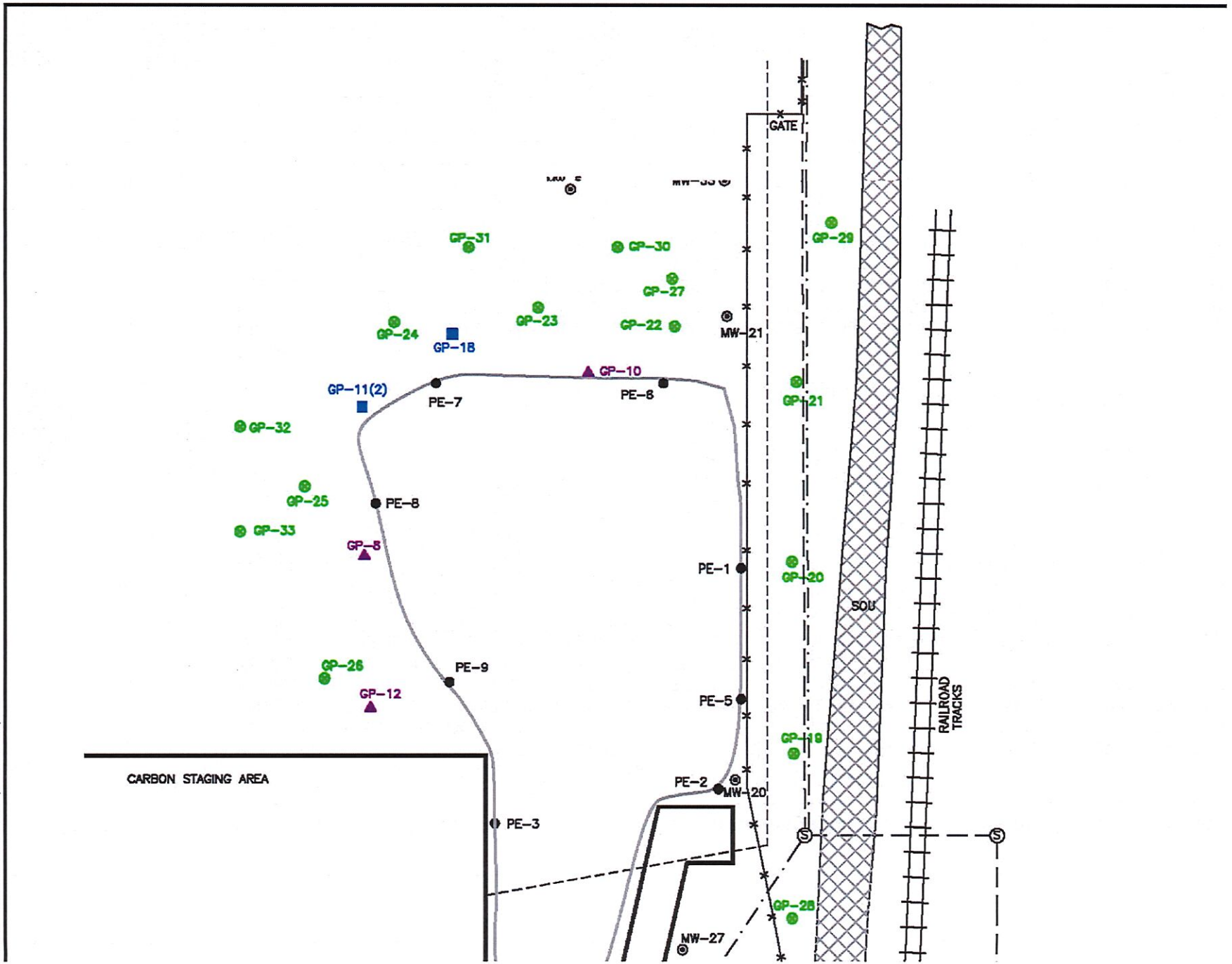

GATE
GP-31
GP-30
GP-29
GP-27
GP-23
GP-22
GP-24
GP-18
MW-21
GP-10
GP-11(2)
PE-7
PE-8
GP-21
GP-32
GP-25
PE-8
GP-33
GP-5
PE-1
GP-20
SOU
GP-26
PE-9
GP-12
PE-5
RAILROAD TRACKS
GP-19
CARBON STAGING AREA
PE-2
MW-20
PE-3
GP-28
MW-27
sU007095 FIG 2 2000-2002 Soil Sample Location Map.mxd

Table 3-2 Proposed Alternative Treatment Standards for F027 Waste and Historic Spent Carbon Analyses

Common Name	CAS #	Proposed Alternative Treatment Standard for F027 Wastes (mg/kg)	Pace 10214461 12/19/12	Pace 10222116-53186 Carbon Control 03/09/13
HxCDDs	NA	0.05[a]	**0.150000**	0.026000
HxCDFs	NA	0.05[a]	0.003100	0.000920
PeCDDs	NA	0.05[a]	**0.130000**	0.020000
PeCDFs	NA	0.05[a]	0.000780	0.000220
Pentachlorophenol	87-86-5	40	2.000000	2.400000
TCDDs	NA	0.05[a]	0.023000	0.003700
TCDFs	NA	0.05[a]	0.000420	0.000120
2,4,5-Trichlorophenol	95-95-4	40	<0.081	<0.081
2,4,6-Trichlorophenol	88-06-2	40	<0.081	<0.081
2,3,4,6-Tetrachlorophenol	58-90-2	40	<0.081	<0.081
2,3,7,8-TCDD TEQ	NA	0.05[a]	0.011000	0.001900

Notes:
[a] For dioxins and furans, standards are met if all individual congener limits are met and/or the 2,3,7,8-TCDD TEQ is met.
***Bold** indicates standards exceeded.*
*Only results for parameters with F027 treatment standards are shown. Additional results for analytical parameters included in the test methods are provided in the analytical reports presented in **Appendix C**.*
All results and standards in mg/kg.

3.2 Proposed Spent Carbon Sampling

A spent carbon sampling plan has been developed in support of demonstrating the spent carbon meets the proposed alternative LDR treatment standards prior to each discrete carbon disposal event. A summary of GAC system capacity, operation, and change-out protocol is provided below, followed by the proposed spent carbon sampling plan.

3.2.1 GAC Treatment System Operational Summary

Strebor's GAC treatment system consists of three GAC contactors designated as Contactor A, Contactor B, and Contactor C. Contactors A and B, which are interchangeable, each contain the maximum GAC capacity of 15,000 lb and are only utilized as the lead or intermediate stage contactors. Contactor C has a maximum capacity of 10,000 lb, but only contains 5,000 lb of GAC and is only utilized as the polish stage contactor. The GAC treatment system is designed for down-flow operation only and is only permitted for operation in three-stage series mode, though during maintenance periods the contactors could be configured for parallel or single-stage mode. When the GAC within a lead carbon contactor reaches its adsorptive capacity as determined by routine (i.e., monthly) GWTS sampling, the spent carbon is replaced with virgin carbon. Following replacement of the spent GAC, the contactor containing the fresh GAC becomes the intermediate contactor and the contactor that was in the intermediate position becomes the lead contractor. During a GAC change-out event, spent GAC is transferred from the lead contactor via a slurry method for temporary storage in two 20-cubic-yard roll-off boxes owned by Strebor. The roll-off boxes are specially equipped to allow dewatering of the spent carbon in preparation for disposal. Drain water from the roll-off boxes is treated through the intermediate and polish GAC contactors prior to being discharged to the sanitary sewer system with concurrence from the local publicly owned treatment works.

