Appendix 4 Integrated Contingency Plan (One Plan)

APPENDIX 4
INTEGRATED CONTINGENCY PLAN

WM WASTE, INC.
21211 DURAND AVE.
UNION GROVE, WISCONSIN
EPA ID No. WIR000000356

FEBRUARY 2023

WM Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin 53182-9711
800.741.3343 or 262.878.2599
262.878.2699 Fax

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Quick Reference Guide

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Contingency Plan Quick Reference Guide

This Quick Reference Guide (QRG) has been prepared by WM Waste, Inc. (WM Waste) in accordance with NR 662.262(2) to provide local emergency responders with easy access to the most critical information for an immediate response to an event.

The regulatory requirements for the QRG are provided below with WM Waste's response in bold.

NR 662.262(2)

a. the types and names of hazardous wastes in layman's terms and the hazard associated with each hazardous waste present at any one time such as toxic paint waste, spent ignitable solvent, or corrosive acid.

WM Waste is licensed to accept all types of hazardous waste except reactive and dioxin-containing wastes.

b. the estimated maximum amount of each hazardous waste that may be present at any one time;

WM Waste has nine (9) licensed container storage areas as identified in the following table. The types and maximum quantities of waste stored in each area will vary depending on customer receipts; however, the quantities will not exceed the licensed capacities.

Storage Area Name	ID	Description	Capacity (Basis)
Licensed Container Storage Area #1	S-1	Container storage area in West Building	33,000 gal (600 55-gal equiv.)
Licensed Container Storage Area #2	S-2	Container storage area in West Building	7,480 gal (136 55-gal equiv.)
Licensed Container Storage Area #3	S-3	Container storage area in West Building	14,080 gal (256 55-gal equiv.)
Licensed Container Storage Area #4	S-4	Container Storage on west wall of East Building	14,080 gal (256 55-gal equiv.)
Licensed Container Storage Area #5	S-5	Container Storage in East Building	8,800 gal (160 55-gal equiv.)

Licensed Container Storage Area #6	**S-6**	**Flammable liquid container storage area adjacent to West Building in Receiving Yard**	**2,035 gal (37 55-gal equiv.)**
<90-day Accumulation Area	**N/A**	**Container storage area in East Building**	**N/A**
Licensed Container Storage Area #7	**S-7**	**Container storage area in West Building**	**4,400 gal (80 55-gal equiv.)**
Licensed Container Storage Area #8	**S-8**	**Container storage (roll-off) in south end of West Building**	**140 cubic yards (3 40 yd^3 roll-offs) and 8,800 gal (160 55-gal equiv.)**
Licensed Container Storage Area #12	**S-12**	**Container (roll-off) storage**	**320 cubic yards (8 40 yd^3 roll-off)**

c. the identification of any hazardous waste where exposure would require unique or special treatment by medical or hospital staff;

It is unlikely that there would be hazardous wastes where exposure would require unique or special treatment by medical or hospital staff. In any case, Chemtrec may be contacted for emergency treatment information at 1-800-424-9300.

d. a map of the facility showing areas where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes;

T**he locations of the above areas are depicted in Figure QRG-1.**

e. a street map of the facility in relation to surrounding businesses, schools, and residential areas to understand how best to get to the facility and also evacuate citizens and workers;

A street map of the facility in relation to surrounding businesses, schools, and residential areas is provided as Figure QRG-2.

f. the locations of water supply (e.g., fire hydrant and its flow rate);

A fire water hookup is located at the retention pond. Its location is depicted in Figure QRG-2.

g. the identification of on-site notification systems such as a fire alarm that rings off-site, or smoke alarms; and

In the event of an emergency, any person observing, involved with, or recognizing an emergency situation should identify the problem to the best of his/her ability and immediately contact one of the Emergency Coordinators listed below. The emergency coordinator shall then communicate the actual or imminent emergency to all facility

employees via the intercom and hand-held radio systems. The Emergency Coordinators shall also immediately determine whether emergency services via 911 are needed to respond to the identified situation.

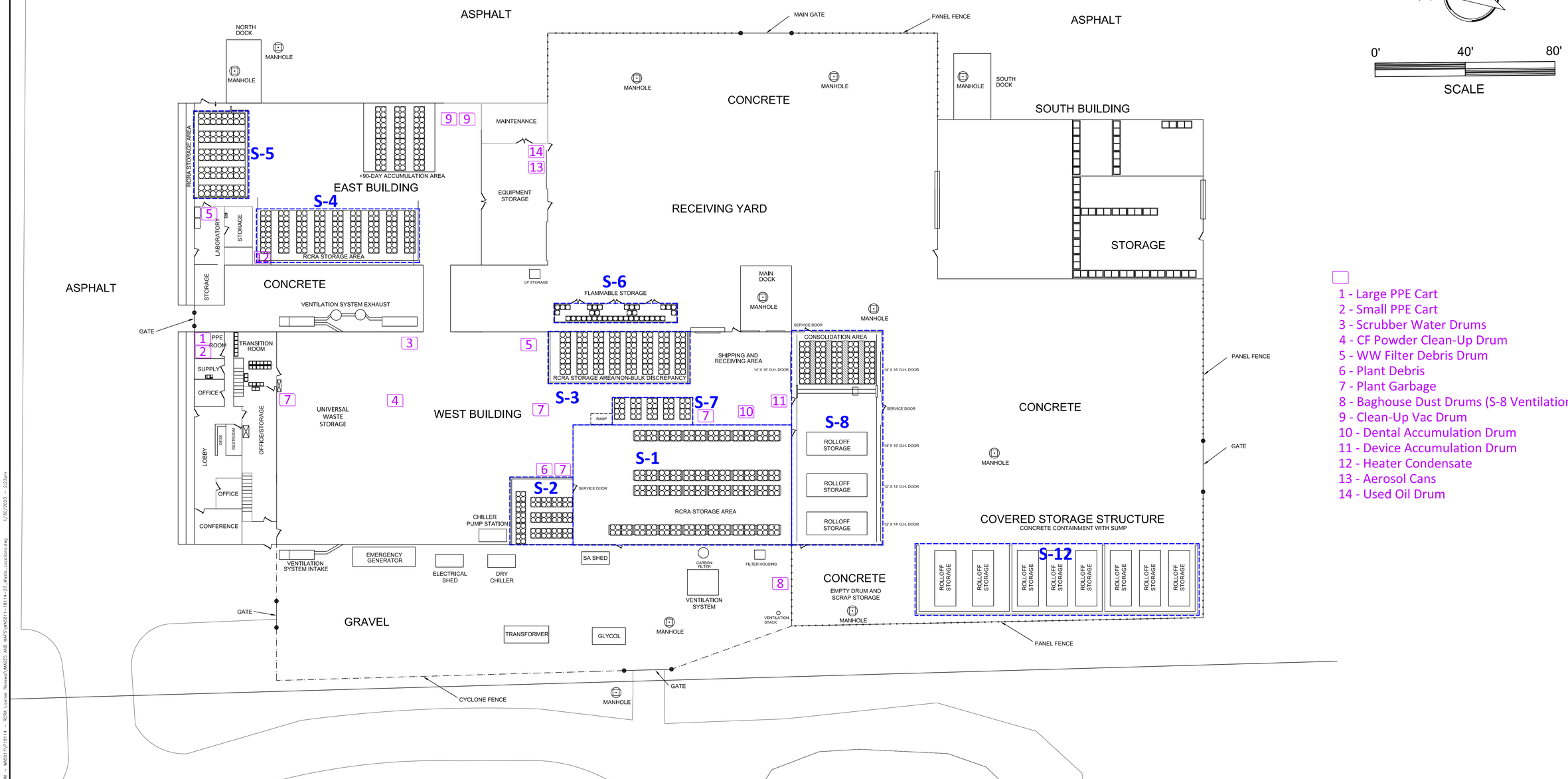
At least one of the Emergency Coordinators is available at all times (i.e., either on the premises or able to respond within a short period of time). The emergency coordinator and alternate emergency coordinator have been provided the appropriate training and have the requisite authority and experience to act as the emergency coordinator, and are authorized to commit company resources to address an emergency subject to this Plan.

h. the name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

Emergency Coordinators		
Primary Coordinator	**First Alternate Coordinator**	**Second Alternate Coordinator**
Steve Smolko	**Dan Knudson**	**Robert Lund**
Sr. Manager Operations	**Material Handler Sr – Hazardous Waste**	**Material Handler Sr – Hazardous Waste**
6015 Greenway Ln Mount Pleasant, WI 53406	**8639 33 Avenue Kenosha, WI 53142**	**324 Edward Street Burlington, WI 53105**
None	**None**	**262 - 763-0903 (Home)**
262-498-3072 (cell)	**262-496-5630 (cell)**	**None**

FIGURE QRG-1

LICENSED STORAGE AREAS



1 - Large PPE Cart
2 - Small PPE Cart
3 - Scrubber Water Drums
4 - CF Powder Clean-Up Drum
5 - WW Filter Debris Drum
6 - Plant Debris
7 - Plant Garbage
8 - Baghouse Dust Drums (S-8 Ventilation System)
9 - Clean-Up Vac Drum
10 - Dental Accumulation Drum
11 - Device Accumulation Drum
12 - Heater Condensate
13 - Aerosol Cans
14 - Used Oil Drum

LEGEND

- LICENSED CONTAINER STORAGE AREA
- DRUMS
- PANEL FENCING
- CYCLONE FENCING

Unit	Capacity	
S-1	33,000 gal.	600 55-gal. Drum Equivalent (DE)
S-2	7,480 gal.	136 55-gal. DE
S-3	14,080 gal.	256 55-gal. DE
S-4	14,080 gal.	256 55-gal. DE
S-5	8,800 gal.	160 55-gal. DE
S-6	2,035 gal.	37 55-gal. DE
S-7	4,400 gal.	80 55-gal. DE
S-8	120 Cu. Yds. and 8,800 gal.	(3) 40-yd rolloff equivalents and 160 55-gal. DE
S-12	320 Cu. Yds.	(8) 40-yd rolloff equivalents

Basemap from Waste Management.

WM Waste, Inc.
Union Grove, Wisconsin

Waste Locations

Racine County, WI

CK Associates Environmental Consultants

Drawn:	CAL	Checked:	BHR
Date:	1/30/2023	Approved:	LEC
Dwg. No.:	WA5011-18114-27		Figure QRG-1

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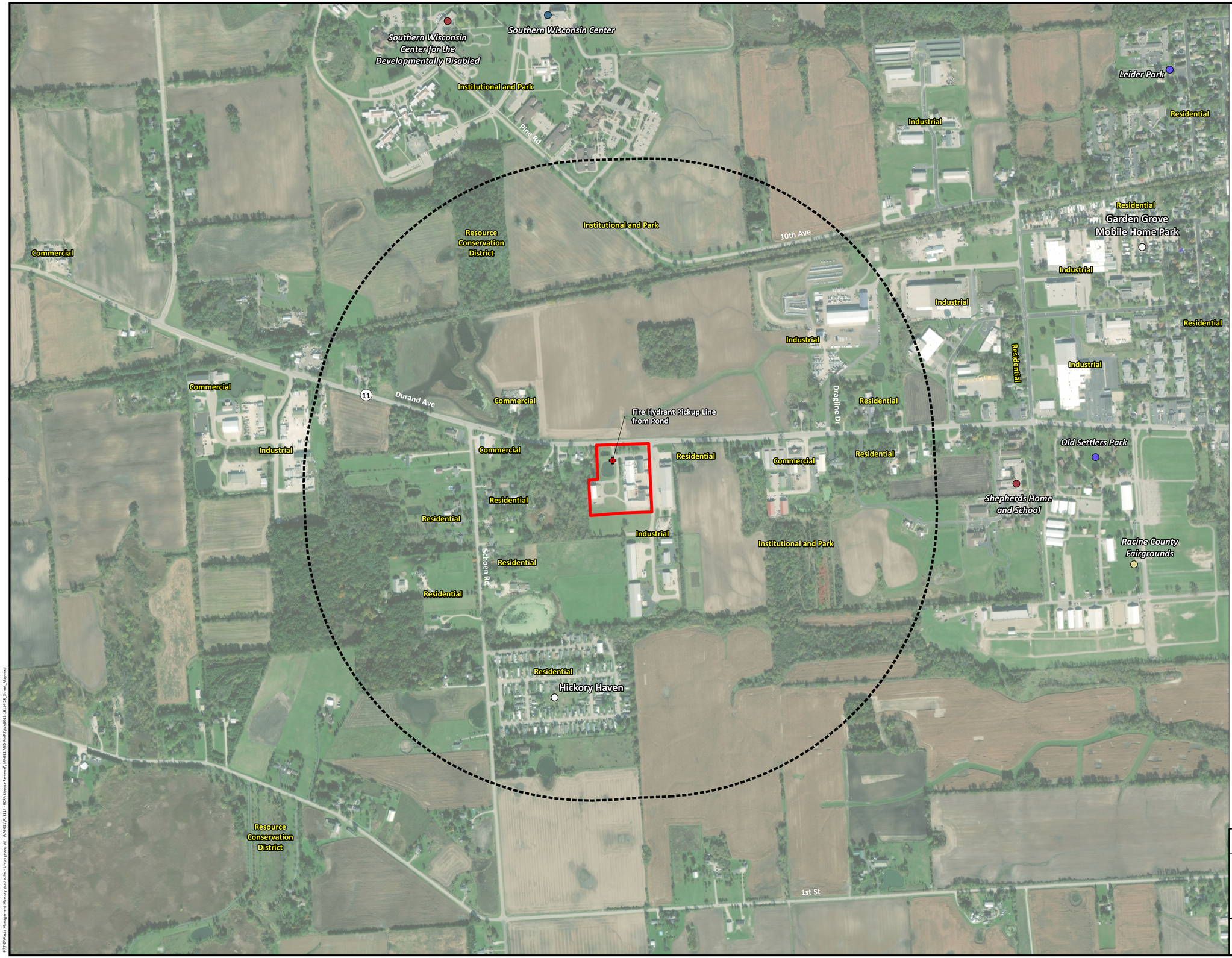
FIGURE QRG-2

STREET MAP



N

S

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Feet

Racine County

Legend

- Populated Place
- Building
- Locale
- Park
- School
- Facility Boundary
- 1/2-Mile Buffer

ESRI: World Transportation, Imagery: Vivid Maxar 10/20/2019
Racine County Zoning Authority

WM Waste, Inc.
Union Grove, Wisconsin

Street Map

Racine County, WI

CK Associates Environmental Consultants

Drawn: CAL	Checked: BHR
Date: 12/18/2020	Approved: RTK
Dwg. No.: WA5011-18114-28	**Figure QRG-2**

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4-1.0 Plan Introduction Elements

4-1.1 Purpose and Scope of Plan Coverage

This Integrated Contingency Plan (ICP) has been prepared to meet the requirements of the Wisconsin Department of Natural Resources (WDNR) regulations for preparation of a RCRA Contingency Plan [NR 664.0050 - 664.0056], the Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) requirements [40 CFR 112], and the Toxic Substance Control Act PCB regulations [761.65(c)(l)(iv)]. The use of the ICP format ensures ready use and organization of the document.

This ICP also addresses WM Waste, Inc. (WM Waste) compliance with the OSHA Hazardous Waste Operations Emergency Response Program in accordance with 29 CFR 1910.120, which requires an Emergency Response Plan to be developed and implemented by all employers. In addition, this procedure is written to assure compliance with several other OSHA regulations in 29 CFR 1910 including Design of Exit Routes (1910.36); Maintenance of Exit Routes (1910.37); Emergency Action Plans (1910.38); Fire Prevention Plans (1910.39); Portable Fire Extinguishers (1910.157); and Employee Alarm Systems (1910.165).

The RCRA Contingency Plan is required as part of the requirements for WM Waste's submission of a license reissuance application for a hazardous waste storage permit.

WM Waste does not formally require an SPCC Plan since the inventory of "oil" that meets the definition of 40 CFR 112.2 does not exceed the 1,320 gallons inventory threshold. However, WM Waste has elected to prepare this ICP consistent with the SPCC requirements. This ICP documents conformance with the SPCC Plan regulatory requirements.

Operation Description

WM Waste operates a commercial hazardous waste storage facility that stores and consolidates containers of various hazardous and universal wastes. For this ICP, facility is defined as the structures and improvements used for hazardous waste storage. Hazardous wastes are stored in licensed container storage areas prior to shipment to off-site, appropriately permitted/licensed treatment, storage and disposal facilities.

Site Location

The site (i.e., the property upon which the facility is located) is located on the south side of State Trunk Highway 11 (21211 Durand Avenue) in the Town of Dover, Racine County, Wisconsin, just west of the Village of Union Grove, Wisconsin. The site is surrounded by agricultural land to the north, light industry to the south, and light industrial/residential land to the east and west. Commercial development increases to the east along Durand Avenue toward Union Grove. The town of Union Grove (population of approximately 5,000) is located

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approximately one-half mile east of the site. The estimated population around the site is approximately 1,909 people within 1 mile, and 7,978 people within 3 miles, according to the U.S. Census Bureau, 2019 American Community Survey. The site rises slightly from south to north and is characterized by relatively flat topography. The elevation of the site is approximately 835 feet national geodetic vertical datum . The operating areas of the facility are enclosed within a fence and or wall system to prevent unauthorized access to the subject material. The waste storage areas are fully lit to assist in discovery of potential releases.

Site Buildings

The WM Waste site is comprised of four buildings as shown in **Figure 4-1**. The buildings are the West, East, South, and the Admin Buildings. Each of these buildings is described below.

1. West Building

The West Building has a total area of about 18,000 square feet and houses the following operations.

- shipping and receiving dock;
- five (5) licensed container storage areas (S-1, S-2, S-3, S-7, and S-8);
- universal and generator waste storage;
- offices and conference room;
- control room;
- transition room; and
- employee locker rooms and breakroom.

The Offices, Control Room, Break Room, and Transition Room are separated by walls from the operation areas and have separate air handling systems.

2. East Building

The East Building has an area of about 7,200 square feet and houses the following operations.

- two (2) licensed container storage areas (S-4 and S-5);
- maintenance shop.

The East Building is divided by walls into three separate areas. An enclosed hallway connects the East and West Buildings.

3. South Building

The South Building has an area of approximately 6,000 square feet and houses the a general storage area.

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4. Admin Building

The Admin Building has an area of approximately 7,200 square feet. The building is broken into two equal halves. One half is used for equipment storage. The other half houses the WM Waste maintenance shop and an Incident Command Center. In the event of an emergency requiring implementation of this Plan, this location will act as an incident command center for both WM Waste and Fire Department personnel and is stocked with computer equipment to remotely operate the processing equipment, emergency response equipment, and documentation materials needed to respond to an incident within the processing buildings.

Waste Storage Areas

Container Storage Area Designation	Gallons	Cubic Yards	Location
S-1	33,000		West Bldg.
S-2	7,480		West Bldg.
S-3	14,080		West Bldg.
S-4	14,080		East Bldg.
S-5	8,800		East Bldg.
S-6	2,035		Receiving Yard
S-7	4,400		West Bldg.
S-8	8,800	120	West Bldg.
S-12		320	Outdoor Shed
TOTAL	92,675	440	

Soils and Groundwater

Shallow surface soils from 0 to 2 feet beneath ground surface (bgs) at the site have been classified by the Unified Soil Classification System as silt loam (ML-CL), silty clay (CH), and clay loam (CL). The uppermost bedrock at the site is a Silurian age dolomite located about 180 feet bgs and includes the Cayugan; Niagaran, and Alexandrian series.

The depth to useable groundwater at the site is estimated to be between 60 and 80 feet bgs with intermittent perched water occurring at depths between 5 and 15 feet bgs.

Storm Water and Surface Water

Surface (storm) water from the active portions of the facility is drained from the site to a stormwater retention basin west of the West Building. Each loading dock is constructed of concrete and is provided with a drain valve that is kept closed to contain and hold storm water until it can be released after inspection which confirms that there is no visible sheen or hazardous waste is present in the storm water. The loading dock drains are connected to

underground storm water sewer lines, which carry the storm water to the retention basin. In addition, several catch basins/manholes at the site convey storm water through an underground line to the stormwater retention basin. The locations of the drains are depicted in **Figure 4-1**. The catch basins and manholes associated with this system are periodically emptied of collected grit and solids and the collected material containerized for characterization and disposal. The West Branch Root River and Des Plaines River are located more than one mile to the east and southeast of WM Waste, respectively. Eagle Lake is located approximately three miles northwest of the site. Eagle Lake is a small lake that is used for recreational purposes. No other surface waters or other sensitive areas including wetlands, floodplains, springs, etc., were noted within one mile of the site.

Nature of Hazards or Events

The Integrated Contingency Plan will be applicable to the following situations:

a. Fire and/or Explosion

i. A fire that causes the release of potentially hazardous materials.
ii. A fire that spreads and could possibly ignite materials at other locations on site or could cause heat-induced explosions.
iii. A fire that could possibly spread to off-site areas.
iv. Use of water and chemical fire suppressants that could result in contaminated run off.
v. There is an imminent danger that an explosion could occur causing a safety hazard because of flying fragments.
vi. There is an imminent danger that an explosion could ignite other hazardous waste at the facility.
vii. There is an imminent danger that an explosion could result in a release of hazardous material.
viii. An explosion that has occurred.

b. Spills or Material Releases

i. A spill that could result in a release of liquids or vapors that could cause the need for evacuation. A spill that could cause the release of hazardous liquids off-site.
ii. A spill that can be contained on site, but with a potential for soil contamination.
iii. A spill that cannot be contained on site, resulting in off-site soil and/or surface water contamination.
iv. All potential releases are expected to remain on site due to the combination of containment measures and site drainage to the on-site stormwater retention basin.

c. Natural Disaster

i. A tornado that has damaged hazardous waste management facility property.
ii. An earthquake that has occurred and has damaged the facility.
iii. Severe thunderstorms that have occurred and caused a release of hazardous waste at the facility.

d. Civil Unrest

i. The facility is involved in a violent labor strike resulting in damage to the hazardous waste management facility.
ii. The facility's security has been breached by individuals intent on sabotage.

e. Bomb Threat

i. An employee or outside caller makes a bomb threat against the facility.

f. Workplace Violence

i. An employee threatens or commits workplace violence at the facility.

g. Electrical Power Outage

i. Facility power is lost or interrupted.

h. Injury/Illness

i. An employee, visitor, or contractor becomes seriously ill or is seriously injured at the facility such that emergency medical services are needed.

4-1.2 General Facility Identification Information

a. Facility name
WM Waste, Inc.

b. Owner/operator/agent
Land owners:

WM Waste, Inc.
21211 Durand Ave.
Union Grove, WI 53182

c. Physical address of the facility

21211 Durand Avenue Union Grove, WI 53182
Latitude: 42.681635
Longitude: -88.07678

d. Township and Range

NE ¼ of Section 36, Township 3 North, Range 20 East Town of Dover, Racine County, Wisconsin

e. Key contact for plan development, maintenance, and discharge prevention

Steve Smolko
21211 Durand Avenue Union Grove, WI 53182
(262) 878-2599
ssmolko@wm.com

f. Facility phone numbers

(800) 741-3343
(262) 878-2599
(262) 878-2699 (fax)

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4-2.0 Core Plan Elements

4-2.1 Discovery

In the event of an emergency, any person observing, involved with, or recognizing an emergency situation will identify the problem to the best of his/her ability and immediately contact one of the Emergency Coordinators. Refer to Section 4-3.2.1 Internal notifications.

4-2.2 Initial Response

In the event of an emergency, the emergency coordinator shall Communicate the actual or imminent emergency to all facility employees via the intercom and hand-held radio systems and assess the actual or potential hazards to human health or the environment.

The following procedures below are used to deal with any emergency that may arise. Section 4-3-10 provides specific guidance for emergency response presented for each chemical class in the WM Waste facility.

4-2.3 Emergency Action Procedure A: Fire and/or Explosion

Fire trucks and emergency vehicles can access all portions of the facility from Durand Avenue via the driveways east and west of the WM Waste facility

The Emergency Coordinator shall initiate the following steps:

1. Communicate the actual or imminent emergency to all facility employees via the intercom and hand-held radio systems.
2. Assess the actual or potential hazards to human health or the environment
3. Contact the appropriate emergency contacts listed in Tables 4-3.2.2-1 and 4-3.2.2-2, if the required response is beyond facility capabilities.
4. Control access to the area--clear all personnel from the area who are not actively involved in fighting the fire or responding to the explosion. These persons are to report to the designated upwind rally point, depending on wind direction) via the evacuation routes depicted on **Figure 4-1**.
5. Direct all semi-truck drivers to move their trailers to allow fire department unfettered access.
6. Immediately discontinue work with hazardous waste in all areas.
7. Shut down all feed lines, including power, as necessary and practical.
8. Extinguish fire with portable fire extinguishers, if possible, or take other immediate action to mitigate the emergency until the Fire Department arrives.
9. If possible, remove all injured persons and administer appropriate first aid medical treatment. (Medical treatment will be administered by qualified personnel.)

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10. Take all reasonable measures necessary to ensure that subsequent fires, explosions, or releases do not occur or spread to other areas of the plant.
11. Follow the appropriate Action Procedure if fire or explosion causes the release of any harmful substance.
12. Deploy additional manpower and equipment as required.
13. Document the emergency event and response.
14. Continually re-evaluate the situation for changes in conditions that warrant changes in response tactics.

Fire extinguishers at WM Waste are the basic dry chemical fire extinguisher type. In order to operate you can follow the PASS SYSTEM.

In the event of a fire, the following procedures should be taken

P	Pull the pin
A	Aim the extinguisher at the base of the fire
S	Squeeze the trigger while holding the extinguisher upright
S	Sweep the extinguisher nozzle from side to side covering the base area of the fire

If the fire requires more than one fire extinguisher, call 911 for the Town of Dover (Kansasville) Fire Department

SEE RESPONSE SHEET FOR SPECIFIC FIRE FIGHTING TECHNIQUES IN SECTION 4-3.10.

4-2.4 Emergency Action Procedure B: Spills or Material Release

Upon discovery of any spill, the Emergency Coordinator will initiate the following steps:

A. Evaluate Emergency:

A. Identify material spilled or released.
B. Identify location of the release or spillage of hazardous material.
C. Estimate the quantity released and the rate at which it is being released.
D. Determine the direction in which the spill or vapor or smoke release is heading.
E. Identify and evaluate any injuries involved.
F. Determine if there is a fire and/or explosion or possibility of these events occurring.

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G. Determine the capability to mitigate with in-plant personnel.

2. **Notify the appropriate Emergency Contacts** in **Tables** 4-3.2.2-1 and 4-3.2.2-2 if the incident response required is beyond plant capabilities.

3. **Control access to the area**- evacuate if necessary. Establish an area of isolation around the spill.

4. **Contain Spill/Confine Danger**

A. Identify spilled material and have employees suited in appropriate PPE.
B. Contain and absorb spilled material with solid adsorbents (sawdust or floor dry). Containerize used absorbent for proper disposal.
C. Minimize migration or run-off of spilled material, if necessary, by creating berms, channels, or dikes using sawdust or floor-dry.
D. In the event that a leaking drum is identified, carefully remove it from its location using a forklift and place it into a recovery or over-pack drum. The leaked materials will be collected as follows:

- wastes that are in solid form will be swept together for collection and placement into a secure drum;

- wastes containing oil or liquids will be covered with oil-dry clay absorbent, collected and shoveled into a secure drum.

E. Decontaminate the area which contacted the waste.

F. Incompatible wastes shall not be stored until cleanup is completed.

Outgoing wastes will be analyzed in accordance with WM Waste's Waste Analysis Plan before shipment for off-site treatment or disposal.

5. **Eliminate Ignition Sources**

Starting with downwind areas, eliminate all sources of heat, open flame, sparks, or friction both indoors and out. Use non-sparking tools for spills clean up.

6. **Document the Emergency Event**

SEE RESPONSE SHEET FOR SPECIFIC FIRE FIGHTING TECHNIQUES IN SECTION 4-3.10.

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4-2.5 Emergency Action Procedure C: Natural Disasters

This procedure will be followed in the event of any emergency caused by severe weather (tornadoes, earthquakes, high-intensity thunderstorms, floods, etc.).

The WM Waste Emergency Coordinator will direct and control the following actions if they can be accomplished without endangering the lives of WM Waste personnel:

1. Discontinue any processes that may be impacted by severe weather conditions.
2. Close any open containers; secure all containers to the extent practicable.
3. Close all doors and windows.
4. Instruct employees to proceed to safe and secure areas of the facility.
    i. Administrative Office Personnel
    Upon notification of a tornado warning, office personnel are to take shelter in the Men's & Women's locker rooms
        1. No one is allowed to leave the building.
        2. Keep calm.
        3. Shut off power to machines, if it can be done safely.
        4. Stay clear of windows.

    ii. Plant Personnel
    NOTE: A Weather Alert Radio is located in the Control Room.
    Upon notification of a tornado warning, plant personnel are to take shelter in one of the following areas:
        - Transition Room
        - Office Hallway - close the exterior office doors

        1. No one is allowed to leave the building.
        2. Keep calm.
        3. Shut off power to machines, if it can be done safely.
        4. Stay clear of windows.

4-2.6 Emergency Action Procedure D: Civil Unrest

This procedure will be followed if the WM Waste facility is subject to civil disturbance. The WM Waste Emergency Coordinator will initiate the following actions:

1. Secure all facility entrances to control access to or exiting from the buildings by either demonstrators or WM Waste employees.
2. Notify local law enforcement authorities by dialing 911. Authorities should be notified, but summoned to take action only as a last resort. There should be an agreement upon conditions under which outside authorities will be summoned. WM Waste employees should be made aware of any planned police action.

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3. Approach demonstrators to inform them that WM Waste does not allow such activity on its premises, if necessary. They should be requested to leave in a restrained and courteous manner.
4. Allow authorities to handle the situation and consult the legal department for further guidance.
5. Communications: Delay as long as possible the widespread communication of the threatened activity in order to avoid the possibility that additional communication may complicate or aggravate the situation. During an actual demonstration, direct communications between demonstrators and facility management and/or employees should be kept to a minimum.

4-2.7 Emergency Action Procedure E: Bomb Threat

This procedure will be followed if the WM Waste facility is subject to a bomb threat. The WM Waste Emergency Coordinator will initiate the following actions:

Personnel receiving telephone call of bomb threat should note the subjects as listed in the Bomb Threat Worksheet (next page) the following procedures should be followed

1. Try to keep the person on the phone as long as possible.
2. Remain calm, pay attention to the speech pattern and other remarks by the caller.
3. If possible, notify a co-worker to contact the Racine County Sheriff (for a possible trace of the call).
4. Evacuate the building as orderly as possible and assemble at the meeting area.
5. No one is allowed to leave the area; all workforce members are to be accounted for.

