



October 28, 2022

Original and Electronic Submittal

Mr. Douglas Coenen (Douglas.Coenen@wisconsin.gov)
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, WI 53707-7921

RE: Re-Submittal of the Application and Feasibility and Plan of Operation Report (FPOR)
Enviro-Safe Consulting, LLC. (dBA Enviro-Safe Resource Recovery)
EPA ID Number: WIR000142877
FID Number: 267193300

This letter is being provided as a Re-Submittal of the Application and Feasibility and Plan of Operation Report (FPOR) for a new hazardous waste treatment and storage facility based upon the FPOR submittal dated September 2, 2022.

Since the submittal on September 2, 2022, guidance on the portable digital file (PDF) submittal requirements has been issued and incorporated into the re-submittal. In addition, new changes to provide further clarification on specific items requested by the WDNR has been provided and includes the following:

- 1) Electronic Submittal in PDF Format. The portable digital file (PDF) has been modified to include bookmark of the part/section/subsection or attachments and internal hyperlinks to the appropriate attachments.
- 2) Appendix H - Waste Analysis Plan. The Waste Analysis Plan (WAP) has been updated October 21, 2022 per discussion with Doug Coenen from the WDNR. The Word Document with the tracked changes has been provided to Doug for easy reference and therefore changes are not individual listed here.
- 3) Appendix T-01 - Stantec PE Certification for Closure Plan. To provide clear description to the Stantec PE Certification the statement. The original statement "Stantec Consulting Services Inc. (Stantec), under my supervision, reviewed and approved of these Closure Plan Requirements for Enviro-Safe Resource Recovery for their Germantown, Wisconsin TSD facility." has been changed to "Stantec Consulting Services Inc. (Stantec), under my supervision, reviewed and approved of these Hazardous Waste Closure Plan Requirements under Part 1, Section L of the Feasibility and Plan of Operation Report (FPOR) and Appendix T-02 of the FPOR HWMU Closure Cost Summary dated October 28, 2022 for Enviro-Safe for their Germantown, Wisconsin TSD facility." The changes are highlighted in the FPOR document under Appendix T-01 for easy reference.

The re-submittal of the FPOR has been revised to be approved pursuant to ss. 289.29 and 289.30(6), Wis. Stats. and with the intent to obtain a license under ss. 289.31 and 291.25, Wis. Stats. The FPOR is dated October 24, 2022 and is being submitted in electronic (PDF) format via the shared files set-up in Outlook with access by the WDNR.



Any questions related to this revised application can be directed to:

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We appreciate your time in reviewing the application and FPOR. In addition, to the contact indicated above, I can be contacted at any time at (262) 790-2500 or jvilione@enviro-safe.com.

Sincerely,
Enviro-Safe Consulting, LLC.

Jeffrey D. Vilione
Founder/President

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Feasibility and Plan of Operation Report

Enviro-Safe Consulting, LLC.
dBA Enviro-Safe Resource Recovery
Germantown, Wisconsin

FID Number: 267193300
EPA ID Number: WIR000142877

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PART 0: INTRODUCTION

0.1 General

This Feasibility and Plan of Operation Report (FPOR) has been prepared as part of an initial license application in accordance with NR 670.001(2) for Enviro Safe Resource Recovery (Enviro Safe) located in the Village of Germantown, Wisconsin.

This FPOR has been formatted in a manner similar to the outline presented in the WDNR's completeness checklist. A completed version of the TSD License Completeness Checklist is presented in Appendix A.

0.2 Definitions

The following definitions apply to this FPOR.

Accept or Acceptance. The time when waste screening is complete and the facility signs line 20 of the manifest.

Acceptable Knowledge. Knowledge-based determinations that are based on relevant and reliable (i.e., verifiable) information from any source that indicates that the waste is either a hazardous waste or non-hazardous waste under subchapter C and D of chapter NR 661 Wis. Adm. Code; which hazardous waste codes(s) apply; and which exclusions or restrictions pertain to management of the waste.

Bulk Container Waste, Bulk Waste or Bulk Load. Waste that is received and shipped in large containers, such as Intermediate Bulk Containers (IBC also known as totes as defined at 49 CFR 171.8), tanker trucks, roll-off containers and lugger boxes.

Bulk Containers. Bulk Containers means containers of Bulk Container Waste.

Bulk or Consolidated Packs. Containers that hold smaller containers of one type of material (e.g., paints, lamps). Each bulk or consolidated pack container is prepacked in accordance with applicable U.S. DOT regulations. Examples of waste delivered in this way includes spent batteries, palletized boxes of ODM/OEM chemicals that have been shipped in the original manufacturer approved outer containers.

Competent Individual. A person by way of training and/or experience, is knowledgeable of applicable standards, is of sound mind and body, and is capable of identifying workplace hazards and environmental risks relating to the specific operations and has the authority to correct them.

Consolidation, Commingling or Bulking. The act of combining the contents of one container or tank with the contents of another container or tank, such that they are in contact with each other. Lab-packing/repacking does not constitute consolidation.

Container. Any portable device in which a material is stored, transported, treated, disposed, or otherwise handled (e.g., sacks, flasks, pails, bags, boxes, gas cylinders, drums, IBCs, cubic-yard boxes and bags and tanker trucks) as defined in NR 660.10(14) Wis. Adm. Code.

Discrepancy. For Level I, II, and III analyses, discrepancy means a difference between the waste received at the facility when compared to its waste information profile, the manifest or bill of lading, and the LDR document (if applicable).

Facility. Facility means Enviro-Safe Consulting, LLC. dBA Enviro-Safe Resource Recovery at W130N10500 Washington Drive, Germantown, WI 53022 (EPA ID Number WIR000142877).

Fingerprint Analysis. The sampling and analysis of several key chemical and physical parameters of a waste to substantiate or verify the composition of a waste as determined previously during a full-scale waste characterization/determination. Fingerprint analysis is typically used by the facility to expedite screening of received wastes. Parameters for analysis may be a subset of the parameters used during full-scale characterization, or they may be parameters that are not normally present in the waste to verify the absence of certain constituents.

Fuel Blending. Combining compatible hazardous wastes that possess substantiable heat value with other compatible materials that also possess substantial heat value (e.g., used oil, spent solvents) to create a waste that is amendable to burning for energy recovery. Fuel blending is a hazardous waste treatment that requires a license.

Generator. Generator means the waste generator responsible for complying with the requirements established in NR 662, or as legally specified by the generator, a bona-fide authorized representative of the generator that (after reasonable due diligence by the receiving facility) is determined to be qualified to act on behalf of the generator.

Lab Pack. An over-packed container, usually a steel, fiber or polyethylene drum, containing a variety of small containers of chemicals of the same DOT hazard class packed in non-biodegradable absorbent materials. Each lab pack container is prepackaged in accordance with applicable U.S. DOT regulations that are based on compatibility, content, and size of individual samples. An inventory-packaging list accompanies each lab pack container and identifies, among other things, the content, quantity, and size of each container within the lab pack, and applicable hazardous waste code(s).

Lab Packing/Repacking. When small containers of hazardous waste are placed into a larger container while remaining in the original smaller container with the intention to not allow the waste contents to mix.

Licensed RCRA Unit or Licensed Unit. A unit that has a hazardous waste license number assigned to it and meets the definition of "hazardous waste management unit" in s. NR 66110(54) Wis. Adm. Code. Examples include:

- Container storage areas. Note: A container alone does not constitute a unit; the unit includes containers and the land or pad upon which they are placed (see s. NR 660.10(54), Wis. Adm. Code).

- Tanks and associated piping and underlying containment systems.
- Landfills.
- Miscellaneous units.

Manufactured Article. A device this is designed for a purpose other than to access the chemicals that are present within the device. As examples, one uses these articles for electrical energy (batteries), light (lamps) or to measure temperature (thermometers). One does not use these articles to access the mercury, lead, or other chemicals contained in these articles.

Processing or Process. When the contents of a container or tank are added to a different container or tank or combined with other wastes or materials or are otherwise treated in a manner not requiring a hazardous waste license. The following are examples of license-exempt processing activities:

- Consolidation or Commingling or Bulking
- Lab-Packing, Depacking, and Re-Packing
- Elementary Neutralization
- Wastewater Treatment Unit Treatment
- Qualifying Treatability Studies

Proper processing requires that wastes are only combined or comingled when compatible with the container and the other wastes or materials.

Receive or Receipt. The time when a waste delivery enters the facility property.

Repackaging or Recontainerization. When the contents one a container are moved to another container without mixing with another waste. This includes placement of a container into an overpack container.

Shipment. A container or containers of a single waste stream that is delivered in the same transportation vehicle.

10-Day Transfer Waste. 10-day Transfer Waste means waste that is received at the facility and is stored for up to 10 days under the transfer facility requirements of NR 663.12. This activity requires a transporter license but not a facility (TSDF) license.

Trans-Ship. A waste that has been accepted into the facility and is then shipped to an off-site facility; the waste remains in its original container and the waste does not undergo any type of treatment or processing.

Waste Information Profile (WIP). A written documentation for a specific waste stream that is intended to contain all the information which must be known by the facility to properly process, treat, store, and/or transship the waste according to this chs. NR 664 and NR 668, Wis. Adm. Code.

Waste Analysis. A waste information gathered from analytical testing of representative samples and from knowledge-based determinations.

Waste Stream. A single type of solid waste or hazardous waste from a single generator that is described in a single profile.

PART 1: SECTION A. GENERAL REQUIREMENTS

1A.1 License Application [NR 670.010(1)]

In accordance with the requirements, two (2) complete and signed copies of the Hazardous Waste License Application (FPOR) have been prepared. As directed by the WDNR, two (2) hard copies and one (1) electronic copy of the FPOR is being submitted to the WDNR and one (1) electronic copy to the USEPA.

1A.2 Plan Review and License Fee [NR 670.010(12)]

The applicable Plan Review and License Fee in accordance with NR 670, Attachment II Hazardous Waste Fee Table for Review of Operating License Application (Part A FPOR) for Containers, Containment Buildings and Miscellaneous Units of \$4,000 shall be applicable. Enviro-Safe submitted payment in March, 2020 and has not been directed by the WDNR to submit any additional required review fee upon receipt of an invoice from the WDNR.

1A.3 Signatories to License Applications and Reports [NR 670.011(1)]

All license applications and reports shall be signed by a general partner.

1A.4 Owner's and Operator's Certification Statement [NR 670.011(4) and 670.012]

This FPOR has been prepared as part of an initial license application in accordance with NR 670.001(2). As part of the FPOR, the owner's and operator's certification statement are included in Appendix B.

1A.5 Claim of Confidentiality [NR 670.012]

Enviro-Safe is not requesting a claim of confidentiality.

1A.6 Summary of Pre-Application Meeting [NR 670.014(2)(v)]

A pre-application meeting was held on Monday, September 30, 2019 at 7:00pm at the Germantown Community Library located at N112 W16957 Mequon Road in Germantown. A public notice of the meeting was published in the Germantown Express News the week of August 16-23, 2019. Representatives from Enviro-Safe attended the meeting. There were no other people in attendance at the meeting and therefore no comments were received. A copy of the presentation, sign-in sheet, affidavit of publication, confirmation of broadcast media spot and a copy of the facility sign are included as part of the Preplanning Meeting Documentation [Appendix E].

1A.7 Local Approval Requirements Documentation [NR 670.014(2)(w)]

Enviro-Safe provided written request, including the standard notice, to each affected municipality, including a request for any additional local approvals that may be required. Responses were received from each affected municipality with no objections. A copy of the written request and

responses are included as part of the Pre-Application Documentation for Local Approvals [Appendix F].

1A.8 Complete Part A Application [NR 670.013]

1A.8.1 License Activities [NR 670.013(1)]

The current activities at the site includes solid waste processing facility, 10-day hazardous waste transfer facility, used oil marketer/processor, universal waste handler, and solvent continued use consolidation activities. Proposed hazardous waste activities at the site includes hazardous waste staging, licensed storage, exempt processing (consolidation/commingling/bulking) and lab packing/repacking) and treatment (fuels blending and elemental neutralization).

The hazardous waste storage and treatment activities are subject to the requirements of Chapter NR 664, NR 670 and NR 668 of the Wisconsin Administrative Code.

USEPA's Forms 8700-12 and 8700-23(are included in Appendix C. Additional information required by NR 670.013(1) through 670.013(14) is provided below. Site photos are included in Appendix D.

1A.8.2 Legal Location Information [NR 670.013(2)]

Facility Identification: Enviro-Safe Consulting, LLC.
dBA Enviro-Safe Resource Recovery
W130 N10500 Washington Drive
Germantown, WI 53022
EPA ID#: WIR000142877
WDNR FID #: 267193300

Geographical Coordinates: Latitude: 43.2079
Longitude: -88.07069

1A.8.3 SIC/NAICS Codes [NR 670.013(3)]

NAICS Codes: 541620: Environmental Consulting Services
562211: Hazardous Waste Treatment and Disposal
562219: Nonhazardous Waste Treatment and Disposal
562998: Tank Cleaning and Disposal Services, Commercial or Industrial

1A.8.4 Operator Information [NR 670.013(4)]

Operator Identification: Enviro-Safe Consulting, LLC.
dBA Enviro-Safe Resource Recovery
W130 N10500 Washington Drive
Germantown, WI 53022
(262) 790-2500

Ownership Status: Private Limited Liability Corporation, jointly owned Jeffrey Vilione and Dawn Zellmer-Vilione.

1A.8.5 Facility Owner's Information [NR 670.013(5)]

Facility Owner Identification: JDV Real Estate Holding, LLC.
W130 N10500 Washington Drive
Germantown, WI 53022
(262) 790-2500

Ownership Status: Private Limited Liability Corporation owned by Jeffrey Vilione

JDV Real Estate Holding, LLC. is the legal entity that owns the property and building. Enviro-Safe Consulting, LLC (dBA Enviro-Safe Resource Recovery) is the entity that leases the property and building which directs the daily operations at the site.

1A.8.6 Indian Land [NR 670.013(6)]

The facility is not located on Indian lands.

1A.8.7 Facility and Application Type [NR 670.013(7)]

The facility was originally built in 2012 for the operation as a solid waste processing facility, hazardous waste 10-day transfer facility, used oil marketer/processor, universal waste handler, hazardous secondary materials and solvent continued use storage and consolidation. Since 2002, the facility continues to operate in this manner.

Enviro-Safe recently constructed a new addition (completed in November-2021) to its original building that will continue to be used for these purposes. Certain parts of the original facility and parts of the recently-expanded facility are proposed to be licensed for hazardous waste storage and treatment. The location and borders of the original building and the 2021 addition are shown on Drawings and Maps - Facility Map [Appendix G-04].

This FPOR is associated with the initial application as a fully licensed, "Part B" hazardous waste TSD facility under NR 664 and 670.

1A.8.8 Hazardous Waste Type, Quantity and Processes [NR 670.013(10)]

The Part A Application [Appendix C] identifies hazardous waste, listed or designated under NR 661, to be stored or treated (fuel blending) along with estimated quantities. The license exempt processes within hazardous waste storage areas include hazardous waste bulking, consolidation, elementary neutralization, lab pack repackaging and aerosol puncturing. Hazardous waste storage, treatment and processing activities are described in Section 1A.8.10. Solvent continued use activities are described in Section 1A.8.9.1.

For a list of waste that will not be accepted at the facility, see the Waste Analysis Plan [Appendix H].

1A.8.9 Current Facility Information [NR 670.013(8)]

1A.8.9.1 Overview

This section describes waste operations currently being conducted at the facility located at W130 N10500 Washington Drive in Germantown, Wisconsin. This includes licensed solid waste storage and processing, used oil marketer/processor, universal waste handler, hazardous waste 10-day transporter license, hazardous secondary materials and solvent continued use storage and consolidation activities. These operations are conducted in the original building and the 2021 addition, and will continue as described herein after hazardous waste licensing occurs.

The Facility Map [Appendix G-04] illustrates the location of the warehouses and above ground storage tanks. The warehouses and above ground storage tanks are currently used for these activities are referred to as the following:

- Laboratory (Not a state certified or registered laboratory)
- RM 124 - Staging and Container Storage
- RM 125 - Container Storage
- RM 126 - Container Storage and Consolidation
- RM 127 - Container Storage, Bulking, Consolidation and Lab Pack/Repacking
- T01 and T02 - Above Ground Storage Tank Storage (Outside)
- T07 thru T10 - Above Ground Storage Tank (Indoors in RM127)

The facility handles usable products that may be legitimately reused (expired or off-spec chemical products or solvent continued use) and are not deemed a solid waste or hazardous waste. If the material is determined to be a usable product and not a waste, as part of the profile and approval process, the material will be identified as such. The profile contains details regarding the chemical product or solvent continued use specifications. In addition, the generator may provide a Safety Data Sheet (SDS) or equivalent, sample of the material, or a Certificate of Analysis (COA) which provides additional information which may be provided to qualify the chemical product or solvent continued use for the end-user and assist in re-sale. A Certificate of Analysis (COA) is a document that provides verified information on key characteristics of the chemical product (such as appearance, pH, flashpoint, etc.) for the end user. If the material is solvent continued use, as part of the profile and approval process, the material will be identified how it will be reused, location of generator, amount to reused, etc. Enviro-Safe requires that a certificate of re-use is issued by the receiving facility. This is maintained in the facility's operating record such that the specific generator loads can be identified and documented as having been reused. The certificate can be provided to the generator upon request.

1A.8.9.2 Laboratory

The facility currently has a laboratory that is used to assist in fingerprint analysis for the receipt of waste. In general, the process includes the sampling of incoming waste containers and the laboratory analysis of these samples for specific parameters against the acceptable criteria identified in the Waste Analysis Plan [Appendix H] to make a comparison for the received waste against the information provided on the profile and the historical receipts of the material to identify any discrepancies. The on-site laboratory is not a certified laboratory (can perform testing on compliance samples for other facilities) or an NR 149 registered laboratory (performs testing on their own samples only).

1A.8.9.3 RM 124 - Staging

The containers present in the staging area (southeast corner of the RM 124 Warehouse) become present as the result of unloading trucks of received waste and materials. The containers are palletized or temporarily held directly on the floor (depending how the containers are received from the customer) with adequate space being left between containers to facilitate container sampling and inspection (approximately 2 feet). Preferably containers are singled stacked. However, secondary containment in the area is sufficient to allow for double stacked containers. Receiving personnel inspect the integrity of each container. If a leaking container is detected, immediate action is taken to mitigate the leak to the extent possible and the container is overpacked.

The labels on each container will identify the regulatory status of the containers (e.g., which containers are solid waste, solvent continued use materials, universal waste, used oil, or containers that are in 10-day transportation.) The receiving personnel will review the label and check the containers into the internal waste software system where a unique tracking number is assigned and identified on each container. Labels with the unique identification number will be generated from the software system and affixed to the container in addition to the other labels. The container is then tracked via the internal software system.

The container contents of solid waste, used oil, universal waste, and solvent continued use are screened, sampled, fingerprinted and analyzed as required under the Waste Analysis Plan [Appendix H] with the results documented on the Container Inspection Form which is contained within the Waste Analysis Plan [Appendix H]. Acceptable containers are palletized (if needed) and moved to a designated container storage area for future processing or off-site shipment. Non-conforming containers (typically for waste not matching the approved profile) are quarantined and labeled as "Non-Conforming Material" with the date. The container is moved to the designated hold area. A discrepancy report is entered into the waste tracking system by the receiving personnel and distributed internally for resolution. Under typical circumstances, the non-conformance is resolved within thirty (30) days or less. Non-conformances that cannot be resolved within this time period is brought to the attention of the Operations Manager.

The container contents of hazardous waste received under the hazardous waste (10-day) transfer license are not opened or fingerprinted unless consolidating the contents of two or more containers with the same hazardous waste into a new container or when combining and consolidating or bulking different hazardous wastes. The new container will be labeled with the verbiage "Hazardous Waste", EPA ID Number of the Generator, and the EPA Waste Codes. A note is added to the manifest in Section 14 for the respective line item to indicate the revised number of containers and container type after consolidation has occurred.

If the solvent continued use material is scheduled to be received by tanker truck and pumped into an above ground storage tank, the tanker truck is staged in one of the outside tanker filling pad areas on the east side of the building. The receiving personnel verifies the solvent continued use material to be received and takes a composite sample of the tanker material. The appropriate incoming waste evaluation and compatibility testing is conducted. The results are documented on the Container Inspection Form which is contained within the Waste Analysis Plan [Appendix H]. If the sample passes the testing, the tanker is approved for unloading activities into the above ground storage tanks. The transporter shall prepare the truck for transfer operations utilizing the Unloading/Loading Procedure Form [Appendix X] and connect

to one of the storage tanks in conjunction with site personnel instructions. Once the tanker volume is transferred into the above ground storage tank, transfer operations are completed and all connections are removed. Upon notification from site personnel, the tanker truck is authorized to leave the property. If the sample fails, the material cannot be unloaded. The Technical Service Manager and Operations Manager are notified immediately for further direction.

1A.8.9.4 RM 124 - Container Storage

The RM 124 warehouse is currently being used for storage of non-hazardous solid waste and universal waste. The stored containers are palletized with a minimum aisle space of 3 feet between rows with painted lines on the floor to ensure adequate aisle space is maintained. Containers managed in the storage area includes various sizes from less than one-gallon containers to 330-gallon totes. The typical types of waste being stored includes solid waste, used oil, universal waste and e-waste streams. Typically, containers are doubled stacked.

1A.8.9.5 RM 125 - Container Storage

The RM 125 warehouse is currently being used to store solid waste which is DOT hazardous materials or hazardous waste associated with the hazardous waste 10-day transportation license held by the facility. NR 663.12 allows transporters to store hazardous waste for a period of up to 10-days and then ship it off-site for proper disposal to the designated facility.

The containers stored are palletized with a minimum aisle space of 3 feet between rows with painted lines on the floor to ensure adequate aisle space is maintained. Containers managed in the storage area includes various sizes from less than one-gallon containers to 330-gallon totes. The typical types of hazardous waste being stored includes characteristic waste (D001, D002, D003, and D004-D043) and listed waste (F, K, P or U codes) waste streams. Typically, containers are doubled stacked. When containers of incompatible waste become present segregation and isolation by the use of pallet and spacing is utilized [Part 2: Section C - Container Standard - Incompatible, Reactive, Ignitable Waste]. The typical types of hazardous waste to be stored includes flammable, corrosives, toxics, and oxidizer waste streams in small quantities.