4.0 CONCLUSIONS

The treatability variance proposed herein represents the most technically and environmentally sound solution to manage contaminated soil, spent carbon, and select PPE/debris generated by soil and groundwater remedial efforts at the site. Two treatment technologies, thermal desorption and persulfate oxidation, were previously applied to soil and spent carbon, respectively, and found to be unable to achieve the level of contaminant reduction required to meet the applicable state and federal standards to allow disposal without a variance. The treatability variance does not cover recovered product or minimal quantities of debris/PPE visibly contaminated with recovered product.

The treatability variance is consistent with USEPA policies discussed in **Sections 1.5.2** and **2.1** regarding management of environmental media contaminated with hazardous wastes. Further, no environmental risks are anticipated to be posed by the proposed variance; rather, significant environmental benefits including reduction of risks to human health and the environment will result, as noted in **Section 2.2**. Historical analytical results demonstrate that PCP and dioxin/furan concentrations using the toxicity equivalence approach will meet the proposed alternative treatment standards. Additional testing is proposed for future carbon change-out events to verify that each shipment of carbon meets the alternative treatment standards and can be accepted by the Subtitle C landfill. If the alternative treatment standards are approved for soil, Strebor will reevaluate the efficacy of additional SSOU-contaminated soil excavation, including a cost-benefit analysis of excavation and disposal in a Subtitle C landfill, versus continued management and enforcement of land use restrictions. Based on previous sampling, a limited amount of the contaminated soil remaining in place in the SSOU may not meet the alternative treatment standards. Therefore, additional sampling and evaluation of statistical methods that could apply to random sampling data will be conducted. A sampling plan addressing these issues will be submitted to MDEQ for review and approval prior to any subsurface soil sampling.

USEPA, 1990a. Superfund LDR Guide #6A (2nd Edition) Obtaining a Soil and Debris Treatability Variance for Remedial Actions. Superfund Publication 9347.3-06FS. September.

USEPA, 1990b. Superfund LDR Guide #6B Obtaining a Soil and Debris Treatability Variance for Removal Actions. Superfund Publication. 9347.3-O6BFS. September.

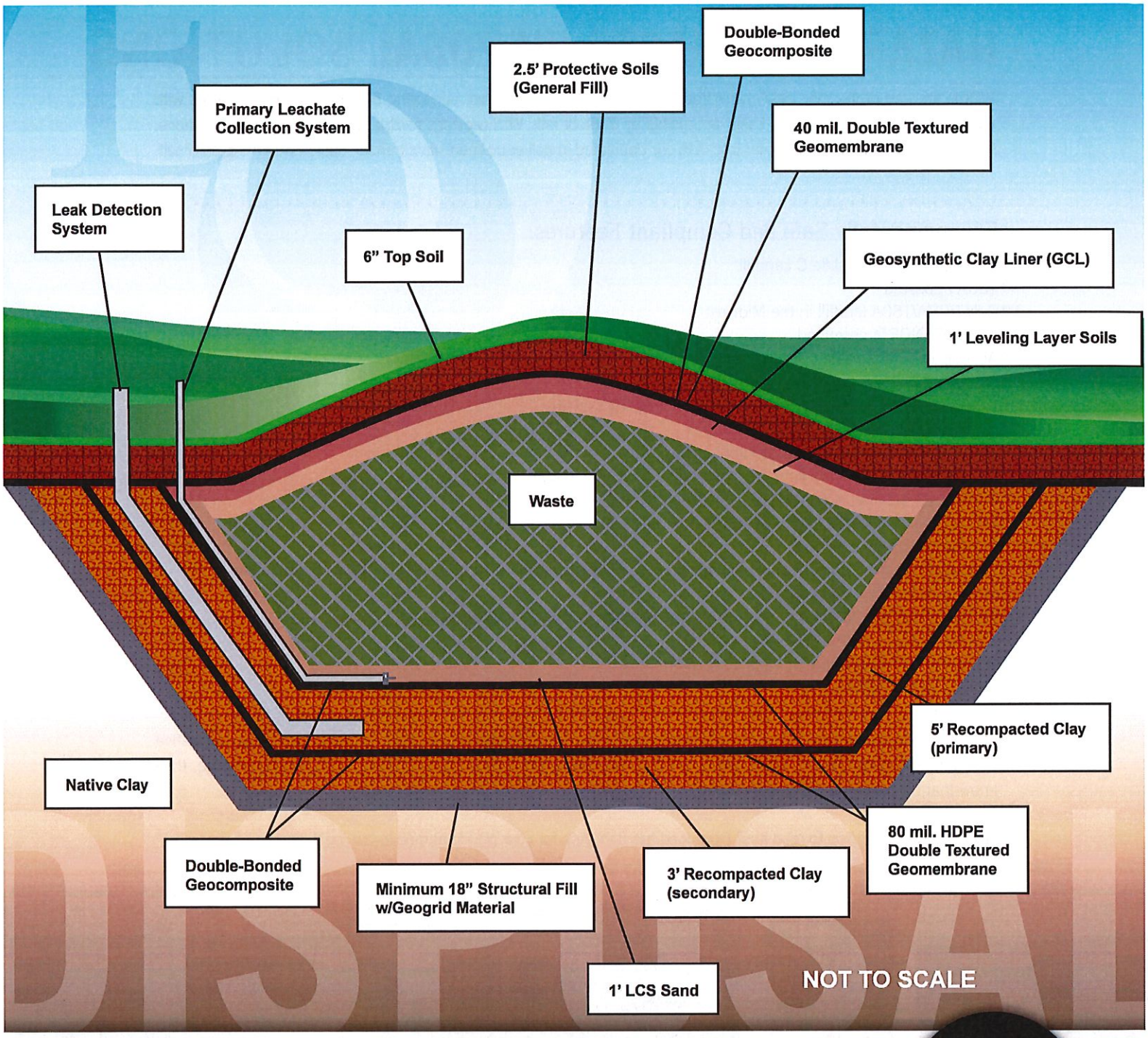
USEPA, 1997. Petition for Site-Specific Treatability Variance from Land Disposal Restrictions Treatment Standards for Hazardous Wastes, 40 CFR 268.44 (h), Notification of Approval. June.

USEPA, 2001. Land Disposal Restrictions: Summary of Requirements, EPA530-R-01-007 August.

USEPA, 2002. Guidance on Demonstrating Compliance with the Land Disposal Restrictions (LDR). Alternative Soil Treatment Standards – Final Guidance, EPA530-R-02-003, July.

USEPA, 2010. Recommended Toxicity Equivalence Factors (TEFs) for Human Health Risk Assessments of 2,3,7,8-Tetrachlorodibenzo-p-dioxin and Dioxin-Like Compounds. Risk Assessment Forum, Washington, DC. EPA/100/R-10/005. December.

USEPA, 2011. Fact Sheet on the Management of Dioxin Contaminated Soils. May 9.



HAZARDOUS WASTE DISPOSAL SOLUTIONS

Wayne Disposal, Inc. (WDI) in Belleville, Michigan offers safe and cost-effective disposal solutions for a wide variety of process and remedial hazardous waste streams. In conjunction with our treatment facilities, EQ has pioneered stringent approval and waste handling procedures that surpass regulatory requirements. ISO certification demonstrates our commitment to provide quality environmental services that exceed customer expectations, protect the environment, ensure safety and maintain compliance with regulatory standards.