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TELEPHONE BOMB THREAT FORM			
Stay calm get as much information as you can and do not hang up the line used in the threat. Immediately report the threat to your local Law Enforcement.			
Date:	Time:	Length of Call:	Number rec'd. on:
ASK THESE QUESTIONS: 1. When will the bomb explode? 2. Where is it right now? 3. What does it look like? 4. What kind of bomb is it? 5. What will cause it to explode? 6. Did you place the bomb? 7. Why? 8. What is your address? 9. What is your name?		DESCRIBE CALLERS VOICE: ___Calm ___Nasal ___Angry ___Stutter ___Excited ___Lisp ___Slow ___Raspy ___Rapid ___Deep ___Soft ___Ragged ___Loud ___Clearing throat ___Laughter ___Crying ___Deep ___Normal Breathing ___Distinct voice ___Slurred accent ___Disguised ___Cracking ___Whisper ___Familiar If voice is familiar, who did it sound like?	
EXACT WORDING (Use back, if necessary)		BACKGROUND SOUNDS: ___Street ___Factory noises or machines ___Crockery ___Animal Noises ___Voices ___Clear ___PA System ___Static ___Music ___Office ___House ___Other noises	
Caller's sex: ___ Race: ___ Age: ___ Threat Language: ___ Well Spoken (educated) ___Incoherent ___Foul ___Taped message read ___Irrational by threat maker		REPORT CALL IMMEDIATELY TO: Sheriff's Office: 911 Name _____ Position _____ Ph. No. _____	

4-2.8 Emergency Action Procedure F: Workplace Violence

This procedure will be followed if the WM Waste facility is subject to workplace violence. The

WM Waste Emergency Coordinator will initiate the following actions:

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1. Evacuate the building as quickly and calmly as possible.
2. Call 911 for emergency assistance - try to describe the situation as best as possible.
3. Noting - Person I Location / Situation / Visible Weapon

4-2.9 Emergency Action Procedure G: Electrical Power Outage

This procedure will be followed if the WM Waste facility is subject to an electrical power outage.

Following an interruption of electricity supply to the facility, the emergency generator will automatically engage to maintain operation of the following primary systems:

- supplied air drier;
- supplied air compressor;
- plant ventilation unit - blowers/motor;
- emergency lights;
- water pump; and
- all 110-volt outlets.

In the event of an electrical power outage, all plant personnel will switch off any equipment that they may be operating. All personnel will remain at their workstation until otherwise directed by supervision.

When electrical power fails, supervisors should check equipment in their areas to ensure that power is shut off and emergency lights are working. Supervisors are to then account for all technicians reporting to them and direct them to proceed to the Control Room (if required) until management gives further instructions.

All personnel will remain on site during a power outage unless otherwise directed by management.

4-2.10 Sustained Actions

In the event that actions to address an event are required beyond the time of the initial response, the facility will conduct response and cleanup activities consistent with remediation activities.

4-2.11 Termination and Follow-Up Actions

4-2.11.1 Emergency Action Procedure: Fire and/or Explosion

1. Investigate and determine the cause of the fire.

2. Review this Plan to determine if changes need to be made to prevent similar future occurrences.
3. Assess the effectiveness of this Plan.
4. Written reports requiring 15-day notification may be required. Refer to Section 4-3.2.3.

4-2.11.2 Emergency Action Procedure: Spills and/or Material Release

1. In the event of a spill requiring cleanup, all emergency equipment will be decontaminated, inspected, replaced, or refilled to ensure availability of said materials before restarting operations. Decontamination of reusable equipment will be accomplished with an appropriate cleaning agent. Personnel decontamination will be accomplished through doffing of emergency response equipment (for decontamination), doffing of personal protective equipment (into containers for proper disposal), and removal of soiled facility uniforms (to be laundered appropriately). Emergency decontamination may be necessary if a worker shows signs of acute chemical exposure.
2. Investigate the cause of the spill.
3. Review this Plan to determine if changes need to be made to prevent similar future occurrences.
4. Assess the effectiveness of this Plan.
5. Written reports requiring 15-day notification may be required. Refer to Section 4-3.2.3.
6. The Emergency Coordinator will notify WDNR and the appropriate state and local authorities that incompatible wastes have not been treated, stored or disposed of until cleanup procedures are completed and that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

Emergency Action Procedure C - G

1. In the event that Emergency Actions Procedures C through G outlined in Section 4-2.2 are initiated, review this Plan to determine if any changes need to be made.
2. Assess the effectiveness of this Plan in dealing with the applicable event.

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4-3.0 Annexes

4-3.1 Facility and Locality Information

4-3.1.1 Facility Maps and Drawings

See the following Figures attached to this ICP for information on the location and arrangement of operations at WM Waste and the evacuation routes and rally points.

Figure 4-1 Site Layout

4-3.1.2 Discharge Sources

There are no drains (other than sanitary sewer connections) from inside the buildings to the environment. Stormwater from the facility is discharged to a stormwater retention basin located on the west side of the West Building, on WM Waste property.

4-3.1.3 Emergency Shut-off Valves

The natural gas shut-off valve is located in the front courtyard by the ventilation unit between the East and West Buildings.

The emergency power shut-off to the building ventilation is located on the west side of the West Building by the emergency generator.

4-3.1.4 Response Equipment Location

WM Waste has placed a set of primary emergency response equipment outside of the operating areas, located in the Admin Building. The locations and types of this emergency equipment as well as emergency equipment located site-wide are included in **Figure 4-1**. Table 4-3.1.4 below provides a brief outline of the equipment capabilities.

Table 4-3.1.4: Emergency Response Equipment

Equipment	Capability	Location
Automatic External Defibrillator (AED)	Assistance with sudden cardiac arrest	See Figure 4-1
Contingency Plan	Describes emergency procedures	
Eye Bath	Quick flushing of eyes if exposed to injurious materials	
Eye Bath/Shower	Quick flushing of eyes if exposed to injurious materials	
Eye Wash	Quick flushing of eyes if exposed to injurious materials	

Equipment	Capability	Location
Emergency Coordinators Phone Numbers List	Provides quick contact information	
Personal Protective Equipment (outer gloves, glove liners, Tyvek suits, Tyvek shoe covers, goggles, face shields, safety glasses, respirators)	Minimizes exposure to hazards	
Self-Contained Breathing Apparatus (SCBA)	Provides breathable air in a dangerous atmosphere	
Spill Kit Drum	Contains equipment to control and cleanup leaks or spills	
Trauma Kit	Contains supplies to control bleeding and injuries	
First Aid Cabinet	Contains supplies used for giving emergency treatment to sick or injured person	
Safety Data Sheets	Lists information relating to occupational safety and health for substances and products	
Sodium Sulfate	For containing spills	
Portable Pressure Sprayer	For spraying down spills	
Absorbent materials (sawdust, oil-dry, clay absorbent floor-dry)	Used to absorb spills	
Shovels	For dispensing absorbent materials	
Recovery Drums	To enclose and protect leaking drums	
Polyethylene Sheeting	To provide temporary liner beneath drums	
Vacuum Pumps	Wet/dry vacuum with an 8-gallon capacity	
Portable ABC Fire Extinguishers	Used to extinguish or control small fires	
Evacuation Alarm	To signal plant evacuations	
Telephone/Intercom	Internal and external communications	

4-3.1.5 Environmentally Sensitive Locations

There are no environmentally sensitive areas identified by the Wisconsin DNR on the property.

The Region 5 Area Contingency Plan identifies the peregrine falcon as an endangered species within Racine County and Racine County has also been identified as a potential breeding ground for the threatened Eastern Prairie Fringe Orchid.

Lake Michigan is located 14 miles due east of the facility.

The headwaters to the Des Plains River are located about 1 mile to the southeast.

4-3.1.6 Economically Sensitive Locations

There are no economically sensitive areas within the vicinity of the WM Waste facility.

4-3.1.7 Human Population Sensitive Areas

The Southern Wisconsin Center for the Developmentally Disabled operated by the Wisconsin Department of Health Services, a Corrections Center and Girls School operated by the Wisconsin Department of Corrections, and a Veterans Affairs clinic operated by the Department of Veterans Affairs, are co-located on property located about 0.5 to 1 mile northwest of the facility.

The following schools are located within 2-miles of the WM Waste facility:

- Union Grove Elementary School, 1745 Milldrum Street, Union Grove, 262-878-2015 – 1.4 miles to the east.

- Union Grove High School - 3433 S. Colony Ave., Union Grove, 262-878-2434 – 1.5 miles to the northeast.

- Union Grove Christian School - 417 15th Ave., Union Grove, 262-878-1264 – 1.1 miles due east.

- Kansasville Grade School, 4101 South Beaumont Ave., Kansasville, 262-878- 3773 – 1.8 miles to the west.

The following Nursing Home is located within a 2-mile radius of the facility:

- Oak Ridge Care - Center 1400 8th Ave, Union Grove, 262-878-2788 – 1.1 miles to the east.

4-3.2 Notification

4-3.2.1 Internal Notifications

In the event of an emergency, any person observing, involved with, or recognizing an emergency situation should identify the problem to the best of his/her ability and immediately contact one of the Emergency Coordinators listed in Table 4-3.2.1 below. The emergency coordinator shall then communicate the actual or imminent emergency to all facility employees via the intercom and hand-held radio systems. The Emergency Coordinators shall also immediately determine whether emergency services via 911 are needed to respond to the identified situation.

At least one of the Emergency Coordinators is available at all times (i.e., either on the premises or able to respond within a short period of time). The emergency coordinator and alternate emergency coordinators have been provided the appropriate training and have the requisite experience to act as the emergency coordinator, and are authorized to commit company resources to address an emergency subject to this Plan.

Table 4-3.2.1: WM Waste Emergency Coordinators

Primary Coordinator	**First Alternate Coordinator**	**Second Alternate Coordinator**
Steve Smolko	Don Knudson	Robert Lund
Sr. Manager Operations	Material Handler Sr. – Hazardous Waste	Material Handler Sr. – Hazardous Waste
6015 Greenway LN Mount Pleasant, WI 53406	8639 33 Avenue Kenosha, WI 53142	324 Edward Street Burlington, WI 53105
262-498-3072 (Cell)	262-496-5630 (Cell)	262 -763-0903 (Home)

4-3.2.2 Community Notifications

When an incident occurs, the Emergency Coordinator must determine the type of emergency and its exact location and then notify the appropriate community organizations, as needed. Table 4-3.2.2-1 illustrates which agencies coordinate each type of emergency that could be encountered. Table 4-3.2.2-2 lists the contact information for each of these agencies.

Table 4-3.2.2-1: Coordinating Agencies

Organization	Purpose
Town of Dover (Kansasville) Fire Department	Fire/Explosion (primary)
Union Grove Fire Department	Fire/Explosion (support)
Burlington Fire Department	Fire/Explosion (support)
Memorial Hospital of Burlington	Injury/Illness
Union Grove/Yorkville Fire & Rescue	Ambulance
Union Grove Police (Racine County Sheriff)	Site Control/Evacuation
Racine County Office of Emergency Management	Evacuation
Racine County Sheriff's Office	Site Control/Evacuation/Bomb Threat
WE Energies	Electrical Power Outage

Table 4-3.2.2-2 - Emergency Response Organizations

Organization	Address	Telephone
Sheriff Racine County Sheriff's Office	717 Wisconsin Avenue Racine, WI 53403	262-636-3211
Ambulance Union Grove/Yorkville Fire & Rescue	700 Main Street Union Grove, WI 53182	262-878-4181
Fire Union Grove Fire Department Town of Dove (Kansasville) Fire Department City of Burlington Fire Department Town of Burlington Fire Department	700 Main Street Union Grove, WI 53182 23730 Durand Avenue Kansasville, WI 53139 165 West Washington Street Burlington, WI 53105 32288 Bushnell Road Burlington, WI 53105	262-878-4181 262-878-3811 262-763-7842 262-763-3070
Emergency: Management Racine County Office of Emergency Management Racine County Office of Emergency Management (LEPC) Wisconsin Division of Emergency Government (SEPC)	730 Wisconsin Avenue Racine, WI 53403	262-636-3515 262-636-3515 800-943-0003
Hospital Memorial Hospital of Burlington	252 McHenry Street Burlington, WI 53105	262-767-6102

Energy Supplier WE Energies	231 W. Michigan Street Milwaukee, WI 53203	414-221-2345 (office) 800-662-4PWR (4797) (electric emergency, power emergency) 800-261-LEAK (5325) (gas leak, odor, or emergency)

4-3.2.3 Federal and State Agency Notifications and Reports

WM Waste operates under many regulatory notification and reporting requirements. WM Waste has agreed to site-specific incident reporting requirements to satisfy both WDNR Spill and Hazardous Waste rule requirements. The reporting thresholds and reporting requirements, both immediate and written, are summarized below. Contact information for the federal and state agencies is included in Tables 4-3.2.2-1 and 4-3.2.2-2.

Immediate Notification Requirements

In accordance with NR 664.0056(4)(b), The emergency coordinator shall immediately the national response center (using its 24-hour toll free number 800-424-8802) and the division of emergency government (using its 24-hour toll free number 800-943-0003). The report shall include all of the following:

1. Name and telephone number of reporter.
2. Name and address of facility.
3. Time and type of incident (e.g., release, fire).
4. Name and quantity of materials involved, to the extent known.
5. The extent of injuries, if any.
6. The possible hazards to human health, or the environment, outside the facility.

Written Report Requirements

For all incidents requiring implementation of the Contingency Plan, WM Waste will submit a written report to both the WDNR-designated Hazardous Waste Inspector assigned to WM Waste and to the WDNR Southeast District Spills Coordinator within 15 days of the incident.

Written reports will contain the following information:

1. Name, address, and telephone number of the Emergency Coordinator
2. Name, address, and telephone number of the facility
3. Date, time, and type of incident (e.g., spill, fire or explosion)
4. Name and quantity of materials involved
5. Extent of injuries, if any

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6. Assessment of actual or potential hazards to human health or the environment, if applicable
7. Estimated quantity and disposition of recovered material that resulted from the incident
8. A narrative describing the known or suspected causes of the incident and a statement describing the measures taken to investigate the cause. The narrative shall also describe any necessary measures that have been or shall be taken to prevent incidents in the future.
9. Any amendments to the Contingency Plan required in section NR 630.22(l)(b) and (c), Wis. Adm. Code.

Notation to Operating Record

The WM Waste Emergency Coordinator will note in the operating record the date, time, and details of any incident that requires the implementation of the Integrated Contingency Plan and the submittal of a written report as described above.

When a fire or explosion occurs, WM Waste shall do the following:

1. Take photo documentation of the incident.
2. Identify the employees who have knowledge of, or were involved in the incident.
3. Retain and secure any data associated with the incident.
4. Retain and secure any equipment and/or parts that were involved in the incident.
5. Retain and secure wastes or residues that were involved in the incident.

Quarterly Spill Log

WM Waste will submit a quarterly log listing all visible spills of hazardous material greater than a gallon occurring at the facility over the previous three months. The report shall include the type and quantity of waste spilled, the location of the release, the source of the release, the actions that were taken to clean up the release and the actions that will be taken to prevent a release from recurring. The quarterly log shall be submitted to the WDNR- designated Hazardous Waste Inspector.

Oil Spills

For incidents involving a discharge of more than 1,000 gallons of oil or PCBs in a single discharge or more than 42 gallons of oil or PCBs in each of two discharges, WM Waste will submit a report to the USEPA Regional Administrator within 60 days containing the following information:

1. Name of the facility;
2. Name of the person completing the report;
3. Location of the facility;

4. Maximum storage or handling capacity of the facility and normal daily throughput;
5. Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
7. The cause of such discharge as described in 40 CFR 112.6, including a failure analysis of the system or subsystem in which the failure occurred;
8. Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
9. Such other information as the Regional Administrator may reasonably

4-3.3 Response Management System

4-3.3.1 General

The WM Waste facility has elected to adopt the fundamental principles of the National Incident Management System (NIMS) Incident Command System (ICS) as described at www.nimsonline.com. The WM Waste emergency management will be turned over to the local incident commander (Emergency Coordinator) once that person is on-site.

4-3.3.2 Command

4-3.3.2.1 Incident Commander/Emergency Coordinator

The primary Incident Commander at WM Waste is the Operations Manager. Authority includes ability to commit WM Waste resources in response to an incident at WM Waste. His/her duties are as follows:

- Communicate the actual or imminent emergency to all facility employees via the intercom and hand-held radio systems
- Assess the actual or potential hazards to human health or the environment
- Identify the character, sources, amount, and extent of release
- Take responsible measures to ensure fire, explosions or releases do not occur or spread to other hazardous waste
- Notify local authorities if evaluation is necessary
- Notify emergency response officials of release outside facility
- Monitor for leaks, pressure build ups, and gas generation if operations stop
- Arrange for treatment, storage, and disposal of material after emergency
- Coordinate the response to an incident
- Obtain additional resources as required
- Notify other senior level management employees of the situation

- Ensure no incompatible waste is treated, stored, or disposal until cleanup is complete
- Ensure equipment is cleaned and fit for its intended use before operations are resumed
- Notify applicable local and state authorities before resuming operations

WM Waste has established the Admin Building as the incident command center in the event of an incident.

4-3.3.2.2 Information (i.e., internal and external communications).

The Emergency Coordinator is responsible for the dissemination of information to the public, or they may delegate the responsibility to another employee.

Radio stations in the vicinity of the WM Waste facility include:

- WRJN AMl400, Racine WI, 262-634-3311
- WLIP AM 1050, Kenosha WI, 262-694-7800
- WEZY FM92.1, Racine WI, 262-634-3311
- WKKV FMI00.7, Racine WI, 414-321-1007
- WEXT FM104.7, Sturtevant WI, 262-694-7800
- WXSS FM103.7, Wauwatosa WI, 414-529-1250

Newspapers in the vicinity of Union Grove include:

- Burlington Standard Press, 262-763-3511
- Racine Journal Times, 262-631-1723

Coordination with the Union Grove administrative offices will be made through:

Village President
Village of Union Grove
925 15th Avenue
Union Grove, WI 53182
262-878-1818

4-3.3.2.3 Safety

Safety of responders is paramount to WM Waste. The company has established an Incident Command Center to the west of the container storage areas in an area that is generally upwind of the facility. Information pertinent to properly responding to an incident at WM Waste is maintained in this building, including Safety Data Sheets, response equipment, and communication devices.

Evacuation routes have been established and are included in **Figure 4-1**.

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4-3.3.2.4 Liaison Staff Mobilization

WM Waste personnel will be expected to take only initial response activities in the event of a significant event. Once the local Incident Commander arrives and takes control, WM Waste personnel will be at their disposal and will not be expected to take the lead in response activities.

4-3.3.3 Operations

4-3.3.3.1 Operational Response Objectives

The primary objective of a response to an incident at WM Waste is to control and minimize exposure to hazardous waste. As such, the control of water that may be used in response to a fire at the facility is important to prevent the further spreading of contamination.

In addition, drums may contain a flammable liquid waste, and buildings are provided with sufficient secondary containment. Liquid spills outside these secondary containment areas that could not be contained through emergency response measures will be captured by the on-site stormwater retention basin.

4-3.3.3.2 Discharge or Release Control

Any liquid releases that may exit the building will be captured in the on-site stormwater retention basin.

4-3.3.3.3 Assessment/Monitoring

If the facility stops operations in response to a fire, explosion or release, the emergency coordinator shall monitor for leaks or releases.

4-3.3.3.4 Containment

Containers containing free liquids may be stored in S-1 through S-6. These container storage areas are provided with secondary containment sized to prevent spills outside of containment. Liquid spills outside these secondary containment areas that could not be contained through emergency response measures will be captured by the on-site stormwater retention basin.

4-3.3.3.5 Recovery

WM Waste has materials and supplies to aid in the capture and recovery of hazardous waste, oil, and/or PCBs that may be released in the event of an incident. Recovered wastes are disposed of off-site as hazardous waste consistent with the disposal method of the original wastes.

4-3.3.3.6 Decontamination

Decontamination of reusable equipment will be accomplished with a suitable cleaning agent before operations are restarted. Personnel decontamination will be accomplished through doffing of emergency response equipment (for decontamination), doffing of personal protective equipment (into containers for proper disposal), and removal of soiled facility uniforms (to be laundered appropriately). Emergency decontamination may be necessary if a worker shows signs of acute chemical exposure.

4-3.3.3.7 Medical

The nearest hospital to the WM Waste facility is:
Memorial Hospital of Burlington
252 McHenry Street
Burlington, WI 53105
Phone 262-767-6102

4-3.3.3.8 Salvage Plans

Wastes captured during response activities may generally be containerized for shipping and disposal at an appropriate off-site facility.

4-3.3.4 Planning

4-3.3.4.1 Hazard assessment

The primary hazards associated with the WM Waste facility are the presence of hazardous wastes, flammable liquids and gases. Sensitive receptors in the area are identified in Sections 4-3.1.5 through 4-3.1.7 of this ICP.

4-3.3.4.2 Protection

Protection of the sensitive areas is accomplished by means of continued operation of the facility in accordance with its operating license and pollution control measures and designs incorporated into the facility operation.

4-3.3.4.3 Coordination with Wisconsin Department of Natural Resources.

In the unlikely event of an incident that results in an off-site release, WM Waste will work closely with the Wisconsin Department of Natural Resources to ensure that natural resources are not damaged. This may include protecting endangered species by working with the following department:

Wisconsin Department of Natural Resources
Endangered Resources Program
P.O. Box 7921
Madison, WI 53707-7921
Telephone: (608)-266-7012
FAX: (608)-266-2925
Website: http://dnr.wi.gov/

4-3.3.4.4 Waste Management.

Wastes generated during response to an incident at WM Waste will be characterized and managed in accordance with NR 662.

4-3.3.5 Logistics

4-3.3.5.1 Medical Needs of Responders

The medical needs of responders during the initial response will be provided through the responding Fire Department/EMS and in conjunction with the local hospital identified in Table 4-3.2.2-2. Ongoing medical needs will be arranged through local medical services providers.

4-3.3.5.2 Site Security

Site security within the confines of the buildings and walled storage yard is provided by the passive facility structures. If additional security is needed outside these areas, facility personnel will provide it or security services will be hired by WM Waste.

4-3.3.5.3 Communications (Internal and External Resources)

The facility has telephones at the plant in addition to a public address system and an outlook address book with facility personnel contact information. The facility is small enough that additional communication devices are not needed.

4-3.3.5.4 Transportation (Air, Land, Water)

In the event of an incident at the facility, equipment located at the site is expected to be adequate to deal with transportation needs, except if roll-off boxes need to be relocated off-site. In that event, local transportation companies will be used to obtain roll-off trucks.

4-3.3.5.5 Personnel Support (e.g., Meals, Housing, Equipment)

Personnel support will be arranged by WM Waste personnel in the event of an extended emergency response.

4-3.3.5.6 Equipment Maintenance and Support

WM Waste will provide equipment maintenance and support, or will hire the required services from local vendors.

4-3.3.5.7 Finance/Procurement/Administration

The General Manager has the authority and resources necessary to address responding to an event occurring at the WM Waste facility.

4-3.3.6 Incident Documentation

4-3.3.6.1 Post-Accident Investigation

After the incident response has been completed, the Incident Commander will lead the post-accident investigation, drawing upon skills and resources of other departments in the organization.

4-3.3.6.2 Incident History

Since WM Waste (or its predecessor) acquired the facility on September 27, 2010, there has only been one incident that required implementation of the ICP. A fire occurred in September 2011 in a Retort Oven used during previous mercury recycling operations. Mercury recycling operations are no longer conducted at the facility. A report describing the incident is provided in Attachment 4-1 of the ICP [Didn't this facility have fires – maybe pre-WM ownership? Yes, and one post-ownership in 2011, as I mentioned previously in a call.]

4-3.4 Training and Drills

Evacuation drills are held annually to ensure personnel are familiar with escape procedures. Also, each new employee receives detailed instruction on this ICP as part of both initial and annual refresher training programs. Logs for evacuation drills, initial training, and annual refresher training are kept in the Facility Training Records.

All alarm systems, emergency equipment, spill containment, and fire equipment are inspected and tested on a monthly basis. Records of all tests are kept by the Regulatory Affairs Department. On an annual basis, WM Waste will make service arrangements with the local fire and police departments to respond to emergencies at the facility. Police and fire personnel will be invited to visit the site to familiarize themselves with the WM Waste facility layout,

evacuation plans, employee workstations, and properties and hazards associated with waste handled at the facility.

Memorial Hospital of Burlington has been notified as to the hazards of the waste located at WM Waste. The hospital has been asked to prepare for and familiarize themselves with the possible trauma and emergency procedures required to respond to an emergency at the site.

4-3.5 Response Critique and Plan Review and Modification Process

The Integrated Contingency Plan is reviewed periodically (at least every five (5) years) by responsible personnel to ensure its accuracy and validity. The following events trigger amendments to the Integrated Contingency plan:

a. Periodic review discovers inaccuracies in the Integrated Contingency Plan;
b. The operating license is amended;
c. The Plan fails in an emergency;
d. The Emergency Coordinator changes;
e. The Emergency equipment changes; or
f. The facility has changes in its design, construction, operations, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste constituents, or changes in response necessary in an emergency.

In the event that the Integrated Contingency Plan must be amended, copies of the updates will be re-distributed to the following authorities:

a. Union Grove Fire Department;
b. Town of Dover (Kansasville) Fire Department;
c. Union Grove Police Department;
d. Racine County Sheriff's Office;
e. Memorial Hospital of Burlington;
f. Racine County Office of Emergency Management; and
g. Wisconsin Department of Natural Resources.

Additionally, existing copies of the Integrated Contingency Plan will be updated and kept in the Operation Manager's office, the control/observation room,

4-3.6 Prevention

No additional prevention activities beyond those previously discussed are required by the regulations for which this ICP is prepared.

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Care is taken to manage the subject materials in a manner that prevents or minimizes the potential for discharges, including, but not limited to:

- Containers are moved only when they are closed;
- Loading and unloading activities are supervised by or conducted by WM Waste employees trained in spill response and prevention;
- Pumping operations are carefully monitored by WM Waste employees;
- Filling of the emergency generator fuel oil tank is monitored by a WM Waste employee;
- All site stormwater drains to a controlled stormwater pond on WM Waste property to prevent release of potential spills to waters of the State; and
- Weekly inspection of container storage areas and daily inspections of loading/unloading.

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4-3.8 Regulatory Compliance and Cross-Reference Matrices

Regulation	ICP Section
RCRA (Wisconsin NR 664)	
664.0052 Content of contingency plan:	
(1) Emergency response actions.	4-2.0
(2) Amendments to SPCC plan.	N/A
(3) Coordination with State and local response parties	4-3.2.3; 4-3.2.2
(4) Emergency coordinator(s)	4-3.3.2.1
(5) Detailed description of emergency equipment on-site	4-3.1.4
(6) Evacuation plan if applicable	4-2.2
664.0053 Copies of contingency plan.	
664.0054 Amendment of contingency plan	4-3.6
664.0055 Emergency coordinator	4-3.2.1
664.0056 Emergency procedures:	
(1) Notification	4-3.2
(2) Emergency identification/characterization	4-3.3.3.1
(3) Health/environmental assessment	4-3-3.2.1
(4) Reporting	4-2.0; 4-3.0; 4-3.2.3
(5) Containment	4-3.3.3.4
(6) Monitoring	4-3.3.3.3
(7) Treatment, storage, or disposal of wastes	4-3.3.4.4
(8) Cleanup procedures:	
(a) Disposal	4-3.3.4.4
(b) Decontamination	4-3.3.3.6
(9) Follow-up procedures	4-2.4
(10) Follow-up report	4-2.4; 4-3.2.3

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4-3.9 Certification

WM Waste qualifies as a Tier I facility under the Spill Prevention, Countermeasure, and Control rules and therefore self-certifies this Plan as provided in 40 CFR 112.6. To meet the Tier I criteria:

- No container of oil is larger than 5,000 gallons;
- There has not been a single discharge of oil exceeding 1,000 gallons or two (2) discharges exceeding 42 gallons within any 12-month period in the three (3) years preceding the self-certification date of this Plan; and
- The aggregate aboveground oil storage capacity is less than 10,000 gallons.

The person certifying that this Plan meets the requirements 40 CFR 112 does so by:

- Being familiar with the requirements of this part;
- Having visited and examined the facility;
- Preparing this Plan in accordance with accepted and sound industry practices and standards, and with the requirements of this part;
- Establishing procedures for required inspections and testing;
- Fully implementing the Plan;
- Meeting the qualification criteria set forth under§ l 12.3(g)(2};
- Not including alternate methods for environmental equivalence;
- Not deviating from any requirement of this part as allowed by§ l 12.7(a)(2) and 112.7(d); and
- Having the full approval of management and the facility owner or operator and having committed the necessary resources to fully implement the Plan.

I certify that I have satisfied the requirement to prepare and implement a Plan under 40 CFR 112.3 and all of the requirements under 40 CFR 112.6(a). I certify that the information contained in this Plan is true.

Signature: _____ Title: _____

Name: _____ Date: ____/____/____

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4-3.10 Incident Response Guides

The Emergency Coordinator will determine the appropriate Isolation Zone and Evacuation Zone, if needed.

The Emergency Coordinator will also make the determination for proper PPE such as:

Respiratory protection - SCBA / Supplied Air
Tyvek - yellow or white

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INCIDENT RESPONSE GUIDE – ACIDS

Fire / Explosion:

- Non-combustible substance, does not burn, but may decompose upon heating to produce corrosive and toxic fumes.

Health

- Toxic -Inhalation of vapors or contact with substance can result in severe injury or death.
- Fire may produce irritating, corrosive and/or toxic gases.

Evacuation

- To be determined by Emergency Coordinator.

Fire

- **Do not direct spray water inside burning containers.**
- Dry chemical, CO_2, water spray or regular foam.

Spill or Leak

- Do not touch or walk through spilled material.
- Do not touch damaged containers or spilled material unless wearing PPE.
- Prevent entry into waterways.

First Aid

- Move victim to fresh air.
- Call 911.
- Wash skin with soap and water.
- Remove and isolate contaminated clothing and shoes.
- **Do not use mouth-to-mouth resuscitation for victims that may have ingested or inhaled the substance, use artificial means.**

CLEAN UP PROCEDURES – ACIDS

- **Cover with oil dry, sand or other non-combustible material followed with plastic sheet to minimize spreading or contact with rain.**
- **Cover with oil dry, sand or other non-combustible material followed with plastic sheet to minimize spreading or contact with rain.**
- **Use clean non sparking tools to collect material and place it into loosely covered plastic container.**

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INCIDENT RESPONSE GUIDE – OXIDIZERS

Fire / Explosion:

- These substances will accelerate burning when involved in a fire.
- May explode from heat.
- Some may decompose when exposed to heat.

Health

- Inhalation of vapors or contact (Skin / Eyes) with substance can result in severe injury or death.
- Fire may produce irritating, corrosive and/or toxic gases.

Evacuation

- To be determined by Emergency Coordinator.

Fire

- **Flood fire area with water from a distance.**
- Use water; do not use dry chemical or foams. CO_2 or Halon may provide limited control.