The 10-day hazardous waste consolidation is performed within the RM 125 warehouse. The operation of consolidation is the practice of combining the same profiled compatible hazardous wastes from smaller containers into larger containers. For liquid or solid 10-day hazardous waste being consolidated into another container, containers are emptied into larger containers by manual pouring. Minor changes to the container number and container type are indicated on the manifest.

1A.8.9.6 RM 126 - Container Storage and Consolidation

The RM 126 warehouse is currently being used for the storage and consolidation of solvent continued use material (which can continue to be used for its intended purpose by another user) or the consolidation of 10-day hazardous waste.

The solvent continued use containers received are profiled and affixed with a label that meets the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard requirements under 1910.1200(f) for hazardous materials. In addition, a Safety Data Sheet (SDS) for the material received is also provided by the generator and on file with the facility that

meets the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard requirements under 1910.1200(g). The containers stored are palletized. A minimum aisle space of 3 feet is present between the rows and painted lines on floor ensure adequate aisle space is maintained. Containers managed in the storage area are typically 55-gallon drums, 275-gallon totes or 330-gallon totes and double stacked. The consolidation operation consists of pumping the contents of portable containers into the outside above ground storage tanks, or into a tanker, or into another container. Prior to the receipt of material, the Technical Service Manager identifies inbound material that are acceptable as the result of the material profile review process conducted under the Waste Analysis Plan [Appendix H]. Upon receipt, the material is sampled and analyzed for acceptability. Acceptable containers are moved to the specific container storage area for future bulking or off-site shipment.

Once approximately 6,000-gallons of solvent continued use material is accumulated on-site in the storage area or above ground storage tank, an outbound shipment is scheduled. In preparation for the shipment, it is determined what containers shall be shipped, if the containers will be pumped into a tanker truck and shipped, or if material stored in the above ground storage tanks will be pumped into a tanker truck and shipped.

If containerized solvent continued waste material is to be shipped, pre-selected stored containers are selected from inventory for the outbound shipment. Trucks are loaded at Docks #2, #3 or #4 on the eastside of the building. Prior to the start of the loading process, the driver verifies the transporter vehicle wheels are chocked and that the secondary containment trench valve is in the closed position. Trucks are loaded using a forklift, pallet jack or drum cart. Dock plates are used to provide a stable transition between the trailer and dock. A bill-of-lading shipping document is prepared by the facility and completed prior to the transporter leaving the property for the designated facility. It is the typical practice of the transport vehicle to leave the property within 24-hours of the initiation of loading activities.

If containers will be pumped into a tanker truck and shipped, pre-selected stored containers are staged for pumping in RM 126. Adequate aisle space is left between every row of pallets to facilitate container sampling and pumping activities. A sample of each staged container is taken and then mixed in a manner to simulate the combined/commingled material [see Appendix H - Waste Analysis Plan for specific details] for compatibility verification. The results are documented on the container inspection form. If the sample passes the compatibility test, the batch is approved for bulking and shipment.

The vacuum tanker shall be staged in the outside tanker filling area on the east side of the building. The transporter shall prepare the truck equipment for the transfer operations utilizing the Unloading/Loading Procedure Form [Appendix X] and transfer to the tanker truck from the portable containers using hoses and a suction wand. Upon the completion of transferring activities, the tanker volume is verified and a composite sample of the material is taken and retained for QA/QC purposes. The results are documented on the container inspection form. A bill-of-lading is prepared by the facility and completed prior to the transporter leaving the property for the designated facility. It is the typical practice of the transport vehicle to leave the property within 24-hours of being loaded. The empty containers from the transferring activities are inspected to confirm that the containers are empty. Upon confirmation, the empty containers are placed onto a staged trailer for shipment to a drum recycler. If the compatibility

testing fails, the batch is not approved and cannot be shipped. The Technical Services Manager and Operations Manager should be notified immediately for further direction.

If material stored in the above ground storage tanks will be pumped into a tanker truck for shipment, the tank for which the material should be pump will be scheduled. The tanker truck shall be staged in one of the outside tanker filling areas on the east side of the building. The transporter shall prepare the truck equipment for the transfer operations utilizing the Unloading/Loading Procedure Form [Appendix X] and conduct the transfer operations via hoses provided by the transporter in conjunction with site personnel. Once the desired volume is transferred into the tanker, the tanker volume is verified and a composite sample of the material is taken and retained for QA/QC purposes. A bill-of-lading is prepared by the facility and completed prior to the transporter leaving the property for the designated facility. It is the typical practice of the transport vehicle to leave the property within 24-hours of being loaded.

The 10-day hazardous waste consolidation is performed within the RM 126 warehouse. The operation of consolidation is the practice of combining the same profiled compatible hazardous wastes from smaller containers into larger containers. For liquid or solid 10-day hazardous waste being consolidated into another container, containers are emptied into larger containers by manual pouring. Minor changes to the container number and container type are indicated on the manifest.

1A.8.9.7 RM 127 - Container Storage and Processing

The RM 127 warehouse is currently being used for the storage and processing of solid waste, storage and processing of used oil, and storage of universal waste as a small quantity handler. The facility stores and conducts solid waste consolidating/commingling/bulking activities to facilitate further off-site processing as allowed by the solid waste processing license held by the facility under NR 502. The facility collects used oil for the blending of the material to meet a specific fuel specification as allowed under NR 679. The facility accumulates less than 11,025 lbs. or less of universal waste (batteries, pesticides, mercury-containing equipment or lamps, calculated collectively) at any one time, and sends them off-site for recycling.

The containers stored are palletized with a minimum aisle space of 3 feet between rows with painted lines on the floor to ensure adequate aisle space is maintained. Containers managed in the storage area includes various sizes from less than one-gallon containers to 330-gallon totes. Typically, containers are doubled stacked. In addition, solid waste can be stored in one of the four inside 12,500-gallon above ground storage tanks with its own secondary containment located within RM-127.

The container processing includes the consolidation in other containers or the inside 12,500-gallon above ground storage tanks with compatible material. The operation of consolidation shall be the practice of combining compatible solid wastes from small to larger contains. Waste is received in various container sizes from one-gallon or less up to totes and cubic yard boxes, and in various forms (e.g., liquid and solids). The contents of these containers are then consolidated into larger containers or an above ground storage tank of like and compatible materials. For liquid waste being consolidated into another container, containers are emptied into larger containers by manual pouring. For liquid waste being consolidated into a above ground storage tank, containers are pumped into the storage tanks. For solid waste being

consolidated, containers are emptied into large containers by manual pouring. Once consolidated, the containers are shipped off-site for disposal. The contents in the above ground storage tanks are pumped onto a tanker truck and shipped off-site for disposal. Containers are kept closed and are open only when the waste is being placed into or taken out of the containers. When waste transfer activities are not being conducted, the container is kept closed. After the containers are deemed empty, they are either reused or sent-off site to a container recycler.

The process of lab packing/repacking shall be the practice of moving small waste containers into larger containers for which the small waste containers are not opened during the process and the contents of the smaller containers are not combined with the contents of any other containers. The lab packing/repacking operations shall be conducted within a designated area in the warehouse. During lab packing/repacking, adequate aisle space shall be left between every row of containers to facilitate container lab packing/repacking activities (approximately 2 feet). Containers will be orientated with the labels facing out to allow inspection of them. Preferably containers will be singled stacked. However, secondary containment in the area is sufficient to allow for double stacked containers. Waste is received in various container sizes from one-gallon or less up to totes and cubic yard boxes, and in various forms (e.g., liquid and solids). These containers are depacked and repacked into larger containers of like and compatible materials. Once repacked containers are full, they are sent off-site for disposal.

The proper personal protective equipment required to be worn during lab pack repackaging, bulking and consolidation shall be specified under the Personal Protective Equipment Plan [Appendix M].

1A.8.10 Proposed Hazardous Waste Processes and Design Capacity [NR 670.013(9)]

1A.8.10.1 Overview

This section describes hazardous waste-related operations to occur at the facility after the proposed hazardous waste storage and treatment license is issued. This includes licensed hazardous waste storage and treatment activities and associated hazardous waste license-exempt processing activities that do not require licensing but may occur within licensed areas. The storage and handling activities described for non-hazardous waste operations (solid waste processing, used oil marketer/processing, universal waste handler, solvent continued used storage and consolidation, and 10-day hazardous waste transfer facility) described in Section 1A.8.9 will continue to occur. For a list of waste that will not be accepted at the facility, see the Waste Analysis Plan [Appendix H].

Storage

The proposed licensed hazardous waste storage areas include:

- RM124. Original RM124 inside storage warehouse is proposed for solid and hazardous waste staging and hazardous waste licensed storage in addition to a designate area for 10-day hazardous waste.
- RM125. Original RM125 inside storage warehouse, including the 2021 addition, is proposed for licensed hazardous waste storage.

- RM126. Original RM126 inside storage warehouse is proposed for licensed hazardous waste storage.
- East Loading Docks. Original outdoor and uncovered East Loading Dock Area (east of RM 124 and RM 125) is proposed for hazardous waste storage (when needed for outbound fuel-blending tankers). These are identified as Loading Docks #2, #3 and #4.
- Tanker Filling Area Pads. Original outside and uncovered tanker filling area pad, including its 2021 addition, which is capable of accommodating two tanker trucks (located east of outdoor tank farm) is proposed for hazardous waste storage (when needed for outbound fuels-blending tankers). These are identified as Tanker Filling Pads #1 and #2.

Processing

The proposed hazardous waste license-exempt processing activities include:

- Consolidation into Containers (RM125 and RM 126)
- Elementary Neutralization (RM126)
- Lab Packing/Depacking (RM125 and RM126)
- Aerosol Can Puncturing (RM125 and RM126)

Treatment

The proposed licensed hazardous waste treatment activities include:

- Fuel Blending (RM 126)

1A.8.10.2 Scheduling of Inbound Containers

A software system is utilized by the site to manage the waste management process from order receipt to the shipment off-site. When an order is received, it is entered into the system as a Sales Order which identifies the generator, the profiles to be received and the anticipated quantities. If a profile has not been approved by Technical Services personnel or has expired, the profile cannot be included on a Sales Order or received. Once the Sales Order is finalized within the software, it is released for scheduling and can be received by the facility.

Released Sale Orders are routed to the Unscheduled Sales Order Report which is utilized by the Transportation Coordinator to schedule shipments into the facility. The Transportation Coordinator schedules the inbound shipments to be received into the facility and issues the Schedule Load Report on a daily basis to the Receiving Operator. The report includes the transporter, generator, disposal facility, profile, profile description, anticipated quantity, and container type to be received. The report communicates to receiving personnel that the waste being received has been pre-qualified and approved for receipt and what to expect to be received at the facility on a specific day/time.

Transporters are required to check-in upon arrival at the site with a receiving operator to verify that they are expected through the Schedule Load Report and present their shipping documents for initial review. The shipment documents accompanying the container delivery are reviewed against the daily receipt schedule by the receiving operator. Waste deliveries are only unloaded if the delivery is scheduled. Only pre-approved waste (with approved profiles) deliveries (wastes

with approved profiles) are allowed to be scheduled and received at the facility. If a waste is present on the truck that is not pre-approved by the facility, it will not be unloaded.

1A.8.10.3 Receiving (Unloading) of Inbound Containers

For containerized waste (as defined under the definitions), upon notification by the receiving operator, the transporter will be directed to the designated loading dock (Dock #2, #3, or #4) on the east side of RM 124 and RM 125 as shown on Facility Map [Appendix G-04]. Prior to the start of the unloading process, the driver backs up their truck to the loading dock and wheels are chocked. It is the responsibility of the receiving operators to verify the secondary containment trench valve is in the closed position and the wheels on the transportation vehicle to be unloaded are chocked prior to the unloading process. Trucks are unloaded using a forklift, pallet jack or drum cart. Dock plates are used to provide a stable transition between the trailer and dock.

The containers being unloaded vary in size from one-gallon or less and up to 330-gallon totes and in various types of containers. While being unloaded the container will be weighted and the amount recorded on the container itself. The unloaded containers will then be put into the Staging Area (RM 124) as shown on Facility Map [Appendix G-04] on pallets or directly on the floor. If during the unloading of the transportation vehicle it becomes known that a container is leaking, it will be immediately addressed prior to being put into the Staging Area. Upon conclusion of the unloading process from the transportation vehicle, receiving personnel shall release the transportation vehicle.

For tankers of hazardous waste under the license, upon notification by the receiving operator, the transporter will be directed to the designated loading dock (East Docks #2, #3, or #4) or Tanker Filling Pads #1 and #2 shown on Facility Map [Appendix G-04]. Prior to the start of the unloading process, the driver parks the truck and the wheels are chocked. It is the responsibility of the receiving operators to verify the secondary containment trench valve is in the closed position and the wheels on the transportation vehicle to be unloaded are chocked prior to the unloading process. Prior to unloading hazardous waste, the waste is screened, sampled and analyzed for acceptability. The results are recorded on the Container Inspection Form which is part of the Waste Analysis Plan [Appendix H]. Once deemed acceptable, the unloading process shall consist of pumping the contents of the tanker truck into empty portable containers staged in RM 126. The vacuum tanker is equipped with all necessary transfer equipment (i.e., filter, transfer hoses, fittings, transfer wand) required for transferring operations. Once a container is deemed full, they will be labeled and moved to a designated container storage area. Additional details regarding the receiving process can be found under Procedure, Structure and Equipment Description Preventing Hazards in Unloading Operations (Section 1A.11). The facility will not receive hazardous waste in tankers under the 10-day transfer facility license.

For solvent continue use material, upon notification by the receiving operator, the transporter will be directed to the designated loading dock (East Docks #2, #3, or #4) or Tanker Filling Pad #1 and #2 shown on Facility Map [Appendix G-04]. Prior to the start of the unloading process, the driver parks the truck and the wheels are chocked. It is the responsibility of the receiving operators to verify the secondary containment trench valve is in the closed position and the wheels on the transportation vehicle to be unloaded are chocked prior to the unloading process. Prior to unloading solvent continue use material, the waste is screened, sampled and

analyzed for acceptability, which may include compatibility testing if the incoming material is being pump into an outside above ground storage tanks that contain material that will be commingled with the incoming load. The results are recorded on the Container Inspection Form which is part of the Waste Analysis Plan [Appendix H]. Once deemed acceptable, the unloading process shall consist of pumping the contents of the tanker truck into empty portable containers staged in RM 126 or an outside above ground storage tank. The vacuum tanker is equipped with all necessary transfer equipment (i.e., filter, transfer hoses, fittings, transfer wand) required for transferring operations. Once a portable container is deemed full, it will be labeled and moved to a designated container storage area. Additional details regarding the receiving process can be found under Procedure, Structure and Equipment Description Preventing Hazards in Unloading Operations (Section 1A.11).

1A.8.10.4 Inspection of Incoming Containers and Container Contents

The containers that have been unloaded and received into the RM 124 Hazardous Waste Staging area from off-site generators must be inspected, accepted, and moved into a hazardous waste licensed storage area within 24-hours of the hazardous waste arriving at the facility. The inspection of containers shall be conducted to confirm that the number and type and sizes of containers is consistent with the manifest, confirm that the container is in good condition, verify that any labels are accurate, and confirm that the material being received is the material that was profiled and pre-approved for acceptance. The receiving package (shipping documents and Container Inspection Form in the Waste Analysis Plan [Appendix H] is used to facilitate the container inspection process.

Manifest and Shipping Documents

Each container of hazardous waste received must be identified on a uniform hazardous waste manifest (NR 664.0070) unless shipped by a very small quantity generator. It should be noted that in Wisconsin if a VSGQ ships waste on a manifest, they must have an EPA ID number. A bill of lading may be used for VSQGs if a manifest is not required by the final destination facility which could be Enviro-Safe or another facility. It should be noted that when a generator is set-up in the waste management software system, a generator's hazardous waste status is verified utilizing the EPA e-Manifest or the appropriate state database. The manifest, LDR and other shipping documents applicable to the shipment is contained within the receiving package. Once the transportation vehicle is unloaded, the information present on the shipping document will be verified against the actual physical containers received which includes the actual number of containers and the container type and sizes. The profile description and profile number (which is included in Section 14 of the manifest) shall be checked against the Scheduled Load Report to ensure that only the anticipated waste to be received is being received. In addition, the labels physically on the containers shall be compared against the shipping document to ensure they are representative and accurate. Once the information is verified and found to be accurate, it is confirmed within the waste management software system and the Container Inspection Report and unique container identification number labels/barcode are generated and included as part of the receiving packet.

Significant manifest or shipping document discrepancies discovered during the container inspection process (e.g., difference between the quantity or type of hazardous waste designated on the manifest or shipping paper and the quantity or type of hazardous waste a facility actually receives, 10% or more variation in the quantity manifested and the amount

actually received) will be reconciled with the generator and documented within the waste management software system. A Discrepancy Report will then be generated and routed to internal personnel and the generator. If the discrepancy cannot be resolved within 15 days after receiving the waste, notification to the WDNR is required.

Containers

Incoming containers may be new, used, and/or reconditioned and must meet the applicable U.S. Department of Transportation (DOT) regulations for packaging of hazardous materials in transportation. Generators shipping waste to the facility are required to place waste in containers that are constructed and/or lined with materials that are compatible with the waste. During container inspection, containers are visually inspected to ensure they are in good condition (e.g., free of severe rust, structurally sound, have no major dents, have no visible holes, gaps or other open spaces with special attention to the covers, gaskets and closure devices) and that no damage occurred during transportation. If during the container inspection, it becomes known that a container is compromised or became compromised, the facility shall make every effort to repair the defect to a satisfactory state as soon as possible after detection. If the container cannot be repaired, then the hazardous waste will be repackaged into an acceptable container or overpacked. When a container inconsistency is identified, it will be documented within the waste management software system. A Discrepancy Report will then be generated and routed to internal personnel and the generator.

Labels and Markings

Each container being received should have previously been marked and labeled by the generator in accordance with DOT regulations (identification number, proper shipping name, diamond-on-point sticker, etc.) and other hazardous waste specifications (waste description, profile, number, customer name/address, etc.) applicable to the container type and size. However, receiving personnel will verify the labeling on the container reflect the actual profile being received. If the label on the container is incorrect, the incorrect label will be removed and the correct label will be printed and affixed to the container. If additional other labels (such as old or inaccurate labels or labels with superfluous information) are present on the containers, they will be removed or sprayed out to avoid confusion with the correct labels. For bulk tankers, the same labeling requirements apply and will be deployed.

In addition to the markings and labels affixed to the container by the generator, at the time of receipt a unique container identification number label/barcode will be affixed to the container that correlates to the container number identified on the Container Inspection Form. The label shall include the word "Hazardous Waste" and contain the unique container identification number, generator name and address, profile number and description, internal approval code, treatment code, inventory date, incoming manifest number and DOT proper shipping name. The label shall be affixed to each individual container and will be the tracking mechanism utilized for the container moving forward within the facility.

Container Contents

After the containers are counted and confirmed to match the manifest and be in acceptable condition, receiving operators or laboratory chemist/technician [see Waste Analysis Plan in Appendix H for specific details] that are properly trained shall conduct the applicable waste evaluation procedures to appropriately accept and handle wastes delivered to the facility in

accordance with the Waste Analysis Plan [Appendix H] for containers in the Hazardous Waste Staging Area (RM 124). The Level I analysis is conducted to validate that the waste received matches the waste information profile. The Level I analysis is documented on the Container Inspection Form contained in the Waste Analysis Plan [Appendix H]. At a minimum, physical state, color, odor, viscosity, pH and flashpoint will be analyzed and recorded on the Container Inspection Form. Additionally, analysis that may be performed include water reactivity, reactive sulfides, reactive cyanides, oxidizers, suspended solids, and chlorine. Samples will be taken in accordance with the Waste Analysis Plan [Appendix H]. Containers pending the lab results will remain in the staging area until results are completed and the containers are approved by the receiving operator or laboratory chemist/technician. The Container Inspection Form shall be included with the receiving packet and will be also used to document information for the facility's operating record as part of the container inspection process.

If the waste is found to not conform to the approved profile, the container will be labeled "Non-Conforming Material" with the date and moved to designated hold/quarantine area in RM 124 depicted on the Container Storage Map [Appendix G-08]. Significant waste discrepancies (i.e., profiled waste not matching the waste actually received) discovered during the container inspection process shall be attempted to be resolved with the waste generator or rejected within 15-days. During this time period the rejected load containers shall be maintained in a designated hold area within RM 124 and clearly labeled as "non-conforming material" or "rejected material" with an identification label. The discrepancy and resolution will be documented in the waste management software system as part of the facility's operating record. If the discrepancy cannot be resolved within 15 days after receiving the waste, notification to the WDNR is required. The discrepancy and resolution will be documented in the software system as part of the facility's operating record.

Once the container passes the required incoming waste evaluation and is approved by receiving operators and laboratory chemist/technician and the results have been recorded on the Container Inspection Form, the container weight and storage location shall be entered into the software system and the container will be accepted into inventory. The container shall then be physically moved from the Hazardous Waste Staging Area (RM124) to the designated hazardous waste storage location. The container is now managed as an inventory item moving forward. The uniform hazardous waste manifest shall be signed within twenty-four (24) hours of the hazardous waste arriving at the facility and the receiving package (which includes a combination of the dispatch ticket, shipping document, LDR, container inspection form and discrepancy report depending on what is applicable to the shipment) shall be scanned and electronically maintained within the software system as part of the facility's operating record.

1A.8.10.5 Hazardous Waste Licensed Storage Areas

General Container Storage in RMs 124, 125, 126

Containers stored in the hazardous waste licensed storage areas shall be stored on pallets with the label facing outward towards the aisle to allow inspection of them. If there are smaller containers on the same pallet and they are manifested as identical containers and their contents are the same (e.g., a pallet of 5-gallon containers of a single off-spec product, batteries), then only the outside containers need to be visible from the aisle while in storage. The containers on the pallet may be banded or shrink wrapped. If containers are banded or

shrink wrapped, additional labels will be affixed to ensure the items are identifiable. A minimum aisle space of 3 feet (see Section 1A.20 Preparedness and Prevention - Required Aisle Space) will be present between the rows and painted lines on the floor will be used to ensure adequate aisle space is maintained. Containers managed in the storage areas include various sizes of less than one-gallon containers to 330-gallon totes. The typical types of hazardous waste to be stored includes characteristic waste (D001, D002, D003, and D004-D043) and listed waste (F, K, P or U codes) waste streams.

Containers may be double-stacked provided that the configuration is stable (i.e., containers will not readily fall off the pallet or damage the integrity of the containers or supporting structure). The lower containers must be able to support the weight of the above containers. The inspection of the containers cannot be impeded with stacking, and container labels must be easily viewed and inspected. All materials stored within the stacked containers must be compatible. Stacked containers must be supported by a pallet unless they are less than 5-gallons in capacity (in the top row) or totes (IBCs) with built-in pallets.