US ecology

251 E Front St., Suite 400, Boise, ID 83702
P 800.590.5220 F 208.331.7900

October 27, 2016

To Whom It May Concern,

After having the opportunity to review the LDR Variance Petition prepared by Bay West for Strebor Inc., US Ecology has made the determination that the waste streams identified in the petition are conditionally approved for disposal at Wayne Disposal Inc. (WDI) in Belleville, MI. Final approval will be made provided that:

- The variance is granted by the Michigan Department of Environmental Quality (MDEQ)
- The generator submits all appropriate wastes stream profiles to WDI for approval with any additional requirements that US Ecology may have (e.g. additional waste characterization and/or approval requirements)

Thank you,

Scott Wisniewski
Environmental Program Manager

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY

KALAMAZOO DISTRICT OFFICE

RICK SNYDER
GOVERNOR

HEIDI GRETHER
DIRECTOR

October 10, 2016

STREBOR INC.
KALAMAZOO PLANT
OCT 19 2016
RECEIVED

Bay West
Mr. Michael McClish
2305 Superior Avenue
Kalamazoo, MI 49009

Dear Mr. McClish:

SUBJECT: Strebor, Kalamazoo County
Site Identification Number MID 005 342 134 (WDS: 393300)

On October 6, 2016, the Department of Environmental Quality (DEQ), Office of Waste Management and Radiological Protection (OWMRP), staff conducted an inspection of Strebor, located at 2305 Superior Avenue, Kalamazoo, Michigan, to evaluate compliance with Part 111, Hazardous Waste Management, and Part 121, Liquid Industrial By-Products, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA); Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended (RCRA); and any administrative rules or regulations promulgated pursuant to these acts. A copy of the completed inspection form can be obtained by contacting this office.

Based upon information obtained and observations made during the inspection, OWMRP staff has determined that Strebor is in compliance with the requirements of Part 111 and Part 121 of the NREPA and Subtitle C of the RCRA that were evaluated.

If you have any questions, please feel free to contact me at the telephone number below or by e-mail at clemensk@michigan.gov.

Sincerely,

Kirsten S. Clemens, P.E.
Environmental Quality Analyst
Kalamazoo District Office of
Waste Management and
Radiological Protection
269-567-3592

KC: ne

cc: Fred Sellers, DEQ

FACT SHEET

Proposed Issuance of a
Hazardous Waste Management Facility Operating License Major Modification

Wayne Disposal, Inc., Site #2
Hazardous Waste Landfill Facility
Belleville, Michigan
MID 048 090 633

October 12, 2017

Waste Management and Radiological Protection Division
Michigan Department of Environmental Quality

BASIS FOR PROPOSED HAZARDOUS WASTE MANAGEMENT FACILITY OPERATING LICENSE MAJOR MODIFICATION

The Department of Environmental Quality (DEQ), Waste Management and Radiological Protection Division (WMRPD), proposes to issue a hazardous waste management facility operating license major modification (Major Mod) to Wayne Disposal, Inc. (WDI), which consists of the addition of eight additional waste codes for disposal at the WDI hazardous waste landfill in Belleville, Michigan. Section I of this Fact Sheet describes the state and federal programs established to regulate hazardous waste and to license hazardous waste treatment, storage, and disposal (TSD) facilities.

Based on the review of the WDI Major Mod request, WMRPD staff has proposed that the Major Mod be issued based on the following conclusion:

- The facility has been constructed and operated in accordance with approved plans and applicable rules. Section II of this Fact Sheet describes the site, facility design, and prior licensing.

- The facility does not, at this time, present a hazard to public health or the environment. This conclusion is based on environmental monitoring of air and groundwater conducted by WDI and audited by the DEQ and on compliance inspections conducted by DEQ staff. If the Major Mod is issued, WDI will be required to include dioxins and furans in their soil monitoring program as a minor modification to their operating license prior to the acceptance of these waste types.

- The addition of the proposed waste codes FO20-FO23, FO26-FO28, and K099, which are wastes from various manufacturing processes that contain dioxins and furans. The management of these wastes in the WDI landfill in accordance with the operating license would not pose an un-acceptable risk to human health or the environment. Prior to placement in the landfill, these wastes must be in compliance with the associated land disposal restriction criteria, or in compliance with a DEQ approved variance from meeting those criteria.

- The WDI facility is routinely inspected and and the MDEQ maintains an onsite observer that reports directly to the DEQ Southeast Michigan Field Office. WDI has remained in substantial compliance with the provisions of Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, since the license was last renewed in 2012. A limited number of violations have been identified during this period and these have been resolved to the satisfaction of the DEQ in a timely manner.

Although the WMRPD believes it has done a thorough job of reviewing the WDI Major Mod request, the WMRPD is seeking public input on the issuance of the Major Mod. Section III of this Fact Sheet describes the public participation process.

I. INTRODUCTION

Part 111 was passed by the Michigan Legislature to regulate the management of hazardous waste from generation to disposal. Likewise, Subtitle C of the Solid Waste Disposal Act, as amended, Title 42 of the United States Code, Section 6901 *et seq.* (commonly known as the Resource Conservation and Recovery Act of 1976 [RCRA]), was passed by the U.S. Congress to regulate hazardous waste nationwide. RCRA was amended substantially by the Hazardous and Solid Waste Amendments of 1984 (HSWA).

Both RCRA and Part 111 established a permit system governing the TSD of hazardous wastes. RCRA allows the states to obtain authorization to issue a state hazardous waste License in lieu of a federal permit. Effective December 27, 1985, the State of Michigan amended its hazardous waste management administrative rules to be equivalent to those under RCRA and applied to the U.S. Environmental Protection Agency for authorization. In October 1986 Michigan was granted authorization to administer all portions of the RCRA Program except some provisions under HSWA.

II. DESCRIPTION OF THE FACILITY

A. Site Description

WDI operates a hazardous waste landfill facility at 49350 North I-94 Service Drive in Belleville, Michigan. The facility is bounded by Willow Run Airport to the north and I-94 Service Drive to the south. The WDI Site #2 hazardous waste landfill facility consists of 120 acres divided into three Master Cells: MC-V, MC-VI, and MC-VII. MC-V and MC-VII have already been filled and closed and are currently in post-closure care.

B. Facility Design and Prior Licensing

Currently, the hazardous waste landfill facility is operated under a Part 111 License that was issued on May 4, 2012. That License is scheduled to expire on May 4, 2022. The existing License authorizes a total landfill capacity (including closed cells) of 22.45 million cubic yards.

WDI operates a hazardous waste landfill for wastes that are generated at off-site facilities. The operating portion of the landfill is MC-VI , is divided into eight subcells (A, B, C, D, E, F, G, and H), they are currently filling in G. All of the subcells have been designed and constructed in accordance with Part 111 to include a leachate collection system, a composite primary liner (80 mil synthetic liner and 5 feet of clay), a leak detection system, and a composite secondary liner (80 mil synthetic liner and certification of at least 10 feet of 10-7 cm/sec native or recompacted clay). The License also requires extensive groundwater, soil, and air monitoring on an ongoing basis.

Currently, incoming waste is unloaded from vehicles into a box within the boundary of MC-VI where it is transported by dedicated vehicles to the location for final disposal.