Spill or Leak

- Do not touch or walk through spilled material.
- Do not touch damaged containers or spilled material unless wearing PPE.
- Prevent entry into waterways.
- Do not get water inside containers.

First Aid

- Move victim to fresh air – Call 911.
- Wash skin with soap and water.
- Remove and isolate contaminated clothing and shoes.

CLEAN UP PROCEDURES – OXIDIZERS

Small dry spill:

- **With clean shovel place material into clean, dry container and cover loosely: move containers from spill area.**

Small liquid spill:

- **Use a non-combustible material like vermiculite, sand or oil dry to soak up the product and place into a container for disposal.**

Large spill:

- **Dike far ahead of liquid spill for later disposal.**
- **Following product recovery, flush area with water.**

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INCIDENT RESPONSE GUIDE – BASE

Fire / Explosion:

- Non-combustible, substance itself does not burn but may decompose upon heating to produce corrosive and/or toxic fumes.
- Containers may explode when heated.

Health

- Inhalation or contact may irritate or burn skin & eyes.
- Fire may produce irritating, corrosive and/or toxic gases.
- Avoid skin contact.

Evacuation

- To be determined by Emergency Coordinator.

Fire

- Dry chemical, CO_2 or water spray.

Spill or Leak

- Eliminate ignition sources.
- Do not touch damaged containers unless wearing appropriate protective clothing.
- DO NOT GET WATER INTO CONTAINERS.

First Aid

- Move victim to fresh air – Call 911.
- Do not use mouth to mouth method if victim has ingested or inhaled the substance: induce artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device.
- Wash skin with soap and water – Remove contaminated clothing.

CLEAN UP PROCEDURE – BASES

- **Absorb or cover with oil dry, sand or other non-combustible material and transfer to containers.**
- **DO NOT GET WATER INSIDE CONTAINERS.**
- **Prevent entry into waterways.**
- **Do not touch damaged containers unless wearing proper PPE.**

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INCIDENT RESPONSE GUIDE – SLUDGE

Fire / Explosion:

- Non-combustible, substance itself does not burn but may decompose upon heating to produce corrosive and/or toxic fumes.

Health

- Inhalation or contact may irritate or burn skin & eyes.
- Fire may produce irritating, corrosive and/or toxic gases.
- Avoid skin contact.
- Runoff from fire control may cause pollution.

Evacuation

- To be determined by Emergency Coordinator.

Fire

- Dry chemical, CO_2 or water spray.

Spill or Leak

- Eliminate ignition sources.
- Do not touch damaged containers unless wearing appropriate protective clothing.

First Aid

- Move victim to fresh air.
- Call 911.
- Do not use mouth to mouth method if victim has ingested or inhaled the substance: induce artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device.
- Wash skin with soap and water.
- Remove contaminated clothing.

CLEAN UP PROCEDURE GUIDE – SLUDGE

- **Absorb or cover with oil dry, sand or other non-combustible material and transfer to containers.**
- **Prevent entry into waterways.**
- **Do not touch damaged containers unless wearing proper PPE.**
- **Use shovels and other tools to transfer into containers.**

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4-3.11 Certification of Applicability of Substantial Harm Criteria

Facility Name: WM Waste, Inc.
Facility Address: 21211 Durand Ave., Union Grove, WI 53182

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes ___ No _X_

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes ___ No _X_

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
Yes ___ No _X_

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?
Yes ___ No _X_

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes ___ No _X_

Certification
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature _____

Name (please type or print) _____

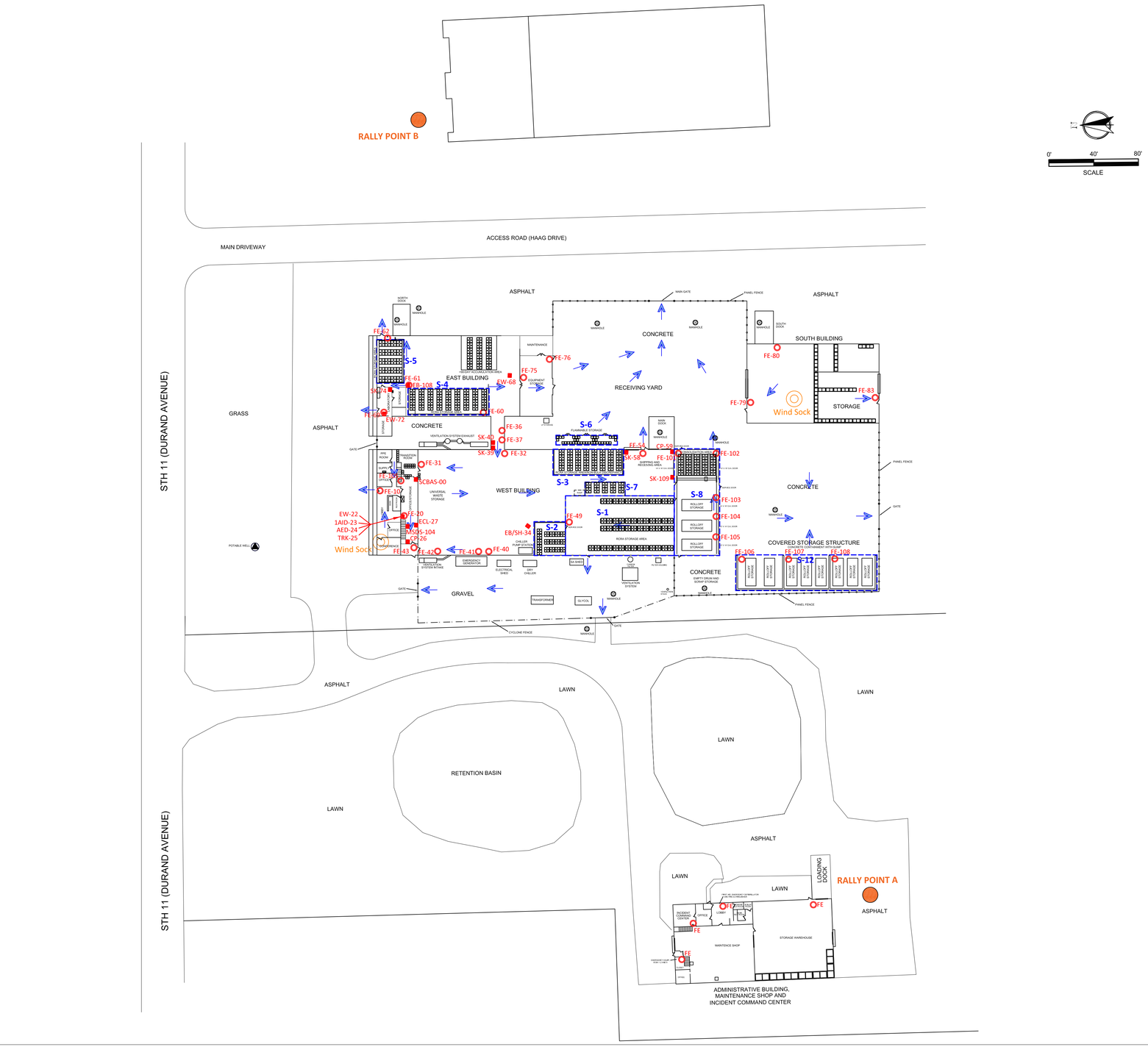
Title _____

Date _____

FIGURES

FIGURE 4-1

SITE LAYOUT



Unit	Capacity	
S-1	33,000 gal.	600 55-gal. Drum Equivalent (DE)
S-2	7,480 gal.	136 55-gal. DE
S-3	14,080 gal.	256 55-gal. DE
S-4	14,080 gal.	256 55-gal. DE
S-5	8,800 gal.	160 55-gal. DE
S-6	2,035 gal.	37 55-gal. DE
S-7	4,400 gal.	80 55-gal. DE
S-8	120 Cu. Yds. and 8,800 gal.	(3) 40-yd rolloff equivalents and 160 55-gal. DE
S-12	320 Cu. Yds.	(8) 40-yd rolloff equivalents

EMERGENCY EQUIPMENT AND SCBA LOCATION

- AED–00 AED (Battery Indicator Ok)
- CP–00 Contingency Plan
- EB–00 Eye Bath
- EB/SH–00 Eye Bath/Shower
- ECL–00 Emergency Coordinators Phone Numbers List
- EW–00 Eye Wash
- PPE–00 Personal Protection Equipment
- SCBA–00 Self–Contained Breathing Apparatus
- SK–00 Spill Kit Drum
- TRK–00 Trauma Kit
- 1AID–00 First Aid Cabinet
- MSDS–00 Material Safety Data Sheets
- FE–00 Fire Extinguisher

Licensed Container Storage Area
Drums
Panel Fencing
Cyclone Fencing
Evacuation Routes

Basemap from Waste Management

Revision:	2
Drawn:	CAL
Date:	8/20/2021

WM Waste, Inc.
Union Grove, Wisconsin

Site Layout

Racine County, WI

CK Associates Environmental Consultants

Drawn:	CAL	Checked:	BHR
Date:	1/30/2023	Approved:	LEC
Dwg. No.:	WA5011-18114-40		

Figure 4-1

P:\T-Z\Waste Management Mercury Waste, Inc - Union grove, WI - WA5011\18114 - RCRA License Renewal\IMAGES AND MAPS\WA5011-18114-40_Site_Layout.dwg 1/30/2023 - 2:02pm

ATTACHMENTS

ATTACHMENT 4-1

INCIDENT REPORT

WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin 53182-9711
800.741.3343 or 262.878.2599
262.878.2699 Fax

WASTE MANAGEMENT®

October 7, 2011

Mr. Scott Ferguson
Hazardous Waste - Spills Coordinator
Southeast District Office
Wisconsin Department of Natural Resources
2300 North Dr. Martin Luther King Drive
Milwaukee, WI 53212

Re: 15-Day Report for Implementation of Contingency Plan
WM Mercury Waste, Inc, Union Grove, WI
EPA ID WIR000000356

Dear Scott:

Pursuant to the requirements of WM Mercury Waste, Inc's (WMMWI) Contingency Plan, enclosed is the incident report for a fire that occurred on Sunday, October 25, 2011. The fire was entirely contained within one room inside WMMWI buildings. The incident was immediately reported to the Wisconsin Emergency Government Line. All residuals from the fire and associated response have been cleaned up and will be processed on-site prior to proper off-site disposal.

Please feel free to contact me to discuss matters further at 262-878-0235.

Sincerely,

Joseph P. Carruth
Environmental Manager
WM Mercury Waste, Inc.

Attachment

Electronic cc:

Pat Baskfield, WMMWI, General Manager
John Kendall, WMMWI, Operations Manager

Mike Ellenbecker, WDNR
Sturtevant Service Center

15-DAY REPORT FOR IMPLEMENTATION OF CONTINGENCY PLAN

Name, address and telephone number of the Emergency Coordinator.

John Kendall
WM Mercury Waste, Inc
21211 Durand Avenue
Union Grove, Wisconsin 53182
262-878-2599

Name, address, and telephone number of the facility.

WM Mercury Waste, Inc
21211 Durand Avenue
Union Grove, Wisconsin 53182
262-878-2599

Date, time, and type of incident.

A fire occurred in the Retort Room at approximately 4:00 pm on Sunday, October 25, 2011. The fire was caused by a clogged vacuum line on Oven #4 that overheated, caught fire, and let loose from its filter assembly. The hose then ignited a drum of retort condensate staged in the vicinity of the Oven #4.

The local fire department was summoned. The fire fighters were able to extinguish the fire using 2-3 fire extinguishers. Several fire departments and a HAZMAT team responded to the incident as is typical for calls to our facility. Only four fire fighters entered the building.

Name and quantity of materials involved.

Approximately 15-20 gallons of retort condensate was consumed during the incident. The combustion products were properly managed through the Retort Room ventilation system, which contained the smoke and mercury vapors and did not spread to other parts of the building.

Extent of injuries, if any.

None.

Assessment of actual or potential hazards to human health or the environment, if applicable.

WMMWI assessed the potential hazards by conducting property line mercury vapor monitoring. Mercury vapor readings were taken at the 16 property line stations around the facility immediately after the incident, as observed by fire department personnel, and for several days after the incident. No mercury vapor was detected. The carbon for the ventilation system was changed out two days after the incident.

The mercury vapors in the Retort Room, according to our direct-reading area monitoring systems, did become elevated due to the fire. Fire department personnel wore protective equipment during the response. Their equipment and outerwear were left at WMMWI for appropriate decontamination/management. In the Retort Room, mercury levels remained high for several days as the cleanup of soot progressed. All staff involved in the clean-up wore appropriate respiratory protection and other personal protective equipment to control exposures. During the cleanup, the elevated vapor levels were contained to the Retort Room and were not elevated in any other areas of the facility.

Estimated quantity and disposition of recovered material that resulted from the incident.

Three 55-gallon drums were generated during the cleanup, which included soot from the walls and ceiling, rags, the burned hose, powder from the extinguishers, etc. This material will be managed as hazardous waste and processed the Retort Ovens for mercury recovery. Once it is rendered non-hazardous, it will be disposed with other materials that have been retorted and sent offsite to be landfilled.

Any amendments to the contingency plan required in s. NR 630.22(1) (b) and (c), Wis. Adm. Code.

No changes are recommended to Contingency Plan. The response was very effective, as were our remote building monitoring systems, enabling responders to view and monitor the inside of the building via computer from outside the building.

Additional Information

Photos of incident. Attached (2).

Employees associated with incident.

Anthony Wember
Bill Kasprowicz

Data Mercury vapors readings for 9-25-11 (attached)
Screen shot of vacuum readings at time of incident (attached)

Equipment Pot filter and hoses.

Waste Samples None required.

Mercury Monitoring System

Daily Record - Mean Values

Date: 25.09.2011

Time	Point 1 Office Lobby µg/m³	status	Point 2 Control Room µg/m³	status	Point 3 East Office µg/m³	status	Point 4 CF Oven Area µg/m³	status	Point 5 Retort South µg/m³	status	Point 6 Retort North µg/m³	status	Point 7 Regulated Storage µg/m³	status	Point 8 WWTP µg/m³	status	Point 9 Shipping and Receiving µg/m³	status	Point 10 Hg Purification Room µg/m³	status	Point 11 Lamp Room µg/m³	status	Point 12 Retorted Tray Storage µg/m³	status	Point 13 Transition Room µg/m³	status	Point 14 Locker Room µg/m³	status	Point 15 Lunch Room µg/m³	status	Point 16 Oven Batch Room µg/m³	status
01:00	1	-	2	-	1	-	9	-	-	-	-	-	6	-	15	-	5	-	17	-	7	-	2	-	2	-	2	-	2	-	93	-
02:00	1	-	2	-	1	-	13	-	-	-	-	-	7	-	16	-	5	-	17	-	10	-	6	-	1	-	2	-	2	-	91	-
03:00	1	-	2	-	1	-	17	-	-	-	-	-	15	-	21	-	6	-	18	-	10	-	3	-	2	-	2	-	2	-	97	-
04:00	1	-	2	-	1	-	8	-	-	-	-	-	8	-	10	-	4	-	17	-	10	-	4	-	2	-	2	-	2	-	88	-
05:00	1	-	2	-	1	-	9	-	-	-	-	-	6	-	11	-	4	-	18	-	11	-	6	-	2	-	2	-	2	-	99	-
06:00	1	-	2	-	1	-	28	-	-	-	-	-	11	-	19	-	4	-	21	-	21	-	6	-	1	-	2	-	1	-	155	-
07:00	1	-	2	-	1	-	25	-	-	-	-	-	16	-	20	-	7	-	59	-	36	H	8	-	1	-	2	-	2	-	131	-
08:00	1	-	3	-	1	-	22	-	-	-	-	-	16	-	19	-	7	-	29	-	29	-	4	-	2	-	2	-	2	-	128	-
09:00	1	-	3	-	1	-	10	-	116	-	97	-	8	-	11	-	4	-	25	-	14	-	5	-	3	-	3	-	2	-	75	-
10:00	1	-	2	-	1	-	16	-	120	-	101	-	11	-	14	-	13	-	25	-	16	-	13	-	2	-	2	-	2	-	81	-
11:00	1	-	2	-	1	-	13	-	128	-	104	-	11	-	15	-	7	-	27	-	23	-	11	-	2	-	2	-	3	-	63	-
12:00	1	-	3	-	1	-	12	-	122	-	105	-	9	-	14	-	6	-	25	-	17	-	7	-	2	-	2	-	2	-	73	-
13:00	1	-	3	-	1	-	13	-	138	-	116	-	11	-	15	-	7	-	24	-	14	-	8	-	2	-	2	-	2	-	67	-
14:00	1	-	2	-	1	-	18	-	131	-	112	-	11	-	17	-	8	-	24	-	16	-	6	-	2	-	2	-	2	-	87	-
15:00	2	-	3	-	1	-	12	-	148	-	122	-	9	-	19	-	7	-	19	-	6	-	3	-	2	-	3	-	3	-	72	-
16:00	1	-	3	-	1	-	23	-	146	-	120	-	12	-	21	-	7	-	18	-	6	-	2	-	2	-	2	-	2	-	58	-
17:00	44	-	17	-	47	-	87	H	3161	H	3245	H	206	H	146	H	108	H	298	H	19	-	10	-	101	H	50	-	49	-	271	-
18:00	66	H	67	H	66	H	59	-	3007	-	3151	-	108	-	83	-	35	-	148	-	10	-	3	-	73	-	57	H	61	H	382	H
19:00	10	-	34	-	10	-	10	-	2913	-	2985	-	32	-	20	-	0	-	95	-	0	-	0	-	20	-	15	-	16	-	140	-
20:00	13	-	28	-	16	-	18	-	2913	-	2946	-	44	-	33	-	8	-	83	-	7	-	3	-	15	-	14	-	13	-	101	-
21:00	11	-	29	-	11	-	14	-	2902	-	2913	-	41	-	28	-	9	-	41	-	13	-	9	-	12	-	13	-	12	-	78	-
22:00	0	-	32	-	0	-	18	-	2794	-	2812	-	35	-	24	-	18	-	36	-	14	-	-	-	-	-	-	-	-	-	-	-
23:00	1	-	24	-	2	-	12	-	2748	-	2794	-	27	-	20	-	2	-	34	-	12	-	8	-	1	-	1	-	1	-	64	-
24:00	2	-	23	-	1	-	40	-	2700	-	2782	-	44	-	44	-	13	-	38	-	19	-	17	H	42	-	4	-	3	-	192	-
Daily Mean	6.8		12.2		7.0		21.1		1511.7		1531.6		29.3		27.3		12.3		48.2		14.2		6.3		12.8		8.2		8.2		116.8	
Standard Deviation	15.3		16.1		15.6		17.7		1384.1		1426.4		42.8		28.7		21.1		60.3		7.7		3.9		25.0		14.6		15.1		74.0	

Mercury Monitoring System

Daily Record - Mean Values

Date: 26.09.2011

Time	Point 1 Office Lobby		Point 2 Control Room		Point 3 East Office		Point 4 CF Oven Area		Point 5 Retort South		Point 6 Retort North		Point 7 Regulated Storage		Point 8 WWTP		Point 9 Shipping and Receiving		Point 10 Hg Purification Room		Point 11 Lamp Room		Point 12 Retorted Tray Storage		Point 13 Transition Room		Point 14 Locker Room		Point 15 Lunch Room		Point 16 Oven Batch Room	
	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status	µg/m³	status
01:00	3	-	19	H	4	H	67	H	2614	H	2740	H	42	H	41	H	12	-	48	-	44	H	30	H	13	-	9	-	10	H	374	-
02:00	3	-	16	-	2	-	45	-	2578	-	2694	-	36	-	35	-	10	-	49	H	39	-	16	-	9	-	6	-	6	-	385	H
03:00	2	-	9	-	2	-	59	-	2549	-	2667	-	32	-	26	-	14	-	45	-	31	-	24	-	23	H	5	-	4	-	348	-
04:00	4	H	10	-	3	-	51	-	2488	-	2600	-	27	-	24	-	15	H	46	-	33	-	29	-	12	-	10	H	10	-	245	-
05:00	3	-	13	-	3	-	46	-	2445	-	2539	-	25	-	21	-	12	-	41	-	32	-	27	-	10	-	7	-	6	-	185	-
06:00	3	-	16	-	2	-	44	-	2403	-	2479	-	21	-	19	-	10	-	37	-	30	-	27	-	17	-	7	-	7	-	201	-
07:00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
08:00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
09:00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10:00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11:00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12:00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13:00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
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21:00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
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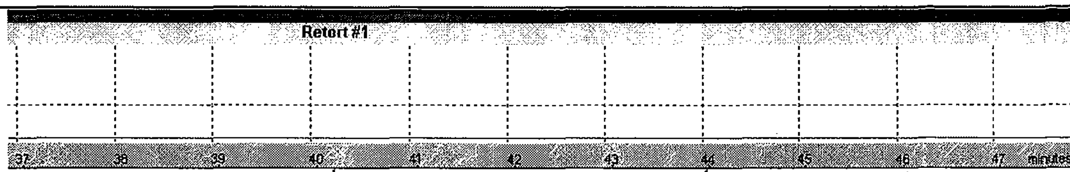
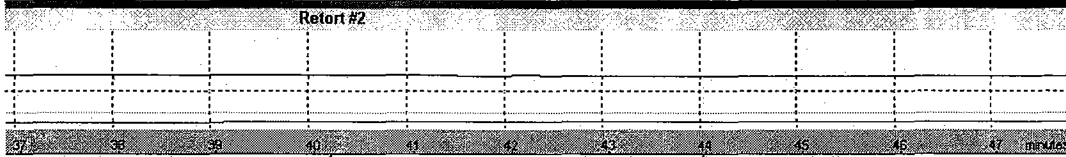
Daily Mean	3.0		13.8		2.7		52.0		2512.8		2619.8		30.5		27.7		12.2		44.3		34.8		25.5		14.0		7.3		7.2		289.7	
Standard Deviation	0.6		3.5		0.7		8.4		74.2		90.3		7.0		7.8		1.9		4.1		5.0		4.6		4.8		1.7		2.2		82.1	

Retort #1



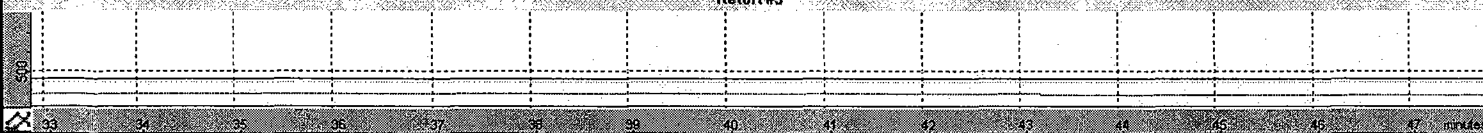
ch Num	Batch Type	Vapor Front	Vapor Rear	Oven Top	Oven Bottom	Oven Tmp SP	Oven Vac	Collection Vac	KO Line Vac	Oven % Cap	Goto Detail	Abort Batch
-2994	Standard 1	1998.1	1994.4	86.2	84.9	0.0	0.7	26.0	1.3	0.0		

Retort #2



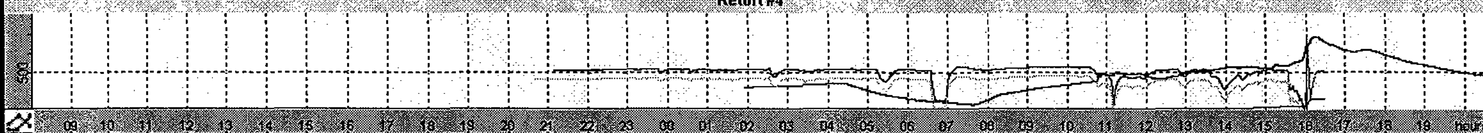
Start Cycle	Resume	Status	SP	ET	Batch Num	Batch Type	Vapor Front	Vapor Rear	Oven Top	Oven Bottom	Oven Tmp SP	Oven Vac	Collection Vac	KO Line Vac	Oven % Cap	Goto Detail	Abort Batch
		Soak4	26.0	22.4	2-3018	Standard 1	94.8	98.5	630.7	603.2	1000.0	1.3	3.1	3.2	0.0		

Retort #3



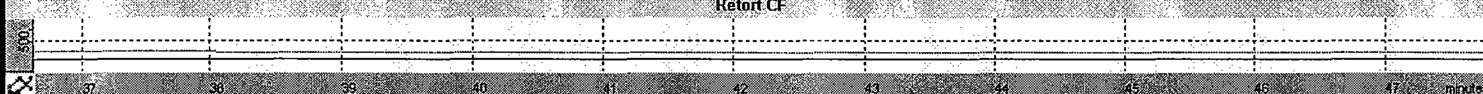
Start Cycle	Resume	Status	SP	ET	Batch Num	Batch Type	Vapor Front	Vapor Rear	Oven Top	Oven Bottom	Oven Tmp SP	Oven Vac	Collection Vac	KO Line Vac	Oven % Cap	Goto Detail	Abort Batch
		Ramp3	4.0	2.4	3-2975	Sludge	306.7	136.9	437.456	0.0	678.6	0.4	5.3	1.9	0.0		

Retort #4



Start Cycle	Resume	Status	SP	ET	Batch Num	Batch Type	Vapor Front	Vapor Rear	Oven Top	Oven Bottom	Oven Tmp SP	Oven Vac	Collection Vac	KO Line Vac	Oven % Cap	Goto Detail	Abort Batch
		Pause/Drain2	4.0	4.0	1-2999	K106	0.0	0.0	462.2	448.4	650.0	31.0	31.2	30.9	0.0		

Retort CF



Start Cycle	Resume	Status	SP	ET	Batch Num	Batch Type	Inside Tmp	Outside Tmp	Oven Tmp SP	Oven Vac	Oven % Cap	Element 1	Element 2	Element 3	CWS Tmp	CWR Tmp	Abort Batch
		Idle	0.0	0.0	CF-2918	Standard 1	258.4	342.7	800.0	1.0	75.5	0.0	0.0	0.0	28.8	27.9	

South Bed Inlet Temp	South Bed Outlet Temp	Nitrogen Release	South Bed Press Diff	North Bed Inlet Temp	North Bed Outlet Temp	Nitrogen Release	North Bed Press Diff	Blower Temp	Filter Dirty	MAIN VACUUM	PRV VACUUM	CF Tmp	CF Hz	ST 1	ST 2	ST 3	ST 4	View Vacuum Pumps
84.9	88.4	Off	1.4	128.0	72.5	Off	0.0	78.6	Off	0.0	1.4	0.0	6.2	Off	Off	Off	NotSet	

Appendix 5 Floodplain Map Detail

NOTES TO USERS

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding, particularly from local drainage sources of small size. The **community map repository** should be consulted for possible updated or additional flood hazard information.

To obtain more detailed information in areas where **Base Flood Elevations** (BFEs) and/or **floodways** have been determined, users are encouraged to consult the Flood Profiles and Floodway Data and/or Summary of Stillwater Elevations tables contained within the Flood Insurance Study (FIS) Report that accompanies this FIRM. Users should be aware that BFEs shown on the FIRM represent rounded whole-foot elevations. These BFEs are intended for flood insurance rating purposes only and should not be used as the sole source of flood elevation information. Accordingly, flood elevation data presented in the FIS Report should be utilized in conjunction with the FIRM for purposes of construction and/or floodplain management.

Coastal Base Flood Elevations shown on this map apply only landward of 0.0' North American Vertical Datum of 1988 (NAVD 88). Users of this FIRM should be aware that coastal flood elevations are also provided in the Summary of Stillwater Elevations table in the Flood Insurance Study Report for this jurisdiction. Elevations shown in the Summary of Stillwater Elevations table should be used for construction and/or floodplain management purposes when they are higher than the elevations shown on this FIRM.

Boundaries of the **floodways** were computed at cross sections and interpolated between cross sections. The floodways were based on hydraulic considerations with regard to requirements of the National Flood Insurance Program. Floodway widths and other pertinent floodway data are provided in the Flood Insurance Study Report for this jurisdiction.

Certain areas not in Special Flood Hazard Areas may be protected by **flood control structures**. Refer to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study Report for information on flood control structures for this jurisdiction.

The **projection** used in the preparation of this map was Universal Transverse Mercator (UTM) zone 16N. The **horizontal datum** was NAD 83, GRS 1980 spheroid. Differences in datum, spheroid, projection or UTM zones used in the production of FIRMs for adjacent jurisdictions may result in slight positional differences in map features across jurisdiction boundaries. These differences do not affect the accuracy of this FIRM.

Flood elevations on this map are referenced to the North American Vertical Datum of 1988. These flood elevations must be compared to structure and ground elevations referenced to the same **vertical datum**. For information regarding conversion between the National Geodetic Vertical Datum of 1929 and the North American Vertical Datum of 1988, visit the National Geodetic Survey website at http://www.ngs.noaa.gov or contact the National Geodetic Survey at the following address:

NGS Information Services
NOAA, N/NGS12
National Geodetic Survey
SSMC-3, #9202
1315 East-West Highway
Silver Spring, Maryland 20910-3282
(301) 713-3242

To obtain current elevation, description, and/or location information for **bench marks** shown on this map, please contact the Information Services Branch of the National Geodetic Survey at **(301) 713- 3242**, or visit its website at http://www.ngs.noaa.gov.

Base map information shown on this FIRM was derived from the National Agriculture Imagery Program's (NAIP) digital orthoimagery produced by the USDA, Farm Service Agency. The orthophoto was collected in the summer of 2005 and produced at a resolution of 1 meter.

The **profile baselines** depicted on this map represent the hydraulic modeling baselines that match the flood profiles in the FIS report. As a result of improved topographic data, the **profile baseline**, in some cases, may deviate significantly from the channel centerline or appear outside the SFHA.

Based on updated topographic information, this map reflects more detailed and up-to-date **stream channel configurations and floodplain delineations** than those shown on the previous FIRM for this jurisdiction. As a result, the Flood Profiles and Floodway Data tables for multiple streams in the Flood Insurance Study Report (which contains authoritative hydraulic data) may reflect stream channel distances that differ from what is shown on the map. Also, the road to floodplain relationships for unrevised streams may differ from what is shown on previous maps.

Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or de-annexations may have occurred after this map was published, map users should contact appropriate community officials to verify current corporate limit locations.

Please refer to the separately printed **Map Index** for an overview map of the county showing the layout of map panels; community map repository addresses; and a Listing of Communities table containing National Flood Insurance Program dates for each community as well as a listing of the panels on which each community is located.

For information on available products associated with this FIRM visit the **Map Service Center** (MSC) website at http://msc.fema.gov. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. Many of these products can be ordered or obtained directly from the MSC website.

If you have **questions about this map**, how to order products or the National Flood Insurance Program in general, please call the FEMA Map Information eXchange (FMIX) at **1-877-FEMA-MAP** (1-877-336-2627) or visit the FEMA website at http://www.fema.gov/business/nfip.