The facility shall conduct daily visual inspection of the hazardous waste licensed container storage areas to identify and correct any deficiencies. Details of this inspection are described in the Total Preventative Maintenance and Inspection Plan [Appendix I]. The inspection shall be documented and conducted in accordance with the Total Preventative Maintenance and Inspection Plan [Appendix I].

The warehouses where storage occurs have sufficient lighting (10 lumens or more per square foot per OSHA general requirements for warehouses) and do not have any particular dark corners or shadowed areas. In addition, the warehouse walls are painted white to provide for good overall visibility and good housekeeping ensure the warehouse is not dark or dingy in any manner.

The inventory at the facility is monitored on a daily basis through inventory reports that are generated from the waste management software system. The inventory reports contain information such as unique container identification number, profile number, descriptions, weight/volume, container type/size, storage location, date received, waste codes and can be generated by various parameters. Once inventory amounts are accumulated on-site in storage to fill transportation vehicles or is economically feasible, an outbound shipment process is initiated through the software system. Inventory reports will be created and reviewed daily to ensure that license storage limits are not exceeded.

Additional information on the storage of incompatible, reactive and ignitable waste can be found under Container Standard – Incompatible, Reactive, Ignitable Waste (Part 2: Section C).

Additional information on the secondary containment of the storage areas can be found under Container Standard - Containment (Part 2: Section B).

Hazardous Waste Licensed Storage - RM 124 Warehouse

The RM 124 is being proposed for receiving, staging and hazardous waste licensed storage. The two types of storage shall include (1) staged waste (inbound waste), (2) hazardous waste

licensed storage, (3) quarantined containers, (4) 10-day transfer facility hazardous waste, and (5) staged outbound containers as shown on the Container Storage Map [Appendix G-08],

The containers stored in RM 124 shall be in accordance with General Container Storage (Part 1: Section 1A.8.10.5). Preferably, containers will be singled stacked. However, secondary containment in the area is sufficient to allow for double stacked containers. The Container Storage Map [Appendix G-08] illustrates the container storage layout for the RM 124 Staging and Hazardous Waste Licensed Storage. Containers in storage status will be kept clearly separated from staged containers (inbound or outbound), quarantined containers and 10-day transfer facility hazardous waste. All acceptable waste types may be stored in RM 125 in accordance with the storage parameters identified under Container Standard - Incompatibles, Reactive, Ignitable Waste (Part 2: Section C).

Hazardous Waste Licensed Storage - RM 125 Warehouse

The RM 125 warehouse is being proposed for hazardous waste licensed storage. The southern part of RM 125 is in the original building and has been expanded into an adjacent newer building area to the north. The typical types of hazardous waste to be stored includes characteristic waste (D001, D002, D003, and D004-D43 codes) and listed waste (F, K, P or U codes) waste streams that are suitable for fuels blending. The containers stored in RM 125 shall be in accordance with General Container Storage (Part 1: Section 1A.8.10.5). Containers may be double stacked and the secondary containment in the area is sufficient to allow for double stacked containers. The Container Storage Map [Appendix G-08] illustrates the container storage layout for the RM 125 Hazardous Waste Licensed Storage. A section of RM 125 has been designated for lab pack repacking as depicted on the Container Storage Map [Appendix G-08]. This process is described in Hazardous Waste License Exempt Process – Lab Packing Repacking (1A.8.10.6). The designated section of RM 125 may be used for other storage when not in use for lab packing repackaging operations.

A section of RM 125 has been designated for incompatible waste storage. The containers of incompatible waste stored in the designated licensed storage area for incompatibles as depicted on the Container Storage Map [Appendix G-08] will be palletized and stored on containment pallets. The typical types of incompatible waste to be stored includes corrosives (D002), reactivities (D003), toxics, and oxidizers waste streams. Incompatible waste will be segregated and isolated by the use of containment pallet and aisle spacing. Only compatible wastes and materials will be stored within any containment pallet. In addition, labels and signage will be used to identify the hazards and incompatibilities. Refer to Container Standard - Incompatibles, Reactive, Ignitable Waste (Part 2: Section C) for additional details regarding incompatible wastes. In circumstances when the designated area is not large enough and additional space for incompatible waste storage is needed, a larger area of RM 125 may be utilized using the same controls. The designated section of RM 125 may be used for compatible wastes when not in use for incompatible wastes storage. All acceptable waste types may be stored in RM 125 in accordance with the storage parameters identified under Container Standard - Incompatibles, Reactive, Ignitable Waste (Part 2: Section C).

Hazardous Waste Licensed Storage - RM 126 Warehouse

The RM 126 warehouse area is being proposed for hazardous waste licensed storage in an original section of the building. The typical types of hazardous waste to be stored includes

characteristic waste (D001, D002, D003, and D004-D43 codes) and listed waste (F, K, P or U codes) waste streams that are suitable for fuels blending. The containers stored in RM 126 shall be in accordance with General Container Storage (Part 1: Section 1A.8.10.5). Palletized containers may be double stacked and the secondary containment in the area is sufficient to allow for double stacked containers. The Container Storage Map [Appendix G-08] illustrates the container storage layout for the RM 126 Hazardous Waste Licensed Storage. The RM 126 warehouse has been designated for fuel blending as depicted on the Container Storage Map [Appendix G-08]. This process is described under Hazardous Waste License Treatment - Fuel Blending (Part 1: Section 1A.8.10.7). However, the warehouse may be used for other storage when not in use for fuel blending activities. The storage that will not be permitted in RM 126 will include waste with DOT classes for Poisonous Gas Zone A (2.3), Poisonous Gas Zone B (2.3), Oxidizers (5.1), Organic Peroxides (5.2), Poisonous Liquids PG I Zone A (6.1) and Corrosive Liquids (8). All acceptable waste types may be stored in RM 125 in accordance with the storage parameters identified under Container Standard - Incompatibles, Reactive, Ignitable Waste (Part 2: Section C).

Hazardous Waste Licensed Storage - East Loading Docks #2, #3 and #4

The East Loading Docks are being proposed for hazardous waste storage within three semi-trailers or tanker trucks. The area is uncovered with secondary containment present. The Container Storage Map [Appendix G-08] illustrates the container storage layout of the tankers and identifies Loading Docks #2, #3 and #4 which are located on the east of RM 124 and RM 125.

Hazardous Waste Licensed Storage - Tanker Filling Area Pads #1 and #2

The Tanker Filling Area Pads are being proposed for hazardous waste storage for two tanker trucks. The area is uncovered with secondary containment present. The Container Storage Map [Appendix G-08] illustrates the container storage layout of the tankers and identifies Tanker Filling Area Pads #1 and #2 which are located east of the outdoor tank farm.

1A.8.10.6 Hazardous Waste License Exempt Processes

Hazardous Waste License Exempt Process - Consolidation into Containers

Waste is received in various container sizes from one-gallon or less up to totes and cubic yard boxes, and in various forms (e.g., liquid and solids), The contents of these containers are then consolidated into larger containers of like and compatible materials having the same DOT hazard classes. For liquid waste being consolidated, containers are emptied into larger DOT approved containers by manual pouring. Once consolidated, the container is either treated on-site by the means of fuel blending, elemental neutralization or shipped off-site for disposal. For wastes that are solid in form (or otherwise not pourable) that are being consolidated, containers are emptied into DOT approved lined cubic yard boxes using a drum tipper attached to a forklift and scraped out or by the means of manually emptying for lighter-weight containers. Empty containers are managed in accordance with Empty Container (Part 1: Section 1A.8.10.12). Containers are kept closed in accordance with NR 664 Subch. CC regulations and are open only when waste is being placed into or taken out of the containers. When waste transfer activities are not being conducted, the container is kept closed. After the containers are determined to be RCRA empty, they are either reused (for compatible materials) or sent-off site to a container recycler. Non-RCRA empty containers that held hazardous waste are sent off-site

for proper disposal as a hazardous waste. Liners associated with cubic yard boxes are recycled or placed into a hazardous waste container to be properly disposed of off-site if RCRA empty. Consolidation into containers is conducted in RM 125 or RM 126. Hazardous waste received under the 10-day transfer facility license will not be consolidated.

The proper personal protective equipment required to be worn shall be specified under the Personal Protective Equipment Plan [Appendix M].

Additional detailed consideration and procedures can be found in Container Standard - Incompatibles, Reactive, Ignitable Waste (Part 2: Section C)

Hazardous Waste License Exempt Process - Elementary Neutralization

Neutralization is the combination of acids and bases to bring the pH of a solution to 4-10 with the intent to remove the characteristic of corrosivity. Neutralization often involving more than one waste stream also constitutes consolidation. The state of the acids and bases in the neutralization process can be solid/liquid and product/waste depending on available materials. Neutralization shall be performed in RM 125 and RM 126 in an appropriate vessel that is compatible with the materials and the expected products. The most common vessel is a portable container either a drum or IBC/tote. The mixing process will be heavily dependent on the specific materials but a general procedure is described here.

Only two materials of known composition shall be mixed at a time. The relative strength based on ionization constants of the two materials will be determined based on literature and the weaker of the two shall be placed into the mixing vessel by decanting from the storage container manually or using a drum tipper. The storage container must be emptied until RCRA empty. If any solids or sludges are present after decanting, these should be removed using a scraper/spatula appropriate to the material being handled. Once the weaker material is in the vessel, the stronger material shall be added at a rate slow enough to prevent excessive reaction as the materials mix. The mixture may be stirred, using a stirring implement compatible with the added materials, as necessary to ensure complete reaction. Prior to being deemed completely reacted, the mixture shall be stirred a final time.

Excessive reaction would be violent bubbling to the point of vessel overflow, discharge from the vessel, or deformation of the vessel by heat. Additionally, the formation of hazardous gases and fumes will be considered excessive reaction and/or user error. Materials should be neutralized utilizing chemical pathways that avoid the formation of hazardous gases and vapor. Should a mixture react violently, cold tap water can be added to the vessel to both weaken the reaction and reduce the temperature of the reaction. If a material is water reactive then water should not be added.

Solids and/or sludges that are added to the vessel will need to be mixed using a stirring implement compatible with the added materials to ensure dissolution and complete neutralization.

The complete chemical reaction formula of a proposed neutralization must be known to ensure that any potential byproducts of a reaction are known prior to performing a neutralization. Some chemicals may form intermediates or by products that are water reactive or present

various hazardous during the course of a reaction. Knowing the reagents/reactants, reaction, and the products formed will prevent unwanted results. Compatibility testing will allow verification of reaction effects prior to container quantities being neutralized. Compatibility testing in the lab will also provide the rate of mixing for safe reaction.

Storage containers being decanted into a vessel must be emptied to the fullest extent possible to ensure the container is left RCRA empty. Once emptied fully, the container may be reused as a neutralization vessel, a bulking container, or sent off site for disposal/reconditioning.

The proper personal protective equipment required to be worn shall be specified under the Personal Protective Equipment Plan [Appendix M].

Additional detailed consideration and procedures can be found in Container Standard - Incompatibles, Reactive, Ignitable Waste (Part 2: Section C)

Hazardous Waste License Exempt Process - Lab Packing/Repacking

A lab pack consists of a DOT authorized outer packaging (49 CFR 173.12) containing two or more small containers of hazardous waste packed in non-biodegradable absorbent materials which are of the same hazard and are compatible. The operation of lab packing/repacking shall be the practice of removing the individual containers from the outer packaging and either consolidating compatible waste by either pouring/emptying the material into a container or repacking the unopened small container itself into a larger container. The lab packing/repacking operations shall be conducted in RM 125. The designated lab packing repackaging area within the warehouse depicted on the Container Storage Map[G-08]. During lab packing/repacking processing, containers will be single stacked, container labels will be visible, and adequate aisle space shall be provided to allow movement around the containers. The original as-received lab pack containers and post-processing larger containers shall be stored on containment pallets.

The proper personal protective equipment required to be worn shall be specified under the Personal Protective Equipment Plan [Appendix M].

Additional detailed consideration and procedures can be found in Container Standard - Incompatibles, Reactive, Ignitable Waste (Part 2: Section C)

Hazardous Waste License-Exempt Process - Aerosol Can Puncturing

The process of aerosol can puncturing shall be the practice of managing non-RCRA empty hazardous waste aerosol cans that will be stored prior to being punctured. Aerosol cans to be punctured will typically include an aerosol spray can that can no longer be used for its intended purpose and the contents are under pressure and are flammable. The aerosol can puncturing operations shall be conducted in RM 125 in the designated puncturing areas as depicted on the Container Storage Map [Appendix G-08]. The original as-received containers and post-processing collection container shall be stored on containment pallets. During aerosol can puncturing, adequate aisle space shall be left between every row of containers to facilitate puncturing activities (approximately 2 feet). Containers storing the aerosol cans to be punctured will be in containers that are structurally sound and compatible with the contents of the cans and will be orientated with the labels facing out to allow inspection of them.

Preferably containers will be singled stacked. However, secondary containment in the area is sufficient to allow for double stacked containers.

The puncturing and draining activities of the aerosol cans will be conducted using a device specifically designed to safely puncture aerosol cans and effectively contain the residual contents and emissions. During puncturing the liquid contained within the aerosol can is drained into a 55-gallon collection container, the air emissions are captured in the carbon filtering device, and the empty metal containers are collected and sent off-site for metal recycling. The liquid collected will generally be deemed hazardous waste and fuel blended on-site. The spent carbon filter device will be deemed hazardous waste (butane, propane) and will be placed in a zip lock bag that will be sealed and put into a hazardous waste container for disposal. The 55-gallon collection container will be grounded and bonded during active puncturing activities. The puncturing of the aerosol cans will be done in manner to prevent fires, reactions and to prevent the release of any component of the waste to the environment. Incompatible wastes will not be punctured into the same receiving container.

The proper personal protective equipment required to be worn shall be specified under the Personal Protective Equipment Plan [Appendix M].

Additional details consideration and procedures can be found in Container Standard - Incompatibles, Reactive, Ignitable Waste (Part 2: Section C)

1A.8.10.7 Hazardous Waste Licensed Treatment

Hazardous Waste Licensed Treatment - Fuel Blending

Fuel blending treatment shall be the combination of hazardous wastes and other materials to create a blend that meets a fuel specification which is amendable to burning for energy recovery. The fuel blending operations shall be conducted in RM 126 and consists of vacuuming the contents of portable containers into a tanker truck that is staged in one of the two outside tanker filling area east of the outside above-ground storage tanks (Tanker Filling Pads #1 and #2) or one of the three east loading docks (Loading Docks #2, #3 or #4) illustrated on the Container Storage Map [Appendix G-08]. The Container Storage Map [Appendix G-08] illustrates the container storage layout for the RM 124 Staging and Licensed Storage and also shows the location of the licensed tanker filler areas 1 and 2 and Docks #2, #3 and #4.

Waste is received in various container sizes from one-gallon or less and up to 330-gallon totes as waste streams. Prior to the receipt of waste, the Technical Service Manager identifies inbound material that are acceptable for on-site fuel blending as the result of the waste profile review process conducted under the Waste Analysis Plan [Appendix H]. Upon receipt, the waste is screened, sampled and analyzed for acceptability. The results shall be recorded on the Container Inspection Form which is part of the Waste Analysis Plan [Appendix H]. Acceptable containers shall be moved to a designated container storage area for future treatment prior to off-site shipment.

Once approximately 6,000-gallons of material is accumulated on-site in various container sizes in the hazardous waste licensed storage areas, a vacuum tanker will be scheduled to come on-site and be loaded for transportation of the outbound shipment. In preparation for the

shipment, pre-selected stored containers are staged for pumping in the RM 126. Temporarily adequate aisle space is left between every row of the pallets (at least two feet) to facilitate container sampling and pumping activities during the shift which will not exceed a 24-hour period. A sample of each staged container is taken and then mixed in a manner to simulate the combined/commingled material [see Appendix H - Waste Analysis Plan for specific details] to prevent the mixing of incompatible materials. If the sample passes the compatibility test, the batch is approved for shipment. If the samples fail the compatibility test, the batch is not approved and cannot be shipped. The Technical Services Manager and Operations Manager should be notified immediately.

The vacuum tanker is equipped with all necessary transfer equipment (i.e., filter, transfer hoses, fittings, transfer wand) required for transferring operations. The truck driver shall prepare the truck equipment for the transfer operations including grounding the unit. To transfer the waste from the portable containers, the vacuum truck hoses will be placed between the vacuum truck and RM 126 through the Overhead Door #5. The typical length of vacuum hoses is approximately 70 feet and would require only one hose from the RM 126 to the outside Tanker Filling Pad or to the east loading Docks #2, #3 or #4. The hose will be connected to the tanker truck using a coupler and to the transfer wand using a connector. Prior to the loading activities beginning, a visual inspection of all hoses, for leaks or wet spots will be conducted as part of the Loading/Unloading Procedure Form [Appendix X]. Each container is grounded and bonded during active pumping operations from the container to the tanker. The bung hole of the container is opened and the wand is inserted. Once the container is empty such that no additional waste can be removed by suction, the wand is removed, bung replaced and grounding clamp removed. This is repeated until the desired volume is accumulated in the tanker from the pre-staged containers. Containers are kept closed in accordance with NR 664 Subch. CC under Subpart CC Container Emission Control (Part 2: Section 2A.4) regulations and are open only when waste is being placed into or taken out of the containers. The tanker is equipped with a liquid level control that also measures the volume pumped. Upon completion, the residue within the hose is removed by suctioning the material into the tanker, the hoses are capped, and the transfer equipment (e.g., hoses, wand, filter) returned to the vacuum truck. Transfer equipment will not be retained at the facility.

The facility will take all measures necessary to prevent spills during the loading operation. It is not likely that the suction wand would cause routine spills during the loading operations based upon its operation in conjunction with the vacuum tanker. However, to eliminate or greatly reduce the possibility, upon removing the suction wand from the empty container, the operator will slowly pull the wand from the unit allowing the suction of the vacuum truck to remove all free liquid from the hose before completely removing the wand from the container and inserting it into the next container. At the tanker truck filling area, a drip pan will be placed below the hose connection during the connection, filling and disconnection process to capture any residual that may leak or spill. The driver shall not leave the tanker pump during the pumping process and shall remain within close proximity of the shutoff valve at all times. In addition, when an overflow alarm is not present on the tanker truck, the driver shall gauge the container during filling operations by monitoring the filling gauge on the vehicle and be in constant communication with the suction wand operator. Walkie talkies will be used during this process to facilitate communication between the transporter driver and the operator. The transfer hoses that are routed from the RM 126 to the outside tanker filling pad or loading dock

will be located on concrete or asphalt and will be inspected prior to use. The areas where the transfer hoses run will be inspected after operations are completed for any leaks or drips.

Upon the completion of transferring activities, the tanker volume is recorded and a sample of the material in the vacuum truck is taken and retained for QA/QC purposes for the receiving facility purposes. A uniform hazardous waste manifest is prepared by the facility and completed prior to the transporter leaving the property for the designated facility. It is the typical practice of the transport vehicle to leave the property within 24-hours of the start of loading operations. However, under non-routine circumstances, the transport vehicle may remain loaded and within the tanker filler area or loading dock for over 24-hours. These non-routine circumstances may include, but may not be limited to, transport vehicle break-down, inclement weather events and receiving facility cancellation. As a result, the two tanker fill areas and three loading docks shall also be licensed for hazardous waste storage.

During the transfer process, the waste shall be removed from the container to the extent possible using practices commonly employed to remove materials from the specific type of container such as pumping. Once the transferring processes is completed, additional removal efforts shall be performed on the container to achieve maximum possible waste removal [see Empty Container under Part 1 Section 1A.8.10.12].

The proper personal protective equipment required to be worn shall be specified under the Personal Protective Equipment Plan [Appendix M].

Additional detailed consideration and procedures can be found in Container Standard - Incompatibles, Reactive, Ignitable Waste (Part 2: Section C).

1A.8.10.8 Hazardous Waste Transshipment

Not all containers shipped to the facility are candidates for license exempt processing or treatment. Containers that remain in their original containers (i.e., that are not bulked, consolidated, repacked, punctured, fuel blended or neutralized on-site) shall be received and properly stored in RM 124, RM 125 or RM 126 until truck load quantities of the waste are accumulated or until it is economically feasible to ship the containers off-site. These wastes will be stored and shipped off-site in the original containers, which is referred to as "transshipment". Hazardous waste containers shall not be stored on-site in excess of 365-days from the day of receipt. See Outbound Shipments (Part 1: Section 1A.8.10.7) for further details.

Prior to transshipment containers being shipped off-site, the selected containers are retrieved from storage, staged in designated aisles(s) on pallets in the West area of RM 124 where they are kept separate from other containers as they are being prepared for shipment. Containers are visually inspected to ensure they are in good condition (i.e., free of severe rust, structurally sound, have no major dents, have no visible holes, gaps or other open spaces with special attention to the covers, gaskets and closure devices) and that no damage occurred during storage. If during the container inspection, it becomes known that a container is compromised or became compromised, it must be addressed prior to shipment.

1A.8.10.9 Hazardous Waste 10-Day Transfer License

Once the hazardous waste license is issued to the facility (after licensing), the majority of the hazardous waste currently being received under the hazardous waste 10-day transfer facility license will be transitioned to be received under the hazardous waste transporter, storage and disposal facility (TSDF) license over a period not to exceed six-months from the date the license was issued. It is anticipated that once licensed, over 99% of the hazardous waste received will be under the license conditions and not the 10-day transfer license. The hazardous waste 10-day transfer license will be used for exceptions or unusual circumstances.

The hazardous waste tankers received under the 10-day transfer license will not be stored in East Loading Docks #2, #3, or #4 or the Tanker Filling Pads #1 or #2. The hazardous waste containers (including but not limited to drums, totes, etc.) received under the 10-day transfer license will be stored in RM 124 in the designated area depicted on the Container Storage Map [Appendix G-08]. In addition, the hazardous waste received under the 10-day transfer license will be affixed with a sticker indicating "10-DAY LICENSE".

Once the hazardous waste license is issued to the facility and after the transition period is completed, the process of consolidation of 10-day hazardous waste will be ceased.