C. New Facility-Specific License Attachment

The following item is a facility-specific License attachment modification for the landfill:

1. Attachment 8, LIST OF ACCEPTABLE TYPES: The waste codes F020-F023, F026-F028, and K099 have been added.

III. PUBLIC PARTICIPATION

A. Public Comment Procedures

The purpose of public participation is to ensure that the interested public has knowledge of the DEQ proposed action and the opportunity to comment on that action. In addition, the process insures that the DEQ has the opportunity to benefit from any information the public might have relevant to the proposed actions. Comments may be submitted in writing to the addressee listed in Subsection C, below, between October 12, 2017, and December 11, 2017. At this time, no hearing has been scheduled for this draft Major Modification; however, upon written request to the DEQ stating the nature of the issues proposed to be raised at a public hearing, a date for a hearing may be established and, if so, notification will be provided to the public of that date. The public comment and public hearing procedures that will be followed are stated in MAC R 299.9514 and R 299.9515 and in Title 40 of the Code of Federal Regulations, Section 124.11 and Section 124.12.

After the close of the sixty day public comment period, the DEQ will decide whether to issue the Major Mod. Written comments submitted during the public comment period and statements provided at the public hearing, if held, will be considered by the Director of the WMRPD in the formulation of the final decision. Responses to written comments and statements will be included in the record supporting the DEQ final decision. The final Major Mod decision made by the DEQ will be communicated to the applicant, each person who submitted a written comment during the public comment period, persons providing statements at the public hearing, and all persons on the facility mailing list.

B. Locations of Available Information

The administrative record for the draft Major Mod is on file at the DEQ,

WMRPD, Constitution Hall, 4th Floor South, 525 West Allegan Street, Lansing, Michigan 48933 (contact Mr. Peter Quackenbush at 517-284-6568). In addition, copies of the draft Major Mod, this Fact Sheet, and the Major Mod request are available for review at the DEQ, Southeast Michigan District Office, WMRPD, located at 27700 Donald Court, Warren, Michigan 48092 (contact Mr. Michael Busse at 586-753-3839), and at the Van Buren Charter Township Hall located at 46425 Tyler Road, Belleville, Michigan 48111 (contact Mr. Ron Akers at 734-699-8913).

C. Contact Person

Comments and requests regarding the proposed Major Mod should be addressed to:

Mr. Peter Quackenbush
WMRPD
DEQ
P.O. Box 30241
Lansing, Michigan 48909-7741

Written comments concerning the proposed Major Mod should include the name and address of the writer, a concise statement of the basis for the comments, and the supporting relevant facts upon which the comments are based. All further requests for information, including requests for copies of the draft Major Mod and this Fact Sheet, should be made to Mr. Quackenbush. Written comments must be postmarked no later than December 11, 2017.

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY

LANSING

RICK SNYDER
GOVERNOR

C. HEIDI GRETHER
DIRECTOR

December , 2017

Mr. Kerry Durnen
Director of Operations
Wayne Disposal, Inc.
A US Ecology Company
49350 North I-94 Service Drive
Belleville, Michigan 48111

Dear Mr. Durnen:

SUBJECT: Approval of Major Modification to Part 111Operating License; Addition of Acceptable Waste Codes; Wayne Disposal, Inc. (WDI); MID 048 090 633

The Michigan Department of Environmental Quality (MDEQ), Waste Management and Radiological Protection Division (WMRPD), has completed its review of the March 27, 2017, request for a major modification to the WDI hazardous waste management facility operating license (License). The WMRPD has reviewed the proposed additions to the list of acceptable hazardous waste codes "Attachment 8" of the License issued pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (License). The WMRPD has determined that the proposed addition of waste codes F020-F023, F026-F028, and K099 along with the supporting documentation are acceptable.

As such, the WMRPD hereby approves the major modification and the enclosed revised Attachment 8, Acceptable Waste Types, of the License pursuant to R 299.9519(5) and (9) of the administrative rules promulgated pursuant to Part 111.

Should you require further information, please contact Mr. Peter Quackenbush at 517 284-6568; quackenbushp@michigan.gov; or MDEQ, WMRPD, P.O. Box 30241, Lansing, Michigan 48909 7741.

Sincerely,

Al Taylor, Manager
Hazardous Waste Section
Waste Management and
Radiological Protection Division

Enclosure
cc: Ms. Sylwia Scott, WDI, A US Ecology Company
Mr. James Blough, USEPA
Mr. Peter Quackenbush, DEQ
Ms. Tracy Kecskemeti/Mr. Mike Busse, DEQ
Mr. Leo Parks, DEQ
Ms. Virginia Himich, DEQ
cc/enc:
Operating License File

NOTICE OF
A HAZARDOUS WASTE MANAGEMENT FACILITY OPERATING LICENSE MAJOR MODIFICATION
Wayne Disposal, Inc.
October 12, 2017

The Department of Environmental Quality (DEQ), Waste Management and Radiological Protection Division (WMRPD), hereby gives notice that it proposes to issue a hazardous waste management facility operating license major modification to Wayne Disposal, Inc. (WDI). A request to add waste codes to the list of acceptable wastes for disposal at the facility was submitted by WDI on March 27, 2017 pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

The request by WDI was for the addition of hazardous waste codes F020-F023, F026-F028, and K099 for disposal at the WDI facility located at 49350 North I-94 Service Drive in Belleville, Michigan. These are wastes from various manufacturing processes that contain dioxins and furans.

The DEQ has reviewed the request and determined that it is acceptable and would comply with Part 111 and the rules promulgated thereunder. The management of these wastes in the WDI landfill in accordance with the operating license would not pose an un-acceptable risk to human health or the environment. Prior to placement in the landfill, these wastes must meet associated land disposal restriction criteria or comply with a DEQ approved variance from meeting those criteria.

The DEQ invites public comment on the proposed major modification. The public comment period begins October 12, 2017, and ends December 11, 2017.

The draft major modification and fact sheet may be reviewed online at http://www.michigan.gov/deq (click on Waste, Hazardous and Liquid Industrial Waste, Hazardous and Liquid Industrial Waste Management, and look under Information); the Van Buren Charter Township Hall, 46425 Tyler Road, Belleville, Michigan (contact Mr. Ron Akers at 734-699-8913); the DEQ, Southeast Michigan District Office, WMRPD, 27700 Donald Court, Warren, Michigan (contact Mr. Michael Busse at 586-753-3839 or bussem@michigan.gov); and the DEQ, WMRPD, Constitution Hall, 4th Floor South, 525 West Allegan Street, Lansing, Michigan (contact Mr. Peter Quackenbush at 517-284-6568 or quackenbushp@michigan.gov).

To receive future DEQ notification concerning this facility, please submit a written request for placement on the WDI facility mailing list. Requests, comments, or questions regarding WDI should be addressed to:

Mr. Peter Quackenbush
Waste Management and Radiological Protection Division
DEQ
P.O. Box 30241
Lansing, Michigan 48909-7741

US ecology

49350 North I-94 Service Drive, Belleville, MI 48111
800.592.5489 800.592.5329

March 27, 2017

Mr. Jack Schinderle
Office of Waste Management and Radiological Protection
Department of Environmental Quality
525 W Allegan Street 4th Floor, South
Lansing Michigan 48933

RE: Wayne Disposal Inc. (WDI) - MID 048 090 633
Hazardous Waste Management Facility Operating License
Notification of Major Modification – R 299.9519(10)

Dear Mr. Schinderle:

With this letter Wayne Disposal, Inc. (WDI) is requesting a major modification of its Part 111 Hazardous Waste Operating License, pursuant to Rule 519(10), in order to receive waste meeting applicable land disposal restrictions for the following waste codes: F020-F023, F026-F028 and K099. WDI is not requesting an expansion of its facility, or an alteration of the method of disposal.