LEGEND

SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

ZONE A	No Base Flood Elevations determined.
ZONE AE	Base Flood Elevations determined.
ZONE AH	Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
ZONE AO	Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
ZONE AR	Special Flood Hazard Areas formerly protected from the 1% annual chance flood by a flood control system that was subsequently decertified. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
ZONE A99	Area to be protected from 1% annual chance flood by a Federal flood protection system under construction; no Base Flood Elevations determined.
ZONE V	Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.
ZONE VE	Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

ZONE X	Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

OTHER AREAS

ZONE X	Areas determined to be outside the 0.2% annual chance floodplain.
ZONE D	Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

- 1% Annual Chance Floodplain Boundary
- 0.2% Annual Chance Floodplain Boundary
- Floodway boundary
- Zone D boundary
- CBRS and OPA boundary
- Boundary dividing Special Flood Hazard Area Zones and boundary dividing Special Flood Hazard Areas of different Base Flood Elevations, flood depths, or flood velocities.
- 513 — Base Flood Elevation line and value; elevation in feet*
- (EL 987) — Base Flood Elevation value where uniform within zone; elevation in feet*

*Referenced to the North American Vertical Datum of 1988

- A — A — Cross section line
- 23 — 23 — Transect line
- Culvert
- Bridge
- 45° 02' 08", 93° 02' 12" — Geographic coordinates referenced to the North American Datum of 1983 (NAD 83) Western Hemisphere
- 3100000 FT — 5000-foot ticks: Wisconsin State Plane South Zone (FIPS Zone 4803), Lambert Conformal Conic projection
- 4889 000mN — 1000-meter Universal Transverse Mercator grid values, zone 16N
- DX5510 × — Bench mark (see explanation in Notes to Users section of this FIRM panel)
- • FT1,000 — River Station

MAP REPOSITORIES
Refer to Map Repositories list on Map Index

EFFECTIVE DATE OF COUNTYWIDE
FLOOD INSURANCE RATE MAP
May 2, 2012

EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL

For community map revision history prior to countywide mapping, refer to the Community Map History table located in the Flood Insurance Study report for this jurisdiction.

To determine if flood insurance is available in this community, contact your insurance agent or call the National Flood Insurance Program at 1-800-638-6620.

MAP SCALE 1" = 500'

250 0 500 1000 FEET
150 0 150 300 METERS

NFIP

PANEL 0187D

FIRM

FLOOD INSURANCE RATE MAP

RACINE COUNTY, WISCONSIN AND INCORPORATED AREAS

PANEL 187 OF 295
(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
RACINE COUNTY	550347	0187	D
UNION GROVE, VILLAGE OF	550586	0187	D

Notice to User: The **Map Number** shown below should be used when placing map orders; the **Community Number** shown above should be used on insurance applications for the subject community.

MAP NUMBER
55101C0187D
EFFECTIVE DATE
MAY 2, 2012

Federal Emergency Management Agency

NATIONAL FLOOD INSURANCE PROGRAM

Appendix 6 Threatened or Endangered Species Habitats and Wetlands

Endangered Resources Preliminary Assessment

Created on **12/3/2020**. This report is good for one year after the created date.

DNR staff will be reviewing the ER Preliminary Assessments to verify the results provided by the Public Portal. ER Preliminary Assessments are only valid if the project habitat and waterway-related questions are answered accurately based on current site conditions. If an assessment is deemed invalid, a full ER review may be required even if the assessment indicated otherwise.

Results

A search was conducted of the NHI Portal within a 1-mile buffer (for terrestrial and wetland species) and a 2-mile buffer (for aquatic species) of the project area. Based on these search results, below are your follow-up actions.

No further action is necessary.

This project is covered by the Broad Incidental Take Permit/Authorization for No/Low Impact Activities (No/Low BITP/A) (https://dnr.wi.gov/topic/ERReview/ITNoLowImpact.html). This BITP/A covers projects that the DNR has determined will have no impact or a minimal impact to endangered and threatened species in the state. Due to this coverage under the No/Low BITP/A, a formal review letter is not needed and there are no actions that need to be taken to comply with state and/or federal endangered species laws, any take that may result from the proposed project is permitted/authorized.

A copy of this document can be kept on file and submitted with any other necessary DNR permit applications to show that the need for an ER Review has been met. This notice only addresses endangered resources issues. This notice does not constitute DNR authorization of the proposed project and does not exempt the project from securing necessary permits and approvals from the DNR and/or other permitting authorities.

Project Information

Landowner name	**WM Waste, Inc.**
Project address	**21211 Durand Avenue**
Project description	**Hazardous Waste License Renewal Application**

Project Questions

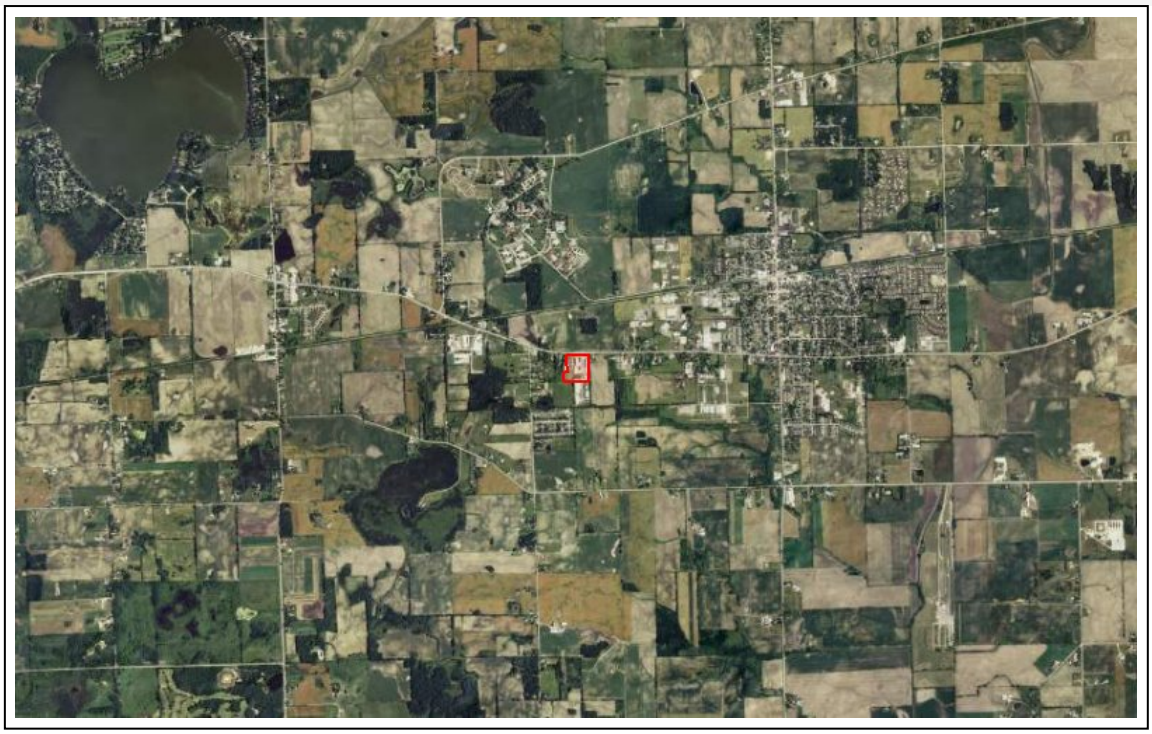
Does the project involve a public property?	**No**
Is there any federal involvement with the project?	**No**
Is the project a utility, agricultural, forestry or bulk sampling (associated with mining) project?	**No**
Is the project property in Managed Forest Law or Managed Forest Tax Law?	**No**
Project involves tree removal?	**No**
Is project near (within 300 ft) a waterbody or a shoreline?	**Yes**
Is project within a waterbody or along the shoreline?	**No**

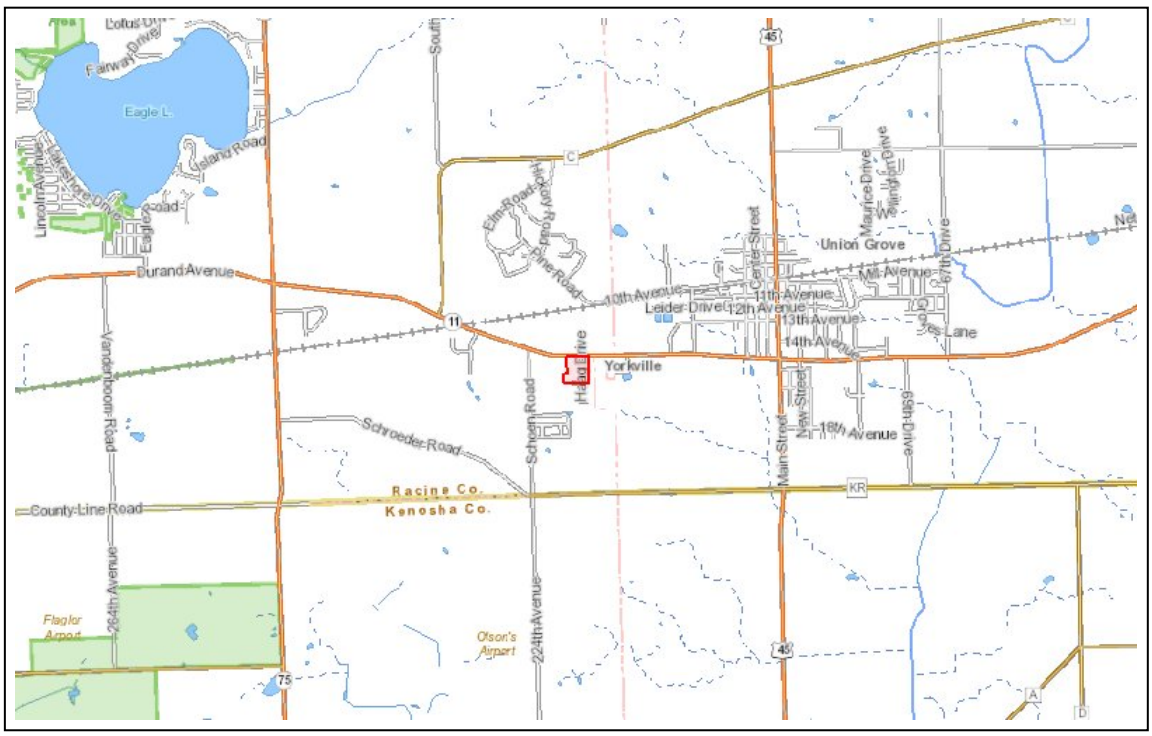
Does the project area (including access routes, staging areas, laydown yards, select sites, source/fill sites, etc.) occur **entirely within** one or more of the following habitats?

Urban/residential	**Yes**
Manicured lawn	**No**

Artificial/paved surface	**Yes**
Agricultural land	**No**
Areas covered in crushed stone or gravel	**Yes**

Project Area Maps





Appendix 7 Training Plan

APPENDIX 7
TRAINING PROGRAM

WM WASTE, INC.
2122 DURAND AVE.
UNION GROVE, WISCONSIN
EPA ID No. WIR000000356

FEBRUARY 2023

WM Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin 53182-9711
800.741.3343 or 262.878.2599
262.878.2699 Fax

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List of Attachments

Attachment 7-1 Training Matrix and Training Module Topics
Attachment 7-2 Job Descriptions
Attachment 7-3 Example Training Documentation Page

WM Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin 53182-9711
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262.878.2699 Fax

7-1.0 INTRODUCTION – NR 664.0016(1)(a)

WM Waste, Inc. (WM Waste) facility personnel successfully complete a program that includes classroom training and on-the-job training that teaches them the proper performance of their duties. In particular, emphasis is placed on training facility personnel so they are able to ensure the facility's compliance with the requirements of the hazardous waste regulations and the facility's license. This training program has been prepared in accordance with NR 664.0016.

7-2.0 TRAINING DIRECTOR- NR 664.0016(1)(b)

The training program is directed by a person experienced in hazardous waste management procedures. The training includes classroom and computer-based training, and on-the-job instruction, which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the position in which a person is assigned. The Facility Manager is designated as the training director at WM Waste. Duties specific to the Facility Manager relating to training include compliance with environmental and safety regulations and development and presentation of the training programs at the WM Waste facility. The Facility Manager is provided training via computer based training and/or in-person instruction.

7-3.0 TRAINING PROGRAM - NR 664.0016(1)(c)

All employees at the facility undergo training pursuant to this plan. New employees, or employees new to a position, are considered trainees until they have successfully completed training relevant to their job position. The training program is designed so that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.

All facility personnel must also complete job-specific training. The amount and scope of the job-specific training an employee receives depends on his or her job duties, regulatory requirements, and the employee's competency, which is based upon proper experience and skills.

7-3.1 Scope of Training

All trainees complete training in specific training modules to enable them to perform their assigned duties in a safe, healthful and a regulatorily compliant manner, so as not to endanger themselves, other employees, or the environment. NOTE: Non-WM Waste employees may not handle hazardous waste at the facility.

WM Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin 53182-9711
800.741.3343 or 262.878.2599
262.878.2699 Fax

A training matrix which describes the relevant training modules for each job title is provided in Attachment 7-1.

7-3.2 Training Modules

A brief description of the topics within each training module is provided below:

Module	Topics
Overview of Facility Operations	• Nature of facility business • Layout of facility
RCRA Overview	• Regulatory background • Identification of hazardous waste • Types of hazardous waste managed at facility and associated hazards • Universal waste • Generator status • Training requirements
Emergency Response Communications and Evacuation Routes	• When to implement • Methods of communication • Alarms • Emergency contacts • Evacuation routes and staging areas
Contingency Plan Implementation	• Emergency Coordinator duties • Arrangements with local authorities • Emergency response procedures in response to fire, explosion, and spill incidents
Emergency Equipment Use, Inspection, and Repair	• Location and capability of emergency equipment • How to use emergency equipment • Inspection of emergency equipment • Repair of emergency equipment
Site Shutdown Procedures	• Procedures to take in the event of a site shutdown
Container Management	• Regulatory background • Types of allowable containers • Labeling • Accumulation (satellite/90 day)

Module	Topics
	• Locations • Placement within container storage areas • Capacities and inventory checks • Compatibility Groups • Incompatible/Flammable/Liquids management procedures • Handling procedures • Waste consolidation and precautions • Staging areas • Spill containment and cleanup • Emergency actions • Condition of containers • Overpacking • Universal waste
Inspections	• Areas to inspect • Frequency • Items to observe • Remediation • Recordkeeping
Shipping/Receiving	• Manifests • Labels/Placards • Compatibility groups • Container inspections • Exception reporting • Acceptable wastes • How to handle quarantined or rejected containers
Forklift	• Operation • Safe handling • Emergency actions • Maintenance
Inventory Management	• Database procedures • Storage of containers in appropriate areas • Identification/segregation of incompatible wastes • Designation of container storage area for each container • Inventory checks

Module	Topics
Waste Analysis	• Waste Analysis Plan • Profiles and Prequalification (see also Section 7-3.3) • Initial screening • Level I analysis (fingerprinting) • Level II analysis • Level III analysis • Off-site laboratory sample management • Sampling strategies and procedures • Waste acceptance/rejections requirements and procedures • Identification of hazardous waste • Waste classification
Sampling	• Sample collection and management
Laboratory Operations	• Waste Analysis Module • Laboratory equipment operation • Quality Assurance/Quality Control
Recordkeeping	• Inspection records • Manifests • Exception reports • LDR forms • Hazardous waste determinations • Waste Analysis Plan • Inspection records • Training records • Emergency responder arrangements • Contingency Plan • Biennial reports • License specific records
Reporting	• Annual/Biennial reporting • Exception reporting • Spill/release reporting • Contingency Plan implementation • License specific reporting

Module	Topics
Personal Protective Equipment	• Types and when needed • Donning and doffing • Maintenance and decontamination

7-3.3 Waste Approvals

All waste approved to be shipped to or accepted by the facility must be approved through the waste prequalification process. As described in section 3.0 of the WAP , the prequalification process requires completion of a Waste Information Profile (WIP) by the generator or their authorized agent, and review and approval of the WIP by the WM Waste Approval staff. The WM Waste Approvals department is a corporate-level WM organization outside of the WM Waste facility which reviews and approves waste profiles for incoming waste streams across individual WM facilities to promote consistency. Training of WM Waste approval staff (referred to a Waste Approval Managers (WAMs)) is conducted at the corporate level. Prior to approving WIPs, WAMs must complete foundation training which addresses federal and state waste analysis requirements as well as pertinent sections of facility hazardous waste permits for which they have responsibility. WAMs must also complete refresher training on topics which are determined regulatory changes or changes to management facility requirements. Additionally, WAMs must complete recurrent RCRA training every five years. Training records for WAMs are maintained at the corporate level.

7-4.0 TRAINING SCHEDULE – NR 664.00016(2)

Facility personnel must successfully complete the training identified within this plan for their job description within six months after the date of their employment or assignment to a given position. No employee is permitted to work in an unsupervised situation until the initial training is successfully completed. Any personnel transferring between positions with new training requirements must be trained on the new requirements within the first month after being transferred.

7-5.0 TRAINING REVIEW – NR 664.0016(3)

Facility personnel take part in an annual review of the initial training identified in Section 7-3.

7-6.0 TRAINING RECORDKEEPING – NR 664.0016(4)

The facility maintains the following training documents and records:

a. The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job. The list of

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262.878.2699 Fax

current job titles and the personnel assigned to those positions is maintained in the facility's operating record.

b. A written job description for each position related to hazardous waste management. The WM Waste job descriptions are included in Attachment 7-2 to this Appendix. Job descriptions and job titles may change; however, training shall be provided for all duties and tasks.
c. A written description of the type and amount of both introductory and continuing training given to each person filling a position that relates to managing hazardous waste at the facility. A table identifying the type and amount of training provided to each job position is included in Attachment 7-1 to this Appendix.
d. Records that document that the training or job experience has been provided to meet the above requirements. An example of the form used to document completion of the training modules is included in Attachment 7-3 to this Appendix. The format and content of this form may be changed without a license modification as long as the minimum information continues to be included in the revised form.

7-7.0 DOCUMENTATION OF TRAINING – NR 664.0016(5)

Training records on current personnel are maintained in a paper or an electronic recordkeeping system available at the facility. The training files on current personnel are kept until closure of the facility. Training records for former employees are kept at least three years from the date the employee last worked at the facility.

ATTACHMENT 7-1

TRAINING MATRIX AND TRAINING MODULE TOPICS

TRAINING MATRIX

Training Module[1]	Facility Manager	Materials Handler	Non-WM Waste Employees Who Enter Licensed Areas[2]							
Overview of Facility Operations	X	X								
RCRA Overview	X	X								
Emergency Response Communications and Evacuation Routes	X	X	X							
Contingency Plan Implementation	X	X								
Emergency Equipment Use, Inspection, and Repair	X	X								
Site Shutdown Procedures	X	X								
Container Management	X	X								
Inspections	X	X								
Shipping/Receiving	X	X								
Forklift	X	X								
Inventory Management	X	X								
Sampling	X	X								
Waste Analysis	X	X								
Laboratory Operations	X	X								
Recordkeeping	X	X								
Reporting	X	X								
Personal Protective Equipment	X	X								

[1] See Section 7-3.2 for a more detailed description of training modules.
[2] Includes visitors, contractors, vendors, casual laborers, and all other non-WM Waste emloyees.

ATTACHMENT 7-2

WM WASTE, INC.
JOB DESCRIPTIONS

WM Waste, Inc.
21211 Durand Avenue
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Title: Facility Manager

Job Description

The facility manager is responsible to provide management oversight to the operations manager to provide for the efficient, safe and compliant operations of the Union Grove facility.

Reporting

The facility manager will report to the districtt manager or next level manager.

General Responsibilities

The facility manager shall be responsible for:

- Hiring and firing of operations personnel;
- Day to day scheduling of operations personnel;
- Implementing, monitoring and ensuring compliance with all plant and company procedures;
- Operating the plant in compliance with all applicable regulations and facility license conditions;
- Protecting the health and safety of all employees
- Acting as point of contact for regulatory agencies; and
- Implementing the hazardous waste training program as the training director.

Specific Responsibilities Related to Hazardous Waste Operations

- RCRA Awareness
- Emergency Response Communications
- Contingency Plan Implementation
- Emergency Equipment
- Site Shutdown Procedures
- Container Management
- Inspections
- Shipping/Receiving
- Forklift
- Inventory Management
- Waste Analysis
- Laboratory Operations
- Waste Profile Approval
- Recordkeeping

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- Reporting
- Personal Protective Equipment

Desired Characteristics and Experience

- Ten years minimum experience in hazardous waste facility operations;
- Strong knowledge of EPA, DNR and OSHA hazardous waste regulations;
- Five years minimum experience managing; and
- Waste industry experience and management a definite plus.

Education

- Bachelor of Science Degree in any of the Sciences; and
- Ten years minimum experience in hazardous waste operations.

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Title: Materials Handler

Job Description

The Materials Handler will support the Facility Manager to complete the tasks required to service our customers, maintain compliance with State and Federal Regulations, follow company protocols and regulations and effectively manage the technicians.

Reporting

The Materials Handler will report to the Facility Manager.

General Responsibilities

The Materials Handler shall be responsible for:

- Monitoring and ensuring compliance with all plant and company procedures;
- Scheduling incoming and outgoing waste shipments, as required; and
- Operating the plant in compliance with all applicable regulations and license conditions

Specific Responsibilities Related to Hazardous Waste Operations

- RCRA Awareness
- Emergency Response Communications
- Contingency Plan Implementation
- Emergency Equipment
- Site Shutdown Procedures
- Container Management
- Inspections
- Shipping/Receiving
- Forklift
- Inventory Management
- Waste Analysis
- Laboratory Operations
- Recordkeeping
- Reporting
- Personal Protective Equipment

Desired Characteristics and Experience

- Two years minimum experience in hazardous waste facility operations;
- Strong knowledge of EPA, DNR and OSHA hazardous waste regulations; and
- Waste industry experience and management a definite plus.

Education

- Two years minimum experience in hazardous waste operations.

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ATTACHMENT 7-3

EXAMPLE TRAINING DOCUMENTATION PAGE

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TRAINING DOCUMENTATION

I have received training in the responsibilities necessary for my current position as:

_____

Area of Training: _____

I have received this training through one or more of the following methods:

- o read the job description
- o received classroom or Computer Based Training instruction
- o received on the job training

Print Name: _____

Signature: _____

Date: _____

The above-signed employee performs the indicated job function on a shift that I am assigned supervisory responsibilities.

Signature: _____ Date: _____

Appendix 8 Closure Plan and Closure Cost Estimate

APPENDIX 8
CLOSURE PLAN

WM WASTE, INC.
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UNION GROVE, WISCONSIN
EPA ID No. WIR000000356

FEBRUARY 2023

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CLOSURE PLAN

WM Waste, Inc. (WM Waste) has prepared a written Closure Plan for its facility in accordance with 40 CFR 264.112(a)(l) and (2); NR 664.0112(l)(a) and (b); 40 CFR 270.14(b)(13); and NR 670.014(2)(m), (o), and (q).

WM Waste will keep a copy of the Closure Plan at the facility until the certificate of final closure has been accepted by the Wisconsin Department of Natural Resources (WDNR).

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8-1.0 General Closure Components

8-1.1 Closure Performance Standard

40 CFR 264.111 and NR 664.0111 require that closure of the facility be performed in a manner that minimizes the need for further maintenance and controls, minimizes, or eliminates threats to human health and the environment, and minimizes or eliminates the post-closure escape of hazardous waste and hazardous-waste constituents to the environment.

This Closure Plan achieves these objectives. Hazardous wastes, including decontamination residues, will either be treated on-site or transported off-site to a licensed or interim status hazardous waste treatment, storage, or disposal (TSD) facility. The equipment and plant areas which relate directly to the management of these wastes will be decontaminated to the levels specified in the Closure Plan, if appropriate, or removed and disposed of off-site at a licensed or interim status hazardous waste TSD facility.

While closure is underway, WM Waste will continue to comply with the monitoring, inspection, and recordkeeping requirements of its hazardous waste license.

8-1.2 Partial Closure

Partial closure is the closure of individual hazardous waste storage units, while other storage units at the facility are still operating. The licensed Professional Engineer shall assess, oversee, and certify closure of each unit at the facility as it is closed, in order ensure that the individual unit closure meets all license conditions and regulatory requirements, that all required data is collected, and that closure cost financial assurance is adjusted accordingly, at the time of individual unit closure. Partial closure procedures for closure of individual units will follow similar methodology, consistent with final closure procedures, and will meet all regulatory requirements. Upon individual unit closure certification by the Professional Engineer, the closure of the unit(s) shall be subject to WDNR approval

At present, WM Waste does not anticipate partial closure of individual units. However, in the event that partial closure of individual units occurs, it will be conducted in accordance with applicable regulations, including 40 CFR 264, and NR 664. If changes to partial closure procedures are required, this Closure Plan will be amended in accordance with the requirements of 40 CFR 264.l 12(c) and NR 664.0112(3), including submission of a written request for a license modification.

8-1.3 Location and Retention of Closure Plan

A copy of this Closure Plan and subsequent amendments shall be maintained electronically and in hardcopy format in the facility's Administrative offices until closure certifications have been submitted to and accepted by the WDNR.

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8-1.4 Notification of Partial or Final Closure

WM Waste will notify the WDNR in writing at least 180 days prior to the date on which the Company expects to begin partial or final closure of the facility.

Notification of state regulatory agencies is not required if the facility license is terminated or if the facility is ordered by judicial decree or final order under Section 3008 of RCRA to cease receiving hazardous waste or to close.

WM Waste may, at any time before or after notification of final closure, remove hazardous waste inventory from the facility and decontaminate or dismantle equipment in accordance with the approved final Closure Plan.

8-1.5 Schedule for Closure

WM Waste will begin closure within 90 days of the date on which the known final volume of hazardous waste is received at the facility. WM Waste intends to complete closure of the facility within 180 days of the date on which the known final volume of hazardous waste is received at the facility. The schedule of closure activities is shown in Table 8.1.5-1. This schedule complies with the time limitations of 40 CFR 264.113 and NR 664.0113 by anticipating full closure within 180 days of receipt of the final volume of hazardous waste.

Within 60 days of completion of closure, WM Waste will submit certification to the Agency, by registered mail, that the storage facility has been closed according to the approved Closure Plan. This certification will be signed by the owner or operator and by an independent registered Professional Engineer.

If closure cannot be accomplished within 180 days or if the Certificate of Closure cannot be prepared within the 60-day time period, WM Waste will submit to the WDNR a written request for an extension of the deadline. The request for an extension will be submitted at least 30 days before the expiration of the 180- or 60-day periods, whichever is applicable.

Table 8-1.5-1 WM Waste Facility Closure Schedule

Item	Days from Start of Closure
Dispose of waste inventories	90
Decontaminate container management areas	90
Decontaminate containment structures and unloading areas	120
Dispose of decontamination residuals and rinsates	120
Complete closure	180
Submit Certification of Closure to WDNR	240

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WM Waste will submit to the WDNR a written request for a permit modification, including a copy of an amended Closure Plan, for approval at least 60 days after unexpected events or 60 days before proposed changes in facility design or operation that affect this Closure Plan. If an unexpected event occurs during the closure period, WM Waste will request from the WDNR a permit modification no later than 30 days after the unexpected event.

WM Waste does not anticipate that closure activities will take more than 180 days to complete. If unforeseen circumstances result in a delay of the closure schedule, WM Waste will request a schedule extension from the WDNR in accordance with 40 CFR 264.113(c)(2) and NR 664.0112(4)(b).

8-1.6 Anticipated Closure Date

Final closure of the WM Waste facility is not expected to occur prior to the year 2050.

8-1.7 Description of Regulated Units

The regulated units at the WM Waste facility include container storage and roll-off storage areas. These units consist of:

- Nine container storage areas capable of handling the following containers:
    - Seven areas (S-1 through S-7) for containerized wastes (i.e., all containers except roll-off boxes); and,
    - One storage area(S-8) primarily for roll-off boxes but may also store containerized waste.
    - One storage area (S-12) for roll-off boxes.

8-1.8 Maximum Waste Inventory

This Closure Plan is based on the total design capacity for the storage of hazardous waste at the facility. Table 8.1.8-1 outlines this storage capacity. The layout of these licensed container storage areas is provided in Figure A-3 in Appendix 1.

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Table 8-1 WM Waste Permitted Storage Capacity

Storage Area Name	ID	Description	Waste Types	Indoors (I) or Outdoors (O)	Capacity (Basis)
Containerized Wastes					
Licensed Container Storage Area #1	S-1	Container storage area on west wall of West Building	Non-Flammable Liquids, Solids, Acids/Bases	I	33,000 gals (600 55-gal equiv.) *
Licensed Container Storage Area #2	S-2	Container storage area in West Building	Non-Flammable Liquids, Solids	I	7,480 gal (136 55-gal equiv.)*
Licensed Container Storage Area #3	S-3	Container Storage on east wall of West Building	Non-Flammable Liquids, Solids	I	14,080 gal (256 55-gal equiv.)*
Licensed Container Storage Area #4	S-4	Container Storage on west wall of East Building	Non-Flammable Liquids, Solids	I	14,080 gal (256 55-gal equiv.)*
Licensed Container Storage Area #5	S-5	Container Storage on north wall of East Building	Non-Flammable Liquids, Solids	I	8,800 gal (160 55-gal equiv.)*
Licensed Container Storage Area #6	S-6	Flammable liquid containers storage shed adjacent to West Building in Receiver Yard	Flammable Liquids, Solids	I	2,035 gal (37 55-gal equiv.)*
Licensed Container Storage Area #7	S-7	Container storage area in West Building	Non-Flammable Liquids, Solids	I	4,400 gal (80 55-gal equiv.)*
Licensed Container Storage Area #8	S-8	Container storage area in West Building	Non-Flammable Liquids, Solids	I	8,800 gal

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Containerized Waste Total					92,675 (1,685 55-gal equiv.)
Roll-off Box Containers					
Licensed Container Storage Area #8	S-8	Container storage (typically roll-off in south end of West Building	Non-Flammable Solids	I	120 cubic yards (3 40 yd^3 roll-offs)**
Licensed Container Storage Area #12	S-12	Container (roll-off) storage	Non-Flammable Solids	O	320 cubic yards (8 40 yd^3 roll-off)**
Roll-off Box Container Storage Total					440 cubic yards

* The majority of hazardous waste containers managed in S-1 through S-7 will primarily contain liquids. Therefore, the capacity of these units is listed in gallons. S-8 will manage roll-off box containers as well as non-roll-off box containers. Containers containing solids that may be typically measured in cubic yards will be converted to gallons using a conversion factor of 1 cubic yard = 202 gallons. This conversion is implemented as part of the inventory management procedure.
** Note: alternative capacity roll-off containers (i.e., 20 yd^3, 25 yd^3) may also be used.