1A.8.10.10 Hazardous Waste Outbound Shipments

If containers are shipped off-site, the software system assigns a unique outbound load number to the shipment and pre-selected containers from inventory are chosen to create the load based upon material assigned processes and ultimate treatment method on a first-in first-out (FIFO) basis. The selected containers shall be retrieved from storage, staged in a designated aisle(s) on pallets in the West area of RM 124 where they are kept separate from other containers and as the containers are being prepared for shipment. Containers are visually inspected to ensure they are in good condition (i.e., free of severe rust, structurally sound, have no major dents, have no visible holes, gaps or other open spaces with special attention to the covers, gaskets and closure devices) and that no damage occurred during storage. If during the container inspection, it becomes known that a container is compromised or became compromised, it must be addressed prior to shipment.

The system will then generate the outbound shipping labels (unless tanker or other bulk container) and shipping documents (uniform manifest, non-hazardous waste manifest, bill-of-lading, etc.) for the load based upon the selected load inventory. The majority of the information on the shipping document will be pre-printed. Once the transportation vehicle is loaded, any missing information (such as container count and container type) on the shipping document will be completed and the document signed and/dated. Copies of the shipping documents shall be retained by the facility prior to the transporter leaving the property for the designated facility. The items shipped shall be removed from inventory. As history of an inventory items is retained in the software system for a minimum of 3-years from receipt until disposition for recordkeeping purposes.

The containers being loaded vary in the size from one-gallon or less and up to 330-gallon totes. Trucks are loaded at Docks #2, #3 and #4 on the eastside of the building. Prior to the start of the loading process, an operator shall ensure the transporter vehicle wheels are chocked and that the secondary containment trench valve is in the closed position. Trucks are loaded using a forklift, pallet jack or drum cart. Dock plates are used to provide a stable transition between the

trailer and dock. The containers being loaded vary in sizes however, the typical sizes are 55-gallons.

It is the typical practice of the transport vehicle to leave the property within 24-hours of the start of loading operation. However, under non-routine circumstances, the transport vehicle may remain loaded and within the loading dock area for over 24-hours. These non-routine circumstances may include, but may not be limited to, transport vehicle break-down, inclement weather events and receiving facility cancellation. As a result, Docks #2, #3 and #4 shall also be licensed for hazardous waste storage.

1A.8.10.11 Hazardous Waste Container Opening and Waste Transfers

The processes described here may occur in RM 124, 125 or 126, but not in other parts of the facility.

The containers of hazardous waste must be opened to conduct sampling or to transfer waste from one container to another. As a result of conducting these activities on site, volatile organic compounds (VOCs) can be reasonably expected to be emitted into the atmosphere. Therefore, controls are required to be implemented to eliminate or reduce VOCs from being emitted to the extent reasonably possible. The controls that will be employed by the facility include engineering controls, administrative controls and container controls, as discussed below.

The facility shall utilize Subpart CC Container Level 1 and Container Level 2 air pollutant emission controls depending on container size, volatile organics concentrations, and vapor pressure; waste stabilization does not occur. Container Level 1 controls require that the hazardous waste be stored in an approved Department of Transportation (DOT) container, a container equipped with a cover and closure devices for each opening, or an open-top container with an organic vapor-suppressing barrier. Container Level 2 controls require that the hazardous waste be stored in an approved DOT container, a container that operates with no detectable organic emissions, or a demonstrated vapor-tight container.

When in storage, all containers will be securely covered and properly closed. A container shall be deemed properly closed when:

- For liquid hazardous waste in closed-top drums, the drum is considered closed when the lid and bungs are secured.
- For liquid hazardous waste in open-top containers, the container is considered closed when the band that seals the lid to the containers is clamped or tightly bolted.
- For non-liquid hazardous waste in drums or other rigid containers, the container is considered closed if there is complete contact between the lid and the rim all around the top of the container.
- For hazardous waste in non-rigid containers (such as cubic yard boxes and gaylords), the container is considered closed when the neck of the inner bag is twisted shut and secured to create an airtight closure. A bag linear is also required to be used.

- For hazardous waste in containers with built-on funnels on the lids, the container is considered closed when a funnel is screwed tightly into the bung hole and the funnel's lid is firmly closed and latched. If the funnel lid is fitted with a locking mechanism that keeps the lid in a closed position, it shall be used at the end of the work shift or day to meet the closed container requirements. All other openings on the drum lid shall be properly closed or capped.
- For hazardous waste, pressure-vacuum relief valves are considered closed when (in addition to being they are properly designed) when they are maintained to prevent emissions when in the closed position.

When sampling, transferring waste or emptying waste from a container, it is conducted through normal container opening and closing devices for the container type (i.e. remove cover, remove cap, open box, etc.). The time period will be limited only to the time to conduct the actual sampling, filling and/or removing activity. Organic liquid wastes that are received in containers may also be transferred to a tanker truck for shipment for off-site processing. The transfer is done using a vacuum pump that is mounted on the tanker truck with the driver's associated equipment (i.e., hoses, fittings and filters) that is used for the shipment of the waste.

In order to minimize emissions, containers are kept closed unless sampling, filling or emptying container.

Container Filling - Continuous. When the facility fills a container to its intended final level during a continuous operation, it shall promptly secure the closure devices in the closed position or install all covers, as applicable to each container, upon conclusion of the filling operation.

Container Filling - Intermittently. When distinct quantities or batches are intermittently added to a container over a period of time, the facility shall promptly secure the closure device in the closed position or install covers, as applicable to each container, upon either the container being filled to the intended final level or the completion of a batch loading after which no addition material will be added to the container within fifteen (15) minutes, the person performing the loading operation leaving the immediate vicinity of the container or the shutdown of the process generating the material being added to the container, whichever condition occurs first.

Container Opening. Opening of a closure device or cover is allowed for the purpose of sampling or removing the contents from the container. When distinct quantities or batches of the contents are removed from the container but the container does not meet the conditions to be an RCRA empty container, the facility shall promptly secure the closure devices in the closed position and install covers, as is applicable to the container, upon the completion of a batch removal after which no additional material will be removed from the container within fifteen (15) minutes or the person performing the removal operation leaves the immediate vicinity of the container, whichever condition occurs first.

Container Opening - Hazardous Waste Empty Containers. Any container that meets the definition of a RCRA empty container will have the closure devices in the closed position or install all covers, as applicable to each container, during storage. If the RCRA empty container is open, it should be for a limited period (15 minutes or less).

Tanker Filling. When the facility fills a tanker truck, a vacuum is placed on the tanker unit which creates a suction on the loading hose causing the removal of the container contents. The waste in the tanker is completely sealed except when sampling the waste, determining liquid levels or when an over pressurized/vacuum condition becomes present. Tankers are filled and shipped to the receiving facilities within 24-hours.

It should be noted that spring loaded, pressure-vacuum relief valves, conservation vents or similar types of pressure relief devices which may be used and vent to the atmosphere will be designed to operate with no detectable organic emission when the device is secured in the closed position. The settings at which the device opens will be established such that the device remains in the closed position whenever the internal pressure of the container is within the internal pressure operating range determined based on container manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices or other requirements for the safe handling of flammable, ignitable, explosive, reactive or hazardous materials.

RCRA-empty containers are sent off-site for recycling. When empty containers are generated from transferring wastes to bulk containers, the container is emptied as completely as possible using best industry standards (see Section 1A.8.10.12).

The facility has been designed for flammable liquid storage and transferring with extensive engineering controls. The storage areas are equipped with a fire alarm system, foam suppression system and gas detection system. A continuous mechanical exhaust ventilation system with a minimum six air exchanges per hour is present to prevent the accumulation of vapors.

The facility has implemented administrative controls to eliminate or reduce ignition sources that could become present. Therefore, open flames, hot surfaces, electric and static electric discharges and potential ignition sources are eliminated or minimized in the facility to the extent possible. In addition, when liquids are being transferred proper bonding and grounding techniques are utilized to eliminate the risk of electrostatic build up during transferring activities. Extensive employee training is conducted in the proper handling and transferring of materials (see Training and Competence - Appendix B Training Matrix [Appendix L]).

1A.8.10.12 Hazardous Waste Empty Containers

Empty containers are generated as the result of conducting license exempt processes and license treatment activities. For drums and other various sized containers, the container shall be inverted to allow for any further material (liquids and solid residue) to be removed from the container. If inversion does not remove the residual, they will be manually scraped from the container. If the container is closed top with only a bung hole available, the drum wand used for fuel blending associated with the tanker will be used to manually scrap the bottom of the containers. For IBC (totes), the containers shall be tilted and drained. If solids remain, they will

be manually scraped from the tote using non-sparking tools through the cap. The residue from containers will be drained into accumulation containers compatible with the waste for collection and proper disposal. The purpose is to remove the remaining hazardous waste to achieve maximum possible removal, not just to the one-inch residue on the bottom of the container or inner liner or 0.3% total capacity by weight if the container is less than or equal to 119 gallons in size or 0.3% total capacity by weight if the container is greater than 119 gallons in size. Once all common emptying practices have been employed and the container has been deemed RCRA empty and does not exceed the residue quantity limits, the container will be reused (only after confirming compatibility), or stored on a staged trailer to send off-site for recycling, or sent-off site for disposal.

1A.8.10.13 Licensed Design Capacities

The proposed facility maximum licensed storage capacity is 115,800-gallons of hazardous waste. The facility will not store more than the maximum storage quantities within each of the areas identified below. The proposed facility maximum licensed treatment throughput is 12,000 gallons per day (or 218 55-gallon equivalent containers per day) of hazardous waste.

Area	Use	Floor Area (sf)	Maximum Storage	
			55-Gal Equiv.	Gallons
RM 124	HW Staging/ Storage	4,646	616	33,880
RM 125	HW Storage	5,091	784	43,120
RM 126	HW Storage/Treatment	1,056	160	8,800
East Loading Docks	HW Storage	1,850	N/A	18,000
Tanker Filling Area #1	HW Storage	616	N/A	6,000
Tanker Filling Area #2	HW Storage	616	N/A	6,000
TOTALS		13,810	1,560	115,800
Maximum License Treatment: 12,000 gallons per day (or 218 55-gallons equivalent containers)				

1A.8.11 Federal and State Permits, Licenses and Approvals [NR 670.013(11)]

A list of all permits, licenses or construction approvals received or applied for under applicable federal and state regulations are listed below. Copies of these documents are provided in Federal and State Permits, Licenses and Approval [Appendix V]. The facility maintains all required federal and state permits, licenses and approval for the operations being conducted and in continued compliance with their requirements.

The site currently operates a solid waste processing facility and hazardous waste transfer facility. The site original was issued a license as a Solid Waste Transfer - Partially Exempt (<50 tons/day) (License #4464) in Sep-2012. That license was terminated in April-2015 and replaced with the current Solid Waste Processing Facility (License #4587). In addition, the site operates as a hazardous waste transfer facility, used oil marketer/processor, universal waste handler and a generator hazardous waste small quantity generator.

- WDNR Solid Waste Processing Facility (License# 4587). A revised Solid Waste Plan of Operation is in process and will be re-submitted to the WDNR.
- WDNR Hazardous Waste Transfer Facility under WDNR NR 663
- WDNR Used Oil Marketer and Processor under WDNR 679
- WDNR Universal Waste Handling under WDNR NR 673

- WDNR Hazardous Waste - SQG (US EPA ID No. WIR000142877). After Hazardous Waste Licensing is completed, the site will become a Large Quantity Generator (LQG).

Solid wastes managed in licensed hazardous waste areas will be managed in the same way as hazardous wastes. Solid waste managed in other areas will be managed in accordance with the Solid Waste License.

The hazardous waste containers generated (or that are being generated) solely by Enviro-Safe is differentiated from those waste received from off-site generators by the classification of "I" assigned within the inventory software system and labeled to identify Enviro-Safe as the generator. The classification of "I" defined created inventory versus received inventory. The typical hazardous waste generated by Enviro-Safe includes spent PPE, aerosol cans and lab waste.

The site currently has a fleet of transportation vehicles with the Germantown, Wisconsin location serving as their terminal. Vehicles that are used to support the primary business of waste disposal and recycling services. Due to the nature of the waste and materials being transported, specific transporter permits and licenses are required. Below is a list of those licenses and permits currently maintained.

- DOT Number (2322446)
- DOT Hazardous Material Registration
- FMCA Uniformed Motor Carrier (MC792795)
- WI DOT IFTA (License # 01075580701)
- WDNR Solid Waste and /or Recyclable Transportation Service License (License #15810)
- WDNR Hazardous Waste Transport Service License (License #15809)
- WDNR Infectious Waste Transportation License (License #16903)
- IL Special Waste Hauling Permit (Permit # 5271)
- MDEQ Alliance for Uniform Hazmat Transporter (License #2322446)
- MDEQ Uniform Program for Liquid Industrial Waste (License #UPW02322446MI)
- MO Hazardous Waste Transporter (License #15L28001000)

The site currently has a WPDES Industrial Storm Water No Exposure Certification based upon current activities being conducted at the site. In addition, a WPDES Construction Site Storm Water Runoff General Permit (Permit No. WI-S067831-05) has been issued to the site in August-2020 based upon the construction activity being conducted. Once construction is completed, the construction site storm water permit will be terminated and the industrial storm water no exposure certification will be re-evaluated. The site does not discharge any wastewaters from the site and therefore a WDNR WPDES wastewater permit is not required.

- WDNR Storm Water Industrial No Exposure Certification (FIN No. 54508)
- WDNR Construction Site Storm Water Runoff General Permit (WI-S067831-05)

The site currently is not required to obtain a WDNR Air Operating Permit based upon current activities conducted at the site. However, the site is subject to Air Emission Control Standard for

Containers and Tanks under NR 670.027 which is further details under Subch CC - Air Emission Control Standard - Container and Tanks (Part 3: Section M) and under Hazardous Waste Container Opening and Waste Transferring (Part 1: Section 1A.8.10.11).

The original Conditional Use Permit (CUP# 03-11) for the site was issued by the Village of Germantown in April-2011. In August-2015, the Conditional Use Permit (CUP# 06-15) was revised and approved by the Village of Germantown at the request of Enviro-Safe as the result of a change in status of the Solid Waste Transfer/Processing permit previously explained above. The site has and continues to operate within the parameters of the Conditional Use Permit and its conditions. The issuance of the hazardous waste license will not require a CUP amendment as indicated in correspondence with the Village of Germantown during the preplanning and notification process. If changes are warranted in the future, Enviro-Safe shall work with the Village of Germantown to amend the permit as appropriate.

- Village of Germantown Conditional Use Permit (CUP# 06-15)

The site utilizes the Village of Germantown sanitary sewage system which is a charter member of the Milwaukee Metropolitan Sewage District (MMSD). The only discharges from the facility are domestic in nature. The discharge regulations and limits are established in the MMSD Discharge Regulations and Enforcement Procedures (Chapter 11).

The site was originally constructed in 2012 and underwent a warehouse and office expansion in 2021. The Village of Germantown issued building permit and individual installation permits (electrical, plumbing, HVAC, sprinkler system, etc.) associated with the construction projects can be provided upon request. The occupancy permits were issues for the site respectively:

- Original Building: Village of Germantown Certificate of Occupancy – Permit 053-12 (Issued August 14, 2012)
- Building Addition: Village of Germantown Certificate of Occupancy – Permit 20GRM-B00040 (November 16, 2021)

1A.8.12 Topographic Map [NR 670.013(12)]

A topographic map [Appendix G-03] is included.

1A.8.13 Nature of Business [NR 670.013(13)]

Enviro-Safe currently operates a solid waste processing facility, hazardous waste transfer facility, used oil marketer/processor, universal waste small quantity handler, and solvent continued use consolidating activities. Enviro-Safe is applying for a hazardous waste treatment, storage and disposal license. The hazardous waste license shall consist of hazardous waste storage and treatment. The facility also proposes hazardous waste license exempt processing (consolidation into containers, bulking, elementary neutralization, lab pack repacking and aerosol can puncturing) and fuel blending treatment.

1A.8.14 Hazardous Debris Categories and Contaminant Categories [NR 670.013(14)]

Debris types to be stored typically includes soils, filter-cake, demolition/remediation debris (Including asbestos), rags, filters, and PPE. The most common contaminants are arsenic, benzene, barium, cadmium, chromium, lead, tetrachloroethylene, xylene, acetone, toluene and methyl ethyl ketone.

1A.9 Professional Engineer Certification [NR 670.014(1) and NR 670.001(2)]

This FPOR has been prepared as part of an initial license application in accordance with NR 670.001(2). As part of the FPOR, technical data, such as design drawings and specifications, and engineering studies shall be certified by a qualified professional engineer (PE) where required. The PE certification associated with this FPOR is included in Appendix B.

1A.10 General Description of Facility [NR 670.014(2)(a)]

General Location

Enviro-Safe is located at W130 N10500 Washington Drive, Germantown, WI 53022, which is located within an industrial park within the Village of Germantown. The Village of Germantown is located on the eastern side of Wisconsin in Washington County. Based upon the 2010 census, the Village of Germantown has a total population of 19,749. The Village of Germantown has a total of 34.44 square miles of which 34.38 miles are land and 0.06 miles are water.

The site has one building which is comprised of offices, laboratory (for confirmation analysis and not a state-certified laboratory), RM 124 warehouse, RM 125 warehouse, RM 126 warehouse, RM 127 warehouse, loading docks, and two outside above ground storage tanks and filling pads. The activities currently conducted in these areas include general administration, solid waste storage and processing, hazardous waste transferring, used oil marketing/processing, universal waste storage and transfer and solvent continued used consolidation. Typical operating hours are Monday thru Friday 7:30am to 4:00pm with limited after hours and weekends.

Proposed operations would expand to hazardous waste storage, license exempt hazardous waste processing (bulking, consolidation into containers, elementary neutralization, lab pack repackaging and aerosol puncturing) and licensed hazardous waste treatment (fuel blending).

1A.11 Procedures, Structures or Equipment Description Preventing Hazards in Unloading Operations [NR 670.014(2)(h)1]

The facility receives solid waste, hazardous waste, 10-day transfer hazardous waste, universal waste, used oil, hazardous secondary materials and solvent continued use from enclosed vans and straight trucks or bulk tanker trailers with a tractor.

Containerized Waste Materials. The containerized solid waste, hazardous waste, 10-day transfer hazardous waste universal waste, universal waste, used oil and solvent continued use material received are from enclosed vans and straight trucks at the East Loading Docks #2, #3 and #4 using EE-rated forklifts. The receiving docks are constructed of reinforced concrete and are designed to meet the secondary containment requirements of NR 664.0175. If a container being unloaded spills or ruptures, it will be entirely contained within the secondary containment system. The valve in the

loading dock storm drain manhole remains in the closed position at all times unless discharge non-contaminated precipitation from weather events. See Container Standard – Containment – Containment System Integrity (Part 2: Section 2B.1) for further details. Spill kits are available in the area for response.

Bulk Container Materials. Hazardous waste and solvent continued use materials are received in tanker trailers with a tractor staged at the designated East Loading Docks #2, #3 and #4 or the Tanker Fill Area #1 or #2 with spill containment and pumped into containers located in RM 126 Hazardous Waste Storage via hoses routed through the Dock #2, #3, #4 or #5 as depicted on Container Storage Map [Appendix G-08]. The areas are constructed of reinforced concrete and meet the secondary containment requirements of NR 664.0175. If a container being unloaded spills or ruptures, it will be entirely contained within the secondary containment system that serves the east loading docks or tanker fill areas and outdoor tanks. The valves in the storm drain systems that can drain these secondary containment areas normally remain in the closed position unless discharge non-contaminated precipitation from weather events. See Container Standard – Containment - Containment System Integrity (Part 2: Section 2B.1) for further details. Spill kits are available in the area for response. Solid wastes are received in tanker trucks staged on the north east side of the building and pumped into the above ground storage tank located in RM 127 via hoses connected to cam lock fittings.

Calculations for the secondary containment capacity of each area is provided under Secondary Containment Calculations [Appendix U-01].

1A.12 Prevention of Runoff from Hazardous Waste Handling Areas and Prevention of Flooding

[NR 670.014(2)(h)2]

The facility was designed so that hazardous waste storage and treatment activities are conducted within an enclosed containment building or outside areas with properly-sized secondary containment.

With hazardous waste activities being conducted in these designated outdoor locations, precipitation accumulation can be present. See Container Standard – Containment - Containment System Integrity (Part 2: Section 2B.1) for further details. In addition, to ensure the continued integrity of the containment system, the facility operations and grounds are routinely inspected as outlined in the Total Preventative Maintenance and Inspection Schedule [Appendix I].

1A.13 Prevent Contamination of Water Supplies [NR 670.014(2)(h)3]

The structures in place to prevent runoff, also protect the area ground and surface water from contamination of a sudden release from an unloading/loading area, waste storage area or operations. Contamination of water supplies is prevented by the secondary containment for all licensed storage and treatment areas, all the active areas of the facility is paved (concrete or asphalt) and storm water is evaluated before release. See Container Standard – Containment – Containment System Integrity (Part 2: Section 2B.1) for further details. Due to the engineered containment of the building and the outside secondary containment areas, the probability of an accidental leak or spill that could escape from the site or to enter groundwater is negligible.

Furthermore, there are no significant geological or topographical features on the site. Because the facility has only negligible potential to affect any of the surrounding areas, extensive geotechnical data is not relevant to the facility.

Area water supply within the industrial park and to the property is provided by municipal water and sewer system serviced by the Village of Germantown. The nearest village water well is located at the north end of the industrial park near Mequon Road which is well over 1,200 feet from the facility. There are no private wells within 250 feet of the facility.

1A.14 Mitigate Effects of Equipment Failure and Power Outages [NR 670.014(2)(h)4]

In the event of a power outage, no immediate environmental hazards would result. Necessary power for storage, treatment and processing areas and the lab is associated with lighting and emergency systems (i.e., gas detection system, fire alarm system, security system, etc.). If auxiliary emergency power is required, the facility's on-site emergency power generator would activate, and the limited lighting and emergency systems would continue to function.

1A.15 Prevent Undue Exposure of Personnel to Hazardous Waste [NR 670.014(2)(h)5]

Personnel employed by the organization that are required to wear personal protective equipment (PPE) are supplied with it to reduce exposures associated with the individual job assignments. The specific requirements for PPE can be found in the Personal Protective Equipment Plan [Appendix M].

In general, personal protective equipment provided to all employees involved in licensed hazardous waste activities includes: uniforms, safety shoes/boots, safety glasses, safety goggles, variety of gloves, plastic/rubber aprons, chemical resistant coveralls (Tyvek), face shields, dust mask, and full-face air-purifying respirators with appropriate cartridges.

In addition, eye wash stations and emergency shower are available immediately to flush contaminants from the eyes or body.