This modification is requested so that WDI may meet the needs of generators seeking secure Subtitle C landfill disposal of waste bearing one or more of these codes. The constituents included in these codes are already acceptable for disposal at WDI when they are not designated to these specific process codes (and in fact wastes containing these constituents have been disposed when these codes were not applicable to the waste). Under certain circumstances these constituents may be accepted at a Subtitle D landfill at the same concentrations required for disposal at WDI. Process specific waste streams should not be restricted from disposal if they meet the necessary land disposal restrictions.

Provided is a modified Attachment 8 Acceptable Waste Types to reflect the addition of the codes. If you have any questions or need further information, please let me know.

Sincerely,

Sylwia Scott

Sylwia Scott

sylwia.scott@usecology.com

Enclosure

cc: Mr. Pete Quackenbush, DEQ

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
1	D001[R]	200000	Y	D80			
2	D002	200000	Y	D80			
3	D003[R]	200000	Y	D80			
4	D004	200000	Y	D80			
5	D005	200000	Y	D80			
6	D006	200000	Y	D80			
7	D007	200000	Y	D80			
8	D008	200000	Y	D80			
9	D009	200000	Y	D80			
10	D010	200000	Y	D80			
11	D011	200000	Y	D80			
12	D012	200000	Y	D80			
13	D013	200000	Y	D80			
14	D014	200000	Y	D80			
15	D015	200000	Y	D80			
16	D016	200000	Y	D80			
17	D017	200000	Y	D80			
18	D018	200000	Y	D80			
19	D019	200000	Y	D80			
20	D020	200000	Y	D80			
21	D021	200000	Y	D80			
22	D022	200000	Y	D80			
23	D023	200000	Y	D80			
24	D024	200000	Y	D80			
25	D025	200000	Y	D80			
26	D026	200000	Y	D80			
27	D027	200000	Y	D80			
28	D028	200000	Y	D80			
29	D029	200000	Y	D80			
30	D030	200000	Y	D80			
31	D031	200000	Y	D80			
32	D032	200000	Y	D80			
33	D033	200000	Y	D80			
34	D034	200000	Y	D80			
35	D035	200000	Y	D80			
36	D036	200000	Y	D80			
37	D037	200000	Y	D80			
38	D038	200000	Y	D80			
39	D039	200000	Y	D80			
40	D040	200000	Y	D80			
41	D041	200000	Y	D80			
42	D042	200000	Y	D80			
43	D043	200000	Y	D80			
44	F001	200000	Y	D80			
45	F002	200000	Y	D80			
46	F003	200000	Y	D80			
47	F004	200000	Y	D80			
48	F005	200000	Y	D80			
49	F006	200000	Y	D80			
50	F007	200000	Y	D80			
51	F008	200000	Y	D80			
52	F009	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
53	F010	200000	Y	D80			
54	F011	200000	Y	D80			
55	F012	200000	Y	D80			
56	F019	200000	Y	D80			
57	F020	200000	Y	D80			
58	F021	200000	Y	D80			
59	F022	200000	Y	D80			
60	F023	200000	Y	D80			
61	F024	200000	Y	D80			
62	F025	200000	Y	D80			
63	F026	200000	Y	D80			
64	F027	200000	Y	D80			
65	F028	200000	Y	D80			
66	F032	200000	Y	D80			
67	F034	200000	Y	D80			
68	F035	200000	Y	D80			
69	F037	200000	Y	D80			
70	F038	200000	Y	D80			
71	F039	200000	Y	D80			
72	K001	200000	Y	D80			
73	K002	200000	Y	D80			
74	K003	200000	Y	D80			
75	K004	200000	Y	D80			
76	K005	200000	Y	D80			
77	K006	200000	Y	D80			
78	K007	200000	Y	D80			
79	K008	200000	Y	D80			
80	K009	200000	Y	D80			
81	K010	200000	Y	D80			
82	K011	200000	Y	D80			
83	K013	200000	Y	D80			
84	K014	200000	Y	D80			
85	K015	200000	Y	D80			
86	K016	200000	Y	D80			
87	K017	200000	Y	D80			
88	K018	200000	Y	D80			
89	K019	200000	Y	D80			
90	K020	200000	Y	D80			
91	K021	200000	Y	D80			
92	K022	200000	Y	D80			
93	K023	200000	Y	D80			
94	K024	200000	Y	D80			
95	K025	200000	Y	D80			
96	K026	200000	Y	D80			
97	K027[R]	200000	Y	D80			
98	K028	200000	Y	D80			
99	K029	200000	Y	D80			
100	K030	200000	Y	D80			
101	K031	200000	Y	D80			
102	K032	200000	Y	D80			
103	K033	200000	Y	D80			
104	K034	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
105	K035	200000	Y	D80			
106	K036	200000	Y	D80			
107	K037	200000	Y	D80			
108	K038	200000	Y	D80			
109	K039	200000	Y	D80			
110	K040	200000	Y	D80			
111	K041	200000	Y	D80			
112	K042	200000	Y	D80			
113	K043	200000	Y	D80			
114	K044[R]	200000	Y	D80			
115	K045[R]	200000	Y	D80			
116	K046	200000	Y	D80			
117	K047[R]	200000	Y	D80			
118	K048	200000	Y	D80			
119	K049	200000	Y	D80			
120	K050	200000	Y	D80			
121	K051	200000	Y	D80			
122	K052	200000	Y	D80			
123	K060	200000	Y	D80			
124	K061	200000	Y	D80			
125	K062	200000	Y	D80			
126	K069	200000	Y	D80			
127	K071	200000	Y	D80			
128	K073	200000	Y	D80			
129	K083	200000	Y	D80			
130	K084	200000	Y	D80			
131	K085	200000	Y	D80			
132	K086	200000	Y	D80			
133	K087	200000	Y	D80			
134	K088	200000	Y	D80			
135	K090	200000	Y	D80			
136	K091	200000	Y	D80			
137	K093	200000	Y	D80			
138	K094	200000	Y	D80			
139	K095	200000	Y	D80			
140	K096	200000	Y	D80			
141	K097	200000	Y	D80			
142	K098	200000	Y	D80			
143	K099	200000	Y	D80			
144	K100	200000	Y	D80			
145	K101	200000	Y	D80			
146	K102	200000	Y	D80			
147	K103	200000	Y	D80			
148	K104	200000	Y	D80			
149	K105	200000	Y	D80			
150	K106	200000	Y	D80			
151	K107	200000	Y	D80			
152	K108	200000	Y	D80			
153	K109	200000	Y	D80			
154	K110	200000	Y	D80			
155	K111	200000	Y	D80			
156	K112	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
157	K113	200000	Y	D80			
158	K114	200000	Y	D80			
159	K115	200000	Y	D80			
160	K116	200000	Y	D80			
161	K117	200000	Y	D80			
162	K118	200000	Y	D80			
163	K123	200000	Y	D80			
164	K124	200000	Y	D80			
165	K125	200000	Y	D80			
166	K126	200000	Y	D80			
167	K131	200000	Y	D80			
168	K132	200000	Y	D80			
169	K136	200000	Y	D80			
170	K141	200000	Y	D80			
171	K142	200000	Y	D80			
172	K143	200000	Y	D80			
173	K144	200000	Y	D80			
174	K145	200000	Y	D80			
175	K147	200000	Y	D80			
176	K148	200000	Y	D80			
177	K149	200000	Y	D80			
178	K150	200000	Y	D80			
179	K151	200000	Y	D80			
180	K156	200000	Y	D80			
181	K157	200000	Y	D80			
182	K158	200000	Y	D80			
183	K159	200000	Y	D80			
184	K161	200000	Y	D80			
185	K169	200000	Y	D80			
186	K170	200000	Y	D80			
187	K171	200000	Y	D80			
188	K172	200000	Y	D80			
189	K174	200000	Y	D80			
190	K175	200000	Y	D80			
191	K176	200000	Y	D80			
192	K177	200000	Y	D80			
193	K178	200000	Y	D80			
194	K181	200000	Y	D80			
195	P001	200000	Y	D80			
196	P002	200000	Y	D80			
197	P003	200000	Y	D80			
198	P004	200000	Y	D80			
199	P005	200000	Y	D80			
200	P006	200000	Y	D80			
201	P007	200000	Y	D80			
202	P008	200000	Y	D80			
203	P009	200000	Y	D80			