8-1.9 Inventory Removal and Disposal

Inventories of hazardous wastes at the time of closure will be transported to an off-site permitted/licensed or interim status hazardous waste TSD facility capable of proper treatment.

8-2.0 Closure Procedures

8-2.1 WM Waste Facility Closure Procedures

This section describes the closure procedures WM Waste will implement to close the facility, including procedures for container storage areas, secondary containment structures, and soils investigation. The Closure Plan addresses disposal and decontamination activities in accordance with 40 CFR 264.114 and NR 664.0114.

The following waste management units are not present at the facility, so closure of these items is not addressed within this Closure Plan:

- Disposal units for hazardous waste,
- Waste piles,
- Surface impoundments,
- Incinerators,
- Landfills, or

- Land treatment units

8-2.1.1 Overview

Closure of the WM Waste facility will proceed, generally, as follows:

- Dispose of hazardous waste inventory from the facility;
- If present, remove residual residue of bulk waste from containment using dry methods;
- De-contaminate secondary containment using a pressure washer;
- Contain, collect, and dispose of all rinsates and expendable decontamination equipment; and,
- Decontaminate all nonexpendable equipment.

8-2.1.2 Container Storage Areas

The Plan provides for the removal of hazardous waste inventory followed by the decontamination of equipment and areas within the facility. The buildings and other structures will not be demolished as part of the Closure Plan. Sampling and testing of the rinsate will be required to verify acceptable decontamination, as discussed in the Sampling and Analysis Plan, Attachment 8-4. Sampling will be performed by applying a small volume of water and collecting the water after it flows across surfaces of the storage area. After the inventory of containers has been removed, the procedures necessary to achieve closure of the Container Storage Areas are as follows.

- **Dry Decontamination (if required)**
  WM Waste will visually inspect the surfaces and remove any visible residues or residual bulk material using dry methods as appropriate. Dry methods could include but not be limited to shovels, brooms, heavy equipment, etc.
- **Visual Inspection**
  WM Waste will visually inspect the surface of each secondary containment area. The surface will be inspected for cracks, fissures, gaps, or deterioration in the secondary containment structures and staining. The certified engineer will determine if temporary sealing should occur before pressure washing to prevent any migration and, if necessary, assist in locating borings/cores should soil sampling be necessary (see Section 8-2.1.3.
- **Decontaminate Floors, Sumps, Docks, and Ramps**
  Floors and sumps within, and docks and ramps adjacent to, the Container Storage Areas and truck unloading areas will be decontaminated using a high-pressure detergent wash with a second-stage water rinse. Detergents or solvents must be capable of removing hazardous waste constituents. Alternatively, steam cleaning, degreasing detergents, high-pressure water sprays, or other appropriate cleaning technology may be used to clean and decontaminate the floors, sumps, docks, and ramps. If possible, decontamination should proceed from clean to dirty areas. Where possible, rinsates will

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be directed to permanent or temporary sumps for collection prior to pick up by wet vacuum units or portable pumps. Otherwise, rinsates will be immediately picked up by vacuum units and subsequently directed to portable storage containers (e.g., drums, totes, or frac tanks) or directly into tank trucks for off-site disposal. Rinsates generated will be managed as hazardous waste. Supplies and equipment used during decontamination also will be collected and managed as hazardous waste.

The "final rinse" will occur after the first two rinses, and will be considered the "testing rinse." The volume of the testing rinse will be minimized to avoid dilution of the sample water. In no case should the volume of testing rinse exceed 10% of the volume of the secondary containment. The test rinse will be sampled to confirm decontamination is complete.

- **Determine Acceptable Decontamination**
  Decontamination will be considered complete when the concentrations of all constituents of concern in the final rinse water are at or below levels as described in the Sampling and Analysis Plan, Attachment 8-4.

  Liquid decontamination wastes will be analyzed for the chemicals associated with the waste codes that have been stored or processed at the facility using one or more of the following analytical methods:

  Volatile organics according to Method 8260;
  - Semi-volatile organics according to Method 8270;
  - Total metals using the Method 3050 digestion procedure followed by Inductively Coupled Argon Plasma (ICAP) analysis for metals according to Method 6010/6020 and the 7000 series methods for specific metals (e.g mercury);
  - Chlorinated Herbicides using Method 8151.

  The Sampling and Analysis Plan, Attachment 8-4, contains a list of the hazardous constituents contained in the analytical suites with the associated Practicable Quantification Limit (PQL).

- **Dispose of Rinsates, Supplies, and Decontamination Equipment**
  Rinsates generated during rinsing of waste transfer equipment, floors, sumps, docks, and ramps will be managed as hazardous waste. The rinsates will be disposed of at a licensed or interim status hazardous waste TSD facility capable of treating the waste.

  Non-expendable decontamination equipment will be decontaminated by using a high-pressure detergent wash with a second-stage water rinse. An appropriate solvent or detergent will be used. Rinsates generated during rinsing of used decontamination equipment will be managed as hazardous waste and disposed of at a permitted or

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interim status hazardous waste TSD facility. The containment areas and other structures will not be demolished as part of this Closure Plan.

8-2.1.3 Soils Investigation

After decontamination of the container storage areas, the certifying PE will determine whether soil sampling is necessary. To make this determination, the PE will evaluate factors including, but not limited to: an inspection of the floors, sumps, docks, and ramps to evaluate the potential of contamination to enter via pavement cracks or other damage to impervious surfaces or expansion joints; a review of inspection reports to determine whether there may have been spills that could have entered the soil; and a review of past soil sampling results. If there are indications of potential soil contamination, a Sampling and Analysis Plan will be prepared and submitted to WDNR. Upon approval, soil samples will be collected and analyzed in accordance with the approved Sampling and Analysis Plan.

8-2.1.4 Additional Closure Activities

It is anticipated that no additional groundwater monitoring, leachate collection, or additional run-on or run-off controls are required during the partial or final closure activities to ensure that closure standards are attained. After decontamination of the container storage areas, the certifying PE will determine whether additional partial or final closure activities are necessary to ensure that closure standards are attained. To make this determination, the PE will evaluate factors including, but not limited to: an inspection of the floors, sumps, docks, and ramps for the potential of contamination to enter via pavement cracks or other damage to impervious surfaces or expansion joints; a review of inspection reports to determine whether there may have been spills that could have entered the soil or groundwater; and a review of past soil sampling results. If there are indications of potential soil or groundwater contamination, a Sampling and Analysis Plan will be prepared and submitted to WDNR. Upon approval, soil samples will be collected and analyzed accordingly. Additional information on historical monitoring at the facility may be found in Section 4.28 of the FPOR.

8-2.2 Closure Certification

Within 60 days of completion of final closure of the WM Waste facility, a certification of completion of final closure will be submitted to the WDNR by registered mail. The certification will state that the facility has been closed in accordance with the approved Closure Plan. The certification will be signed by a representative of WM Waste and by an independent registered Professional Engineer. In accordance with 40 CFR 264.115 and NR 664.0115, documentation that supports the certification of closure will be generated and retained in the Operating Record of the facility. Upon release of WM Waste by the WDNR from the financial assurance requirements for closure per 40 CFR 264.143(i) and NR 664.0115, these data may be destroyed.

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As described in Section 8-2, partial closure of the facility, involving the closure of individual units while other units are still operational, shall be performed under the oversight of the licensed Professional Engineer, and closure certification of the Professional Engineer, as the individual units are closed. Closure of individual units will follow the same methodology and procedures as full closure of the facility. Closure of individual units will also require approval of WDNR as they are closed. WM Waste will maintain required data and records from the closure of each individual unit during partial closure activities, and will use these data to certify final closure for the facility when it occurs. In order to have the most current and accurate financial assurance data available for the facility, the Professional Engineer shall use all partial closure data to adjust financial assurance calculations, as needed, when individual units are closed.

8-3.0 Amendment of Closure Plan

Any modification to existing and currently planned equipment, structures, and management procedures or changes in applicable regulations may require revisions to this Closure Plan and its associated cost estimates. This Closure Plan will also be revised if the expected year of closure changes.

WM Waste may submit to the WDNR, in accordance with applicable procedures in 40 CFR Part 124, 40 CFR Part 270, and NR 664.0112(3)(a), a written notification of or a request for a permit modification to authorize a change in operating plans, facility design, or other procedures that would affect this Closure Plan. The written notification or request must include a copy of the amended Closure Plan for review and approval by the WDNR.

WM Waste may submit to the WDNR written notification of or request for a permit modification to amend the Closure Plan at any time before the notification of final closure of the facility. Generally, WM Waste must submit for approval by the WDNR a written request for a permit modification, including a copy of the amended Closure Plan, at least 60 days before a proposed change in facility design or operation that requires a change in the Closure Plan. If an unexpected event occurs during the partial or final closure period, WM Waste shall request an operating license modification no later than 30 days after the unexpected event. Other, more specific requirements for Modifying the Closure Plan are contained in 40 CFR 264. l 12(c)(3) and (4) and NR 664.0112(3).

8-4.0 Closure Cost Estimate

An estimate of the closure cost for each regulated unit at the WM Waste facility has been developed and is included in Attachment 8-1. Estimates of all closure costs have been based on selection of a qualified, experienced third-party contractor, as required by NR 664.0142(1)(b) of the Wisconsin Administrative Code (WAC). To satisfy these requirements, the closure cost estimate for waste inventories and decontamination rinsates has been based on treatment and disposal at an approved and licensed facility. Procedures and assumptions used to develop the closure cost estimate are provided in Attachment 8-2. The closure cost estimate

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is based on information derived from the RSMeans software, supplemented and/or validated, where appropriate, by quotes or estimates from waste services contractors and disposal facilities.

RSMeans is a web-based construction cost estimating tool and associated database. The database contains cost-related information for all phases of construction projects, including, but not limited to, labor rates, material costs, and transportation costs. The data are continuously researched, validated, and revised, and are based on location. RSMeans data can be obtained for approximately 1,000 locations in North America, and contain more than 85,000 unique line items.

Within the closure cost estimate, costs for decontamination of the various units are separately itemized. Disposal costs for waste inventories, rinsates, and decontamination supplies are separately itemized, as are the costs of transportation to the destination facility. The estimated decontamination costs for equipment and structures have been listed. The decontamination costs include labor, sampling, and testing. The cost of engineering oversight and closure certification from a registered professional engineer is also included. A 10% contingency of the total closure cost estimate is included in the estimate. No salvage value from the sale of dismantled equipment and scrap metal has been incorporated in the estimate. The engineering oversight/certification and contingencies have been included as a single step on the front page of the estimate report rather than being incorporated into each storage area's calculations.

Closure cost estimates are adjusted for inflation within 60 days prior to the annual date in which the financial assurance mechanism for closure was established, in accordance with 40 CFR 264.142(b) and NR 664.0142(2). The latest closure cost estimates and the latest adjustments for inflation are kept at the facility, in accordance with 40 CFR 264.142(d) and NR 664.0142(4).

8-5.0 Financial-Assurance Mechanism for Closure

Financial assurance for closure of the WM Waste facility has been obtained. The option chosen by WM Waste to provide financial assurance is through the use of a Surety Bond Guaranteeing Performance of Closure (Performance Bond), as provided in 40 CFR 264.143(c) and Chp. NR 664.0143(3), Wis. Admin. Code. Attachment 8-3 includes the current performance bond as of the date of submission of this license application as required by federal and state regulations to prove WM Waste has obtained a suitable financial assurance mechanism. The performance bond is updated within 60 days at any time in which the closure cost estimate increases to an amount greater than the face value of the policy. An updated performance bond or other financial assurance mechanism meeting the requirements of NR 664.0143 will be provided to the WDNR within 60 days of renewal of this license..

While this Closure Plan and Closure Cost Estimate provide for closure of all licensed areas at maximum capacity, the closure cost estimate will be maintained at a level consistent with the licensed storage areas in use at that time to take into account storage areas that are licensed and

either not used for hazardous waste storage or not constructed. Prior to initializing use of an individual storage area, the closure cost estimate and financial assurance mechanism will be adjusted to reflect those operations. Modifications and submittal of the financial assurance mechanism will be by means of a Class I permit modification.

8-6.0 Post-Closure Plan and Cost Estimate

A Post-Closure Plan is not currently necessary for the WM Waste facility since the facility's activities do not include land disposal of hazardous wastes. It is not anticipated that any hazardous waste, waste residuals, or waste constituents will remain at the facility after closure that would require post-closure maintenance. Additionally, since no Post-Closure Plan is necessary, a Post-Closure Cost Estimate has not been included with this Plan.

8-7.0 Notices Required for Disposal Facilities

Because WM Waste does not operate a disposal facility (i.e., surface impoundment, waste pile, land treatment unit, or landfill unit) for hazardous waste, these notices are not required.

8-8.0 Liability Requirements

WM Waste is covered for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operation of the facility through use of an insurance mechanism. See section NR 670.014(2)(q) of the FPOR for details.

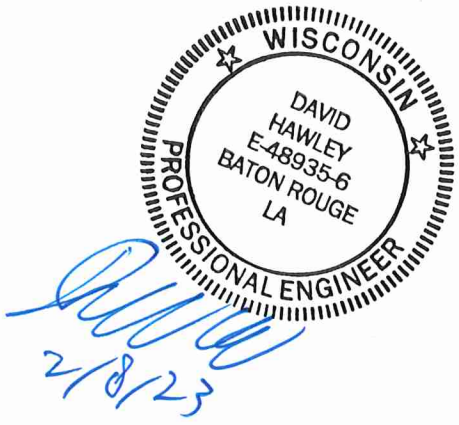
WM Waste does not operate any hazardous waste surface impoundments, landfills, land treatment facilities, or disposal miscellaneous units at the facility. Therefore, WM Waste is not required to maintain liability insurance coverage for non-sudden accidental occurrences under 40 CFR 264.147(b) and NR 664.0147(2).

8-9.0 State Mechanisms

Wisconsin's insurance liability requirements are equivalent to federal requirements; therefore, no additional State mechanisms are required.

ATTACHMENT 8-1

CLOSURE COST ESTIMATE SUMMARY FOR THE WM WASTE FACILITY



Cost Summary
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Storage Area		Total Cost
S-1	$	184,446.73
S-2	$	42,647.80
S-3	$	79,507.57
S-4	$	79,548.05
S-5	$	48,970.40
S-6	$	13,507.21
S-7	$	76,508.70
S-8	$	165,202.29
S-12	$	301,833.09
Decontamination Storage and Transportation	$	7,625.00
Subtotal	$	999,796.85
Engineering Certification	$	30,000.00
Contingency (10% total)	$	99,979.69
TOTAL (2022 DOLLARS)	**$**	**1,129,776.54**

S1 Containment Area Details
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Unit S1		
Hazardous Waste Disposal Volumes		
Total Number of Liquid Hazardous Waste Drums	600	55-gallon drums
Total Number of Solid Hazardous Waste Drums	0	55-gallon drums
Volume of Liquid Waste	33,000	gallon
Volume of Solid Waste	0	cubic yard
Secondary Containment/Floor Dimensions		
Length (excluding Berm/Curb)	59.8	foot
Width (excluding Berm/Curb)	41.7	foot
Berm Area	0.0	square foot
Total Area	2,489.6	square foot
Thickness	0.4	foot
Total Volume	1,037.3	cubic foot
Decontamination		
Ratio of Decontamination Fluid to Area	0.6	gallon/square foot
Total Volume of Decontamination Liquid	1494	gallon
Work rate to clean one square foot	0.0097	work hr per square foot
labor hours	24.1	hour
Other Structures		
Area	0	square foot
Volume	0	cubic foot

S1 Closure Costs
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Removal, Transportation, and Disposal of Liquid Hazardous Waste Drums	Unit	Quantity[1]	Unit Price	Total Cost
Labor and Equipment Cost	per drum	600	3	$2,070.00
Transportation Cost	truckload (80 drums)	8	1,995	$15,960.00
Disposal Cost	per drum	600	265	$159,000.00
Removal, Transportation, and Disposal of Solid Hazardous Wastes	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost (drum management)	per drum	0	3	$0.00
Labor and Equipment Cost (roll-off management)	per day	0	505	$0.00
Drum Transportation Cost	per truckload (80 drums)	0	6,703	$0.00
Bulk Transportation Cost	truckload (25 cy)	0	6,703	$0.00
Drum Disposal Cost	per drum	0	265	$0.00
Bulk Disposal Cost	per ton	0	655	$0.00
Decontamination Labor, Equipment, and Disposal Costs	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost for Steam Cleaning or pressure washing	per hour	24	63.47	$1,532.73
Decontamination Water Disposal Cost	per gallon	1,494	1.30	$1,942.00
Sampling and Analysis	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Decontamination water analysis2	per sample	6	567	$3,402.00
Sample Collection Labor	per hour	6	90	$540.00

TOTAL COST **$184,446.73**

[1]See area detail sheet for quantity derivation.

[2]Decontamination is included in a separate cost summary sheet

S2 Containment Area Details
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Unit S2		
Hazardous Waste Disposal Volumes		
Total Number of Liquid Hazardous Waste Drums	136	55-gallon drums
Total Number of Solid Hazardous Waste Drums	0	55-gallon drums
Volume of Liquid Waste	7,480	gallon
Volume of Solid Waste	0	cubic yard
Secondary Containment/Floor Dimensions		
Length (excluding Berm/Curb)	24.00	foot
Width (excluding Berm/Curb)	24.92	foot
Berm Area	0.00	square foot
Total Area	598.00	square foot
Thickness	0.00	foot
Total Volume	0.00	cubic foot
Decontamination		
Ratio of Decontamination Fluid to Area	0.60	gallon/square foot
Total Volume of Decontamination Liquid	358.80	gallon
Work rate to clean one square foot	0.01	work hr per square foot
labor hours	5.80	hour
Other Structures		
Area	0.00	square foot
Volume	0.00	cubic foot

S2 Closure Costs
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Removal, Transportation, and Disposal of Liquid Hazardous Waste Drums	Unit	Quantity[1]	Unit Price	Total Cost
Labor and Equipment Cost	per drum	136	3	$469.20
Transportation Cost	truckload (80 drums)	2	1,995	$3,990.00
Disposal Cost	per drum	136	265	$36,040.00
Removal, Transportation, and Disposal of Solid Hazardous Wastes	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost (drum management)	per drum	0	3	$0.00
Labor and Equipment Cost (roll-off management)	per day	0	505	$0.00
Drum Transportation Cost	per truckload (80 drums)	0	6,703	$0.00
Bulk Transportation Cost	truckload (25 cy)	0	6,703	$0.00
Drum Disposal Cost	per drum	0	265	$0.00
Bulk Disposal Cost	per ton	0	655	$0.00
Decontamination Labor, Equipment, and Disposal Costs	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost for Steam Cleaning or pressure washing	per hour	5.80	63.47	$368.16
Decontamination Water Disposal Cost	per gallon	359	1.30	$466.44
Sampling and Analysis	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Decontamination water analysis2	per sample	2	567	$1,134.00
Sample Collection Labor	per hour	2	90	$180.00

TOTAL COST **$42,647.80**

[1]See area detail sheet for quantity derivation.

[2]Decontamination is included in a separate cost summary sheet

S3 Containment Area Details
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Unit S3		
Hazardous Waste Disposal Volumes		
Total Number of Liquid Hazardous Waste Drums	256	55-gallon drums
Total Number of Solid Hazardous Waste Drums	0	55-gallon drums
Volume of Liquid Waste	14,080	gallon
Volume of Solid Waste	0	cubic yard
Secondary Containment/Floor Dimensions		
Length (excluding Berm/Curb)	51.9	foot
Width (excluding Berm/Curb)	17.3	foot
Berm Area	33.9	square foot
Total Area	929.5	square foot
Thickness	0.0	foot
Total Volume	0.0	cubic foot
Decontamination		
Ratio of Decontamination Fluid to Area	0.6	gallon/square foot
Total Volume of Decontamination Liquid	641	gallon
Work rate to clean one square foot	0.0097	work hr per square foot
labor hours	10.4	hour
Other Structures		
Area	138.4	square foot
Volume	0	cubic foot

S3 Closure Costs
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Removal, Transportation, and Disposal of Liquid Hazardous Waste Drums	**Unit**	**Quantity[1]**	**Unit Price**	**Total Cost**
Labor and Equipment Cost	per drum	256	$3.45	$883.20
Transportation Cost	truckload (80 drums)	4	$1,995.00	$7,980.00
Disposal Cost	per drum	256	$265.00	$67,840.00
Removal, Transportation, and Disposal of Solid Hazardous Wastes	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost (drum management)	per drum	0	$3.45	$0.00
Labor and Equipment Cost (roll-off management)	per day	0	$505.00	$0.00
Drum Transportation Cost	per truckload (80 drums)	0	$6,703.20	$0.00
Bulk Transportation Cost	truckload (25 cy)	0	$6,703.20	$0.00
Drum Disposal Cost	per drum	0	$265.00	$0.00
Bulk Disposal Cost	per ton	0	$655.00	$0.00
Decontamination Labor, Equipment, and Disposal Costs	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost for Steam Cleaning or pressure washing	per hour	10.4	63.47	$657.44
Decontamination Water Disposal Cost	per gallon	641	$1.30	$832.93
Sampling and Analysis	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Decontamination water analysis2	per sample	2	$567.00	$1,134.00
Sample Collection Labor	per hour	2	$90.00	$180.00

TOTAL COST **$79,507.57**

[1]See area detail sheet for quantity derivation.

[2]Decontamination is include in a separate cost summary sheet

S4 Containment Area Details
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Unit S4		
Hazardous Waste Disposal Volumes		
Total Number of Liquid Hazardous Waste Drums	256	55-gallon drums
Total Number of Solid Hazardous Waste Drums	0	55-gallon drums
Volume of Liquid Waste	14,080	gallon
Volume of Solid Waste	0	cubic yard
Secondary Containment/Floor Dimensions		
Length (excluding Berm/Curb)	52.0	foot
Width (excluding Berm/Curb)	17.8	foot
Berm Area	35.2	square foot
Total Area	958	square foot
Thickness	0.0	foot
Total Volume	0.0	cubic foot
Decontamination		
Ratio of Decontamination Fluid to Area	0.6	gallon/square foot
Total Volume of Decontamination Liquid	658	gallon
Work rate to clean one square foot	0.0097	work hr per square foot
labor hours	10.6	hour
Other Structures		
Area	139	square foot
Volume	0	cubic foot

S4 Closure Costs
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Removal, Transportation, and Disposal of Liquid Hazardous Waste Drums	**Unit**	**Quantity[1]**	**Unit Price**	**Total Cost**
Labor and Equipment Cost	per drum	256	$3.45	$883.20
Transportation Cost	truckload (80 drums)	4	$1,995.00	$7,980.00
Disposal Cost	per drum	256	$265.00	$67,840.00
Removal, Transportation, and Disposal of Solid Hazardous Wastes	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost (drum management)	per drum	0	$3.45	$0.00
Labor and Equipment Cost (roll-off management)	per day	0	$505.00	$0.00
Drum Transportation Cost	per truckload (80 drums)	0	$6,703.20	$0.00
Bulk Transportation Cost	truckload (25 cy)	0	$6,703.20	$0.00
Drum Disposal Cost	per drum	0	$265.00	$0.00
Bulk Disposal Cost	per ton	0	$655.00	$0.00
Decontamination Labor, Equipment, and Disposal Costs	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost for Steam Cleaning or pressure washing	per hour	10.6	63.47	$675.30
Decontamination Water Disposal Cost	per gallon	658	$1.30	$855.56
Sampling and Analysis	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Decontamination water analysis2	per sample	2	$567.00	$1,134.00
Sample Collection Labor	per hour	2	$90.00	$180.00

TOTAL COST **$79,548.05**

[1]See area detail sheet for quantity derivation.

[2]Decontamination is included in a separate cost summary sheet

S5 Containment Area Details
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Unit S5		
Hazardous Waste Disposal Volumes		
Total Number of Liquid Hazardous Waste Drums	160	55-gallon drums
Total Number of Solid Hazardous Waste Drums	0	55-gallon drums
Volume of Liquid Waste	8,800	gallon
Volume of Solid Waste	0	cubic yard
Secondary Containment/Floor Dimensions		
Length (excluding Berm/Curb)	28.6	foot
Width (excluding Berm/Curb)	17.0	foot
Berm Area	25.0	square foot
Total Area	511.9	square foot
Thickness	0.0	foot
Total Volume	0.0	cubic foot
Decontamination		
Ratio of Decontamination Fluid to Area	0.6	gallon/square foot
Total Volume of Decontamination Liquid	307	gallon
Work rate to clean one square foot	0.0097	work hr per square foot
labor hours	5.0	hour
Other Structures		
Area	0.0	square foot
Volume	0	cubic foot

S5 Closure Costs
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Removal, Transportation, and Disposal of Liquid Hazardous Waste Drums	Unit	Quantity[1]	Unit Price	Total Cost
Labor and Equipment Cost	per drum	160	$3.45	$552.00
Transportation Cost	truckload (80 drums)	2	$1,995.00	$3,990.00
Disposal Cost	per drum	160	$265.00	$42,400.00
Removal, Transportation, and Disposal of Solid Hazardous Wastes	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost (drum management)	per drum	0	$3.45	$0.00
Labor and Equipment Cost (roll-off management)	per day	0	$505.00	$0.00
Drum Transportation Cost	per truckload (80 drums)	0	$6,703.20	$0.00
Bulk Transportation Cost	truckload (25 cy)	0	$6,703.20	$0.00
Drum Disposal Cost	per drum	0	$265.00	$0.00
Bulk Disposal Cost	per ton	0	$655.00	$0.00
Decontamination Labor, Equipment, and Disposal Costs	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost for Steam Cleaning or pressure washing	per hour	5.0	63.47	$315.14
Decontamination Water Disposal Cost	per gallon	307	$1.30	$399.26
Sampling and Analysis	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Decontamination water analysis2	per sample	2	$567.00	$1,134.00
Sample Collection Labor	per hour	2	$90.00	$180.00

TOTAL COST **$48,970.40**

[1]See area detail sheet for quantity derivation.

[2]Decontamination is included in a separate cost summary sheet

S6 Containment Area Details
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Unit S6		
Hazardous Waste Disposal Volumes		
Total Number of Liquid Hazardous Waste Drums	37	55-gallon drums
Total Number of Solid Hazardous Waste Drums	0	55-gallon drums
Volume of Liquid Waste	2,035	gallon
Volume of Solid Waste	0	cubic yard
Secondary Containment/Floor Dimensions		
Length (excluding Berm/Curb)	40.9	foot
Width (excluding Berm/Curb)	6.9	foot
Berm Area	60.6	square foot
Total Area	343.6	square foot
Thickness	0.0	foot
Total Volume	0.0	cubic foot
Decontamination		
Ratio of Decontamination Fluid to Area	0.6	gallon/square foot
Total Volume of Decontamination Liquid	206	gallon
Work rate to clean one square foot	0.0097	work hr per square foot
labor hours	3.3	hour
Other Structures		
Area	0	square foot
Volume	0	cubic foot

S6 Closure Costs
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Removal, Transportation, and Disposal of Liquid Hazardous Waste Drums	Unit	Quantity[1]	Unit Price	Total Cost
Labor and Equipment Cost	per drum	37	$3.45	$127.65
Transportation Cost	truckload (80 drums)	1	$1,995.00	$1,995.00
Disposal Cost	per drum	37	$265.00	$9,805.00
Removal, Transportation, and Disposal of Solid Hazardous Wastes	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost (drum management)	per drum	0	$3.45	$0.00
Labor and Equipment Cost (roll-off management)	per day	0	$505.00	$0.00
Drum Transportation Cost	per truckload (80 drums)	0	$6,703.20	$0.00
Bulk Transportation Cost	truckload (25 cy)	0	$6,703.20	$0.00
Drum Disposal Cost	per drum	0	$265.00	$0.00
Bulk Disposal Cost	per ton	0	$655.00	$0.00
Decontamination Labor, Equipment, and Disposal Costs	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost for Steam Cleaning or pressure washing	per hour	3.3	63.47	$211.54
Decontamination Water Disposal Cost	per gallon	206	$1.30	$268.01
Sampling and Analysis	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Decontamination water analysis2	per sample	2	$460.00	$920.00
Sample Collection Labor	per hour	2	$90.00	$180.00

TOTAL COST **$13,507.21**

[1]See area detail sheet for quantity derivation.

[2]Decontamination is included in a separate cost summary sheet

S7 Containment Area Details
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Unit S7		
Hazardous Waste Disposal Volumes		
Total Number of Liquid Hazardous Waste Drums	80	55-gallon drums
Total Number of Solid Hazardous Waste Drums	0	55-gallon drums
Volume of Liquid Waste	4,400	gallon
Volume of Solid Waste	0	cubic yard
Secondary Containment/Floor Dimensions		
Length (excluding Berm/Curb)	30.0	foot
Width (excluding Berm/Curb)	10.0	foot
Berm Area	0.0	square foot
Total Area	300.0	square foot
Thickness	0.0	foot
Total Volume	0.0	cubic foot
Decontamination		
Ratio of Decontamination Fluid to Area	0.6	gallon/square foot
Total Volume of Decontamination Liquid	180	gallon
Work rate to clean one square foot	0.0097	work hr per square foot
labor hours	2.9	hour
Other Structures		
Area	0	square foot
Volume	0	cubic foot

S7 Closure Costs
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Removal, Transportation, and Disposal of Liquid Hazardous Waste Drums	Unit	Quantity[1]	Unit Price	Total Cost
Labor and Equipment Cost	per drum	80	$3.45	$276.00
Transportation Cost	truckload (80 drums)	1	$1,995.00	$1,995.00
Disposal Cost	per drum	80.0	$900.00	$72,000.00
Removal, Transportation, and Disposal of Solid Hazardous Waste (Mecury Contaminated Waste)	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost (drum management)	per drum	0	$3.45	$0.00
Labor and Equipment Cost (roll-off management)	per day	1	$505.00	$505.00
Transportation Cost	per truckload (80 drums)	0	$6,703.20	$0.00
Transportation Cost	truckload (25 cy)	0	$6,703.20	$0.00
Disposal Cost	per ton	0	$655.00	$0.00
Decontamination Labor, Equipment, and Disposal Costs	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost for Steam Cleaning or pressure washing	per hour	2.9	63.47	$184.70
Decontamination Water Disposal Cost	per gallon	180	$1.30	$234.00
Sampling and Analysis	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Decontamination water analysis2	per sample	2	$567.00	$1,134.00
Sample Collection Labor	per hour	2	$90.00	$180.00

TOTAL COST **$76,508.70**

[1]See area detail sheet for quantity derivation.