1A.16 Procedures, Structures and Equipment Used to Prevent Releases to the Atmosphere [NR 670.014(2)(h)6]

Containers of hazardous waste that are received at the facility meets the applicable U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation. All containers are equipped with a cover and closure device that forms a continuous barrier over the container opening such that when the cover and closure devices are secured in the closed position there are no visible holes, gaps or other open spaces into the interior of the container.

The containers are covered and closed at all times when they are in storage except during active sampling, consolidation, or lab-packing/repacking. When sampling containers, typically the container bung hole on the drum lid is utilized to access the hazardous waste via the insertion of the sampling tube to reduce exposure. When consolidating or transferring containers, typically the bung hole on the drum lid is utilized or the lid is removed and the material is manually poured into the receiving container. See Hazardous Waste Container Opening and Transferring (Section 1A.8.10.11)

for specific details. In addition, the evaporation emission from fuel blending activities is minimized by the use of the submerged loading method into the tanker truck. During the submerged filling method, waste enters the tanker below the liquid surface level. Liquid turbulence is controlled significantly during submerge loading, resulting in much lower vapor generation than encountered during splash loading.

1A.17 Traffic Pattern, Control and Road Surface [NR 670.014(2)(j)]

General access to the facility is typically reached by traveling via U.S. Highway 41/45 (either northbound or southbound) and exiting onto Highway 145 and traveling north via a traffic light intersection. Travel continues approximately 3.5 miles northbound to Donges Bay Road. At the controlled traffic light, travel would continue westbound on Donges Bay Road approximately 0.6 miles to Washington Drive. After turning northbound on Washington Drive, vehicles travel approximately 1,050 feet to the entrance of the facility located in the Germantown Industrial Park. All roads are paved and capable of bearing loads up to 30,000 pounds per axle. Approximately eighty (80) transports, consisting of straight trucks, semi-trailers and bulk tankers, may deliver and ship material to the facility each week. Transportation is via vehicles having a gross (loaded) weight of 80,000 lbs. or less.

There is also vehicle traffic from the facility to other facilities to transfer empty waste containers, receipts of solid waste and hazardous waste which will not be managed at the facility, solid waste and hazardous waste generated at the facility, and fuel-blended wastes for use in secondary market (i.e., sent to cement kilns). Outbound truck traffic expected to be approximately two (2) trucks per day. These trucks include, but are not limited to, van trailer and tanker trucks.

Trucks leaving the facility shall follow the same routes in reverse. U.S. Highway 41/45 is a four-lane highway which typically carries heavy truck traffic which can easily accommodate the facility traffic described above. Highway 145 is a straight, four-lane road and Donges Bay Road is a two-lane road. All roadways described are capable of carrying described traffic. The local streets and principal traffic patterns for the facility are depicted on the Local Street and Traffic Pattern Map [Appendix G-07].

Trucks waiting to be loaded or unloaded are staged on the truck driveway on the property. The trucks are attended by the drivers while waiting to be loaded or unloaded at the facility. All incoming and outgoing trucks are scheduled in advance and the contents of the load are known at the time of scheduling.

1A.18-1A.19 Chemical and Physical Analyses of Hazardous Waste/Debris to be Handled [NR 670.014(2)(b) and NR 670.014(2)(c)]

The Waste Analysis Plan [Appendix H] should be referenced for details of the chemical and physical analyses of hazardous waste/debris to be handled.

1A.20 Preparedness and Prevention [NR 670.014(2)(f) and NR 664.0031 through NR 670.0037]

The facility does not request a waiver of the preparedness and prevention requirements under NR 664 Subchapter C - Preparedness and Prevention.

The following sections address each of the facility preparedness and prevention requirements in NR 664.0030 through NR 664.0037.

Design and Operation of Facility [NR 664.0031]

The facility has been designed, constructed, maintained and operated to minimize the possibility of a fire, explosion and any unplanned sudden or un-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which threaten human health or the environment.

Required Equipment [WDNR 664.0032]

An internal alarm system has been installed at the facility that is capable of providing immediate emergency instruction (signal) to facility personnel to evacuate the building. The internal alarm system is monitored 24-hours per day 365-days per year by an external monitoring service that contacts the local emergency response services upon activation. A fire panel with alarm pull station is located at the main entrance to the facility and an alarm pull-station is located in RM 125. The alarm stations are readily identified and marked.

A telephone or intrinsically safe hand-held 2-way radios are available at the operating location which are capable of summoning emergency assistance from local police departments, fire departments or state or location emergency response teams.

Portable fire extinguishers, fire hoses, and spill control equipment are present throughout the facility and readily marked and available. The fire extinguishers are ABC rated 10-pound units.

The RM 124, RM 125, RM 126, and RM 127 have a foam sprinkler fire suppression system installed in accordance with National Fire Protection Association (NFPA) 13, 16, 20 and 72. The system was designed and installed by Ahern Fire Protection (Fond du Lac, Wisconsin) and Blair Fire Protection (Milwaukee, Wisconsin) respectively. The outside tank secondary containment area has a deluge fire suppression system installed in accordance with the National Fire Protection Association (NFPA) 13, 16, 20 and 72. The system was designed and installed by Ahern Fire Protection (Fond du Lac, Wisconsin). The foam system is specifically engineered and designed to protect areas where flammable and combustible liquids are present. The office area is protected by a wet suppression system and installed in accordance with National Fire Protection (NFPA) 13, 16, 20, and 72. A summary of the hydraulic calculations is included below to demonstrate adequate water volume and pressure to supply the adequate response from the systems. The documentation with the detailed calculations performed by J. F. Ahern Company and Blair Fire Protection are retained on file by the facility.

Fire Suppression System Summary

Remote Area Number:	#1	#2	#3	#4	#5
Area Location:	Office	RM 124	RM 126	RM 125	Tank Farm
Occupancy Classification:	Light Hazard	Storage	Storage	Storage	Storage Tanks
Density:	10 gpm/sq ft	0.30 gpm/sq ft	0.30 gpm/sq ft	0.30 gpm/sq ft	75 gpm/sq ft
Area of Application:	966 sq ft	3,063 sq ft	1,056 sq ft	3,045 sq ft	Entire

Enviro-Safe Resource Recovery
Feasibility and Plan of Operation Report

Coverage per Sprinkler:	225 sq ft	100 sq ft	100 sq ft	100 sq ft	Entire
Type of Sprinkler:	Viking VK302	Tyco TY5151	Tyco TY5151	Tyco TY5151	Foam Cannons
No. of Sprinklers:	10	34	12	32	4
In-Rack Demand:	N/A	N/A	N/A	N/A	N/A
Hose Streams:	100 gpm	500 gpm	500 gpm	500 gpm	0 gpm
Total Water Required:	278 gpm	1,058 gpm @ 20 min discharge	1,058 gpm @ 20 min discharge	1,058 gpm @ 20 min discharge	300 gpm
Type of System;	Wet System	Closed Head Foam Water	Closed Head Foam Water	Closed Head Foam Water	Deluge

Spill control equipment present on-site for the containment and clean-up of a release consist of pads, socks, oil-dry and drain covers/seals. The spill kits are located throughout the facility are inventoried and inspected as part of the Daily Facility Inspection. The used consumable clean-up is properly disposed after use and spill kits restocked. The facility does not use any reusable equipment for spill clean-up that would require decontamination.

Testing and Maintenance of Equipment [WDNR NR 664.0033]

The facility communications and alarm systems, fire protection equipment, spill control equipment and decontamination equipment shall be tested and maintained as required by NFPA requirements and documented as described in the Total Preventative Maintenance and Inspection Plan [Appendix I] to assure its proper operation in time of emergency.

Access to Communications or Alarm Systems [WDNR NR 664.0034]

When hazardous waste is being poured, mixed, spread or otherwise handled, all personnel involved in the operation shall have immediate access to an internal alarm system or hand-held 2-way radios capable of summoning external assistance either directly or through visual or voice contact with another employee.

It is the policy of the company that there shall never be only one person on the premises while the facility is operating. A minimum of two people is required to be on the premises while facility operations are being conducted.

Required Aisle Space [WDNR NR 664.0035]

The layout of the facility is designed to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of the facility operation in an emergency situation by maintaining adequate aisle spaces. The aisle spaces between pallet rows throughout the facility are permanently and clearly marked with solid continuous yellow lines that are a minimum of 3 feet wide and ceiling are at least 8 feet high as required for OSHA Walking and Working Surfaces [OSHA 1910.22(b)] and OSHA Means of Egress [OSHA Subpart E] which allow for unobstructed movement during normal operations and emergency situations. The main corridors throughout the facility to the row of pallets are a minimum of 6 feet wide and easily allow for unobstructed movement during normal operations and emergency situation. Aisle spaces are kept clear of containers, equipment, supplies, debris and other materials that could obstruct these movements.

The company has established arrangements with local police and fire department and emergency response teams and familiarize them with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, areas of normal work, entrances to the facility, and evacuation routes. The layout of the facility and storage of materials have been reviewed and it has been determined that aisle spaces are adequate to address emergency situations such as fires, spills/releases and medical situations. It also has been noted that forklifts are readily available that may assist in emergency situation with the quick and easy of movement of containers by a qualified operator in the event of off-hours incidents. The Emergency Management Plan was submitted to the Germantown Fire Department on April 29, 2022 with the facility layout which included aisle spacing. The Fire Chief was then contacted on May 4, 2022 to schedule an on-site tour. It was communicated that the submittal was sufficient and the layout of the facility was deemed appropriate so no on-site tour was warranted. Routine Fire Department inspections will continue to be conducted as in the past.

Arrangements with Local Authorities [WDNR NR 665.0037]

The facility attempts to establish prearranged agreement with the local police department, fire department, and emergency response teams. This was done by written notification to the applicable agencies and includes information on the facility layout, properties of the hazardous waste handled at the facility and associated hazards, places where personnel work, entrances to the site, and evacuation routes. In the case that more than one police or fire department may respond to a situation, the Germantown Fire Department shall be the primary authority. In addition, arrangements have been made with outside emergency response contractors.

The facility has notified local occupational clinics and hospitals to ensure they are familiar with the organization, properties of the hazardous waste handled at the facility and potential resulting injuries and illnesses that could result from fires, explosions or releases at the facility.

Unless a specific response is received from a state or local authority indicating that they refuse or decline to enter into these arrangements, it will be assumed these arrangements are acceptable. It is the practice of Enviro-Safe to invite state and local authority agencies to the facility on a routine basis for a tour to ensure they are familiar with the property and the activities being conducted and the materials/quantities being stored.

Additional specific details on the submittal of the written notifications to the applicable agencies can be found in the Emergency Management Plan [Appendix J].

1A.21-1A.25 Prevention of Accidental Ignition or Reaction of Ignitable, Reactive or Incompatible Wastes [NR 670.014(2)(i) and 664.0017(1) through NR664.0017(3)]

For prevention of Accidental Ignition or Reaction of Ignitable, Reactive or Incompatible Wastes see Container Standards - Incompatible, Reactive, Ignitable Waste (Part 2: Section C).

PART 1: SECTION B. NON-COMPLIANCE WITH PLANS OR ORDERS

1B.1 Identification of Ownership [NR 670.014(2)(x)1(a)]

The site is owned by JDV Realty Estate Holding, LLC. The JDV Realty Estate Holding, LLC. address is:

JDV Real Estate Holdings, LLC.
W130 N10500 Washington Drive
Germantown, WI 53022

JDV Real Estate Holdings, LLC. is a Limited Liability Corporation (LLC) which is owned and operated under the direction of Jeffrey D. Vilione (100%).

The site is operated by Enviro-Safe Consulting, LLC. (dBA as Enviro-Safe Resource Recovery) with the physical address of the hazardous waste facility:

Enviro-Safe Consulting, LLC.
dBA Enviro-Safe Resource Recovery
W130 N10500 Washington Drive
Germantown, WI 53022

Enviro-Safe is a Limited Liability Corporation (LLC) which is owned and operated under the direction of Jeffrey D. Vilione (49%) and Dawn E. Zellmer-Vilione (51%).

1B.2 Other Facility Orders or Approvals [NR 670.014(2)(x)1(b)]

Jeffrey Vilione (49%) and Dawn Zellmer-Vilione (51%) own Enviro-Safe Consulting, LLC. (dBA Enviro-Safe Resource Recovery) which is subject to plan approval issued by the WDNR for a Wisconsin Solid Waste Facility. Neither Jeffrey Vilione or Dawn Zellmer-Vilione is named in or subject to an order or plan approval issued by the WDNR for any other Wisconsin hazardous waste facility.

1B.3 Other Facility Ownership [NR 670.014(2)(x)1(c)]

Jeffrey Vilione (49%) and Dawn Zellmer-Vilione (51%) own Enviro-Safe Consulting, LLC. (dBA Enviro-Safe Resource Recovery) which currently operates a Wisconsin solid waste facility. Neither Jeffrey Vilione or Dawn Zellmer-Vilione owns or previously owned 10% or greater legal or equitable interest or at 10% or greater interest in the assets of any other Wisconsin hazardous waste facility.

1B.4 Plan Approval and Order Compliance [NR 670.014(2)(x)1(d)]

Enviro-Safe currently operates a solid waste processing facility at the same facility that is subject to this application, and all plan approvals and orders currently are being complied with by the facility. Routine inspections conducted by the WDNR supports this conclusion.

PART 1: SECTION C. ENVIRONMENTAL IMPACT REVIEW

1C.1 Project Summary [NR 670.014(2)(x)2.a]

Enviro-Safe currently operates a solid waste processing facility, hazardous waste transfer facility, used oil marketer/processor, universal waste handler and solvent continued use bulker located in the Germantown Industrial Park located in Germantown, Wisconsin. The existing building was built in 2012 and consist of office space (3,341 sq. ft.), RM 124 Staging and Container Storage (4,646 sq. ft.), RM 125 Container Storage (2,040 sq. ft.) and RM 126 Container Storage and Bulking (1,056 sq. ft.). Hazardous waste associated with the hazardous waste transfer license, is typically stored in RM 125. Occupancy was provided by the Village of Germantown on August 14, 2012 in accordance with the initial Conditional Use Permit (CUP 03-11). A revised Condition Use Permit (CUP 06-15) was issued to the site in July-2015 due to the change in the solid waste processing permit status.

In October-2021, an expansion to the building was commenced to expand current office space (486 sq. ft.), laboratory, RM 125 Container Storage (3,189 sq. ft.) and RM 127 Container Storage (22,743 sq. ft.). The purpose for the construction was to increase storage and capacities for current activities being conducted by the site to accommodate future business growth. Upon completion, RM 124 is typically be used for staging and RM 127 is typically used for solid waste storage and processing. Hazardous waste of the transfer license continues to be typically stored in RM 125 and RM 126.

The purpose of obtaining the hazardous waste operating license is to allow for hazardous waste storage, license exempt processing, and treatment (fuel blending and elemental neutralization) at the site.

A meeting was held on Tuesday, July 2, 2019 with the Village of Germantown Planning Administration and it was determined that the current conditional use permit and zoning is appropriate to the current activities being conducted at Enviro-Safe and authorizes future proposed expansion and the proposed licensed hazardous waste activities and therefore, no further action is required. All state and local permits required for the actual construction were facilitated on the behalf of Enviro-Safe by the general contractor. See Local Approval Required Documentation (Part 1: Section 1A.7) for more details.

Additional permits and approvals are addressed under Federal and State Permits, Licenses and Approvals (Part 1: Section 1A.8.11).

1C.2 Terrestrial Resources [NR 670.014(2)(x)2.b.1]

The facility is established with surface water drainage and sediment controls. Public road access to the facility is established. Changes to the terrestrial resources are not proposed and will not be needed.

1C.3 Aquatic Resources [NR 670.014(2)(x)2.b.2]

The facility is established. No additional impacts to surface water are anticipated.

1C.4 Building and Structures [NR 670.014(2)(x)2.b.3]

In October-2020, an expansion to the existing building was commenced to increase storage and capacities for the current activities licensed and being conducted at the site to accommodate business growth. This recent construction project associated with the existing building is independent and unrelated to the site's proposed application for a hazardous waste license and is expected to be completed before hazardous waste licensing occurs. All detailed data, specifications and information presented in this FPOR for the pre-existing and recently-constructed facilities represent final as-built conditions.

1C.5 Air Emissions and Water Discharges [NR 670.014(2)(x)2.b.4]

At the present time the facility does not generate air emissions that requires a construction, operation or registration permit, or other exemption. The actual air emissions (WDNR 400-499) associated with new hazardous waste licensing storage and treatment have been calculated and are anticipated to be low based upon the type of materials that will be received, stored and treated. As a result, it is expected that the facility will qualify for the actual air emission operation permit exemption. Upon issuance of the hazardous waste license, the facility will submit a notice of intent for updated air emission exemption to the WDNR Air Management Division. In addition, monthly records will be maintained to demonstrate compliance with the exemption. In an effort to ensure the site minimizes air emissions, see mitigation efforts under Container Opening and Waste Transferring (Part 1: Section 1A.8.10.11).

At the present time the facility does not discharge any industrial or wastewaters from the facility under a WPDES (Wisconsin Pollutant Discharge Elimination System) for which a permit is required. Since no industrial or wastewater discharges are conducted from the facility, there is no potential for hazardous waste to be inadvertently discharged from the facility. However, facility operations are currently regulated under the WPDES (Wisconsin Pollutant Discharge Elimination System) under a Storm Water No Exposure Exclusion for storm water run-off from the property. Since outside storage is limited, it is anticipated that the Storm Water No Exposure Exclusion will continue to cover the property. All hazardous waste license activities will be conducted in areas with secondary containment, it is not anticipated that there will be any storm water discharges. See Container Standards - Containment (Part 2: Section B) for specific mitigation efforts.

Objectionable odors (per NR 429) associated with the new hazardous waste licensing storage and treatment are anticipated to be minimal based upon knowledge of the type of materials that will be received, stored and treated. However, in an effort to ensure the site minimizes exposure of odor-causing materials, containers will only be opened when material is being added or removed. If unusually odorous container is identified, additional measures may be taken.

1C.6 Other Changes [NR 670.014(2)(x)2.b.5]

There are no other changes anticipated with facility development for the activities requested by this application.

1C.7 Maps and Other Materials [NR 670.014(2)(x)2.b.6]

The Facility Map [Appendix G-04] show the current and proposed conditions at the facility.

1C.8 Physical Environment [NR 670.014(2)(x)2.c.1]

Area Topography. Surface elevations of the property is approximately 802 feet mean sea level (MSL) and the lands which are associated with the parcel are relatively level with a pitch towards the eastern portions of the property to facilitate site drainage.

Area Geology. The soil at the site is composed primarily of Ozaukee silt loam with St. Charles silt loam on the southeast and Virgil silt loam on the north [United States Department of Agriculture (USDA) soil map].

Surface Water Drainage. The property contains a storm water ponds and wetlands. The property is bordered to the north and east by wetlands and the south by a storm water pond. The property is gradually sloped from the north to south, with under 8 feet of grade difference. The wetland on the property has an elevation of approximately 795 feet above mean sea level (MSL). The property is approximately 802 feet above MSL near the northern edge of the property, sloping down to 794 feet above MSL in the southern edge of the property.

Hydrogeological Conditions

The topography of the property generally slopes to the southeast, towards an unnamed intermittent creek near the southeast property corner. An intermittent creek also runs from the northwest to the intermittent creek near the south property line. Depth to ground water is approximately 10 to 18 feet below ground surface. Regional groundwater flow direction at the site is easterly and local groundwater flow is southerly, toward the unnamed creek. [Water Resources of Wisconsin, Lake Michigan Basin (Skinner and Borman, 1973) and USGS topographical maps]

Air. Washington County is an attainment area for the National Ambient Air Quality Standards (NAAQS) pollutants. The Air Quality Index (AQI) for Washington County is not monitored.

Wetlands. There are two wetlands identified on the property per the Wetland Delineation Report conducted by Stantec in September-2019 [Appendix R]. Wetland W1 is approximately 0.32 acres in size and consists of a fresh wet meadow wetland located in the eastern edge of the property boarding the storm water pond. The wetland is an open water, standing water palustrine, excavated wetland. Wetland W2 is approximately 0.007 acres in size and consists of a floodplain forest wetland located in the northern edge of the property. The wetland is a forested broad-leaved deciduous wet soil, palustrine wetland. In 2020, the wetlands were concluded to be artificial wetlands by the Village of Germantown Artificial Wetland Determination Letter dated 2020-06-03 [Appendix R].

Groundwater Quality Data. Groundwater was encounter on the property at the depths ranging from 3 to 10 feet below existing grade. Some of the shallower occurrences of groundwater seepage are likely the result of perched groundwater conditions. Based upon the soil colorations, it appears that the historic groundwater elevation ranges between about 778 and 789. The water level in the pond along the east side of the property is approximately El. 784.

Performance of Existing Solid Waste Units. The facility has not been and will not be operated in a manner which the management of solid waste and hazardous waste will have a reasonable

probability of having a detrimental effect on groundwater quality or will cause a violation of groundwater standards. Solid waste storage and processing is located inside the building with secondary containment.

1C.9 Dominant Species and Habitat [NR 670.014(2)(x)2.c.2]

The facility is located within the Southeast Glacial Plains Ecological Landscape. Current vegetation in the Southeast Glacial Plains Ecological Landscape is primarily agriculture cropland, fragmented forests, and grassland with vegetation. Dominant species present include White Oak (*Quercus alba*, FACU), common buckthorn, prickly ash (*Zanthoxylum Americanum*, FACU), staghorn sumac (*Rhus typhina*, UPL), sideoats grama (*Bouteloua curtipendula*, UPL), Kentucky blue grass (*Poa pratensis*, FAC) and flat-stem blue grass (*Poa compressa*, FACU). Bird species, rabbits, squirrels, mice and deer are dominate in the area. There are no aquatic species in close proximity to the facility.

1C.10 Existing Land Use, Dominate Features and Zoning [NR 670.014(2)(x)2.c.3]

The facility is located in the Germantown Industrial Park that is zoned M-1 (limited industrial). A storm water pond is located on the east side of the property with wetlands located on the eastern edge and northern edge of the property. To the west of the property is a pharmaceutical manufacturer and to the north of the property is open vegetation.

1C.11 Social and Economic Conditions [NR 670.014(2)(x)2.c.4]

The facility is located in the Village of Germantown in Washington County. Based upon the 2010 census, the population is 19,749 with a current known (unofficial) population of 20,094 in 2020. Germantown spans over 34 miles and has a population density of 585 people per square mile. The average household income in Germantown is \$108,572 with a poverty rate of 3.03%. According to the most recent ACS, the racial composition of Germantown includes Caucasians (89.65%), Asian (4.98%), Black or African American (2.40%), Two or More Races (2.15%), Other Race (0.67%) and Native American (0.15%). More than 96.19% of the population have a high school education or higher.