204	P010	200000	Y	D80			
205	P011	200000	Y	D80			
206	P012	200000	Y	D80			
207	P013	200000	Y	D80			
208	P014	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
209	P015	200000	Y	D80			
210	P016	200000	Y	D80			
211	P017	200000	Y	D80			
212	P018	200000	Y	D80			
213	P020	200000	Y	D80			
214	P021	200000	Y	D80			
215	P022	200000	Y	D80			
216	P023	200000	Y	D80			
217	P024	200000	Y	D80			
218	P026	200000	Y	D80			
219	P027	200000	Y	D80			
220	P028	200000	Y	D80			
221	P029	200000	Y	D80			
222	P030	200000	Y	D80			
223	P031	200000	Y	D80			
224	P033	200000	Y	D80			
225	P034	200000	Y	D80			
226	P036	200000	Y	D80			
227	P037	200000	Y	D80			
228	P038	200000	Y	D80			
229	P039	200000	Y	D80			
230	P040	200000	Y	D80			
231	P041	200000	Y	D80			
232	P042	200000	Y	D80			
233	P043	200000	Y	D80			
234	P044	200000	Y	D80			
235	P045	200000	Y	D80			
236	P046	200000	Y	D80			
237	P047	200000	Y	D80			
238	P048	200000	Y	D80			
239	P049	200000	Y	D80			
240	P050	200000	Y	D80			
241	P051	200000	Y	D80			
242	P054	200000	Y	D80			
243	P056	200000	Y	D80			
244	P057	200000	Y	D80			
245	P058	200000	Y	D80			
246	P059	200000	Y	D80			
247	P060	200000	Y	D80			
248	P062	200000	Y	D80			
249	P063	200000	Y	D80			
250	P064	200000	Y	D80			
251	P065	200000	Y	D80			
252	P066	200000	Y	D80			
253	P067	200000	Y	D80			
254	P068	200000	Y	D80			
255	P069	200000	Y	D80			
256	P070	200000	Y	D80			
257	P071	200000	Y	D80			
258	P072	200000	Y	D80			
259	P073	200000	Y	D80			
260	P074	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
261	P075	200000	Y	D80			
262	P076	200000	Y	D80			
263	P077	200000	Y	D80			
264	P078	200000	Y	D80			
265	P081	200000	Y	D80			
266	P082	200000	Y	D80			
267	P084	200000	Y	D80			
268	P085	200000	Y	D80			
269	P087	200000	Y	D80			
270	P088	200000	Y	D80			
271	P089	200000	Y	D80			
272	P092	200000	Y	D80			
273	P093	200000	Y	D80			
274	P094	200000	Y	D80			
275	P095	200000	Y	D80			
276	P096	200000	Y	D80			
277	P097	200000	Y	D80			
278	P098	200000	Y	D80			
279	P099	200000	Y	D80			
280	P101	200000	Y	D80			
281	P102	200000	Y	D80			
282	P103	200000	Y	D80			
283	P104	200000	Y	D80			
284	P105	200000	Y	D80			
285	P106	200000	Y	D80			
286	P108	200000	Y	D80			
287	P109	200000	Y	D80			
288	P110	200000	Y	D80			
289	P111	200000	Y	D80			
290	P112	200000	Y	D80			
291	P113	200000	Y	D80			
292	P114	200000	Y	D80			
293	P115	200000	Y	D80			
294	P116	200000	Y	D80			
295	P118	200000	Y	D80			
296	P119	200000	Y	D80			
297	P120	200000	Y	D80			
298	P121	200000	Y	D80			
299	P122	200000	Y	D80			
300	P123	200000	Y	D80			
301	P127	200000	Y	D80			
302	P128	200000	Y	D80			
303	P185	200000	Y	D80			
304	P188	200000	Y	D80			
305	P189	200000	Y	D80			
306	P190	200000	Y	D80			
307	P191	200000	Y	D80			
308	P192	200000	Y	D80			
309	P194	200000	Y	D80			
310	P196	200000	Y	D80			
311	P197	200000	Y	D80			
312	P198	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
313	P199	200000	Y	D80			
314	P201	200000	Y	D80			
315	P202	200000	Y	D80			
316	P203	200000	Y	D80			
317	P204	200000	Y	D80			
318	P205	200000	Y	D80			
319	U001	200000	Y	D80			
320	U002	200000	Y	D80			
321	U003	200000	Y	D80			
322	U004	200000	Y	D80			
323	U005	200000	Y	D80			
324	U006	200000	Y	D80			
325	U007	200000	Y	D80			
326	U008	200000	Y	D80			
327	U009	200000	Y	D80			
328	U010	200000	Y	D80			
329	U011	200000	Y	D80			
330	U012	200000	Y	D80			
331	U014	200000	Y	D80			
332	U015	200000	Y	D80			
333	U016	200000	Y	D80			
334	U017	200000	Y	D80			
335	U018	200000	Y	D80			
336	U019	200000	Y	D80			
337	U020	200000	Y	D80			
338	U021	200000	Y	D80			
339	U022	200000	Y	D80			
340	U023	200000	Y	D80			
341	U024	200000	Y	D80			
342	U025	200000	Y	D80			
343	U026	200000	Y	D80			
344	U027	200000	Y	D80			
345	U028	200000	Y	D80			
346	U029	200000	Y	D80			
347	U030	200000	Y	D80			
348	U031	200000	Y	D80			
349	U032	200000	Y	D80			
350	U033	200000	Y	D80			
351	U034	200000	Y	D80			
352	U035	200000	Y	D80			
353	U036	200000	Y	D80			
354	U037	200000	Y	D80			
355	U038	200000	Y	D80			
356	U039	200000	Y	D80			
357	U041	200000	Y	D80			
358	U042	200000	Y	D80			
359	U043	200000	Y	D80			
360	U044	200000	Y	D80			
361	U045	200000	Y	D80			
362	U046	200000	Y	D80			
363	U047	200000	Y	D80			
364	U048	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
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LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
365	U049	200000	Y	D80			
366	U050	200000	Y	D80			
367	U051	200000	Y	D80			
368	U052	200000	Y	D80			
369	U053	200000	Y	D80			
370	U055	200000	Y	D80			
371	U056	200000	Y	D80			
372	U057	200000	Y	D80			
373	U058	200000	Y	D80			
374	U059	200000	Y	D80			
375	U060	200000	Y	D80			
376	U061	200000	Y	D80			
377	U062	200000	Y	D80			
378	U063	200000	Y	D80			
379	U064	200000	Y	D80			
380	U066	200000	Y	D80			
381	U067	200000	Y	D80			
382	U068	200000	Y	D80			
383	U069	200000	Y	D80			
384	U070	200000	Y	D80			
385	U071	200000	Y	D80			
386	U072	200000	Y	D80			
387	U073	200000	Y	D80			
388	U074	200000	Y	D80			
389	U075	200000	Y	D80			
390	U076	200000	Y	D80			
391	U077	200000	Y	D80			
392	U078	200000	Y	D80			
393	U079	200000	Y	D80			
394	U080	200000	Y	D80			
395	U081	200000	Y	D80			
396	U082	200000	Y	D80			
397	U083	200000	Y	D80			
398	U084	200000	Y	D80			
399	U085	200000	Y	D80			
400	U086	200000	Y	D80			
401	U087	200000	Y	D80			
402	U088	200000	Y	D80			
403	U089	200000	Y	D80			
404	U090	200000	Y	D80			
405	U091	200000	Y	D80			
406	U092	200000	Y	D80			
407	U093	200000	Y	D80			
408	U094	200000	Y	D80			
409	U095	200000	Y	D80			
410	U096	200000	Y	D80			
411	U097	200000	Y	D80			
412	U098	200000	Y	D80			
413	U099	200000	Y	D80			
414	U101	200000	Y	D80			
415	U102	200000	Y	D80			
416	U103	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
417	U105	200000	Y	D80			
418	U106	200000	Y	D80			
419	U107	200000	Y	D80			
420	U108	200000	Y	D80			
421	U109	200000	Y	D80			
422	U110	200000	Y	D80			
423	U111	200000	Y	D80			
424	U112	200000	Y	D80			
425	U113	200000	Y	D80			
426	U114	200000	Y	D80			
427	U115	200000	Y	D80			
428	U116	200000	Y	D80			
429	U117	200000	Y	D80			
430	U118	200000	Y	D80			
431	U119	200000	Y	D80			
432	U120	200000	Y	D80			
433	U121	200000	Y	D80			
434	U122	200000	Y	D80			
435	U123	200000	Y	D80			
436	U124	200000	Y	D80			
437	U125	200000	Y	D80			