S8 Containment Area Details
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Unit S8		
Hazardous Waste Disposal Volumes		
Total Number of Liquid Hazardous Waste Drums	160	55-gallon drums
Total Number of Solid Hazardous Waste Drums	0	55-gallon drums
Volume of Liquid Waste	0	gallon
Volume of Solid Waste	120	cubic yard
Secondary Containment/Floor Dimensions		
Length (excluding Berm/Curb)	78.9	foot
Width (excluding Berm/Curb)	39.0	foot
Berm Area	22.0	square foot
Total Area	3,099	square foot
Thickness	0.0	foot
Total Volume	0.0	cubic foot
Decontamination		
Ratio of Decontamination Fluid to Area	0.6	gallon/square foot
Total Volume of Decontamination Liquid	1,859	gallon
Work rate to clean one square foot	0.0097	work hr per square foot
labor hours	30.1	hour
Other Structures		
Area	0	square foot
Volume	0	cubic foot

S8 Closure Costs
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Removal, Transportation, and Disposal of Liquid Hazardous Waste Drums	Unit	Quantity[1]	Unit Price	Total Cost
Labor and Equipment Cost	per drum	160	$3.45	$552.00
Transportation Cost	truckload (80 drums)	2	$1,995.00	$3,990.00
Disposal Cost	per drum	160.0	$265.00	$42,400.00
Removal, Transportation, and Disposal of Solid Hazardous Waste (Mecury Contaminated Waste)	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost (drum management)	per drum	0	$3.45	$0.00
Labor and Equipment Cost (roll-off management)	per day	1	$505.00	$505.00
Transportation Cost	per truckload (80 drums)	0	$6,703.20	$0.00
Transportation Cost	truckload (25 cy)	5	$6,703.20	$33,516.00
Disposal Cost	per ton	120	$655.00	$78,600.00
Decontamination Labor, Equipment, and Disposal Costs	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost for Steam Cleaning or pressure washing	per hour	30.1	63.47	$1,907.99
Decontamination Water Disposal Cost	per gallon	1,859	$1.30	$2,417.30
Sampling and Analysis	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Decontamination water analysis2	per sample	2	$567.00	$1,134.00
Sample Collection Labor	per hour	2	$90.00	$180.00

TOTAL COST **$165,202.29**

[1]See area detail sheet for quantity derivation.

[2]Decontamination is included in a separate cost summary sheet

S12 Containment Area Details
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Unit S12		
Hazardous Waste Disposal Volumes		
Total Number of Liquid Hazardous Waste Drums	0	55-gallon drums
Total Number of Solid Hazardous Waste Drums	0	55-gallon drums
Volume of Liquid Waste	0	gallon
Volume of Solid Waste	320	cubic yard
Secondary Containment/Floor Dimensions		
Length (excluding Berm/Curb)	91.7	foot
Width (excluding Berm/Curb)	25.0	foot
Berm Area	53.1	square foot
Total Area	2,345	square foot
Thickness	0.0	foot
Total Volume	0.0	cubic foot
Decontamination		
Ratio of Decontamination Fluid to Area	0.6	gallon/square foot
Total Volume of Decontamination Liquid	1,407	gallon
Work rate to clean one square foot	0.0097	work hr per square foot
labor hours	22.7	hour
Other Structures		
Area	0	square foot
Volume	0	cubic foot

S12 Closure Costs
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Removal, Transportation, and Disposal of Liquid Hazardous Waste Drums	Unit	Quantity[1]	Unit Price	Total Cost
Labor and Equipment Cost	per drum	0	$3.45	$0.00
Transportation Cost	truckload (80 drums)	0	$1,995.00	$0.00
Disposal Cost	per drum	0.0	$900.00	$0.00
Removal, Transportation, and Disposal of Solid Hazardous Waste (Mecury Contaminated Waste)	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost (drum management)	per drum	0	$3.45	$0.00
Labor and Equipment Cost (roll-off management)	per day	1	$505.00	$505.00
Transportation Cost	per truckload (80 drums)	0	$6,703.20	$0.00
Transportation Cost	truckload (25 cy)	13	$6,703.20	$87,141.60
Disposal Cost	per ton	320	$655.00	$209,600.00
Decontamination Labor, Equipment, and Disposal Costs	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Labor and Equipment Cost for Steam Cleaning or pressure washing	per hour	22.7	63.47	$1,443.58
Decontamination Water Disposal Cost	per gallon	1,407	$1.30	$1,828.92
Sampling and Analysis	**Unit**	**Quantity**	**Unit Price**	**Total Cost**
Decontamination water analysis2	per sample	2	$567.00	$1,134.00
Sample Collection Labor	per hour	2	$90.00	$180.00

TOTAL COST **$301,833.09**

[1]See area detail sheet for quantity derivation.

[2]Decontamination is included in a separate cost summary sheet

Decontamination Costs
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Decontamination Storage and Transportation Costs	Unit	Quantity	Unit Price	Total Cost
storage of decontamination water in double walled Frac tank - 20,000 gallon	month	1	$1,500.00	$1,500.00
Transportation Cost	per truckload (6,900 gallons)	2	$3,062.50	$6,125.00

TOTAL COST **$7,625.00**

Note: cost includes transportation, and temporary storage of decontamination water (hazardous waste) from all container storage areas (S1 - S8, and S12)

Decontamination Details
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin

Storage Area	Total Labor Hours	Decontamination Volume (gallons)
S1	24.1	1,494
S2	5.8	359
S3	10.4	641
S4	10.6	658
S5	5.0	307
S6	3.3	206
S7	2.9	180
S8	30.1	1,859
S12	22.7	1,407
Total	**115.0**	**7,111**

ATTACHMENT 8-2

BASIS FOR AND ASSUMPTIONS MADE IN THE CLOSURE COST ESTIMATE

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262.878.2699 Fax

The closure cost estimate is based on labor cost information derived from the RSMeans, supplemented where appropriate by quotations from waste services contractors and disposal facilities. In general, the comments below apply to the calculation page for each storage area (S-1 through S-12) within the cost estimate.

REMOVAL OF WASTE INVENTORY

A labor cost to remove the waste inventory was calculated using a value of $3.45 per drum. This cost only applies to drummed waste removal for S1 through S-7.

A labor cost to oversee and coordinate the pickup and removal of roll-off bins was calculated at a rate of $505 per day per unit (S-8 and S-12).

TRANSPORTATION OF WASTE

Transportation costs were calculated using RSMeans default values for vehicle transport capacity. Transportation truckloads were assessed based on the following:

- 80 drums per truckload
- 25 cubic yards per truckload
- 6,900 gallons per truckload

Costs for transportation of waste, along with the disposal facility, is based on the following costs:

Waste	Facility	Location and distance	Truckload basis	Transportation Cost/mile	Transportation Cost per truckload	Source Cost/Mile
Non-Free Liquids Wastes	Waste Management	Emelle, AL 840 miles	80 drums or 25 cubic yards	$7.98	$6,703.20	RSMeans
Drummed Liquid Waste	Heritage	Indianapolis, IN 250 miles	80 drums	$7.98	$1,995.00	RSMeans
Decontamination water	Waste Management	Vickery, OH 350 miles	6,900 gallons	$8.75	$3,062.50	RSMeans

TREATMENT AND DISPOSAL OF WASTE

WAC NR 664.0142(1)(a) requires that "[t]he estimate shall equal the cost of final closure at the point in the facility's active life when the extent and manner of its operation would make closure the most expensive." Treatment and disposal costs were calculated according to the maximum

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licensed volume of waste material present in each licensed storage area. WM Waste understands that the disposal of various materials in conformance with compliance limits can lead to highly variable disposal costs, depending upon whether the substance is a free liquid or non-free liquid waste. WM Waste will periodically evaluate worst-case closure scenarios, based on current market conditions for the two types of wastes, and will revise closure cost estimates accordingly.

Costs for the treatment and disposal of waste, based on disposal facility, is based on the following current disposal estimates for liquid and non-free liquid wastes:

Waste	Facility	Location	Disposal Cost	Source of Cost/Drum
Drummed Liquid Wastes	Heritage	Indianapolis, IN	$265 per drum	RSMeans
Drummed Non-Free Liquids Wastes	Waste Management	Emelle, AL	$265 per drum	RSMeans
Bulk Non-Free Liquids Wastes	Waste Management	Emelle, AL	$655 per ton [1]	RSMeans
Decontamination Water	Waste Management	Vickery, OH	$1.30 per gallon	Intercompany Quote

1. For the purpose of this cost estimate, one (1) ton is assumed to equal one (1) cubic yard, based on experience, i.e., typical density for this type of material.

DECONTAMINATION BY STEAM CLEANING OR PRESSURE WASH

Work rate to steam clean or pressure wash one square foot of surface area:

- Value used: 0.0097 Work hr per ft^2

  Justification: Field estimation based on experience using the same equipment to clean interiors of roll-off boxes.

As described in the Closure Plan, decontamination will be achieved using a two-step process. The first stage, a high-pressure detergent wash, is assumed to take 30 seconds to pressure wash 1 ft^2. The second stage, a water rinse, is assumed to take 5 seconds to rinse 1 ft^2.

$$\frac{35 \text{ seconds}}{1 \text{ ft}^2} \times \frac{1 \text{ work hour}}{3600 \text{ seconds}} = 0.0097 \frac{\text{work hour}}{\text{ft}^2}$$

Ratio of decontamination fluid to area:

- Value used: 0.6 gal per ft^2

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Justification: Field estimation based on experience using the same equipment to clean interiors of roll-off boxes.

For the first stage, the application rate of decontamination fluid from the cleaning device is estimated to be 0.5 gallons per minute. Decontamination fluid is applied for 30 seconds per square foot. The application rate and required time for decontamination fluid application are based on experience, typical application rates for this type of surface and equipment, and typical required decontamination fluid application time, for this type of surface and decontamination fluid.

$$\frac{30 \text{ seconds}}{1 \text{ ft}^2} \times \frac{1 \text{ work hour}}{3600 \text{ seconds}} \times 0.5 \frac{\text{gallons}}{\text{minute}} \times \frac{60 \text{ minutes}}{1 \text{ work hour}} = 0.25 \frac{\text{gallons}}{\text{ft}^2}$$

For the second stage, ½" of rinse water is assumed to be applied per square foot.

$$\frac{0.5 \text{ inches}}{\text{ft}^2} \times \frac{1 \text{ foot}}{12 \text{ inches}} \times 1 \text{ ft}^2 = 0.04 \frac{\text{ft}^3}{\text{ft}^2} \times 7.48 \frac{\text{gallon}}{\text{ft}^3} = 0.31 \frac{\text{gallon}}{\text{ft}^2}$$

The summary below describes the approach used to derive the Closure Cost Estimate.

Decontamination
The labor cost and decontamination fluid generation amounts were calculated using the values indicated above. For the purpose of this cost estimate, decontamination fluid from each storage area is assumed to be directed to permanent or temporary sumps for collection and transferred to a rented 20,000-gallon double-walled frac tank via wet vacuum units or portable pumps. A total of 12,037-gallons of decontamination fluid will be generated that will require disposal. All labor, equipment, transportation, and disposal costs for decontamination are included as a separate line item.

SAMPLING AND ANALYSIS

Rinsate Samples
The labor cost associated with sampling final rinsate water was based on experience and assumes samples can be collected at a rate of 1 sample per hour. The analytical costs were obtained from a certified laboratory in Wisconsin.

Analytical Method Described in Closure Plan	Cost/Sample
Volatile organic analysis (SW-846 Method 8260)	$84
Semi-volatile organics (SW-846 Method 8270)	$183
Chlorinated herbicides (SW-846, Method 8151)	$215
Metals (SW-846 Method 6010 with appropriate Series 7000 individual Metal Methods (e.g	$85

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Mercury, cold vapor (SW-846, Method 7470) with prep)	

ENGINEERING

The costs for an engineering firm to manage, oversee and certify the closure are based on a proposal from an engineering firm. The engineering cost estimate includes the following project management, administration, and oversight activities: procurement, contract administration, vendor performance review, payment processing, and other activities reasonably anticipated to complete the project.

CONTINGENCY

A contingency was calculated based on 10% of the total closure cost.

ATTACHEMENT 8-3

FINANCIAL ASSURANCE DOCUMENT

Bond No. 1057642

RIDER

To be attached to and form a part of Performance Bond, No. 1057642

dated the 1st day of November , 2010 issued by

LEXON Insurance Company, 10002 Shelbyville Road, Louisville, KY 40223 as Surety, on behalf of

WM Waste, Inc., 21211 Durand Avenue, Union Grove, WI 53182 , as Principal,

in the penal sum of Four Hundred Thirty-Six Thousand Two Hundred Eighty-One and 53/100

Dollars ($ 436,281.53), and in favor of Wisconsin DNR 101 South Webster, Madison, WI 53707-7921

In consideration of the premium charged for the attached bond, it is hereby agreed that the attached bond be amended as follows:

This rider will increase the bond amount as follows:

Current Closure Amount: $2,670,691.00
New Closure Amount: $2,703,274.00

Provided, However, that the attached bond shall be subject to all its agreements, limitations and conditions except as herein expressly modified, and further that the liability of the Surety under the attached bond and the attached bond as amended by this rider shall not be cumulative.

This rider shall become effective as of the 1st day of November , 2021

Signed, sealed and dated this 5th day of October , 2021

WM Waste, Inc.

WITNESS:

Sandra L Fusinetti

PRINCIPAL

By Susan Ritter

Susan Ritter, Attorney-in-Fact

WITNESS:

Sandra L Fusinetti

LEXON Insurance Company

By Theresa Pickerrell

Theresa Pickerrell , Attorney-in-Fact

POWER OF ATTORNEY

KNOWN ALL MEN BY THESE PRESENTS that Waste Management, Inc. and each of its direct and indirect majority owned subsidiaries (the "WM Entities"), have constituted and appointed and do hereby appoint Theresa Pickerrell, Sandra L. Fusinetti, and Susan Ritter of Acrisure, LLC DBA Smith Manus, each its true and lawful Attorney-in-fact to execute under such designation in its name, to affix the corporate seal approved by the WM Entities for such purpose, and to deliver for and on its behalf as surety thereon or otherwise, bonds of any of the following classes, to wit:

1. Surety bonds to the United States of America or any agency thereof, and lease and miscellaneous surety bonds required or permitted under the laws, ordinances or regulations of any State, City, Town, Village, Board or any other body or organization, public or private.

2. Bonds on behalf of WM Entities in connection with bids, proposals or contracts.

The foregoing powers granted by the WM Entities shall be subject to and conditional upon the written direction of a duly appointed officer of the applicable WM Entity (or any designee of any such officer) to execute and deliver any such bonds.

The signatures and attestations of such Attorneys-in-fact and the seal of the WM Entity may be affixed to any such bond, policy or to any certificate relating thereto by facsimile and any such bond, policy or certificate bearing such facsimile signatures or facsimile seal shall be valid and binding upon the applicable WM Entity when so affixed.

IN WITNESS WHEREOF, the WM Entities have caused these presents to be signed by the Vice President and Treasurer and its corporate seal to be hereto affixed. This power of attorney is in effect as of October 5, 2021.

Witness:

Diana Lea

On behalf of Waste Management, Inc. and each of the other WM Entities

David D. Reed

David Reed
Vice President and Treasurer

SOMPO INTERNATIONAL
INSURANCE

11078

POWER OF ATTORNEY

KNOW ALL BY THESE PRESENTS, that **Endurance Assurance Corporation**, a Delaware corporation, **Endurance American Insurance Company**, a Delaware corporation, **Lexon Insurance Company**, a Texas corporation, and/or **Bond Safeguard Insurance Company**, a South Dakota corporation, each, a "Company" and collectively, "**Sompo International,**" do hereby constitute and appoint: **Brook T. Smith, Raymond M. Hundley, Jason D. Cromwell, James H. Martin, Barbara Duncan, Sandra L. Fusinetti, Mark A. Guidry, Jill Kemp, Lynnette Long, Amy Bowers, Deborah Neichter, Theresa Pickerrell, Sheryon Quinn, Beth Frymire, Leigh McCarthy, Michael Dix, Susan Ritter, Ryan Britt** as true and lawful Attorney(s)-In-Fact to make, execute, seal, and deliver for, and on its behalf as surety or co-surety; bonds and undertakings given for any and all purposes, also to execute and deliver on its behalf as aforesaid renewals, extensions, agreements, waivers, consents or stipulations relating to such bonds or undertakings provided, however, that no single bond or undertaking so made, executed and delivered shall obligate the Company for any portion of the penal sum thereof in excess of the sum of **One Hundred Million Dollars ($100,000,000.00).**

Such bonds and undertakings for said purposes, when duly executed by said attorney(s)-in-fact, shall be binding upon the Company as fully and to the same extent as if signed by the President of the Company under its corporate seal attested by its Corporate Secretary.

This appointment is made under and by authority of certain resolutions adopted by the sole shareholder of each Company by unanimous written consent effective the 15th day of June, 2019, a copy of which appears below under the heading entitled "Certificate".

This Power of Attorney is signed and sealed by facsimile under and by authority of the following resolution adopted by the sole shareholder of each Company by unanimous written consent effective the 15th day of June, 2019 and said resolution has not since been revoked, amended or repealed:

RESOLVED, that the signature of an individual named above and the seal of the Company may be affixed to any such power of attorney or any certificate relating thereto by facsimile, and any such power of attorney or certificate bearing such facsimile signature or seal shall be valid and binding upon the Company in the future with respect to any bond or undertaking to which it is attached.

IN WITNESS WHEREOF, each Company has caused this instrument to be signed by the following officers, and its corporate seal to be affixed this 15th day of June, 2019.

Endurance Assurance Corporation
By: Richard M Appel
Richard Appel; SVP & Senior Counsel

Endurance American Insurance Company
By: Richard M Appel
Richard Appel; SVP & Senior Counsel

Lexon Insurance Company
By: Richard M Appel
Richard Appel; SVP & Senior Counsel

Bond Safeguard Insurance Company
By: Richard M Appel
Richard Appel; SVP & Senior Counsel

ACKNOWLEDGEMENT

On this 15th day of June, 2019, before me, personally came the above signatories known to me, who being duly sworn, did depose and say that he/they is an officer of each of the Companies; and that he executed said instrument on behalf of each Company by authority of his office under the by-laws of each Company.

By: Amy Taylor
Amy Taylor, Notary Public - My Commission Expires 5/9/23

CERTIFICATE

I, the undersigned Officer of each Company, DO HEREBY CERTIFY that:

1. That the original power of attorney of which the foregoing is a copy was duly executed on behalf of each Company and has not since been revoked, amended or modified; that the undersigned has compared the foregoing copy thereof with the original power of attorney, and that the same is a true and correct copy of the original power of attorney and of the whole thereof;
2. The following are resolutions which were adopted by the sole shareholder of each Company by unanimous written consent effective June 15, 2019 and said resolutions have not since been revoked, amended or modified:

   "RESOLVED, that each of the individuals named below is authorized to make, execute, seal and deliver for and on behalf of the Company any and all bonds, undertakings or obligations in surety or co-surety with others: RICHARD M. APPEL, BRIAN J. BEGGS, CHRISTOPHER DONELAN, SHARON L. SIMS, CHRISTOPHER L. SPARRO, MARIANNE L. WILBERT

   ; and be it further

   RESOLVED, that each of the individuals named above is authorized to appoint attorneys-in-fact for the purpose of making, executing, sealing and delivering bonds, undertakings or obligations in surety or co-surety for and on behalf of the Company."
3. The undersigned further certifies that the above resolutions are true and correct copies of the resolutions as so recorded and of the whole thereof.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the corporate seal this 5th day of October, 2021.

By:
Daniel S. Lurie, Secretary

NOTICE: U. S. TREASURY DEPARTMENT'S OFFICE OF FOREIGN ASSETS CONTROL (OFAC)

No coverage is provided by this Notice nor can it be construed to replace any provisions of any surety bond or other surety coverage provided. This Notice provides information concerning possible impact on your surety coverage due to directives issued by OFAC. **Please read this Notice carefully.**

The Office of Foreign Assets Control (OFAC) administers and enforces sanctions policy, based on Presidential declarations of "national emergency". OFAC has identified and listed numerous foreign agents, front organizations, terrorists, terrorist organizations, and narcotics traffickers as "Specially Designated Nationals and Blocked Persons". This list can be located on the United States Treasury's website – https://www.treasury.gov/resource-center/sanctions/SDN-List.

In accordance with OFAC regulations, if it is determined that you or any other person or entity claiming the benefits of any coverage has violated U.S. sanctions law or is a Specially Designated National and Blocked Person, as identified by OFAC, any coverage will be considered a blocked or frozen contract and all provisions of any coverage provided are immediately subject to OFAC. When a surety bond or other form of surety coverage is considered to be such a blocked or frozen contract, no payments nor premium refunds may be made without authorization from OFAC. Other limitations on the premiums and payments may also apply.

UPS CampusShip: View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.

2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. **GETTING YOUR SHIPMENT TO UPS**
   Customers with a Daily Pickup
   Your driver will pickup your shipment(s) as usual.

   Customers without a Daily Pickup
   Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.
   Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.
   Hand the package to any UPS driver in your area.

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UPS Access Point™
JOHN'S SUPERMARKET & HARDWARE
34019 WALKER RD N
WALKER ,LA 70785

UPS Access Point™
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DENHAM SPRINGS ,LA 70726

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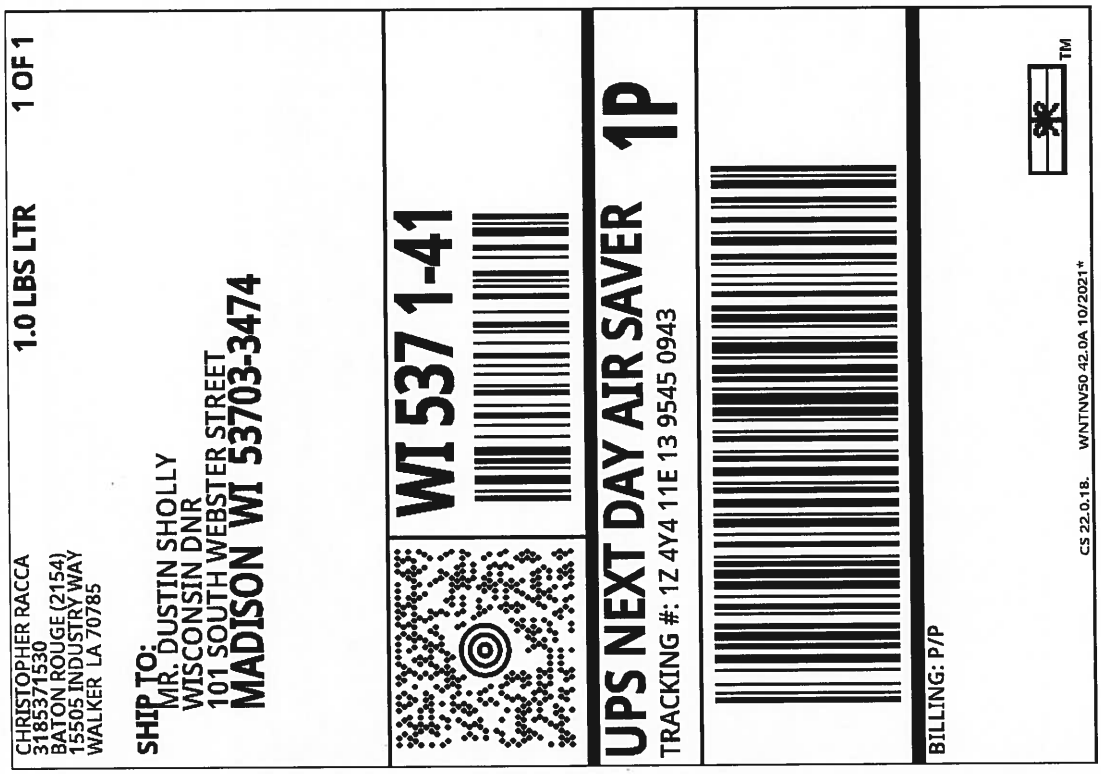

ATTACHEMENT 8-4

SAMPLING AND ANALYSIS PLAN

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Derivation of Estimated Sample Count in Sampling Schedule

Estimated number of decontamination samples in individual units is based on the decontamination and decontamination sampling strategies in Sections 8-2.1.1.2 and 8-2.1.1.3

TABLE 8-4-1
WM WASTE FACILITY
SAMPLING SCHEDULE

CSA	Number of Rinsate Samples			Number of QA/QC Samples[1]		
				Decontamination Blanks[3]	Field Blank	Number of Duplicate Samples
S-1[4]	1			2	2	1
S-2	1					1
S-3	1					1
S-4	1					1
S-5	1					1
S-6	1					1
S-7	1					1
S-8	1					1
S-12	1					1

[1]The final number of QA/QC samples will be determined by field conditions. However, QA/QC sampling protocols contained in EPA document SW-846 will be utilized as guidance for trip blanks, field blanks, decontamination blanks, and field duplicates. In addition to the blanks that are illustrated here, a trip blank will be included in every cooler containing VOCs.
[23]Background water samples are the input to cleaning devices and the water output from cleaning devices.
[4]All costs associated with taking background and QA/QC decontamination blanks, and field blank samples have been incorporated to the sampling and analysis cost of S-1.
[5]

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- **Sample Equipment Decontamination**

  Decontamination procedures during closure will include the washing of all non-disposable sampling equipment with a non-phosphate-based detergent or equivalent, followed by a tap water rinse. Additionally, dedicated sampling spoons and bailers will be used during sample collection. As appropriate, after collecting each discrete sample, decontamination procedures will be performed on sampling equipment. This procedure is designed to eliminate the possibility of contamination being introduced from an off-site source, preventing on-site cross-contamination between samples, and assuring that possible contamination encountered during the investigation does not leave the site.

  All decontamination fluids will be collected and transferred to a temporary holding unit of adequate capacity and construction for disposal and/or sampling and analysis. The soil cuttings accumulated while auguring soil samples will be replaced to the respective borehole. All PPE will also be properly disposed.

  The following constitutes a minimum list of supplies and equipment necessary for closure decontamination and sample equipment decontamination that will be available during the closure:

  - stainless steel or polyethylene tubs;
  - clean drums/containers for rinsate storage;
  - wash and rinse water;
  - steam cleaner;
  - long handled brush;
  - water sprayer;
  - duct tape;
  - paper towels;
  - trash bags;
  - surgical gloves;
  - hand cleaner;
  - non-phosphate soap;
  - potable water;
  - first-aid kit; and
  - work bench or equivalent work area.

Sample Custody and Laboratory Procedures

The samples collected will be analyzed for the applicable parameters listed in Tables 8-4-2 and 8-4-3, as required by the Closure Plan for the sample type.

Clean Closure Standards

Clean closure standards for liquid samples will be compared to the values developed in compliance with NR 140.

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TABLE 8-4-2
LIQUID SAMPLES - ANALYTICAL PARAMETERS

Test Parameters / Methods[1]	Analytes (CAS No., Waste Code)	Typical PQLs[2]
Total Metals SW6010/6020 (metals)	Arsenic (As) (7440-38-2, D004) Barium (Ba) (7440-39-3, D005) Cadmium (Cd) (7440-43-9, D006) Chromium (Cr) (7440-47-3, D007) Lead (Pb) (7439-92-1, D008) Selenium (Se) (7782-49-2, D010) Silver (Ag) (7440-22-4, D011)	0.06 (mg/l) 0.05 0.005 0.005 0.005 0.01 0.05
SW7470 (mercury)	Mercury (Hg) (7439-97-6, D009, K071, K106, U151, P092)	0.20 (ppm)
Organic Constituents SW8270 (semi-volatiles organics)	1,4-Dichlorobenzene (106-46-7, D027) 2,4,5-Trichlorophenol (95-95-4, D041) 2,4,6-Trichlorophenol (88-06-2, D042) 2,4-Dinitrotoluene (121-14-2, D030) Chlordane (57-74-9, D020) Cresol (D026) Endrin (72-20-8, D012) Heptachlor (76-44-8, D031) Hexachlorobenzene (118-74-1, D032) Hexachlorobutadiene (87-68-3, D033) Hexachloroethane (67-72-1, D034) Lindane (58-89-9, D013) m-Cresol (108-39-4, D024) Methoxychlor (72-43-5, D014) Nitrobenzene (98-95-3, D036) o-Cresol (95-48-7, D023) p-Cresol (106-44-5, D025) Pentachlorophenol (87-86-5, D037) Toxaphene (8001-35-2, D015)	10 (ppb) 10 10 10 10 10 10 10 10 10 10 10 50
SW8260 (volatiles organics)	Chloroform (67-66-3, D022) 2-Butanone (78-93-3, D035) Carbon Tetrachloride (56-23-5, D019) Benzene (71-43-2, D018) Pyridine (110-86-1, D038) Tetrachloroethene (127-18-4, D039) Chlorobenzene (108-90-7, D921) 1,2-Dichloroethane (107-06-2, D028) Vinyl Chloride (75-01-4, D043) Trichloroethene (79-01-6, D040) 1,1-Dichloroethene (75-35-4, D029)	3 (ppb) 57 2 2 2 3 2 4 3 4
SW8151 Chlorinated Herbicides	2,4,5-TP (Silvex) (93-72-1, D017) 2,4-D (94-75-7, D016)	0.08 (ppb) 0.2

[1]Methods are from Test Methods for Evaluating Solid Waste, Physical/Chemical Methods SW-846, USEPA. The latest revisions of each method will be used.

[2]PQLs - Practical Quantitation Limits. These PQLs represent typical laboratory reporting limits for liquids.

Appendix 9 Insurance Documents

CERTIFICATE OF LIABILITY INSURANCE

1/1/2023

DATE (MM/DD/YYYY): 6/17/2022

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER	LOCKTON COMPANIES 3657 BRIARPARK DRIVE, SUITE 700 HOUSTON TX 77042 866-260-3538
CONTACT NAME:	
PHONE (A/C, No, Ext):	FAX (A/C, No):
E-MAIL ADDRESS:	

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A : ACE American Insurance Company	22667
INSURER B : Indemnity Insurance Co of North America	43575
INSURER C : ACE Fire Underwriters Insurance Company	20702
INSURER D : ACE Property & Casualty Insurance Co	20699
INSURER E :	
INSURER F :	

INSURED 1300299
WASTE MANAGEMENT HOLDINGS, INC. & ALL AFFILIATED, RELATED & SUBSIDIARY COMPANIES INCLUDING:
WASTE MANAGEMENT OF WISCONSIN INC.
W132 N 10487 GRANT DRIVE
GERMANTOWN WI 53022

COVERAGES WIGERMAN **CERTIFICATE NUMBER:** 17369339 **REVISION NUMBER:** XXXXXXX

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	X COMMERCIAL GENERAL LIABILITY [ ] CLAIMS-MADE [X] OCCUR X XCU INCLUDED X ISO FORM CG00010413 GEN'L AGGREGATE LIMIT APPLIES PER: [ ] POLICY [X] PRO-JECT [X] LOC [ ] OTHER:	Y	Y	HDO G72492365	1/1/2022	1/1/2023	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG $	$ 5,000,000 $ 5,000,000 $ XXXXXXX $ 5,000,000 $ 6,000,000 $ 6,000,000 $
A	AUTOMOBILE LIABILITY X ANY AUTO X OWNED AUTOS ONLY [ ] SCHEDULED AUTOS X HIRED AUTOS ONLY [X] NON-OWNED AUTOS ONLY X MCS-90	Y	Y	MMT H25550328	1/1/2022	1/1/2023	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident) $	$ 1,000,000 $ XXXXXXX $ XXXXXXX $ XXXXXXX $ XXXXXXX
D	X UMBRELLA LIAB [X] OCCUR EXCESS LIAB [ ] CLAIMS-MADE [ ] DED [ ] RETENTION $	Y	Y	XEUG27929242 007	1/1/2022	1/1/2023	EACH OCCURRENCE AGGREGATE $	$ 15,000,000 $ 15,000,000 $ XXXXXXX
B A C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? Y/N [N] (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	N/A	Y	WLR C68918595 (AOS) WLR C68918558 (AZ,CA & MA) SCF C68918637 (WI)	1/1/2022 1/1/2022 1/1/2022	1/1/2023 1/1/2023 1/1/2023	X PER STATUTE [ ] OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	 $ 3,000,000 $ 3,000,000 $ 3,000,000
A	EXCESS AUTO LIABILITY	Y	Y	XSA H25550286	1/1/2022	1/1/2023	COMBINED SINGLE LIMIT $9,000,000 (EACH ACCIDENT)	

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
BLANKET WAIVER OF SUBROGATION IS GRANTED IN FAVOR OF CERTIFICATE HOLDER ON ALL POLICIES WHERE AND TO THE EXTENT REQUIRED BY WRITTEN CONTRACT WHERE PERMISSIBLE BY LAW. CERTIFICATE HOLDER IS NAMED AS AN ADDITIONAL INSURED ON ALL POLICIES (EXCEPT FOR WORKERS' COMP/EL) WHERE AND TO THE EXTENT REQUIRED BY WRITTEN CONTRACT.