1C.12 Other Special Resources [NR 670.014(2)(x)2.c.5]

There are no special resources associated with the property such as archaeological, historical, state natural areas and prime agricultural lands.

1C.13 Physical Impacts [NR 670.014(2)(x)2.d.1]

The facility is located within an existing Industrial Park on a property owned by JDV Real Estate Holdings, LLC. and operated by Enviro-Safe Consulting, LLC. (dBA as Enviro-Safe Resource Recovery). The new addition to the building has expanded warehouse uses and has assisted in streamlining processes and efficiencies while accommodating the volume of material being received and shipped from the facility. The facility uses good housekeeping and maintenance practices to maintain the appearance and integrity of the facility during its operating life. These practices prevent adverse physical impacts from the continuous operation of the facility. No significant change in physical impacts associated with facility design, construction and operation is anticipated if hazardous waste

storage and treatment activities occur as part of the overall waste management activities at the facility.

1C.14 Biological Impacts [NR 670.014(2)(x)2.d.2]

The facility is existing and its use for hazardous waste storage and treatment will not result in biological impacts including destruction and creation of habitat, alternation of the physical environment or any impacts to endangered or threatened species.

1C.15 Land Use Impacts [NR 670.014(2)(x)2.d.3]

Enviro-Safe is a currently operating facility located in an industrial park zone for such operations. The current expansion to the facility on the current property will only provide more capacity of the current operations. Therefore, no adverse impacts on land use or bordering businesses are anticipated as the result of the proposed hazardous waste license. In addition, the property is well maintained with well-manicured landscaping including trees, grasses and other vegetation that will continue to grow and beautify the property.

1C.16 Social and Economic Impacts [NR 670.014(2)(x)2.d.4]

Enviro-Safe has a positive impact on the social and economic conditions of the area. Enviro-Safe currently provides full-time employment to approximately 20 people from the surrounding area and with the expansion of the facility anticipates adding 17.8 jobs as identified by the EDWC Impact Report [Appendix S]. The hazardous waste licensing of the facility will serve the current industry by improving hazardous waste capacity within the state and regional areas which is limited and can sometimes cause challenges to industry that generate wastes and by-products. In addition, it will improve recycling and reuse opportunities by diverting waste from landfills or finding secondary applications for materials to be used in manufacturing or other processes.

1C.17 Other Special Resource Impacts [NR 670.014(2)(x)2.d.5]

It is not anticipated that there will be other special resource impacts on the site.

1C.18 Probable Adverse Impacts [NR 670.014(2)(x)2.d.6]

Current and requested activities will not be performed in a manner in which the management of hazardous waste will have a reasonable probability of having a detrimental effect on groundwater quality or will cause a violation of groundwater standards under ch. NR 140. The equipment used in the fuel blending process is inside a building with containment (RM 126 Hazardous Waste Storage). Container storage is located inside the building structure with containment. The building floors were designed specifically as containment to protect the soil and surface water. Enviro-Safe is not requesting to expand its waste management activities beyond the current borders. There will be no further modifications of topography, any loss of agricultural or forest land, or displacement of wildlife. No new structures are planned that will have an adverse aesthetic impact for the people in and around the facility.

Probable adverse impacts to air quality would potentially be fugitive emission of Particulate Matter (PM), Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) as the result of

hazardous waste bulking and fuel blending activities. However, an evaluation of the operation has identified these emissions as insignificant in nature based upon which an WDNR air permit is not required.

Objectionable (malodorous) odors associated are anticipated to be minimal based upon knowledge of the type of materials that will be received, stored and treated. However, in an effort to ensure the site minimizes exposure of odor-causing materials, containers will only be opened when material is being added or removed. If a usual odorous container is identified, additional measures may be taken.

1C.19 Feasible Alternatives [NR 670.014(2)(x)2.e]

The alternative action would be not to issue the requested hazardous waste treatment, storage and disposal facility license to Enviro-Safe. If so, the facility would continue to operate as a solid waste processor, hazardous waste transfer facility, oil marketer/processor, universal waste handler and solvent continued user bulker. Creation of a new hazardous waste storage and treatment facility with the same capacities at a separate location is generally considered a less feasible alternative. The issuance of the hazardous waste treatment, storage facility license to Enviro-Safe will not present adverse environmental impacts and will allow for broader and more efficient operations for Enviro-Safe and the industries it services.

1C.20 Need Determination per 289.28 [NR 670.014(2)(x)3]

Since its establishment in 2002, Enviro-Safe has seen a change in the availability of waste disposal companies to service small and mid-size companies due to the active mergers and acquisition activities in the marketplace. Consolidation within the waste management industry has kept its pace over the years with active merger and acquisition activities in the United States. According to industry sources it is on track to continue in 2020 as the result of strong public equity performance and as favorable debt financing continues. The industry has three major companies taking over the marketplace which is causing gaps or limited-service offerings in the treatment, storage and disposal of specialty wastes, hazardous and solid waste to the small and midsize company. Therefore, this is an opportunity for Enviro-Safe to expand the facility and operations by obtaining a hazardous waste license to provide these companies a cost effective in-state option for management of hazardous waste.

The extended storage period of hazardous waste will allow continued accumulation until truck load quantities are collected or it is economically feasible to ship the containers off-site. The purpose of license exempt processing (consolidation into containers, elementary neutralization, lab pack repackaging and aerosol puncturing) shall allow for smaller volumes of materials to be brought in, processed and then shipped out in larger containers for more economical disposal. In addition, the treatment of fuel blending of hazardous waste prior to shipment to a cement kiln shall allow for an increase in the volume of waste that is sent off-site for recycling opposed to strictly destruction (incineration).

Enviro-Safe has become a vital company in the proper management of waste in the State of Wisconsin and Midwest, specifically for small to mid-size companies. The facility has provided cost effective solutions for the treatment, consolidation and transportation of waste materials while maintaining the highest compliance and safety standards in the industry.

PART 1: SECTION D. GROUNDWATER PROTECTION

1D.1-1D.9 Groundwater Protection [NR 670.014(3)]

Additional information regarding protection of groundwater is required from owners or operators of hazardous waste facilities containing a regulated unit. The groundwater protection requirements do not apply because Enviro-Safe does not contain or propose any regulated units (land disposal units) as defined in NR 664.0090(1).

PART 1: SECTION E. CORRECTIVE ACTION AND SOLID WASTE MANAGEMENT UNITS

1E.1 Information Regarding Groundwater Protection if There is a Release from A SWMU [NR 670.014(3)]

There have been no known releases from any solid waste management units. This has been determined based upon historical and current use of the property and facility.

1E.2 Topographic Map Showing Location of SWMU [NR 670.014(4)(a)1]

The solid waste management unit is shown on the Topographical Map [Appendix G-03].

1E.3 Designated Types of SWMUs [NR 670.014(4)(a)2]

The solid waste management unit at the site is for the storage of solid waste containers.

1E.4 General Dimensions and Structural Description of SWMUs [NR 670.014(4)(a)3]

There is one primary solid waste management unit that consists of four warehouses (RM 124, RM 125, RM126 and RM 127) for container storage and processing. The solid waste management unit is a building that contains three warehouses with concrete non-porous flooring which is sealed and serves as secondary containment. The Warehouse RM 124 is 4,646 square feet, Warehouse RM 125 is 5,091 square feet, Warehouse RM 126 is 1,056 square feet and Warehouse RM 127 is 22,743 square feet. Warehouse RM 127 has 4 above ground storage tanks, each having a capacity of 12,500-gallons. The solid waste management units are identified on the Container Storage Map [Appendix G-08].

1E.5 When the SWMUs Were Operated [NR 670.014(4)(a)4]

The solid waste management units have been in operation since Sept-2012 when the building was originally built for solid waste transferring activities and operated under a Solid Waste Facility Transfer License. Since then, the facility has terminated the Solid Waste Facility Transfer License and replaced it with a Solid Waste Processing Facility License issued in September-2016. The facility continues to operate under the Solid Waste Processing Facility License.

1E.6 Types of Wastes Managed at the SWMUs [NR 670.014(4)(a)5]

The types of solid waste managed in the solid waste management units have included any waste meeting the definition of solid waste, 10-day hazardous waste, used oil, universal waste, e-waste and solvent continued use material.

1E.7 All Available Information Pertaining to Releases of Hazardous Waste Constituents from Hazardous Waste Units [NR 670.014(4)(b)]

There has not been any releases of hazardous wastes or hazardous constituents from the solid waste management units and therefore no information is available.

1E.8 Results of Sampling and Analysis of Surface or Groundwater, Soil and Air Sampling if the Department Determines a RFA is Necessary [NR 670.014(4)(c)]

There have been no releases that required or require sampling or analysis of groundwater, land surface and subsurface strata, surface water or air which may include the installation of wells.

PART 1: SECTION F. LOCATION STANDARDS

1F.1 100-Year Flood Plain [NR 670.014(2)(k)3]

The property is not located within a 100-year flood plain.

1F.2 100-Year Flood Plain Federal Insurance Administration Flood Map [NR 670.014(2)(k)3]

It was determined that the property was not located in a 100-year flood plain utilizing the federal insurance administrative (FIA) 100-Year Flood Plain Map [Appendix G-06] for the property located at Township 09 N, Range 20 E, Section 25.

1F.3 Identification of 100-Year Flood Plain [NR 670.014(2)(k)3]

The property is not located within a 100-year flood plain and as a result, no additional information is provided.

1F.4 Engineering Analysis of Hydrodynamic and Hydrostatic Forces [NR 670.014(2)(k)4.a]

The property is not located within a 100-year flood plain and as a result, no additional information is required.

1F.5 Structural and Engineering Studies Showing Design or Operations Units and Floor Protection Devices [NR 670.014(2)(k)4.b]

The property is not located within a 100-year flood plain and as a result, no additional information is required.

1F.6 Description of Procedures to Move Hazardous Waste Before Flooding [NR 670.014(2)(k)4.c]

The property is not located within a 100-year flood plain and as a result, no additional information is required.

1F.7 Demonstration of Procedures in Effect to Move the Waste Safely to a Location that is not Vulnerable to Flood Waters [NR 664.0018(2)9a]

The property is not located within a 100-year flood plain and as a result, no additional information is required.

1F.8 Compliance Schedule [NR 670.014(2)(k)5]

The property is not located within a 100-year flood plain and as a result, no additional information is required.

1F.9 Dated Topographic Map [NR 670.014(2)(s)]

A Topographic Map [Appendix G-03] showing a distance of 1,000 feet around the facility at a scale of 2.5 centimeters (one inch) equal to not more than 61.0 meters (200 feet) and contours intervals that clearly show patterns of surface water flow of waste management is provided.

1F.10 Map Shows Map Scale and Date [NR 670.014(2)(s)1]

The Topographic Map [Appendix G-03] has a scale and date of information included.

1F.11 Map Shows 100-Year Flood Plain Area [NR 670.014(2)(s)2]

The 100-Year Flood Plain Map [Appendix G-06] documents the 100-Year flood plain information for the site.

1F.12 Surface Waters [NR 670.014(2)(s)3]

The Surface Waters and Streams Map [Appendix G-09] depicts these bodies of waters within 1,000 feet of the facility. The Wetland Delineation Report conducted by Stantec in September-2019 [Appendix R] includes the wetland limit lines.

1F.13 Surrounding Land Use [NR 670.014(2)(s)4]

The Village of Germantown Zoning Surrounding Land Use Map [Appendix G-01] depicts residential, commercial, agriculture, industrial/office governmental and park land use surrounding the facility. In addition, rivers, lakes and streams are included.

1F.14 Wind Rose [NR 670.014(2)(s)5]

The Wind Rose Data Map [Appendix G-10] provides the annual frequency distribution of wind direction in Southeastern Wisconsin.

1F.15 Map Orientation [NR 670.014(2)(s)6]

Drawings and maps provided in this submittal have orientation notes with a north arrow.

1F.16 Legal Boundaries of the Hazardous Waste Facility [NR 670.014(2)(s)7]

The plat map of property boundaries which depicts legal boundaries and legal description of the property is contained on the Facility Map [Appendix G-04].

1F.17 Access Control [NR 670.014(2)(s)8]

The building is equipped with a badge access system at all entry points to maintain a secure facility. The main front door is unlocked from 7:30am to 4:00pm Monday thru Friday for general visitors. The area is manned with a receptionist during this period. The door to the shipping corridor (RM 127) is unlocked from 7:30am to 4:00pm Monday thru Friday for drivers. The door from the shipping corridor into the facility is equipped with a badge access system and entry is only allowed upon allowable access from on-site personnel. Hazardous waste that is stored in the Tanker Fill Pad #1 or #2 or the East Loading Docks #2, #3 or #4 in a tanker vehicle has the valves and connections

capped and locked when not under the immediately supervisor of personnel. See Security Requirements (Part 1: Section H) for further details.

1F.18 Injection and Withdrawal Wells [NR 670.014(2)(s)9]

The site does not have any injection and withdrawal wells. A search was conducted utilizing the WDNR Well Construction Report and the map identifying wells within 1,000 feet have been depicted [Appendix G-11].

1F.19 Buildings and Storage, Treatment or Disposal Operations [NR 670.014(2)(s)10]

The Facility Map [Appendix G-04] depicts the facility on the site.

1F.20 Other Structures [NR 670.014(2)(s)10]

The Facility Map [Appendix G-04] depicts runoff control system, roads, stormwater and sanitary sewers, loading/unloading areas and fire control facilities on the site.

1F.21 Barriers for Drainage or Floor Control [NR 670.014(2)(s)11]

The site is not located within a 100-year flood plain area and therefore no further information is required. (Also refer to flood plain mapping.)

1F.22 Locations of Operational Units Storage [NR 670.014(2)(s)12]

The Container Storage Map [Appendix G-08] depicts the areas of the facility where hazardous waste treatment and storage activities will occur.

1F.23 Wetlands [NR 670.014(2)(k).6.b]

A Wetland Delineation Report was completed by Stantec Consulting Services. The purpose and objective of the investigation was to identify the extent and spatial arrangement of wetlands within the property. The investigation was completed in September-2018 and two wetland areas were identified east of the property in the Wetland Delineation Report [Appendix R]. The submittals and follow-up requirements associated with the report to the WDNR and U.S. Army Corps Engineers were fulfilled.

In addition, a review by the Village of Germantown on June 3, 2020 has concluded that the wetland area located on the west side of the storm water basin that would be impacted by the proposed driveway extension shown on the approved site plans for the facility expansion (dated February 4, 2020) meets the Village's and WDNR definition of an artificial wetland and therefore, no additional approval is required per the Village of Germantown - Artificial Wetland Determination Letter, June 3, 2020 [Appendix R]. No new construction is proposed. Therefore, no additional wetlands-related regulatory work or authorizations are needed.

1F.24 Critical Habitat for Threatened or Endangered Species [NR 670.014(2)(k).6.a]

The facility is not located on a shoreline of a waterfront (lake) in Washington County that has been designated as a critical habitat in accordance with the WDNR list of Critical Habitat Designation.

The Bureau of Natural Heritage Conservation completed an Endangered Resources (ER) Review on February 29, 2020 for the property and no action is required. However, the report did provide recommended actions for the Least Bittern, Blanchard's Cricket Frog and erosion/run-off controls. As a result, the site shall do the following:

Least Bittern Bird: The site will avoid disturbance of all suitable habitat on the property observed during nesting season (15 May – 15 August) to avoid impact to the species.

Blanchard's Cricket Frog: It is not anticipated that this type of frog will be present at the site. However, if a Blanchard's cricket frog is observed, the Endangered Resources Review Program (608-266-5241) will be immediately contacted.

See the WDNR Endangered Resource Review (ERR Log #20-124) dated February 29, 2020 [Appendix Q].

PART 1: SECTION G. WASTE ANALYSIS PLAN

1G.1 Waste Characterization and Analysis [NR 664.0013(1)(a)]

Refer to the Waste Analysis Plan – Section 2.0 and 3.0 [Appendix H].

1G.2 Certified Laboratory Requirements [NR 664.0013(1)(a)]

The on-site laboratory is not a certified laboratory (can perform testing on compliance samples for other facilities) or a registered laboratory (performs testing on their own samples only) with the WDNR and subcontracts with an independent certified or registered laboratory under WDNR NR Chapter NR 149 when required. Refer to the Waste Analysis Plan - Section 16.2 [Appendix H].

1G.3 Other Data [NR 664.0013(1)(b)]

Refer to the Waste Analysis Plan – Section 7.0 [Appendix H].

1G.4 Analysis Upon Receipt [NR 664.0013(1)(d)]

Refer to the Waste Analysis Plan – Section 5.0 [Appendix H].

1G.5 Parameter and Rational [NR 664.0013(2)(a)]

Refer to the Waste Analysis Plan - Section 14.0 [Appendix H].

1G.6 Test Methods [NR 664.0013(2)(b)]

Refer to the Waste Analysis Plan – Section 15.0 [Appendix H].

1G.7 Sampling Method [NR 664.0013(2)(c)]

Refer to the Waste Analysis Plan – Section 13.1 [Appendix H].

1G.8 Frequency of Repeat Analysis [NR 664.0013(2)(d)]

Refer to the Waste Analysis Plan – Section 3.1.3 [Appendix H].

1G.9 Minimum Repeat Analysis [NR 664.0013(1)(c)]

Refer to the Waste Analysis Plan – Section 3.1.3 [Appendix H].

1G.10 Waste Analysis Generator [NR 664.0013(2)(e)]

Refer to the Waste Analysis Plan – Section 3.0 [Appendix H].

1G.11 Ignitable, Reactive and Incompatible Waste Analysis Method [NR 664.0013(2)(f)]

Refer to the Waste Analysis Plan – Section 5.0 [Appendix H].

1G.12 Process Vents (Subpart AA Standard) Test Method and Procedure to Comply [NR 664.1034(4) and NR 664.013(2)(f)]

The facility does not operate any equipment with process vents or control devices associated with hazardous waste that would be subject to Chapter 664 Subpart AA standard requirements and therefore no information is required.

1G.13 Equipment Leaks (Subpart BB Standard) Test Method and Procedure to Comply [NR 664.1063(4) and NR 664.0013(2)(f)]

The facility does not operate equipment associated with hazardous waste that is subject to Chapter 664 Subchapter BB and therefore, no information is required.

1G.14 Container Air Emissions (Subpart CC Standard) Waste Determination Procedure [NR 664.1083 and NR 664.0013(2)(f)]

Refer to the Waste Analysis Plan [Appendix H].

1G.15 Land Disposal Restriction (LDR) Standard Testing [NR 668.07 and NR 664.0013(2)(f)]

Refer to the Waste Analysis Plan [Appendix H].

1G.16 Container Air Emission (Subpart CC Standard) Exemption [NR 664.0013(2)(h)]

The facility is not seeking an exemption from container air emission Subchapter CC standard.

1G.17 Off-Site Waste Inspection and Analysis Procedures [NR 664.0013(3)]

Refer to the Waste Analysis Plan – Section 12.0 [Appendix H].

PART 1: SECTION H. SECURITY REQUIREMENTS

1H.1 Security Procedures to Prevent Unauthorized Entry [NR 664.0014(2)(a)]

The unknowing entry of people onto the active portion of the facility shall be prevented by the structure which provides a physical barrier between the person and the waste being stored in the building. All doors with access to the facility are continuously locked at all times excepted upon immediate use by an authorized individual and entrance is controlled by a card access control system with the exception of the front entrance door when manned by a receptionist Monday thru Friday 7:30am to 4:00pm. This includes the doors from the warehouse to the office areas. Badges are issued to employees with specific access permissions based upon the job responsibilities and need. The issued badge prevents entry from intruders and other unauthorized personnel. All other persons, other than employees, entering and exiting the building are required to register with the facility and wear a designated visitor name tag while on-site or to be escorted by site personnel. The building has a security alarm system which includes glass breakage alarm installed and is active when no authorized employees are present. The system triggers an alarm if a breach is detected which dispatches local authorities and notifies designated internal personnel.

The unknowing entry of people onto the active portion of the facility (Docks #2, #3 and #4 and the tanker filling pads) shall be prevented by access gates which provides a physical barrier to the vehicle (e.g., tanker trailer) storing the waste. The gates are controlled by gate opener remotes in company owned vehicles and internal personnel for third party vehicles. In addition, the tanker truck trailer itself provides the structure which provides a physical barrier between the person and the waste being stored on the tanker trailer. The vehicles that are present in Docks #2, #3 and #4 or the tanker filling pads are locked and secure when not in immediate attendance. This includes all valves and connections to ensure security of the vehicle contents. The vehicles are placarded with the DOT placard associated with the waste contained within the tanker. A 24-hour active internal protocol (IP) camera surveillance system continuously monitors and records the activities conducted on the property and around the facility.

Unauthorized access to all active portions of the facility is minimized by the systems described above and by signs and lighting.

Security lighting assist to both deter attempts to penetrate the facility's perimeter and assist in the monitoring and detection of such attempts. Perimeter lighting is present on the exterior of the building and other strategic locations on the outside of the property. In addition, a night lighting system within the building is present to provide sufficient illumination to all areas.

1H.2 Perimeter Barriers [NR 664.0014(2)(b)]

The facility is located in an industrial park with a natural barrier of the retention pond to the east side of the property to aid in the security of the property. Gates are present at each driveway entry point restricting access to Docks #2, #3 and #4 and the tanker filling pads. Signage is posted at each driveway entry point stating the proper is under surveillance.

1H.3 Signage [NR 664.0014(3)]

Warning signs are posted in English at the entrance points of the property which state “Danger: Unauthorized Personnel Keep Out” and are legible from a distance of at least 25 feet. In addition, a general Personal Property – No Trespassing sign is posted at each entrance to the property.

1H.4 Demonstration that Security Requirements are Not Necessary [NR 664.0014(1)]

Approval of this demonstration is not being requested.

PART I: SECTION I. GENERAL INSPECTION REQUIREMENTS

11.1 Description of the Equipment and Device Inspected [NR 664.0015(2)(a)]

For each inspection to be conducted a written inspection protocol is established which identifies the item, inspection frequency/schedule, purpose of the inspection, references associated equipment, any prerequisite that should be known, inspection intervals and procedure, how to handle deficiencies, required documentation and reference to outside contract to aid to resolve any unacceptable conditions. The Inspection Procedures are included as part of the Total Preventative Maintenance (TPM) and Inspection Plan [Appendix I].