438	U126	200000	Y	D80			
439	U127	200000	Y	D80			
440	U128	200000	Y	D80			
441	U129	200000	Y	D80			
442	U130	200000	Y	D80			
443	U131	200000	Y	D80			
444	U132	200000	Y	D80			
445	U133	200000	Y	D80			
446	U134	200000	Y	D80			
447	U135	200000	Y	D80			
448	U136	200000	Y	D80			
449	U137	200000	Y	D80			
450	U138	200000	Y	D80			
451	U140	200000	Y	D80			
452	U141	200000	Y	D80			
453	U142	200000	Y	D80			
454	U143	200000	Y	D80			
455	U144	200000	Y	D80			
456	U145	200000	Y	D80			
457	U146	200000	Y	D80			
458	U147	200000	Y	D80			
459	U148	200000	Y	D80			
460	U149	200000	Y	D80			
461	U150	200000	Y	D80			
462	U151	200000	Y	D80			
463	U152	200000	Y	D80			
464	U153	200000	Y	D80			
465	U154	200000	Y	D80			
466	U155	200000	Y	D80			
467	U156	200000	Y	D80			
468	U157	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
469	U158	200000	Y	D80			
470	U159	200000	Y	D80			
471	U160	200000	Y	D80			
472	U161	200000	Y	D80			
473	U162	200000	Y	D80			
474	U163	200000	Y	D80			
475	U164	200000	Y	D80			
476	U165	200000	Y	D80			
477	U166	200000	Y	D80			
478	U167	200000	Y	D80			
479	U168	200000	Y	D80			
480	U169	200000	Y	D80			
481	U170	200000	Y	D80			
482	U171	200000	Y	D80			
483	U172	200000	Y	D80			
484	U173	200000	Y	D80			
485	U174	200000	Y	D80			
486	U176	200000	Y	D80			
487	U177	200000	Y	D80			
488	U178	200000	Y	D80			
489	U179	200000	Y	D80			
490	U180	200000	Y	D80			
491	U181	200000	Y	D80			
492	U182	200000	Y	D80			
493	U183	200000	Y	D80			
494	U184	200000	Y	D80			
495	U185	200000	Y	D80			
496	U186	200000	Y	D80			
497	U187	200000	Y	D80			
498	U188	200000	Y	D80			
499	U189	200000	Y	D80			
500	U190	200000	Y	D80			
501	U191	200000	Y	D80			
502	U192	200000	Y	D80			
503	U193	200000	Y	D80			
504	U194	200000	Y	D80			
505	U196	200000	Y	D80			
506	U197	200000	Y	D80			
507	U200	200000	Y	D80			
508	U201	200000	Y	D80			
509	U202	200000	Y	D80			
510	U203	200000	Y	D80			
511	U204	200000	Y	D80			
512	U205	200000	Y	D80			
513	U206	200000	Y	D80			
514	U207	200000	Y	D80			
515	U208	200000	Y	D80			
516	U209	200000	Y	D80			
517	U210	200000	Y	D80			
518	U211	200000	Y	D80			
519	U213	200000	Y	D80			
520	U214	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
521	U215	200000	Y	D80			
522	U216	200000	Y	D80			
523	U217	200000	Y	D80			
524	U218	200000	Y	D80			
525	U219	200000	Y	D80			
526	U220	200000	Y	D80			
527	U221	200000	Y	D80			
528	U222	200000	Y	D80			
529	U223	200000	Y	D80			
530	U225	200000	Y	D80			
531	U226	200000	Y	D80			
532	U227	200000	Y	D80			
533	U228	200000	Y	D80			
534	U234	200000	Y	D80			
535	U235	200000	Y	D80			
536	U236	200000	Y	D80			
537	U237	200000	Y	D80			
538	U238	200000	Y	D80			
539	U239	200000	Y	D80			
540	U240	200000	Y	D80			
541	U243	200000	Y	D80			
542	U244	200000	Y	D80			
543	U246	200000	Y	D80			
544	U247	200000	Y	D80			
545	U248	200000	Y	D80			
546	U249	200000	Y	D80			
547	U271	200000	Y	D80			
548	U278	200000	Y	D80			
549	U279	200000	Y	D80			
550	U280	200000	Y	D80			
551	U328	200000	Y	D80			
552	U353	200000	Y	D80			
553	U359	200000	Y	D80			
554	U364	200000	Y	D80			
555	U367	200000	Y	D80			
556	U372	200000	Y	D80			
557	U373	200000	Y	D80			
558	U387	200000	Y	D80			
559	U389	200000	Y	D80			
560	U394	200000	Y	D80			
561	U395	200000	Y	D80			
562	U404	200000	Y	D80			
563	U409	200000	Y	D80			
564	U410	200000	Y	D80			
565	U411	200000	Y	D80			
566	001S	200000	Y	D80			
567	002S	200000	Y	D81			
568	003S	200000	Y	D82			
569	004S	200000	Y	D83			
570	005S	200000	Y	D84			
571	006S	200000	Y	D85			
572	007S	200000	Y	D86			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
573	001K	200000	Y	D80			
574	002K	200000	Y	D80			
575	001U	200000	Y	D80			
576	002U	200000	Y	D80			
577	003U	200000	Y	D80			
578	004U	200000	Y	D80			
579	005U	200000	Y	D80			
580	006U	200000	Y	D80			
581	007U	200000	Y	D80			
582	008U	200000	Y	D80			
583	009U	200000	Y	D80			
584	011U	200000	Y	D80			
585	012U	200000	Y	D80			
586	013U	200000	Y	D80			
587	014U	200000	Y	D80			
588	015U	200000	Y	D80			
589	016U	200000	Y	D80			
590	017U	200000	Y	D80			
591	020U	200000	Y	D80			
592	021U	200000	Y	D80			
593	022U	200000	Y	D80			
594	023U	200000	Y	D80			
595	024U	200000	Y	D80			
596	025U	200000	Y	D80			
597	027U	200000	Y	D80			
598	028U	200000	Y	D80			
599	029U	200000	Y	D80			
600	030U	200000	Y	D80			
601	031U	200000	Y	D80			
602	032U	200000	Y	D80			
603	033U	200000	Y	D80			
604	034U	200000	Y	D80			
605	036U	200000	Y	D80			
606	037U	200000	Y	D80			
607	038U	200000	Y	D80			
608	040U	200000	Y	D80			
609	041U	200000	Y	D80			
610	042U	200000	Y	D80			
611	043U	200000	Y	D80			
612	044U	200000	Y	D80			
613	046U	200000	Y	D80			
614	047U	200000	Y	D80			
615	048U	200000	Y	D80			
616	049U	200000	Y	D80			
617	050U	200000	Y	D80			
618	051U	200000	Y	D80			
619	052U	200000	Y	D80			
620	054U	200000	Y	D80			
621	055U	200000	Y	D80			
622	056U	200000	Y	D80			
623	057U	200000	Y	D80			
624	058U	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
625	059U	200000	Y	D80			
626	061U	200000	Y	D80			
627	063U	200000	Y	D80			
628	064U	200000	Y	D80			
629	065U	200000	Y	D80			
630	068U	200000	Y	D80			
631	070U	200000	Y	D80			
632	071U	200000	Y	D80			
633	072U	200000	Y	D80			
634	073U	200000	Y	D80			
635	074U	200000	Y	D80			
636	075U	200000	Y	D80			
637	076U	200000	Y	D80			
638	077U	200000	Y	D80			
639	078U	200000	Y	D80			
640	079U	200000	Y	D80			
641	080U	200000	Y	D80			
642	082U	200000	Y	D80			
643	083U	200000	Y	D80			
644	086U	200000	Y	D80			
645	088U	200000	Y	D80			
646	089U	200000	Y	D80			
647	090U	200000	Y	D80			
648	092U	200000	Y	D80			
649	093U	200000	Y	D80			
650	094U	200000	Y	D80			
651	095U	200000	Y	D80			
652	096U	200000	Y	D80			
653	097U	200000	Y	D80			
654	098U	200000	Y	D80			
655	099U	200000	Y	D80			
656	100U	200000	Y	D80			
657	101U	200000	Y	D80			
658	102U	200000	Y	D80			
659	103U	200000	Y	D80			
660	104U	200000	Y	D80			
661	106U	200000	Y	D80			
662	108U	200000	Y	D80			
663	110U	200000	Y	D80			
664	111U	200000	Y	D80			
665	112U	200000	Y	D80			
666	113U	200000	Y	D80			
667	114U	200000	Y	D80			
668	115U	200000	Y	D80			
669	116U	200000	Y	D80			
670	117U	200000	Y	D80			
671	118U	200000	Y	D80			
672	119U	200000	Y	D80			
673	120U	200000	Y	D80			
674	121U	200000	Y	D80			
675	122U	200000	Y	D80			
676	124U	200000	Y	D80			