CERTIFICATE HOLDER

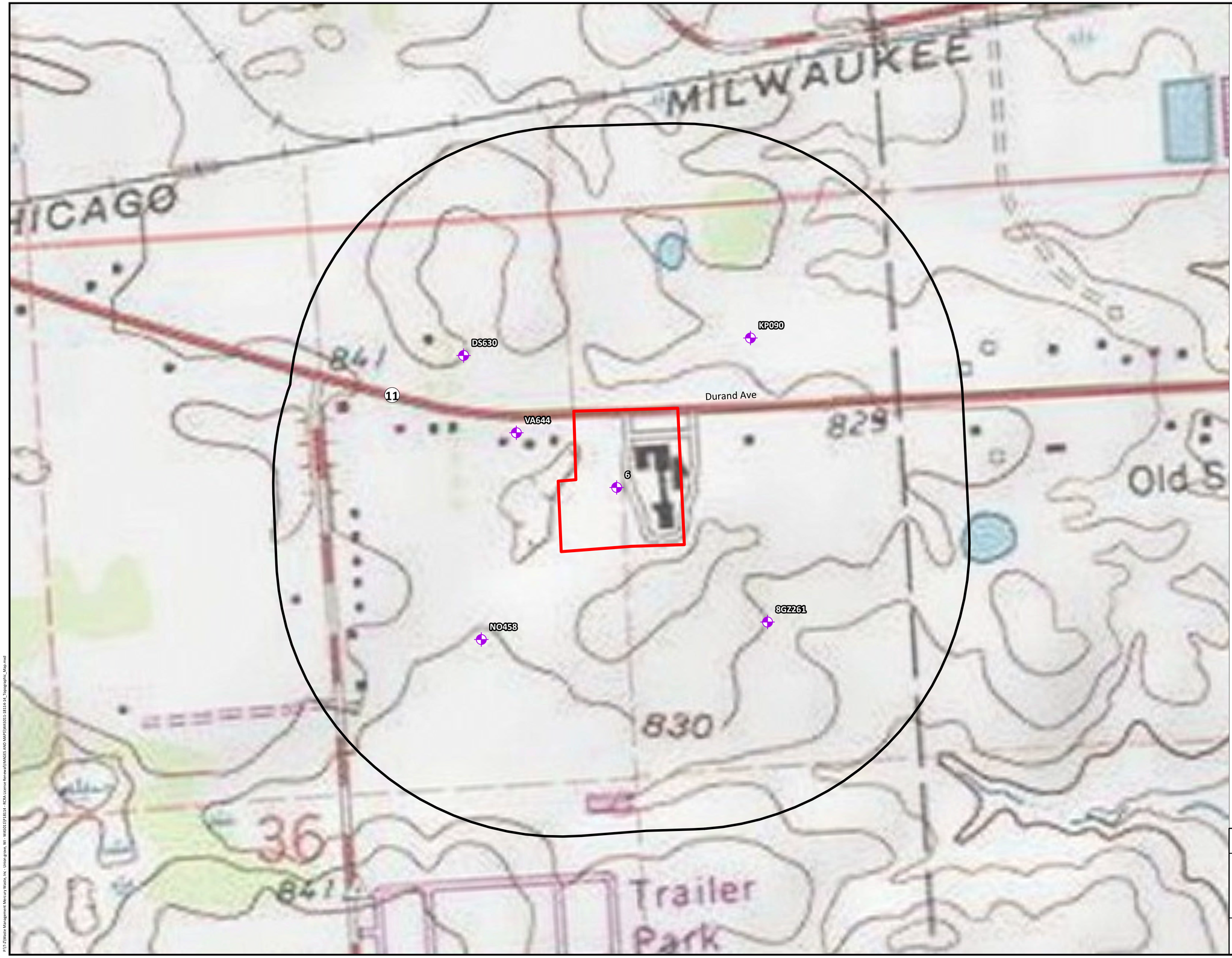
17369339
WISCONSIN DEPARTMENT OF NATURAL RESOURCES
101 S WEBSTER ST
MADISON WI 53707

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Appendix 10 Topographic Map and Wind Rose



N

S

0 200

Feet

Racine County

Legend

- Domestic Water Well
- Facility Boundary
- 1/4-Mile Buffer

USGS 24K Series Topo Map, Union Grove, WI

WM Waste, Inc.
Union Grove, Wisconsin

Topographic Map

Racine County, WI

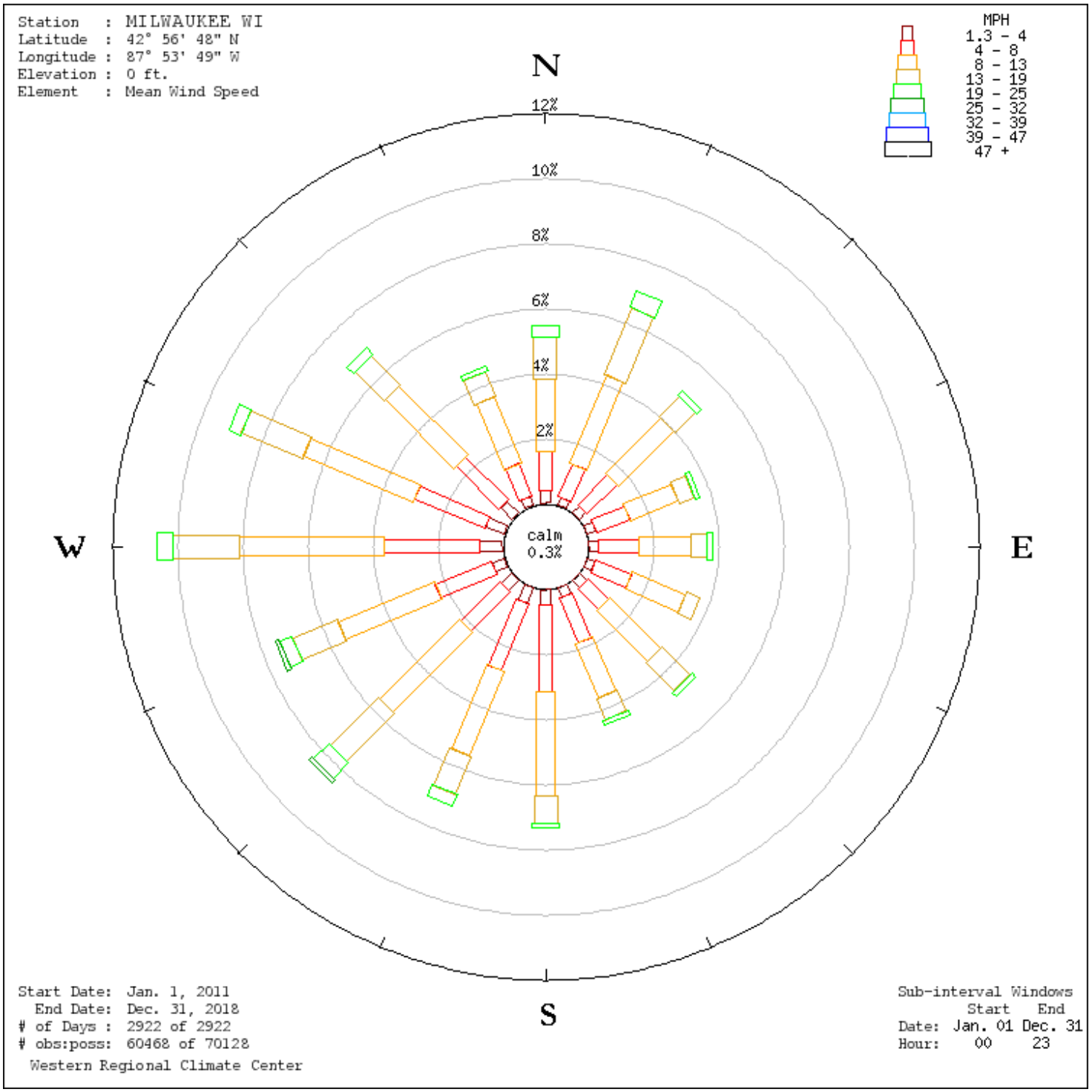
CK Associates Environmental Consultants

Drawn:	CAL	Checked:	BR
Date:	11/19/2020	Approved:	RK
Dwg. No.:	WA5011-18114-14	**Figure 10-1**	

12/21/2021 11:22:57 AM

P:\1-2\Waste Management Mercury Waste, Inc - Union grove, WI - WA5011P18114 - RCRA License Renewal\IMAGES AND MAPS\WA5011-18114-14_Topographic_Map.mxd

MILWAUKEE WI



MILWAUKEE WI - Wind Frequency Table (percentage)

Latitude : 42° 56' 48" N
Longitude : 87° 53' 49" W
Elevation : 0 ft.
Element : Mean Wind Speed

Start Date : Jan. 1, 2011
End Date : Dec. 31, 2018
# of Days : 2922 of 2922
obs : poss : 60468 of 70128

Sub Interval Windows

	Start	End
Date	Jan. 01	Dec. 31

Hour 00 23

(Greater than or equal to initial interval value and Less than ending interval value.)

Range (mph)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	Total
1.3 - 4	0.4	0.2	0.3	0.3	0.3	0.2	0.3	0.3	0.5	0.5	0.4	0.4	0.7	0.6	0.5	0.3	6.0
4 - 8	1.2	1.1	1.3	1.1	1.2	1.2	0.9	1.5	2.7	2.2	1.7	1.9	2.9	2.3	1.9	1.1	26.2
8 - 13	2.2	2.9	2.4	1.6	1.6	1.8	2.2	1.8	3.2	2.8	3.5	3.2	4.4	3.7	3.0	2.2	42.4
13 - 19	1.3	2.2	0.9	0.5	0.5	0.4	1.2	0.7	0.9	1.3	2.1	1.5	2.1	2.0	1.3	0.8	19.5
19 - 25	0.4	0.5	0.2	0.2	0.2	0.1	0.2	0.2	0.1	0.4	0.7	0.4	0.5	0.4	0.3	0.1	4.7
25 - 32	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1	0.1	0.1	0.1	0.0	0.0	0.7
32 - 39	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
39 - 47	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
47 -	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total(%)	5.5	7.0	5.0	3.7	3.8	3.7	4.8	4.5	7.3	7.2	8.4	7.5	10.7	9.1	6.9	4.5	99.6
Calm (<1.3)																	0.3
Ave Speed	11.0	12.1	10.1	9.7	9.4	9.1	10.8	9.5	8.9	10.0	11.4	10.8	10.2	10.5	10.0	10.2	10.3

MILWAUKEE WI - Hourly Wind Statistics Table

Latitude : 42° 56' 48" N
Longitude : 87° 53' 49" W
Elevation : 0 ft.
Element : Mean Wind Speed

Start Date : Jan. 1, 2011
End Date : Dec. 31, 2018
# of Days : 2922 of 2922
obs : poss : 60468 of 70128

Sub Interval Windows

	Start	End
Date	Jan. 01	Dec. 31
Hour	00	23

Time - Time of Day (L.S.T.)
Speed - Average (Scalar) Speed in MPH
U-Vel - East-West Velocity, Positive to East
V-Vel - North-South Velocity, Positive to North
Res Spd - Vector Average (resultant) Speed in MPH
Res Dir - Vector Average (resultant) Direction
Dir Con - Directional Constancy (Res Spd/Speed)
Num Spd - Number of Wind Speed Observations
Num Dir - Number of Wind Direction Observations

Time	Speed	U-Vel	V-Vel	Res Spd	Res Dir	Dir Con	Num Spd	Num Dir
0	7.8	2.7	0.1	2.7	268	0.348	2745	2308
1	7.8	2.8	-0.1	2.8	271	0.359	2745	2331
2	7.7	2.9	-0.2	2.9	274	0.381	2745	2291
3	7.7	2.8	-0.3	2.9	276	0.373	2744	2308
4	7.7	2.8	-0.3	2.8	276	0.364	2745	2332
5	7.8	2.9	-0.3	2.9	277	0.371	2743	2318
6	8.1	2.7	-0.4	2.8	279	0.341	2745	2390
7	8.8	2.8	-0.3	2.8	275	0.317	2743	2469
8	9.7	2.7	-0.2	2.7	275	0.281	2742	2514
9	10.4	2.7	-0.1	2.7	273	0.264	2742	2536

10	11.1	2.5	-0.0	2.5	271	0.225	2740	2567
11	11.6	2.2	0.2	2.2	264	0.190	2744	2599
12	11.9	1.7	0.4	1.7	257	0.143	2744	2625
13	12.2	1.5	0.6	1.6	249	0.129	2739	2629
14	12.4	1.2	0.7	1.4	238	0.111	2743	2661
15	12.1	0.9	0.7	1.2	232	0.098	2744	2673
16	11.7	1.0	0.6	1.2	238	0.099	2741	2676
17	10.7	1.0	0.5	1.1	243	0.101	2739	2641
18	9.7	1.1	0.4	1.2	248	0.122	2744	2612
19	8.8	1.3	0.4	1.3	251	0.152	2742	2537
20	8.4	1.6	0.4	1.7	255	0.201	2743	2479
21	8.1	2.0	0.5	2.1	256	0.261	2743	2392
22	8.0	2.5	0.4	2.5	261	0.311	2742	2347
23	7.9	2.6	0.2	2.6	265	0.331	2741	2328
ALL	9.5	2.1	0.2	2.1	266	0.224	65828	59563

Return to Wind Rose Options
Return to WRCC Home Page

Appendix 11

Plan of Operations and Approval Letter
License 4381

License Renewal Application for Period October 1, 2021 to September 30, 2022 Solid Waste Storage - General Materials Containerized - Non-small non-partially exempt - License Number: 4381

State of Wisconsin - Department of Natural Resources
Waste and Materials Management Program
Form Number 4400 - 115 (Rev Date: 04/2018)

For Questions Contact:
Jennifer Bowen
Jennifer.Bowen@wisconsin.gov
(608) 800-2917

WM WASTE INC
21211 Durand Ave
Union Grove WI 53182-9711

Facility Identifiers
FID: 252195350
EPA ID: WIR000000356

STEVEN SMOLKO
21211 Durand Ave
Union Grove WI 53182-9711
SSMOLKO@WM.COM
(262) 498-3072

To update the contact information click:
Contact Update Form

FORM DUE UPON RECEIPT

To renew this license, select "Yes". If not renewing, select "No". (●) Yes ( ) No

Waste Types - Review and Update As Needed

Code	Description
W180	CONTAMINATED SOIL
W410	INDUSTRIAL
W485	MERCURY VAPOR LAMPS

Service Areas

If you provide the service for which you are being licensed for the entire state of Wisconsin select "Yes". If you do not provide services statewide, select "No". (●) Yes ( ) No

Renewal Fee

Base Fee: 550.00

Total Renewal Fee:

Certification for Renewal

I hereby certify that the information provided is true and accurate to the best of my knowledge and belief. ☒

Submission Detail

E-mail address: ssmolko@wm.com

WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin 53182-9711
800.741.3343 or 262.878.2599
262.878.2699 Fax

WASTE MANAGEMENT®

April 22, 2014

Ken Hein
Waste Management Specialist
Wisconsin Dept. of Natural Resources
2300 N Dr Martin Luther King Jr Dr
Milwaukee, WI 53212

Subject: **WM Mercury Waste Solutions, Inc.**
Modifications to Solid Waste Storage Facility License #4381
Additional Liquid Storage Request

Dear Mr. Hein:

WM Mercury Waste, Inc (WMMWI) is a mercury reclamation facility located in Union Grove, Wisconsin, and is a hazardous waste facility (EPA ID WIR000000356) licensed pursuant to NR 664 for the treatment and storage of hazardous waste prior to recycling. Pursuant to that license, the WDNR has approved of a Feasibility and Plan of Operations Report for this facility for the storage of hazardous wastes through August 2012. Recycling operations (retort oven operations) at the WMMWI facility are exempt from Resource Conservation and Recovery Act (RCRA) licensing pursuant to NR the recycling exemption found in NR 661.06 (3) (b).

Most of the wastes processed by WMMWI are classified as hazardous waste. Typical wastes processed at the WMMWI facility include mercury-containing devices, mercury-contaminated equipment and soil, and aqueous mercury wastes. A small fraction of incoming wastes, however, are classified as solid waste (non-hazardous waste) for various regulatory reasons such as testing below the hazardous waste regulatory limits or because the wastes have been reclassified per some regulatory authority to be managed as solid wastes (e.g. characteristic by-product being reclaimed (NR 661.02 (3) c), characteristic sludge being reclaimed (NR 661.02 (3) c), etc.).

Under WDNR Solid Waste Administrative Code, NR 502.04 and .07, applicants must provide specific information to WDNR for review for authorization to operate a solid waste storage facility. That information was provided in our previous application modification submittal that was approved on April 2, 2013 (see Attachment 1 for March 22, 2013 modification).

This letter requests modifications to our existing Solid Waste Storage Facility License. Table 1 lists the solid waste storage areas approved with the April 2, 2013, authorization.

Table 1
Storage Areas Approved on April 2, 2013

Area Designation	Licensed for Hazardous Waste Storage	Container Types	Liquid Wastes	Indoor Outdoors	Area Capacity
S-1	Y	Containers	Y	Indoors	520 55-gallon drum equivalents
S-7	Y	Containers Roll-Offs	N	Indoors	20 cubic yard box equivalents
S-8	Y	Roll-Offs	N	Indoors	120 cubic yard equivalents
S-12, 13, and 14	Y	Roll-Offs	N	Indoors (shed roof)	340 cubic yard equivalents
Receiving Dock	N	Containers	N	Indoors	120 55-gallon drum equivalents
South Building	N	Containers	N	Indoors	400 55-gallon drum equivalents

WMMWI is requesting authorization to store liquid solid wastes in two additional previously approved storage areas. Table 2 below reflects the storage authorization modification request. WMMWI is proposing to store liquids in either Storage area S-8 or the South Building. WDNR administrative code (NR 502.05(8)(m)) requires that an applicant describe how liquids will be contained.

> *NR 502.05(8)(m) A discussion of design features and logic including the equipment capacity or size. Information shall be included to justify the size and configuration of the receiving area; methods of handling wastes containing free liquids resulting from operations such as floor drains, sewers and water treatment facilities; sizing of storm water drainage control structures; design life of any building and facility equipment; and methods of screening the facility from the surrounding area.*

Table 2
Proposed Modification for Storage Areas

Area Designation	Licensed for Hazardous Waste Storage	Container Types	Liquid Wastes	Indoor Outdoors	Area Capacity
S-1	Y	Containers	Y	Indoors	520 55-gallon drum equivalents
S-7	Y	Containers Roll-Offs	N	Indoors	20 cubic yard box equivalents
S-8	Y	Roll-Offs	Y	Indoors	120 cubic yard equivalents
S-12, 13, and 14	Y	Roll-Offs	N	Indoors (shed roof)	340 cubic yard equivalents
Receiving Dock	N	Containers	N	Indoors	120 55-gallon drum equivalents
South Building	N	Containers	Y	Indoors	400 55-gallon drum equivalents

WMMWI will provide secondary containment for any stored solid waste liquid containers. Portable berms will be used when solid wastes require on-site storage. Portable berms provide a durable and protective means of containing liquids. WMMWI is committed to providing the same containment volume as is required under the hazardous waste regulations for solid wastes. A minimum of 10 percent of the total volume stored and greater than the largest single container stored will be maintained. A specification sheet and drawing of an example portable berm are provided for your review in Attachment 2.

At some point in the future, WMMWI may decide to install permanent meeting the same secondary containment specification identified above.

WMMWI appreciates your assistance on this issue. Please contact me at (262-878-2599) with questions or comments regarding the modification request.

Sincerely,

Joseph P. Carruth
Environmental Manager
WM Mercury Waste, Inc.

Electronic CC

Mike Ellenbecker, WDNR
Pat Baskfield, Senior Manager Operations, WMMWI
Greg Holtzen, Operations Manager, WMMWI

Attachment 1

March 22, 2013 Solid Waste Storage Modification Request

WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, Wisconsin 53182-9711
800.741.3343 or 262.878.2599
262.878.2699 Fax

WASTE MANAGEMENT®

March 22, 2013

Ken Hein
Waste Management Specialist
Wisconsin Dept. of Natural Resources
2300 N Dr Martin Luther King Jr Dr
Milwaukee, WI 53212

Subject: **WM Mercury Waste Solutions, Inc.**
Modifications to Solid Waste Storage Facility License #4381

Dear Mr. Hein:

WM Mercury Waste, Inc (WMMWI) is a mercury reclamation facility located in Union Grove, Wisconsin, and is a hazardous waste facility (EPA ID WIR000000356) licensed pursuant to NR 664 for the treatment and storage of hazardous waste prior to recycling. Pursuant to that license, the WDNR has approved of a Feasibility and Plan of Operations Report for this facility for the storage of hazardous wastes through August 2012. Recycling operations (retort oven operations) at the WMMWI facility are exempt from Resource Conservation and Recovery Act (RCRA) licensing pursuant to NR the recycling exemption found in NR 661.06 (3) (b).

Most of the wastes processed by WMMWI are classified as hazardous waste. Typical wastes processed at the WMMWI facility include mercury-containing devices, mercury-contaminated equipment and soil, and aqueous mercury wastes. A small fraction of incoming wastes, however, are classified as solid waste (non-hazardous waste) for various regulatory reasons such as testing below the hazardous waste regulatory limits or because the wastes have been reclassified per some regulatory authority to be managed as solid wastes (e.g. characteristic by-product being reclaimed (NR 661.02 (3) c), characteristic sludge being reclaimed (NR 661.02 (3) c), etc.).

WMMWI submitted an initial Solid Waste License Processing Exemption application in January 2010 that has been modified several times since original issuance. WDNR last approved the exemption on April 25, 2012. This exemption applies to solid waste recycled on-site and shipped off-site for further processing.

This letter requests revisions to our existing Solid Waste Storage Facility License issued on March 11, 2005. As a hazardous waste facility, WMMWI currently has authorization to bulk hazardous wastes and ship them off-site for downstream processing. Under WDNR Solid Waste Administrative Code, NR 502.04 and .07, applicants must provide specific information to

WDNR for review for authorization to operate a solid waste storage facility. WMMWI is providing the documents listed below in support of this request for adding solid waste storage capacity.

1. This cover letter with a description of the proposed solid waste storage facility design and operation;
2. Pertinent attachments;
    A. 2005 Solid Waste Storage Authorization (Attachment 1);
    B. Regional Map (Attachment 2);
    C. Site Storm Water Flow (Attachment 3);
    D. Site Plan with Proposed Solid Waste Storage Areas identified (Attachment 4);

WMMW requests to maintain its current solid waste storage authorization for the storage of PCB and non-PCB ballasts. The ballast are currently stored in the East building. The current 2005 authorization does not require that WMMWI store the ballast in a specific area, but does limit the amount stored on site.

Description of Proposed Facility
WMMWI proposes to expand its Solid Waste Storage Facility to receive, store, and bulk containerized solid waste into roll-offs, tanker trucks, and container trucks for off-site disposal. The functional areas associated with the proposed expanded operation are shown on the site plan provided as Attachment 4. These functional areas are also listed in Table 1, below.

Area Designation	Licensed for Hazardous Waste Storage	Container Types	Liquid Wastes	Indoor Outdoors	Area Capacity
S-1	Y	Containers	Y	Indoors	520 55-gallon drum equivalents
S-7	Y	Containers Roll-Offs	N	Indoors	20 cubic yard box equivalents
S-8	Y	Roll-Offs	N	Indoors	120 cubic yard equivalents
S-12, 13, and 14	Y	Roll-Offs	N	Indoors (shed roof)	340 cubic yard equivalents
Receiving Dock	N	Containers	N	Indoors	120 55-gallon drum equivalents
South Building	N	Containers	N	Indoors	400 55-gallon drum equivalents

Containers received from off-site will be off-loaded at the main dock and stored in one of the authorized solid waste storage areas to await transfer for into a roll-off box, tanker truck, or maintained in the container that is was received in for off-site transfer.

Six areas have been designated for storage for solid wastes. Table 1 provides information on each of these areas. Only Licensed Storage Area S-1 will be used for liquid solid wastes. Licensed Storage Area S-1 is designed with secondary containment and is licensed for liquid hazardous wastes.

The transfer for solid wastes to a roll-off would take place in the recently constructed area designated under the WMMWI Hazardous Waste License as Storage Area S-8. S-8 is a storage area authorized in the WMMWI Hazardous Waste Storage License to store hazardous waste roll-offs. The area is totally enclosed and measures approximately 40 feet by 80 feet. Three overhead doors allow for roll-offs to be easily placed into and removed from the building. Additionally, S-8 is under negative pressure and is served by a new ventilation system to assure complete containment of any types of emissions from the materials managed in this area.

Once the containerized waste is transferred into a roll-off, the roll-off would be moved out of S-8 into one of the roll-off sheds (S-12, S-13, and S-14) located just south of the West Building. These roll-off sheds are also authorized by the WMMWI Hazardous Waste Storage License for roll-off storage. Per the hazardous waste requirements, these areas have sealed concrete and trenching to provide for secondary containment and a roof. When a roll-off is filled, it will be transported off-site with a licensed hauler to a recycling or disposal facility.

The transfer of liquid wastes to a tanker truck would take place in the main dock area or in Licensed Storage Area S-8. Containerized liquid wastes would be pumped from containers into tanker trucks.

WMMWI appreciates your assistance on this issue. Please contact me at (262-878-2599) with questions or comments regarding the modification request.

Sincerely,

Joseph P. Carruth
Environmental Manager
WM Mercury Waste, Inc.

Electronic CC

Mike Ellenbecker, WDNR
Pat Baskfield, General Manger, WMMWI
John Kendall, Operations Manager, WMMWI

Attachment 1

2005 Solid Waste Storage Authorization

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Gloria L. McCutcheon, Regional Director

Sturtevant Service Center
9531 Rayne Rd
Sturtevant, Wisconsin 53177
Telephone 262-884-2300
FAX 262-884-2306
TTY Access via relay - 711

March 11, 2005

FID#: 252195350
Lic#: 4381
SW APP

Mr. Joseph Carruth
Mercury Waste Solutions, Inc.
21211 Durand Avenue
Union Grove, WI 53182-9711
(262) 878-2599

SUBJECT: Plan of Operation Approval Modification for a Containerized Solid Waste PCB Ballast and Non-PCB Ballast Storage Facility.
Mercury Waste Solutions, Inc.
License # 4381

Dear Mr. Carruth:

The Department has completed its review of your letter dated December 10, 2004 requesting to modify the March 4, 1999 plan of operation report. The letter requested changing the ballast operation from processing of PCB ballast and storage of PCB and non-PCB ballasts to only the storage of PCB and non-PCB ballasts.

Based on the Department's review, the Department has determined that the plan of operation is consistent with Wisconsin's solid waste regulations. If implemented in accordance with the approved plans and this approval, the plan of operation will be compatible with environmentally acceptable construction, operation, and monitoring of this facility. Therefore, the plan of operation is approved, subject to compliance with chapter NR 157 and chapters NR 500 to 538, Wis. Adm. Code, and the conditions in this approval.

If you have any questions about this approval, please call Mike Ellenbecker at (262) 884-2342.

Sincerely,

Frances M. Koonce

Frances M. Koonce
Waste Management Team Leader
Southeast Region, WDNR

Cc: SER file

PROJECT SUMMARY

Authorized Contact
Mr. Joseph Curruth
Director of Environmental Affairs
Mercury Waste Solutions, Inc.
21211 Durand Avenue
Union Grove, WI 53182-9711
Phone # (262) 878-2599

Licensee and Facility Owner
Mercury Waste Solutions, Inc.

Location of Facility
21211 Durand Avenue
Union Grove, WI 53182-9711

Generators Served
The solid waste storage facility typically receives wastes from the Midwest.

Storage Capacity
PCB Ballast Storage area has a capacity of forty (40) 55-gallon drums.
Non PCB Ballast Storage area has a capacity of forty (40) 55-gallon drums.

Facility Operation
Mercury Waste Solution picks up and receives PCB ballasts and Non-PCB Ballast from their client's facilities. The PCB ballasts and Non-PCB Ballast are then consolidates into larger shipments at the site and then shipped to an EPA-approved processing and incineration facility for destruction.

BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

CONDITIONAL PLAN OF OPERATION APPROVAL MODIFICATION SOLID WASTE CONTAINERIZED SOLID WASTE PCB BALLAST AND NON-PCB BALLAST STORAGE FACILITY MERCURY WASTE SOLUTIONS, INC. UNION GROVE, WISCONSIN LICENSE # 4381

FINDINGS OF FACT

The Department finds that:

1) Mercury Waste Solutions, Inc. owns and operates a solid and hazardous waste storage facility located at 21211 Durand Avenue, Union Grove, Wisconsin.

2) On July 23, 1998 Mercury Waste Solutions, Inc. submitted a request for an exemption under s. 289.53, Wisconsin Statutes to store and dismantle PCB and non-PCB ballasts. The request describes how Mercury Waste Solutions, Inc. will accept and handle PCB and non-PCB ballasts.

3) The Department issued to Mercury Waste Solutions, Inc. a conditional exemption approval document dated March 4, 1999 for the storage and dismantling of PCB and non-PCB ballasts.