11.2 Description of Problems Checked During the Inspection [NR 664.0015(2)(c)]

Each Inspection Protocol identifies or references the items to be checked during the inspection based upon regulations, industry standards and manufacturing recommendations. The Inspection Procedures are included as part of the Total Preventative Maintenance (TPM) and inspection Plan [Appendix I].

11.3 Inspection Schedule for Closed Vent System or Control Device Required by NR 664.1033 [NR 670.014(2)(d)]

The facility does not operate a closed vent system or control device to treat, store or dispose of hazardous waste and therefore, monitoring and inspection requirements for closed vent systems and control devices are not applicable.

11.4 Inspection Schedule for Subch. BB Pumps in Light Liquid Service Required by NR 664.1052 [NR 670.014(2)(d)]

The facility does not use pumps in light liquid service to treat, store or dispose of hazardous waste and therefore, monitoring and inspection requirements associated with these pumps are not applicable.

11.5 Inspection Schedule for Subch. BB Compressors Required by NR 664.1053 [NR 670.014(2)(d)]

The facility does not operate a compressor associated with the treatment, storage or disposal of hazardous waste and therefore, monitoring and inspection requirements for the compressor is not applicable.

11.6 Inspection Schedule for Subch. BB Pumps and Valves in Heavy Liquid Service, Pressure Relief Devices and Connectors Required by NR 664.1058 [NR 670.014(2)(d)]

The facility does not operate pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service and flanges, or other connectors to treat, store, or dispose of hazardous waste and therefore, monitoring and inspection requirements associated with this equipment is not applicable.

11.7 Inspection Frequency for Subpart BB Equipment [NR 664.0015(2)(d)]

The facility does not operate Subpart BB equipment and therefore, monitoring and inspection frequency associated with this equipment is not applicable.

11.8 Areas Subject to Spill Inspected Daily When in Use [NR 664.0015(2)(d)]

The areas subject to daily spill inspections are identified in the Total Preventative Maintenance (TPM) and inspection Plan - Appendix A [Appendix I] - Facility Daily Inspection.

11.9 Inspection Frequency Based on Probability of an Environmental or Human Health Incident [NR 664.0015(2)(d)]

The frequency of inspections conducted at the facility is based upon the rate of possible deterioration of a particular area of the probability that an environmental or human health incident would occur if there were deterioration, malfunction or operator error, which could possibly go undetected between inspections. In addition, inspections are based upon regulations (e.g., OSHA, Local Ordinances, etc.), industry standards and manufacturing recommendations. The specific frequency for each inspection can be found in the Total Preventative Maintenance (TPM) and inspection Plan - Appendix A [Appendix I]. When an inspection frequency is established as daily, it means the days for which the facility is operational and does not include when wastes and containers secured and are not being actively handled (e.g., weekends, holidays, etc.).

Inspections are documented by internal trained designated employees or qualified outside contractors. The inspector is required to check the status of the pre-determined listed item on the form and indicate whether its condition is acceptable or unacceptable. If the status of a particular item is found unacceptable, it should be recorded. If the repair is immediately addressed, this will be documented on the inspection form itself. If the repair needs to be addressed at a different time or outside services are required, this should be indicated on the inspection form. The inspection forms should be submitted to the Operation Manager upon completion and all actions to correct any deficiencies will be documented in the Corrective Action Log. Specific details can be found in the Total Preventative Maintenance and Inspection Plan - Appendix I.

In addition to scheduled inspections, informal visual operator inspections are performed prior to the start of their work area to ensure their safety and the environment around them. The visual inspection includes container leaks, spills, general equipment and tool condition, communication equipment, personal protective equipment and other items that are used daily in the course of their work. Operators will promptly correct the issue or communicate the issue to the Operation Manager.

11.10 Schedule to Remedy [664.0015(3)]

The Operation Manager shall review the inspection report and sign/date the report to verify review and acceptance of the inspection results. If the inspection form indicates unacceptable conditions, the Operation Manager will enter the item into the Corrective Action Log [Total Preventative Maintenance and Inspection Plan - Appendix B] and assign a priority level to resolve the current unacceptable condition. All actions to correct any deficiencies will be documented in the Corrective Action Log. Specific details can be found in the Total Preventative Maintenance and Inspection Plan - Appendix I.

11.11 Inspection Log Retention [NR 664.0015(4)]

The inspection schedule, inspection form and/or documentation, the corrective action log, and repair documentation shall be maintained electronically (scanned copies of forms, reports, repair documentation, etc.) for a minimum period of three (3) years.

PART 1: SECTION J. CONTIGENCY PLAN REQUIREMENTS

1J.1 Contingency Plan [NR 670.014(2)(g)]

A copy of the Contingency Plan (referred to as Emergency Management Plan) is included as Appendix J.

1J.2 Purpose and Scope [NR 664.0051(1)]

Refer to the Emergency Management Plan - Section 1.1 [Appendix J].

1J.3 Implementation of Contingency Plan [NR 664.0051(2)]

Refer to the Emergency Management Plan - Section 5.1 through 5.6 [Appendix J].

1J.4 Emergency Response Procedures [NR 664.0052(1)]

Refer to the Emergency Management Plan - Section 10.1 through 10.7 [Appendix J].

1J.5 SPCC Plan [NR 664.0052(2)]

The facility is required to have a Spill Prevention, Control and Countermeasure (SPCC) Plan [Appendix K]. The plan is a standalone plan and has not been incorporated into the Emergency Management Plan [Appendix J].

1J.6 Arrangements with Local Emergency Agencies [NR 664.0052(3)]

Refer to the Emergency Management Plan - Section 18.1 through 18.3 [Appendix J].

1J.7 List of Emergency Coordinator and Alternates [NR 664.0052(4)]

Refer to the Emergency Management Plan - Appendix A [Appendix J].

1J.8 List of Emergency Equipment [NR 664.0052(5)]

Refer to the Emergency Management Plan - Appendix C [Appendix J].

1J.9 Evacuation Plan [NR 664.0052(6)]

Refer to the Emergency Management Plan - Section 12.1 through 12.2 [Appendix J].

1J.10 Plan Distribution [NR 664.0053]

Refer to the Emergency Management Plan - Appendix E [Appendix J].

1J.11 Plan Amendments [NR 664.0054]

Refer to the Emergency Management Plan - Section 23.1 [Appendix J].

1J.12 Emergency Coordinator [NR 664.0055]

Refer to the Emergency Management Plan - Section 6.1 [Appendix J].

1J.13 Emergency Coordinator Knowledge [NR 664.0055]

Refer to the Emergency Management Plan - Section 5.1 through 5.4 [Appendix J].

1J.14 Emergency Coordinator Authority [NR 664.0055]

Refer to the Emergency Management Plan - Section 4.1 [Appendix J].

1J.15 Activates Alarm and Notifies Local Authorities [NR 664.0056(1)]

Refer to the Emergency Management Plan - Section 16.1 through 16.3 [Appendix J].

1J.16 Identifies Emergency Details [NR 664.0056(2)]

Refer to the Emergency Management Plan - Section 10.5 [Appendix J].

1J.17 Identifies Human Health and Environmental Hazards [NR 664.0056(3)]

Refer to the Emergency Management Plan - Section 10.5 [Appendix J].

1J.18 Local Authority Notification [NR 664.0056(4)(a)]

Refer to the Emergency Management Plan - Section 10.5 [Appendix J].

1J.19 Emergency Response Officials Notification [NR 664.0056(4)(b)]

Refer to the Emergency Management Plan - Section 20.1 through 20.2 [Appendix J].

1J.20 Preventing Spread of Emergency [NR 664.0056(5)]

Refer to the Emergency Management Plan - Section 10.5 [Appendix J].

1J.21 Monitoring Emergency [NR 664.0056(6)]

Refer to the Emergency Management Plan - Section 10.3 and 10.5 [Appendix J].

1J.22 Disposal of Materials from Emergency [NR 664.0056(7)]

Refer to the Emergency Management Plan - Section 11.1 [Appendix J].

1J.23 Incompatibilities Between Waste and Emergency Materials [NR 664.0056(8)(a)]

Refer to the Emergency Management Plan - Section 10.5 [Appendix J].

1J.24 Restoring Emergency Equipment [NR 664.0056(8)(b)]

Refer to the Emergency Management Plan - Section 11.2 [Appendix J].

1J.25 Operating Log and Incident Reporting [NR 664.0056(9)]

Refer to the Emergency Management Plan - Section 20.1 through 20.2 [Appendix J].

PART 1: SECTION K. TRAINING PLAN REQUIREMENTS

1K.1 Training Outline [NR 670.014(2)(L)]

Refer to the Training and Competence Plan - Section 7.1 [Appendix L].

1K.2 Hazardous Waste Management Training [NR 664.0016(1)(b)]

Refer to the Training and Competence Plan - Section 7.1 [Appendix L].

1K.3 Training for Emergencies [NR 664.0016(1)(c)]

Refer to the Training and Competence Plan - Section 7.1 [Appendix L].

1K.4 New Position Training [NR 664.0016(2)]

Refer to the Training and Competence Plan - Section 9.1 [Appendix L].

1K.5 Training Documentations [NR 664.0016(4)]

Refer to the Training and Competence Plan - Section 10.1 [Appendix L].

1K.6 Training Designed to Meet Actual Job Tasks [NR 670.014(2)(L)]

Refer to the Training and Competence Plan - Section 8.1 [Appendix L].

PART 1: SECTION L. CLOSURE PLAN REQUIREMENTS

1L1. Closure Plan [NR 670.014(2)(m), NR 664.112 and 664.142]

This section constitutes as the closure plan and has been established to describe the final closure activities that will be performed to close the facility. The scope of this plan is limited to providing closure for the hazardous waste container management units. A copy of this plan will be kept at the facility and available for inspection during the operating life of the facility. The closure plan requirements and hazardous waste management unit closure cost summary has been reviewed and certified by Wisconsin registered PE [Appendix T-01].

This plan will be amended whenever changes in the design or operating plans of the facility cause a change in closure procedures. A request for modification will be submitted at least 60-days prior to any proposed change in the facility design or operation that affects this closure plan or no later than 60-days after an unexpected event has occurred that affects the closure plan.

1L.2 Closure to Minimize Need for Further Maintenance [NR 664.0112(2)(a)]

The purpose of the closure plan is to conduct closure operations in a controlled manner to ensure there is no escape of hazardous waste, hazardous constituents, leachate, contaminated run-off or hazardous waste decomposition products to the ground or surface waters or to the atmosphere to the extent necessary to protect human health and the environment or require a need for further maintenance thereafter. In the event that this is not or can not be achieved during the closure operations, further investigation and remediation will be performed in accordance with WDNR NR 664.0110(2) to establish a long-term care plan.

1L.3 Closure to Minimize Post Closure Escape [NR 664.0112(2)(a)]

The purpose of the closure plan is to conduct closure operations so no further hazardous waste or contaminated hazardous waste surfaces are present so there is no post closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off or hazardous waste decomposition products to the ground or surface waters or to the atmosphere to the extent necessary to protect human health and the environment. In the event that this is not or can not be achieved during the closure operations, further investigation and remediation will be performed in accordance with WDNR NR 664.0110(2) to establish a long-term care plan.

1L.4 Extent of Operations During Facility Life [NR 664.0112(2)(b)]

While in operation, the facility will operate and manage the following hazardous waste management units:

- Hazardous Waste Container Staging and Storage Area (RM124)
- Hazardous Waste Container Storage and License Exempt Processing (RM125)
- Hazardous Waste Container Storage, Licensed Treatment, and License Exempt Processing (RM126)
- Hazardous Waste Storage (East Loading Docks #2, #3 and #4)
- Hazardous Waste Storage (Tanker Filling Area #1 and #2)

The facility has no land disposal operations and therefore, the facility can operate indefinitely provided the operations by the facility are warranted.

1L.5 Maximum Inventory [NR 664.0112(2)(c)]

The closure plan is based on the total hazardous waste under the License Design Capacity in each storage area during the active life of the facility. The facility will not store more than the maximum storage quantity within each hazardous waste management unit identified below.

The method for removing the waste containers from the facility during closure will include identifying, labeling, loading and manifesting containers to be sent off-site for disposal.

Area	Use	Floor Area (sf)	Maximum Storage	
			55-Gal Equiv.	Gallons
RM 124	HW Container Staging/Storage	4,646	616	33,880
RM 125	HW Container Storage/License Exempt-Processing	5,091	784	43,120
RM 126	HW Container Storage/License Treatment	1,056	160	8,800
East Loading Docks	HW Storage	1,850	N/A	18,000
Tanker Filling Area #1	HW Storage	616	N/A	6,000
Tanker Filling Area #2	HW Storage	616	N/A	6,000
TOTALS		13,810	1,560	115,800

1L.6 Inventory Removal and Disposal [NR 664.0112(2)(c)]

At the time of closure operations, inventory of hazardous waste present at the facility may be processed through Hazardous Waste License Exempt Processes (Part 1 Section 1A.8.10.6) or through Hazardous Waste Treatment (Part 1 Section 1A.8.10.7) prior to being shipped off-site. Stored inventory of hazardous waste present at the facility will be shipped off-site as Hazardous Waste Outbound Shipments (Part 1 Section 1A.8.10.10). The shipments of hazardous waste will be via semi-trailer or tanker truck and be transported to a treatment, storage and disposal facility for proper management.

1L.7 Off-Site Management [NR 664.0112(2)(c)]

Inventories of hazardous waste identified during final closure shall be shipped off-site to other active TSD facilities and will be managed through fuel blending, stabilization or incineration.

1L.8 Removal and Decontamination [NR 664.0112(2)(d)]

The steps necessary to remove or decontaminate all hazardous waste residues and contaminated containment system components, structures and soils during partial or final closure are described below to the extent of decontamination required to satisfy the closure performance standard.

Prior to decontamination occurring, facility personnel and a Wisconsin registered certifying PE will review the facility history and all records of spills and releases in developing a detailed decontamination plan. The decontamination plan will be consistent with this closure plan and establish details for the number and layout of decontamination areas, the equipment needed, the appropriate decontamination methods, procedures to prevent contamination of clean areas, criteria for deeming successful decontamination, methods and procedures to minimize worker contact with contaminants during removal of personal protective equipment, and methods for disposing of waste generated and personal protective equipment that are not completely decontaminated. The facility history and records of spills and releases will be taken into consideration when developing the decontamination plan by facility personnel and the Wisconsin

registered certifying PE. The decontamination plan will be retained as part of the closure documentation. The general contents of the decontamination plans are summarized below.

Prior to the decontamination of the licensed hazardous waste storage and treatment areas, all containerized waste will be shipped off-site to a third-party off-site facility for appropriate treatment and disposal. All equipment or tools that will not remain in place after closure will be decontaminated and removed. The inside concrete floors (including curbs, ramps and gutters), installed equipment that will remain (such as electrical, plumbing and HVAC components) and building structure components (such as potentially-impacted walls and ceilings) will be inspected, cleaned, decontaminated and temporarily repositioned as needed to allow for decontamination of floor and structure areas. The concrete floors will be swept to remove any solid residue or debris (by scraping off hardened residue) and then visually inspected for evidence of spills, cracks, or gaps. If spills are identified, they will be cleaned up appropriately prior to further decontamination operations. If minor cracks or gaps are present, they will be sealed prior to decontamination. Any cracks or gaps identified that can hold contaminants or may extend through the entire thickness of the concrete slab would trigger the need for closer investigation and may require investigation of soil contamination by the Wisconsin registered PE certifying the closure prior to decontamination. The decontamination method will include pressure washing each hazardous waste management units with high-pressure water (3,000psi at ambient temperature) to scour the surface to remove contaminants on the concrete floors and structures. Soaps, detergents and other cleaners may be added to the water as needed/appropriate. The rinsate will be collected and analyzed by a third-party certified laboratory prior to proper disposal. After pressure washing, a final water rinse over all surfaces will be done, taking care to avoid unnecessary dilution, and this final rinsate will be collected for testing. The effectiveness of the decontamination procedures for the concrete and structure will be deemed effective if the laboratory analysis of representative sample(s) demonstrates that the final rinsate meet the closure performance standards in NR 664.0111. If observations and testing indicate that contaminants do not meet the closure performance standards in NR 664.0111, the pressure washing process will be repeated. If pressure washing cannot achieve decontamination, steam cleaning will be conducted on surfaces.

Prior to decontamination of licensed outside secondary containment areas, the secondary containment areas will be inspected to identify accumulation of precipitation (rain water, snow or ice) or any indication of a spill or leak being present. If precipitation is identified, it is discharged in accordance with Accumulated Liquid Removal and Analysis (Part 2 Section 2B.5). If a spill or leak is present, it will be containerized and sent off-site for proper disposal. The secondary containment concrete floors will be swept to remove any solid residue or debris and visually inspected for evidence of cracks or gaps. If minor cracks or gaps are present, they will be sealed prior to decontamination. Any cracks or gaps identified that extend through the entire thickness of the concrete slab would trigger the need for investigation of soil contamination by the PE certifying the closure prior to decontamination. The decontamination method will be the same as indicated above. Any storm water entering into the secondary containment area during decontamination activities will be collected and transferred into tanker truck that will be transported off-site for proper treatment and disposal. The Wisconsin registered certifying PE will assess the discharge piping, manhole and control valve system to confirm that the closure performance standards in NR 664.0111 are met.

The asphalt paved roads and parking area will be brushed and swept and left in place. Surface soil samples will be collected from unpaved areas which border the outside hazardous waste storage areas of the facility which will be sampled and analyzed to determine if contamination is present. The soil sampling will target areas that were known or most likely known to have been impacted. At a minimum, five one-quart soil samples will be individually collected from each of five separate surface locations of each grid segment. Each individual sample will be thoroughly mixed and retained. A one-quart composite sample will be prepared to represent the grid segment by taking an equal volume of soil from each of the individual five one-quart soil samples. This composite sample will be analyzed to determine if the unpaved grid area has been contaminated. The sampling will be conducted consistent with the methods established in NR 700-799. The samples will be analyzed, at a minimum, for TCLP parameters. Additional sample may be required if recommended by the certifying PE. Soils will be considered uncontaminated if they do not exceed the applicable standards in NR 700-799, notification, investigations and remediation in accordance with NR 700-799 will occur prior to closure certification.

The facility laboratory and its contents will be thoroughly cleaned of all hazardous waste and constituents. Unless it is to remain in place after closure, lab equipment, glassware and non-waste chemicals will be salvaged and sold. All waste samples and waste laboratory chemicals will be lab packed and sent off-site for proper disposal.

1L.9 Meeting Closure Performance Standards [NR 664.0112(2)(e)]

All closure activities will be monitored by an independent registered professional engineer. Upon conclusion of closure activities, the registered professional engineer will provide certification that all closure performance standards have been met per NR 664.0111 and NR 664.0115. No additional groundwater monitoring, leachate collection or run-on and run-off controls are expected to be required during the partial or final closure activities to ensure that closure standards are attained.

1L.10 Closure of Container Area [NR 664.0178]

For closure of container areas see the Removal and Decontamination (Part 1 Section 1.L8).

1L.11 Closure of Tank System [NR 664.0197(1)]

The facility does not have licensed hazardous waste storage tanks on-site and therefore, this section is not applicable.

1L.12 Schedule for Closure of Each HWMU and Final Closure [NR 664.0112(2)(f)]

The estimated times to perform the closure tasks are listed in Hazardous Waste Management Unit Closure Cost Summary [Appendix T-02]. These tasks may be performed concurrently with each other. It is estimated that the time to conduct closure activities is 13-days and final closure of the facility to be 30-days. If partial closure is planned, then this closure plan will be modified accordingly and approved.

1L.13 Estimated Year of Closure [NR 664.0112(2)(g)]

The facility does not use trust funds to establish financial assurance. In addition, the facility does not expect to close prior to the expiration of the operating license. Therefore, the estimated year of final closure is not required.

1L.14 Alternative Requirements [NR 664.0112(2)(h)]

At the present time the WDNR has not required alternative requirements for the facility and that there are no regulated units, as defined in NR 664.0090.

1L.15 Department Notification [NR 664.0112(4)(a)]

The facility will notify the Department, in writing, at least 180-days prior to the intent for a partial or final closure of a hazardous waste management unit.

1L.16 Final Receipt of Hazardous Waste [NR 664.0113(1)]

Within 90-day after receiving the final volume of hazardous wastes, the facility will treat or remove from the licenses hazardous waste facility, all hazardous waste in accordance with the approved Closure Plan. If additional time is required, an extension will be requested from the WDNR in accordance with NR 664.0113(1)(a) and 664.0113(1)(b).

1L.17 Completion of Partial of Final Closure [NR 664.0113(2)]

Within 180-days after receiving the final volume of hazardous wastes, the facility will complete partial or final closure activities in accordance with the approved closure plan. If addition time is required, an extension to the closure period will be requested from the WDNR in accordance with 664.0113(2)(a) and 664.0013(2)(b).

1L.18 Disposal or Decontamination of Equipment, Structures and Soil [NR 664.0114]

During the decontamination of licensed hazardous waste storage and treatment areas and outside secondary containment areas described under Removal and Decontamination (Part 1. Section 1L.8), the facility may potentially become a generator of hazardous waste including:

- hazardous (RCRA) rinsate from concrete surface decontamination activities
- non-hazardous (Non-RCRA) rinsate from concrete surface decontamination activities
- non-hazardous (Non-RCRA) personal protective equipment

If hand tools or the actual decontamination equipment itself used during the partial or final closure of the decontamination process, they will be decontaminated by rinsing. The rinsate shall be collected and be properly disposed.

1L.19 Certification of Closure [NR 664.0115]

Within 60-days of completion of the final closure of the facility, the facility will submit to the WDNR, by registered mail, a certification that the hazardous waste management facility has been closed in accordance with the specifications in the approved Closure Plan. The certification will be signed by the owner or operator and by a qualified professional engineer. The documentation supporting the professional engineer's certification shall retained by the facility and furnished to the department upon request until the WDNR releases the owner or operator from financial assurance requirements from closure. The documentation will include detailed information showing how the requirements of this Closure Plan were achieved, including a detailed description of the work performed, inspection findings and results, sampling and analysis methods and results, information on how wastes and residues were managed (including quantities, waste types, shipping documents), drawings to support the description of the work and sampling/analysis, and photos before, during and after closure activities.

Partial closure of the facility does not require certification of closure unless the owner/operator desires approval and release from associated financial assurance obligations. However, the facility will maintain documentation supporting the partial closure activities for use in the future for final closure certification.