[R]Reacted

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
677	127U	200000	Y	D80			
678	128U	200000	Y	D80			
679	129U	200000	Y	D80			
680	131U	200000	Y	D80			
681	132U	200000	Y	D80			
682	134U	200000	Y	D80			
683	135U	200000	Y	D80			
684	136U	200000	Y	D80			
685	137U	200000	Y	D80			
686	138U	200000	Y	D80			
687	139U	200000	Y	D80			
688	140U	200000	Y	D80			
689	141U	200000	Y	D80			
690	142U	200000	Y	D80			
691	143U	200000	Y	D80			
692	144U	200000	Y	D80			
693	146U	200000	Y	D80			
694	147U	200000	Y	D80			
695	148U	200000	Y	D80			
696	150U	200000	Y	D80			
697	151U	200000	Y	D80			
698	152U	200000	Y	D80			
699	153U	200000	Y	D80			
700	154U	200000	Y	D80			
701	155U	200000	Y	D80			
702	157U	200000	Y	D80			
703	158U	200000	Y	D80			
704	159U	200000	Y	D80			
705	160U	200000	Y	D80			
706	161U	200000	Y	D80			
707	162U	200000	Y	D80			
708	163U	200000	Y	D80			
709	164U	200000	Y	D80			
710	165U	200000	Y	D80			
711	166U	200000	Y	D80			
712	167U	200000	Y	D80			
713	168U	200000	Y	D80			
714	169U	200000	Y	D80			
715	170U	200000	Y	D80			
716	171U	200000	Y	D80			
717	172U	200000	Y	D80			
718	173U	200000	Y	D80			
719	174U	200000	Y	D80			
720	175U	200000	Y	D80			
721	PCBs	200000	Y	D80			
722	CAMU-eligible	200000	Y	D80			

[R]Reacted

Residents of Wayne & Oakland County Attend Two FREE Workshops!

RSVP workshop title and date within one week of workshop to:
rsvp@allianceofrougecommunities.com or 734-272-0291

Sponsored by:

Alliance of Rouge Communities

OURS TO PROTECT

Working together, restoring the river

Septic System Maintenance Workshop

Learn about your septic system and how to maintain it.

Wayne County residents attend:
September 14, 2017, 6 pm - 8 pm
Otisville Sheldon Room, Van Buren Township Hall
46425 Tyler Road

Oakland County residents attend:
September 21, 2017, 6 pm - 8 pm
Wexford Hall, Farmington Hills Costick Center
28600 West Eleven Mile Road

Stewards of The Rouge River Workshop

Learn how you can protect water quality at home.

Wayne County residents attend:
October 11, 2017, 6 pm - 8 pm
Walnut Room, Summit on the Park, Canton
46000 Summit Parkway

Oakland County residents attend:
October 26, 2017, 6 pm - 8 pm
Public Library Meeting Room, West Bloomfield Twp.
4600 Walnut Lake Road

Help direct future activities - take our survey on Water Quality Changes in the Rouge River!
Completed surveys will be entered in a drawing for a $100 Visa gift card to be distributed in December 2017.
Survey Link: https://www.surveymonkey.com/r/PBKWV5H or if you don't have internet access call 734-272-0291

For more information go to: www.allianceofrougecommunities.com

Van Buren
CHARTER TOWNSHIP

FALL TREE PLANTING
W O R K S H O P

-September 30th, 2017 at 10:00 am-

Learn how to plant a tree the right way!

**Working with the Van Buren Township staff,
Alliance for Downriver Watersheds &
Citizen Foresters Detroit, volunteers will...**

- Help plant 30 trees at the VBT Water Tower
- Learn the right way to plant a tree
- Be part of an ongoing project to 'increase the green' in Metro Detroit

Please park at Township Hall and walk over to the Water Tower
46425 Tyler, Van Buren, MI 48111
To register or for more info, please call 734-699-8913

Alliance of Downriver Watersheds
OURS TO PROTECT