4) On December 10, 2004, the Department received a loose-leaf report prepared by Joseph Carruth of Mercury Waste Solutions, Inc. dated December 10, 2004. The report request a change from a processing and storage facility of PCB and non-PCB ballasts to only a storage facility of PCB and non-PCB.

5) On March 10, 2005, the Department received a fax prepared by Joseph Carruth of Mercury Waste Solutions, Inc. dated March 10, 2005. The fax stated that there would be no secondary containment for the ballast storage area.

6) Additional documents considered in review of the plan of operation include the following:
   a) A May 28, 1997 letter from Mercury Waste Solutions, Inc. entitled "***Exemption from PCB Storage Facility Requirements***".
   b) A May 11, 1998 Department correspondence entitled "***PCB Storage License Inspection 2/4/98***".
   c) A November 18, 1997 Department letter entitled "***Notice of Incompleteness of a PCB Storage Facility License Exemption Request Mercury Waste Solutions, Inc., (MWS) EPA I.D.# - WIR000000356***".
   d) A November 24, 1997 letter from Mercury Waste Solutions, Inc. entitled "***Responses to the Notice of Incompleteness for PCB Storage Facility License Exemption Request***".
   e) A February 3, 1998 letter from Mercury Waste Solutions, Inc. entitled "***PCB Ballast Storage Area***".
   f) A February 25, 1998 Department approval letter entitled "***Proposed PCB Ballast Accumulation Mercury Waste Solutions, Inc., 21211 Durand Avenue, Union Grove, WI 53182 EPA I.D. # - WIR000000356***".
   g) A July 6, 1998 letter from Mercury Waste Solutions, Inc. entitled "***Exemption Condition Requiring PCB Shipments to be accompanied by WI Manifest***".
   h) A July 23, 1998 letter from Mercury Waste Solutions, Inc. entitled "***Modifications to PCB Storage Exemption***".

i) An August 3, 1998 letter from Mercury Waste Solutions, Inc. entitled "***Additional information on Proposed PCB Processing and Battery Sorting Operations***".
j) A November 11, 1998 Department correspondence entitled "***PCB Storage Modification***".
k) A December 29, 1999 document from Mercury Waste Solutions, Inc. entitled "***Mercury Waste Solutions, Inc. – Protocol #OPS – 001C (Ballast) Ballast Receipt, Storage, & Separation***".

7) The Department is imposing special conditions to protect human health and the environment and ensure that record keeping and reporting is adequate.

8) The conditions set forth below are needed to assure that the handling and storage of PCB and non-PCB ballasts at Mercury Waste Solutions, Inc. is conducted in compliance with chapters NR 500 to 538, Wis. Adm. Code.

CONCLUSIONS OF LAW

1) The Department has authority under s. 289.30, Stats., to modify a plan of operation approval if it would not inhibit compliance with chapters NR 500-538, Wis. Adm. Code.

2) The Department has authority to approve a plan of operation with special conditions if the conditions are needed to ensure compliance with chapters NR 500-538, Wis. Adm. Code.

3) The conditions of approval set forth below are needed to ensure compliance with chapter NR 157 and chapters NR 500-538, Wis. Adm. Code.

4) In accordance with the foregoing, the Department has authority under chapter 289, Stats., to issue the following conditional plan of operation approval modification.

CONDITIONAL PLAN OF OPERATION APPROVAL MODIFICATION

The Department hereby approves the plan modification request dated December 10, 2004 to modify PCB and Non-PCB Ballast handling as identified in the plan of operation report dated July 23, 1998 and approved by the Department on March 4, 1999, subject to compliance with the provisions of chapters NR 500-538, Wis. Adm. Code, and the following conditions:

The Department retains the jurisdiction to either require the submittal of additional information or to modify this approval at any time if, in the Department's opinion, conditions warrant further modifications. Unless specifically noted, the conditions of this approval do not supersede or replace any previous conditions of approval for this facility.

1. Conditions 1 through 17 of the March 4, 1999 approval document entitled "*Proposed PCB Ballast Storage and Processing Mercury Waste Solutions, Inc., 21211 Durand Avenue, Union Grove, WI 53182 EPA I.D. # - WIR000000356*" are hereby rescinded.

2. All ballast shall be stored in containers.

3. Ballast storage and repacking/consolidation shall be conducted inside on a sealed floor.

4. Containers shall be dated with the date that the ballast arrived at the facility. Containers containing multiple shipments of ballast shall use the earliest date that the ballast arrived at the facility.

5. Ballast shall not be stored on-site for more than one year

6. Spills/releases from ballast storage and handling shall be managed in accordance with Mercury Waste Solutions' Inc., hazardous waste contingency plan.

7. PCB ballast storage is limited to no more than forty (40) 55-gallon drums or equivalent.

8. Non-PCB ballast storage is limited to no more than forty (40) 55-gallon drums or equivalent.

9. Mercury Waste Solutions, Inc. shall pay the plan review fee of one thousand six hundred fifty US dollars ($1650.00) to the Department by April 11, 2005.

10. Mercury Waste Solutions, Inc. shall pay the license fee of five hundred fifty US dollars ($550.00) to the Department by April 11, 2005.

NOTIFICATION OF APPEAL RIGHTS

If you believe you have a right to challenge this decision made by the Department, you should know that Wisconsin statutes, administrative codes and case law establish time periods and requirements for reviewing Department decisions.

To seek judicial review of the Department's decision, sections 227.52 and 227.53, Stats., establish criteria for filing a petition for judicial review. Such a petition shall be filed with the appropriate circuit court and shall be served on the Department. The petition shall name the Department of Natural Resources as the respondent.

Dated: March 11, 2005

DEPARTMENT OF NATURAL RESOURCES
For the Secretary

Frances M. Koonce

Frances M. Koonce
Waste Management Team Leader
Southeast Region, WDNR

Michael J. Ellenbecker
Waste Management Specialist

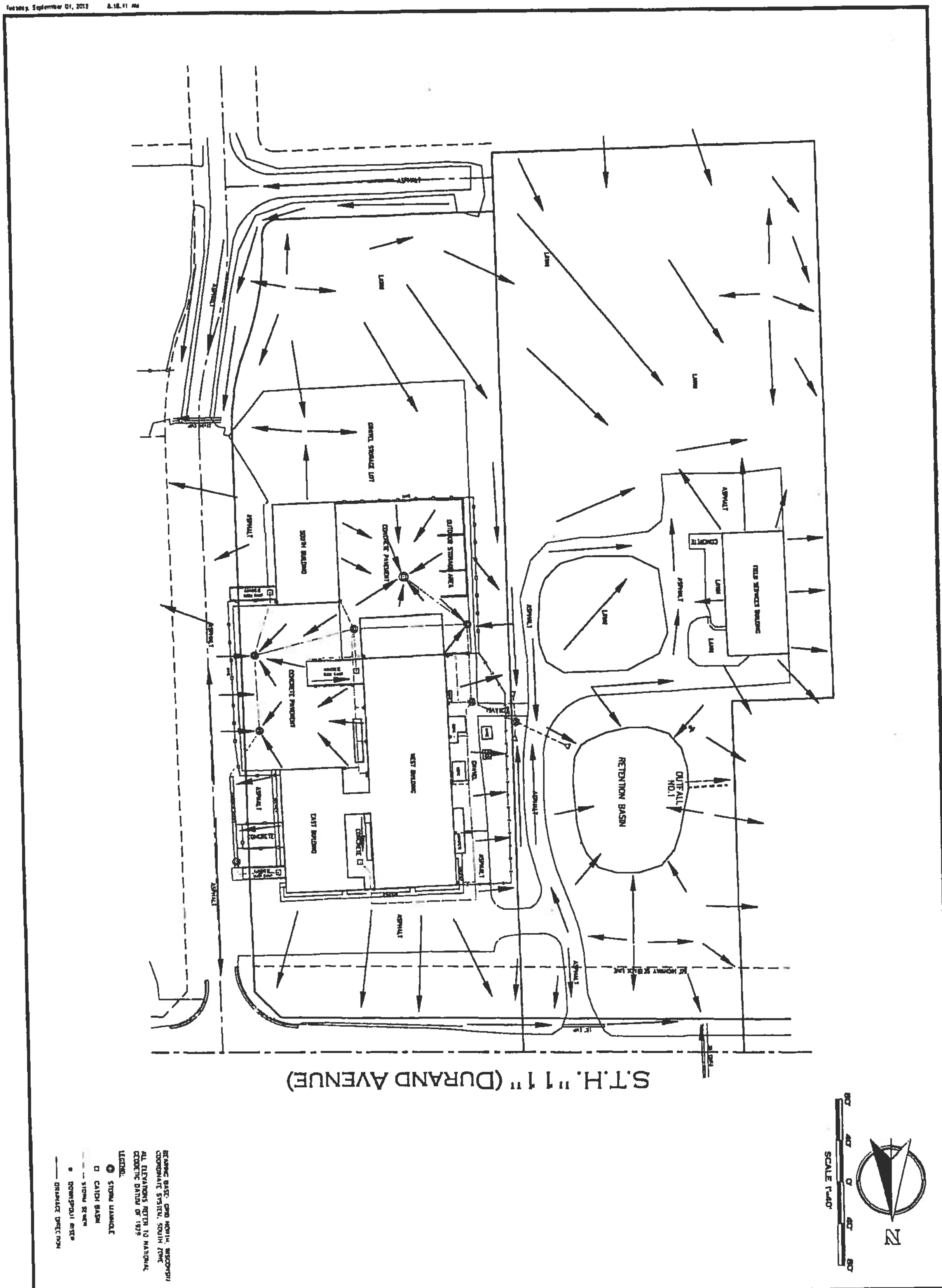
Attachment 2

Regional Map

REGIONAL MAP
WM MERCURY WASTE, INC.
WASTE MANAGEMENT
Nielsen Madsen & Barber S.C.
Civil Engineers and Land Surveyors
SCALE 1"=500'
N
HICKORY HAVEN
HOUSING PARK
CIC RANDY FOWK
SWSF-1
2011.0006.01

Attachment 3

Site Storm Water Flow



WASTE MANAGEMENT

SHEET S-3

2011.0006.01

SITE PLAN WITH STORM WATER FLOW PATTERN

FOR

WM MERCURY WASTE, INC.

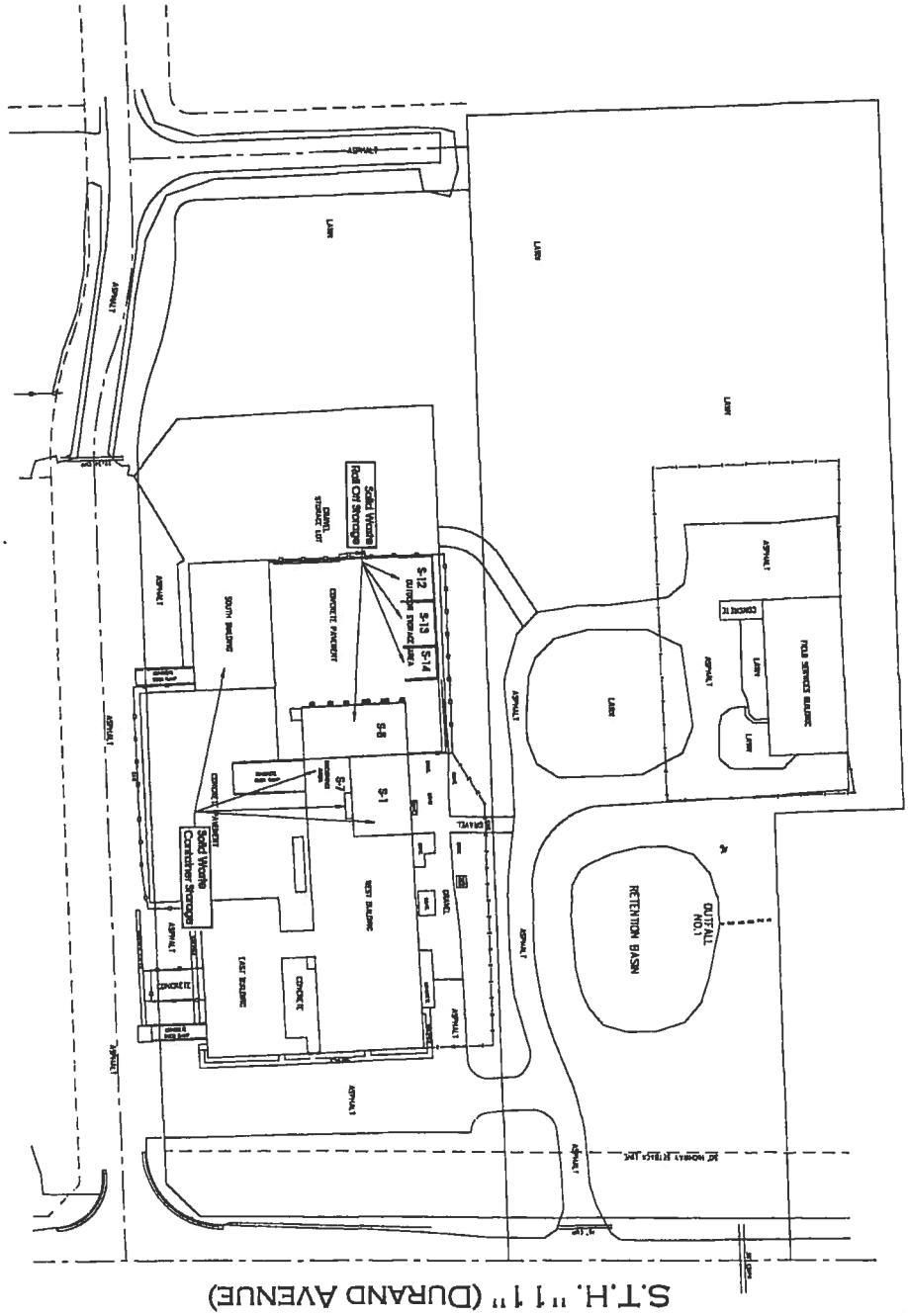
21211 DURAND AVENUE
UNION GROVE, WISCONSIN

Nielsen Madsen & Barber S.C.
Civil Engineers and Land Surveyors
1339 Washington Ave. Racine, WI. 53403
Tele: (262)634-5588 Fax: (262)634-5024
Website www.nmbsc.net

Attachment 4

Site Plan

Friday, March 22, 2013 8:55:42 AM



BEARINGS ARE BASED ON NORTH, WISCONSIN COORDINATE SYSTEM, NORTH ZONE. ALL ELEVATIONS REFER TO NATIONAL GEODETIC DATUM OF 1929.

LEGEND:
- MONUMENT/MANHOLE
- CATCH BASIN
- SIGN/SENSOR
- DOWNSPOUT/PIPE
- DRAINAGE DIRECTION

WASTE MANAGEMENT

TRANSFER FACILITY OPERATION LOCATIONS

FOR

WM MERCURY WASTE, INC.

21211 DURAND AVENUE
UNION GROVE, WISCONSIN

Nielsen Madsen & Barber S.C.
Civil Engineers and Land Surveyors
1339 Washington Ave. Racine, WI. 53403
Tele: (262)634-5588 Fax: (262)634-5024
Website www.nmbsc.net

PROJ. MGR:	DATE
DRAFTED:	AM 3/20/2013
DATE:	
REVISED:	AM 3/20/2013
DATE:	

2011.0006.01

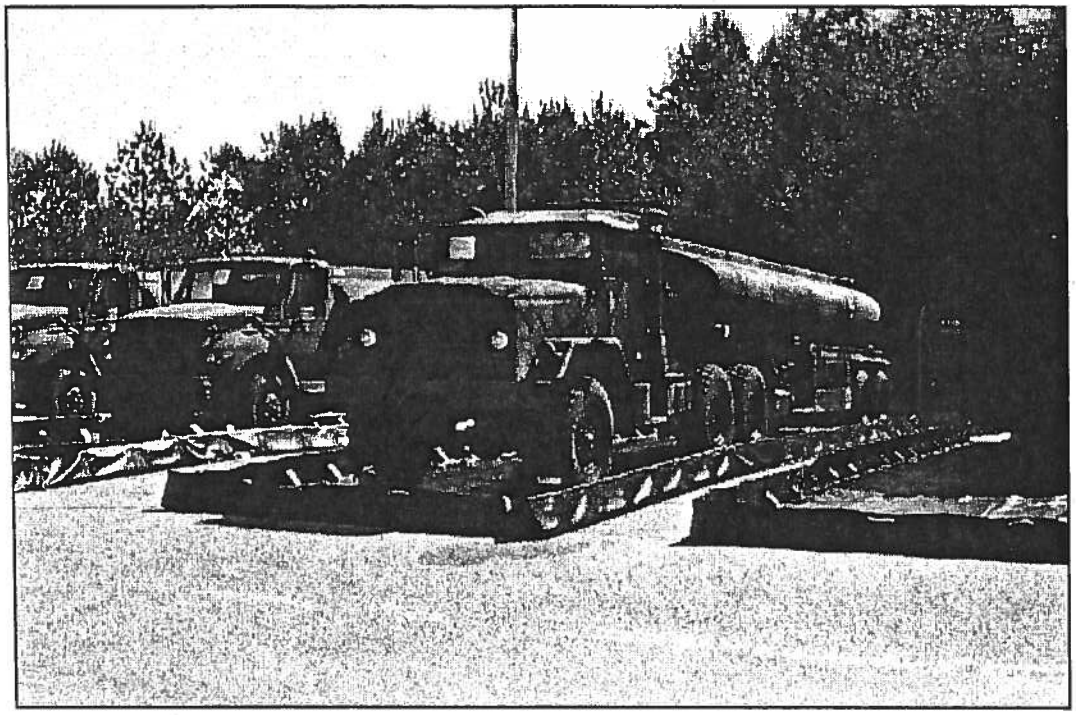
SHEET SWSF-2

Attachment 2

Example Portable Berm Info

BermPac

Portable Spill Berms



Portable secondary containment berms

- One piece pop-up berm is ready to use
- Bracketed berm easily sets up in minutes
- Manufactured with UV and chemically resistant membranes
- Durable and light-weight
- Portable, reusable, and repairable
- Prompt manufacturing lead time
- Custom designs engineered to meet your specific needs

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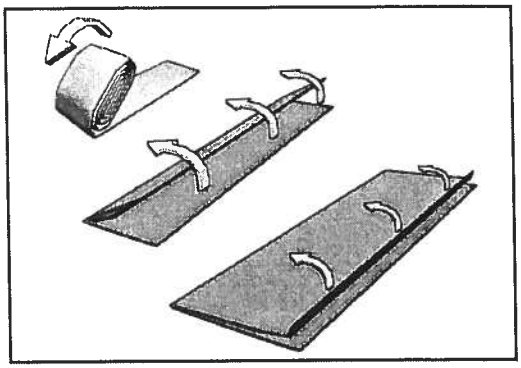
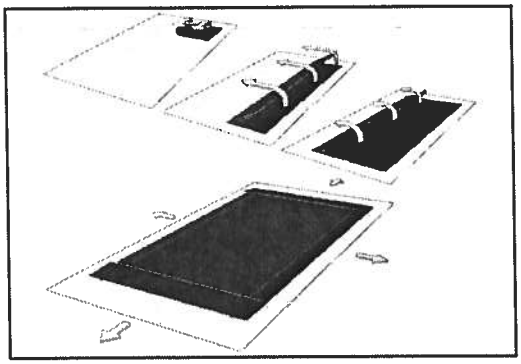
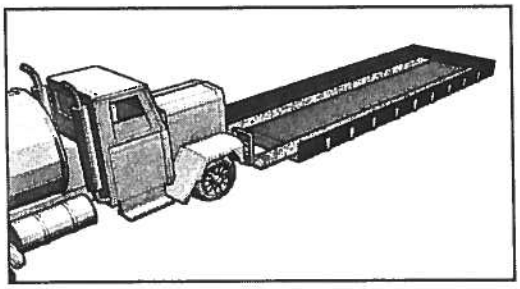
Berm Installation



1. Unpack all components and locate the ground cover. The ground cover is the thick cloth type material. Unfold the ground cover and position it in the desired location.

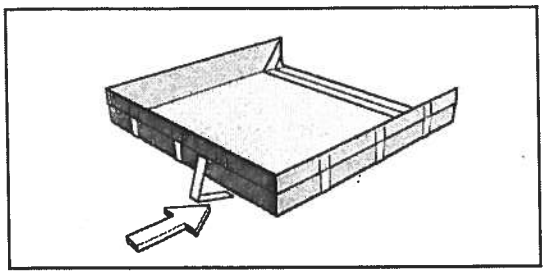


2. Next, locate the spill berm. Unfold the spill berm and center it on top of the ground cover.



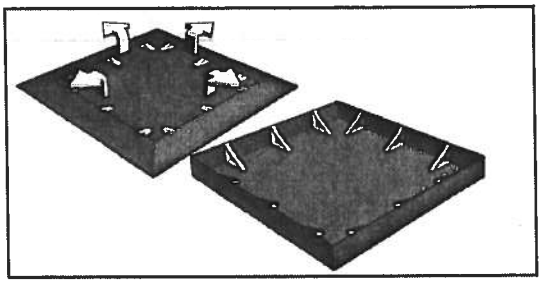
3. If the optional track guard is used, position it on top of the erected berm.

Bracketed Berm

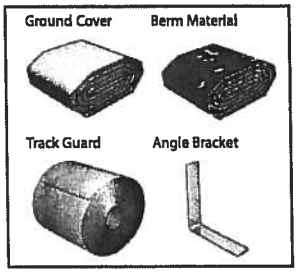


For the bracketed berm, locate the aluminum angle brackets. Insert the angle brackets into the perimeter pockets on three sides of the spill berm. Use the unsupported end for equipment entry. After equipment is in place, insert the angle brackets on the fourth side to complete the installation.

Pop Up Berm



For the InstaBerm, pull all four sidewalls of the spill berm outward so that they are standing upright. Straighten the top angles of the wall supports inside the berm. The walls will move further outward as the berm is filled.



APPLICATIONS

- Roll-off Containers
- Tanker Trucks
- Frac Tanks
- Decon Wash Pads
- Emergency Response
- Drum Storage
- Portable Pumps

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BermPac™

Specifications	40 mil Polyethylene	36 mil Polypropylene	Reinforced Geomembrane	18 oz Vinyl
Weight	11.2 oz/yd^2 (379.7 g/m^2)	25 oz/yd^2 (847.6 g/m^2)	30 oz/yd^2 (1.01 kg/m^2)	18 oz/yd^2 (610.3 g/m^2)
Thickness	40 mil avg (1.01 mm)	36 mil (0.91 mm)	36 mil (0.91 mm)	19.5 mil (0.49 mm)
Puncture Strength	56 lbs (249 N)	300 lbs (1,330 N)	220 lbs (978 N)	430 lbs (1,912 N)
Low Working Temp	-106.6° F (-77° C)	-40° F (-40° C)	-25° F (bend) (-31° C)	-40° F (-40° C)
High Working Temp	160° F (71° C)	170° F (76° C)	180° F (82° C)	158° F (70° C)

Ground Cover and Trackguard

Specifications	8 oz Non-Woven Polypropylene	12 oz Non-Woven Polypropylene	Track Guard	Rubber Matting
Weight	8 oz/yd^2 (271 g/m^2)	12 oz/yd^2 (406.9 g/m^2)	77 oz/yd^2 (2.61 kg/m^2)	77 oz/yd^2 (2.61 kg/m^2)
Thickness	90 mil (2.2 mm)	105 mil (2.6 mm)	106 mil (2.6 mm)	95 mil (2.4 mm)
Puncture Strength	500 lbs (2,224 N)	800 lbs (3,558 N)	N/A	N/A
UV Resistance	70% @ 500 hours	70 % @ 500 hours	N/A	N/A

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee WI 53212-3128

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

May 2, 2014

FID #: 252195350
Racine County
SW / APP

Mr. Joseph Carruth
WM Mercury Waste, Inc.
21211 Durand Avenue
Union Grove, WI 53182-9711

SUBJECT: Simple plan modification for Additional Solid Waste Storage Locations, Containerized Solid Waste Storage Facility, WM Mercury Waste, Inc., License # 4381

Dear Mr. Carruth:

We have completed review of your request attached to an email dated April 21, 2014 and a follow-up email dated May 2, 2014 showing the storage locations on Attachment 4 of the request. The request identified additional locations to store solid waste under this storage facility license. Based on this review, the requested modification is consistent with Wisconsin's solid waste regulations.

Your request identified two additional indoor locations (Area S-8 and the South Building). There was no increase in the capacity of these two areas and spill containment measures will be provided is liquid solid wastes are stored within these areas.

This letter constitutes authorization to proceed with implementation of your request and should be maintained with previous plan modification approvals dated March 11, 2005 and April 2, 2013.

> Condition #1 of the April 2, 2013 approval is modified to limit storage under this approval to areas S-1, S-8 and South Building.

The Department has authority to modify a plan of operation approval if the modifications would not inhibit compliance with chs. NR 500 to 520, Wis. Adm. Code. This request is acceptable to the Department because it does not affect any essential aspects of landfill design, construction, operation, or closure, nor does it conflict with any specific conditions of approval or specific prohibitions in chs. NR 500 to 520, Wis. Adm. Code or ch. 289, Wis. Stats.

NOTICE OF APPEAL RIGHTS: If you believe that you have a right to challenge this decision, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed.

For judicial review of decisions pursuant to sections 227.52 and 227.53, Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate

circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

There is no plan review fee required for review of this request. If you have any questions, please contact Ken Hein at (414) 263-8714 or by e-mail at kenneth.hein@wisconsin.gov.

Sincerely,

Franklin C. Schultz
Waste and Materials Management Program
Southeast Region

cc. SER File

Appendix 12
EJ Screen Report

EJSCREEN Report (Version 2020)

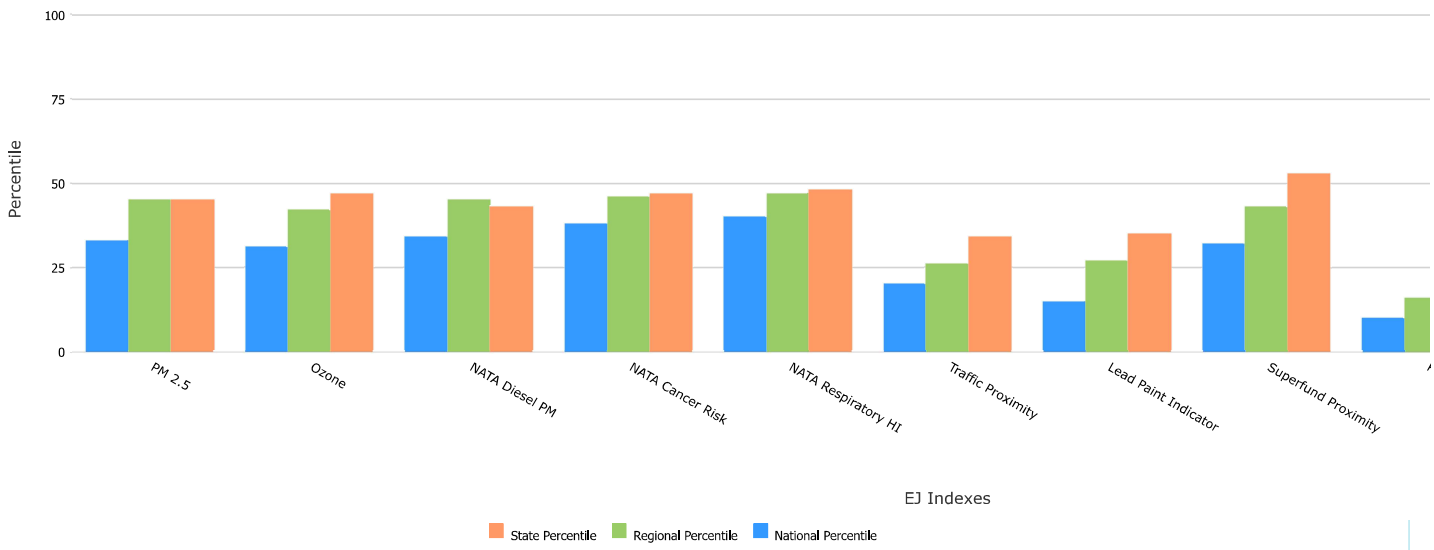
3 mile Ring Centered at
WISCONSIN, EPA Region 5
Approximate Population: 8,096
Input Area (sq. miles): 28.27

EJ Indexes

Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Index for Particulate Matter (PM 2.5)	45	45	33
EJ Index for Ozone	47	42	31
EJ Index for NATA* Diesel PM	43	45	34
EJ Index for NATA* Air Toxics Cancer Risk	47	46	38
EJ Index for NATA* Respiratory Hazard Index	48	47	40
EJ Index for Traffic Proximity and Volume	34	26	20
EJ Index for Lead Paint Indicator	35	27	15
EJ Index for Superfund Proximity	53	43	32
EJ Index for RMP Proximity	22	16	10
EJ Index for Hazardous Waste Proximity	32	35	25
EJ Index for Wastewater Discharge Indicator	44	46	32

EJ Indexes Chart

EJ Index for the Selected Area Compared to All People's Blockgroups in the State/Region/US



Map

Environmental Indicators

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	2

Selected Variables	Value	State		EPA Region		USA	
		Avg.	%tile	Avg.	%tile	Avg.	%tile
Particulate Matter (PM 2.5 in µg/m^3)	7.78	6.92	93	8.4	25	8.55	26
Ozone (ppb)	45	41.6	93	43.8	62	42.9	70
NATA* Diesel PM (µg/m^3)	0.273	0.301	50	0.446	<50th	0.478	<50th
NATA* Air Toxics Cancer Risk (risk per MM)	22	21	61	26	<50th	32	<50th
NATA* Respiratory Hazard Index	0.26	0.27	52	0.34	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	220	600	49	530	55	750	50
Lead Paint Indicator (% pre-1960s housing)	0.33	0.36	54	0.38	52	0.28	65
Superfund Proximity (site count/km distance)	0.047	0.12	30	0.13	40	0.13	40
RMP Proximity (facility count/km distance)	1	0.89	69	0.83	73	0.74	76
Hazardous Waste Proximity (facility count/km distance)	1.1	1.5	59	2.4	47	5	52
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	4.3E-06	1.9	41	2.4	33	9.4	42

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: https://www.epa.gov/national-air-toxics-assessment.

Demographic Indicators

Selected Variables	Value	State		EPA Region		USA	
		Avg.	%tile	Avg.	%tile	Avg.	%tile
Demographic Index	20%	23%	58	28%	47	36%	31
People of Color Population	11%	18%	53	25%	41	39%	23
Low Income Population	26%	28%	53	30%	49	33%	45
Linguistically Isolated Population	0%	2%	61	2%	59	4%	45
Population with Less Than High School Education	9%	8%	67	10%	58	13%	49
Population under Age 5	5%	6%	42	6%	41	6%	40
Population over Age 64	18%	16%	63	16%	64	15%	67