PART 1: SECTION M. CLOSURE COST ESTIMATE AND FINANCIAL RESPONSIBILITY

1M.1 Closure Cost Estimate [NR 670.014(2)(o) and NR 664.0142(1)]

The current closure cost estimate for the facility is established under the closure plan (Part 1 Section L) for Hazardous Waste Management Unit Closure Cost Summary [Appendix T-02]. The closure costs include the five hazardous waste management units where license storage, exempt-processing and treatment is conducted. See License Design Capacity (Part 1 Section 1A.8.10.13) for each storage area. The closure costs are based on the work described in the closure plan (Part 1 Section L).

1M.2 Most Expensive Costs Used in Cost Estimate [NR 664.0142(1)(a)]

The closure cost estimate is based on the maximum inventory levels under the License Design Capacity (Part 1 Section 1A.8.10.13) in each storage area.

1M.3 Third Party Closure of Facility [NR 664.0142(1)(b)]

The closure cost summary includes the hiring of a third party to close the facility at the “worst case” condition in accordance with the closure plan and closure standards in NR 664. For the purpose of closure costing, the third party is a party who is neither a parent corporation nor a subsidiary of the owner or operator.

1M.4 Salvage Value Not Used in Closure Cost [NR 664.0142(1)(c)]

The closure cost estimate does not incorporate any salvage value that may be realized from the sale of hazardous wastes, facility structures or equipment, land or other assets associated with the facility at the time of partial or final closure.

1M.5 Zero Cost Not Allowed [NR 664.0142(1)(d)]

The closure cost estimate does not incorporate a zero cost for hazardous wastes that might have an economic value.

1M.6 Estimated Financial Assurance for Closure [NR 664.0143]

The facility shall establish financial assurance for the closure of the facility in the form of a closure letter of credit [Appendix T-03].

1M.7 Closure Insurance Applicable Requirements [NR 664.0143]

The facility shall provide proof of closure insurance [Appendix O] applicable to requirements NR 664.0143.

1M.8 New Facility Requirement [NR 670.014(2)(o)]

A copy of the documentation required to demonstrate financial assurance shall be submitted no later than 60-days prior to the initial receipt of hazardous waste.

PART 1: SECTION N. POLLUTION LIABILITY INSURANCE

1N.1 Insurance Policy [NR 670.014(2)(q)]

The current liability insurance certificate for the facility can be found on the effective Certificate of Insurance (COI) document [Appendix O].

1N.2 Third Party Bodily Injury and Property Damage [NR 664.0147(1)]

The current liability insurance policy for the facility provides coverage for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations at the facility.

1N.3 Coverage Levels [NR 664.0147(1)]

The current liability insurance policy for the facility provides liability coverage for sudden accidentally occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million exclusive of legal defense costs.

1N.4 New Facility [NR 670.014(2)(q)]

This is a new licensed hazardous waste facility and therefore, the owner and operator plan to have in effect before initial receipt of hazardous waste for treatment, storage and disposal an insurance policy with documentation showing the amount of insurance meeting the specifications of NR 664.0147(1) and 664.0147(2).

PART 2: SECTION A. CONTAINER STANDARDS - INSPECTIONS

2A.1 Weekly Inspections [NR 670.014(2)(e), NR 664.0174 and NR 664.0175]

On a weekly basis an inspection of container storage areas shall be conducted to identify any leaking or compromised container integrity and to identify and deterioration of the secondary containment system. If a leaking or compromised container or any other abnormal condition or deterioration is identified during the inspection, it should be immediately remedied to ensure the problem does not lead to an environmental or human health hazards. The inspection will be documented as depicted in the Total Preventative Maintenance and Inspection Plan [Appendix I] including any corrected actions taken.

2A.2 Frequency of Container Storage Area Inspections [NR 670.014(2)(e) and NR 664.0015(2)(d)]

The inspection of container storage areas will be conducted weekly as depicted in the Total Preventative Maintenance and Inspection Plan [Appendix I]. In addition, on an annual basis all containers will be removed from each storage area and secondary containment system to visually inspect for evidence of deterioration and to ensure the areas are free of cracks or gaps and sufficient impervious to contain leaks, spills and accumulated precipitation.

2A.3 Subpart CC Container Inspections [NR 670.014(2)(e) and NR 664.1086]

Upon receipt at the facility, the containers are visually inspected during the receiving process to confirm that the containers are free from severe rust, have no visible holes, gaps or other open spaces with special attention to the covers, gaskets and closure devices on containers. It is the responsibility of the receiving department personnel for inspecting the inbound containers and confirming the containers meet the Container Level 1 or Container Level 2 controls at the time of acceptance. See Receiving (Unloading) of Inbound Containers (Part 1: Section 1A.8.10.3) for more specific receiving inspection details. While in storage, waste containers shall be inspected at least weekly in accordance with the Total Preventative Maintenance and Inspection Plan [Appendix I].

2A.4 Subpart CC Container Emission Control [NR 670.014(2)(e), NR 664.1088 and NR 670.014(2)(e)]

The facility operates three areas that store containers that are subject to Subpart CC standards due to the volatile organic (VO) concentration of the RCRA hazardous waste being at least 500 ppmw at the point of generation. These areas include the RM 124 Staging/Storage Area, RM 125 Storage/Exempt License Process Area and RM 126 Storage/Treatment Area depicted on the Container Storage Map [Appendix G-08]. The facility does not operate any floating roof covers, enclosures, floating membrane covers, closed-vent systems and is not required to maintain emission monitoring plan for containers provided they continue to meet the Container Standard (NR 664.1086) requirements.

Containers subject to this standard must be equipped with an organic-vapor repressing barrier which is fulfilled by the use and acceptance of U.S. DOT approved containers or containers equipped with a cover and closure device. Typical container sizes and applicable code requirements are as follows. however, it should be noted the facility does manage hazardous waste in varying sized containers including small cans:

DOT Certified Containers

Container Size (DOT Approved)		Service of Container	Container Control Level
30-Gallon Drum	0.114 cubic meters	Light Material Service	Container Level I
55-Gallon Drum	0.21 cubic meters	Light Material Service	Container Level I
275-Gallon Tote	1.04 cubic meters	Light Material Service	Container Level II
330-Gallon Tote	1.25 cubic meters	Light Material Service	Container Level II
6,000-Gallon Tanker	22.7 cubic meters	Light Material Service	Container Level II

The facility utilizes the Standards for Containers (NR 664.1086) which states that containers greater than 0.1 m³ (26.42 gallons) and less than or equal to 0.46 m³ (121.5 gallons) are subject to Container Level 1 standards and containers larger than 0.46 m³ are subject to Container Level 2 standards. The facility's compliance with both standards can be achieved using a container that meets U. S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation. See Hazardous Waste Container Opening and Waste Transfers (Section 1A.8.10.11) for additional details on transferring, closure and inspections of containers. The containers will be inspected to ensure that the container complies with the appropriate DOT performance packaging code for the contents contained within the container.

The facility transfers materials in a manner to minimize exposure of exposures of hazardous waste to the atmosphere. The facility does not conduct stabilization of waste in containers that would require implementation of Level 3 standard.

The facility does not operate any Subchapter CC closed vent systems or control devices to control air emissions and therefore, the requirements for inspection and monitoring of air control equipment is not applicable.

2A.5 Subpart CC Container Inspection Frequency [NR 670.014(2)(e) and NR 664.1015(2)(d)]

If the frequency of container inspections required under Subpart CC Container Standard - Inspection (Part 2: Section A) show a rate of deterioration to the containers or their closures that would lead to a probability of an environmental or human health incident, the inspection frequency will be increased.

PART 2: SECTION B. CONTAINER STANDARDS - CONTAINMENT

2B.1 Containment System Integrity [NR 664.0175(2)(a)]

The inside warehouse rooms where hazardous waste containers are stored (RMs 124, 125 and 126) are constructed of concrete floors and walls and are covered with a roof. The concrete floors are 7" thick and free of cracks, gaps and are non-porous due to impregnating the floors with an additive (Xyper C-500) upon construction and the installation of chemical resistant water stop (Envirostop TPER) as part of the foundation. The curbing and ramps inside the building are at least 6" above the floor level to prevent spills from exiting the building. The floors and landings within the building are flat with the sloped ramps to man doors and loading docks. The expansion joints are sealed with a chemically resistant barrier (Synthacalk GC2 - see Joint Sealer and Concrete Additive Specification under Appendix U-03) that is designed to containing leaks and spillage until it can be detected and removed. Displacement volumes caused by pallets, containment pallets, forklift wheels, floor scales and other equipment are limited and will not significantly impact secondary containment capacities.

The secondary containment associated with the east loading docks (Docks #2, #3 and #4) are constructed of 6" concrete that is free of cracks and gaps and is non-porous due to impregnating the floors with an additive (Xyper C-500) upon construction. The concrete pad is sloped downward towards the building and has a concrete trench drain that runs the length of the pad and connects to a manhole with a control valve that is normally maintained in the closed position. The manhole drains into a stormceptor that is located at the top of the concrete pad and surrounded by asphalt prior to discharge to the retention pond. On each side of the cement pad is 10' wide sloped asphalt walls. The expansion joints within the concrete pad are sealed with a chemically resistance barrier (Synthacalk GC2 - See Joint Sealer and Concrete Additive Specifications under Appendix U-03) that is designed to contain leaks, spillage and accumulation of precipitation until it can be detected and removed. The only displacement volume in this area is associated with tanker/trailer tires and will not significantly impact secondary containment capacities. The storage of hazardous waste in the east load docks are for non-routine event such as vehicle issues, receiving facility cancellation or abnormal industry shut-down periods. It is anticipated that storage within this area will not exceed 30-days unless a different time period is requested and approved by the Department on a case-by-case basis.

The secondary containment associated with the tanker filling pad areas and outside storage tank containment are constructed of 6" concrete that is free of cracks and gaps and is non-porous due to impregnating the floors with an additive (Xyper C-500) upon construction. The concrete pads are side by side and sloped inward towards the concrete and non-porous trench drain that runs into the above ground storage tanks secondary containment structure. The Tanker Filling Area Pad #1 and #2 does not independently provide containment but drains to the above ground storage tank secondary containment structure. The Tanker Filling Area Pad #1 and #2 and tank secondary containment structure is affixed with a chemical resistant water stop (Envirostop TPER - see Waterstop and Stormceptor System Specifications in Appendix U-04) and contains a sump (2'x2'x2' deep) which is connected to a manhole with a control valve that is maintained in the closed position. The pipes and valve systems that are a part of the secondary containment for the two outdoor storage areas were constructed, and are maintained, to be watertight. The concrete walls associated with the secondary containment structure are 2 feet high. The discharge from the

secondary containment structure is routed to the stormceptor prior to discharge into the retention pond. The purpose of the stormceptor is to remove free oil and suspended solids from storm water that is discharged from the containment area after a rainfall prior to release to the environment. The expansion joints within the concrete pads are sealed with a chemically resistance barrier (Synthacalk GC2 - see Joint Sealer and Concrete Additive Specification under Appendix U-03) that is designed to route any leaks, spillage and accumulation of precipitation to the secondary containment structure until it can be detected and removed. The displacement volume in this area is associated with tanker/trailer tires, the base of the above ground storage tanks, pump and auxiliary metal brackets and stairways and will not significantly impact secondary containment capacities. The storage of hazardous waste in the tanker filling pad areas are for non-routine event such as vehicle issues, receiving facility cancellation or abnormal industry shut-down periods. It is anticipated that storage within this area will not exceed 30-days unless a different time period is requested and approved by the Department on a case-by-case basis.

2B.2 Containment System Protection from Accumulated Liquids [NR 664.0175(2)(b)]

The inside hazardous waste storage areas (RM124, RM125, RM126) store containers elevated on pallets (typical wood and 48x48 in size) to protect the containers from contact with accumulated liquid.

The east loading docks and tanker loading pads have tanker/trailer elevated by a chassis stored in these areas for non-routine storage events. It is not anticipated that the tanker/trailer container would come into contact with accumulated liquid.

2B.3 Containment System Capacity [NR 664.0175(2)(c) and NR 670.015(1)(c)]

The warehouses, loading docks and tank filling area secondary containment system capacity has been calculated based upon the current as-built conditions of the facility and meets 10% of the volume of containers stored within the various areas, or the volume of the largest container. It should be noted that RM 124, RM 125 and RM 126 are inter-connected (with no barriers or segregation from room to room) and therefore the total aggregate of secondary containment for these rooms as a whole are used in the secondary containment calculations”.

The containment calculations and associated drawings for each area within can be found in the Secondary Containment Calculations [Appendix U-01]. Appendix U also considers containment volumes from displacement, fire suppression systems, and precipitation.

The storage and secondary containment system capacities for the hazardous waste container storage areas for the facility are depicted below.

Area	Use	Floor Area	Maximum Storage ^(b)		Secondary Containment ^(c)			
			Maximum Hazardous Waste Storage Capacity		Minimum Required Containment		Largest Container	Actual Containment Capacity ^(d)
			55-Gal Equivalents	Gallons	55-Gal Equivalent	Gallons	Gallons	Gallons
RM 124 ^(a)	Hazardous Waste Staging and Storage	4,646	616	33,880	62	3,388	330	12,895
RM 125	Hazardous Waste Storage	5,091	784	43,120	78	4,312	330	15,227

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RM 126	Hazardous Waste Storage/Treatment	1,056	160	8,800	16	880	330	3,076
Total		10,793	1,560	85,800	156	8,580	N/A	31,198
East Loading Docks	Hazardous Waste Storage	1,785	N/A	18,000	N/A	N/A	6,000	13,087
Tanker Fill Area #1 and #2	Hazardous Waste Storage	616	N/A	12,000	N/A	N/A	6,000	27,077

N/A = Not Applicable

(a) All of RM 124 can be used for temporary staging of up to 616 drums (double stacked) which represents the largest possible total container volume in RM 124. When not used for staged containers, the west part of RM 124 can be used for licensed storage of up to 376 drums (double-stacked).

(b) Maximum hazardous waste storage capacity (gallons and drum count) is derived from the container/pallet layout on Container Storage Map [Appendix G-08], and assumes that pallets are doubled stacked. Includes all hazardous waste in storage, all containers that are temporarily staged (less than 24 hours) and all other containers with free liquids (hazardous and non-hazardous) in storage. This provides the basis for secondary containment.

(c) Secondary containment capacity requirement is 10% of the total container volume or largest container volume, whichever is larger which is identified in italic. Secondary containment capacities for RM 124, RM 125 and RM 126 are combined into a single containment area.

(d) Secondary containment capacities are presented in the Secondary Containment Calculations [Appendix U-01].

2B.4 Run-On Prevention [NR 664.0175(2)(d) and NR 670.015(1)(d)]

The hazardous waste staging, storing and/or treatment in RM 124, RM 125 and RM 126 are contained within the building which is enclosed with a roof and sidewalls to prevent run-on from precipitation. The East Loading Docks and Tanker Filling Area #1 and #2 are outside the building and are not enclosed nor do they have a roof and therefore, rain and snowmelt are not prevented from becoming present within the secondary containment for these areas. The rain and snowmelt that collects in secondary containment is removed in a timely manner and the secondary containment systems have sufficient capacity to accommodate a 24-hour, 25-year rain fall event (see Secondary Containment Calculations - Appendix U).

2B.5 Accumulated Liquid Removal and Analysis [NR 664.0175(2)(e) and NR 670.015(1)(e)]

All container storage areas are inspected on a daily operating basis for leaks or spillage. In the event accumulated liquid is discovered for an incidental release, the absorbent materials available in the spill kits will be used to conduct cleanup operations. If the accumulated liquid discovered is of significant volume, it will be removed from the containment area by vacuum tanker or other devices. If the accumulated material is solid or a slurry it will be cleaned up using a shovel, scoop or other devices or methods. The spill and cleanup material accumulated and removed will be placed into a compatible container and analyzed to determine proper disposal. The analysis conducted will be dependent upon the material leaked or spilled and conducted in accordance with the Waste Analysis Plan [Appendix H]. Spilled or leaked waste shall be cleaned up as soon as possible to prevent harm to humans and the environment. Precipitation accumulated shall be removed within 24-hours or less after the event has concluded.

The secondary containment associated with the loading docks and tanker filling areas are equipped with an open and closed manual valve that remain in the closed position except when manually discharging evaluated rainwater. The secondary containment areas will be inspected on a daily basis to identify accumulation of precipitation (rainwater, snow or ice) or any indication of a spill or leak being present. If any accumulation of liquid is identified during the daily inspection, it should be

determined if precipitation would be expected based upon recent weather conditions (rain event, snow events, etc.). The accumulated precipitation will be visually evaluated. The evaluation shall include observations of color, odor, clarity, turbidity, floating solids, foam, oil sheen, or any other indications of contamination. If the visual evaluation of accumulated precipitation shows no indication of contamination, the precipitation will be identified as uncontaminated rainwater, snow or ice. If the precipitation is uncontaminated rainwater, it can be discharged to the retention pond using the manual drain valve. The drain valve must be closed after draining. If the precipitation is uncontaminated snow or ice, it can be shoveled or plowed out from the area. In the event the visual evaluation indicates that the precipitation has been contaminated, the Operations Manager should be informed to determine next steps which may include analytical testing, pumping the materials from the secondary containment areas and/or sumps into containers or a tanker truck, or shoveling and collecting the snow into containers for proper disposal. The visual evaluation results and precipitation removal shall be documented and maintained on file for a minimum period of three years.

2B.6 Containment for F020, F021, 022, F023, F026, F027 Waste [NR 664.0175(4)]

Enviro-Safe will store containerized hazardous waste with the EPA hazardous waste codes F020, F021, F022, F023, F026 or F027 and therefore, the containment system requirements of NR 664.0175(4) are not applicable and have been met.

2B.7 Containment Design [NR 670.015(1)(a)]

Drawings of the container storage areas showing drainage patterns and containment structures are provided in Secondary Containment Map [Appendix G-05]. There are no sanitary sewer drains in the licensed storage areas.

2B.8 Containment Design Provides Protection Against Accumulated Liquids [NR 670.015(1)(b)]

See Part 2, Section 2.B.2.

2B.9 Containment Capacity in Relationship to Volume Stored [NR 670.015(1)(c)]

See Containment System Capacity (Part 2: Section 2B.3).

2B.10 Run-On Prevention [NR 670.015(1)(d)]

See Run-On Prevention (Part 2: Section 2B.4).

2B.11 Analysis and Removal of Accumulated Liquids [NR 670.015(1)(e)]

See Accumulated Liquid Removal Analysis (Part 2: Section 2B.5).

2B.12 Storage of Containers with No Free Liquids [NR 670.015(2)]

All hazardous waste storage areas are designed to provide storage for containers holding free liquids. All hazardous waste storage areas meet the requirements of NR 664.0175(3) for the storage of waste with no free liquids.

2B.13 No Free Liquids Analysis [NR 670.015(2)(a)]

The facility does not designate separate storage areas for waste containing no free liquids, therefore, test procedures and results or other documentation or information to show that the wastes do not contain free liquid are not required.

2B.14 Design of Areas for the Storage of Waste with No Free Liquids [NR 670.015(2)(b)]

All hazardous waste storage areas are designed to provide storage for containers holding free liquids. All hazardous waste storage areas are designed and operated to meet the requirements of WDNR NR 670.015(2)(b) for the storage of waste with no free liquids.

PART 2: SECTION C. CONTAINER STANDARDS - INCOMPATIBLE, REACTIVE, IGNITABLE WASTE

2C.1 Ignitable Stored 50 Feet from Property Line [NR 664.0176]

The facility stores ignitable and reactive waste in containers. The majority of the hazardous waste processed and stored at the facility is ignitable. All areas used to process and store ignitable waste are located at least 50 feet from the facility’s property line. The Facility Map [Appendix G-04] depicts the property line, 50-foot buffer and its proximity to the hazard waste storage area. Appendix V of WDNR NR 664 (as well as the DOT 49 CFR regulations regarding segregation of hazardous materials) were taken into consideration when developing this section.

2C.2 Storage of Incompatible Waste [NR 664.0177(3) and NR 664.0017(1)]

Containers to be stored are segregated with respect to their compatibility with other hazards classes in accordance with the DOT Hazardous Material Load and Segregation Chart (49 CFR 177.878). Using the hazard classifications of incoming waste, the warehouses have been designated for the storage of specific hazards classes which is based from the methodology of the DOT Hazardous Material Load and Segregation Chart (see DOT Hazardous Material Load and Segregation Chart Appendix P-01). When the same warehouse (RM 125 only) is used to store incompatible hazard classes and other materials that are incompatible, additional precautions such as containment pallets and separation are employed. The warehouse RM 125 is separated into storage areas (see Storage Compatibility Chart Appendix P-02). The containment pallets are used to prevent the potential mixing of incompatible materials should a leak or spill occur. The containment pallets are capable of holding 4 55-gallon containers and are only allowed to be stacked two high with the same hazard classes. In addition, incompatible materials will not be stored on the same pallet (whether a regular pallet or containment pallet). Separation of incompatible materials shall be a minimum of 20-feet.

The chart below describes the areas that are present within the different warehouse’s spaces and the acceptable DOT classes that can be stored within the applicable warehouse/areas (see the Container Storage Map G-08). The Storage Compatibility Chart [Appendix P-02] depicts what classes can be stored within each area.

Storage Location	Storage Areas	Acceptable DOT Classes in Storage Area
RM 124 Storage	No Storage Areas	Flammable Gases (2.1), Non-Toxic Non-Flammable Gases (2.2), Flammable Liquids (3), Flammable Solids (4.1), Spontaneous Combustible (4.2), Dangerous When Wet Materials (4.3), Environmentally Hazards (9). No additional requirements.
RM 125 Storage	1	Corrosive Liquids (8). Must be stored on containment pallets. Acids and bases will be stored in separate rows.
RM 125 Storage	2	Lab Packs (storage segregation compliance with 49 CFR 173.12(e).
RM 125 Storage	3	Oxidizers (5.1), Organic Peroxides (5.2). Must be stored on containment pallets.

RM 125 Storage	4	Flammable Gases (2.1), Non-Toxic Non-Flammable Gases (2.2), Flammable Liquids (3), Flammable Solids (4.1), Spontaneous Combustible (4.2), Dangerous When Wet Materials (4.3), Environmentally Hazards (9). No additional requirements.
RM 126 Storage	No Storage Areas	Flammable Gases (2.1), Non-Toxic Non-Flammable Gases (2.2), Flammable Liquids (3), Flammable Solids (4.1), Spontaneous Combustible (4.2), Dangerous When Wet Materials (4.3), Environmentally Hazards (9). No additional requirements.

Lab packs will be stored in accordance with the DOT segregation requirements for waste material lab packs (49 CFR 173.12(3)).

Prior to waste being placed into storage, personnel will assess the compatibility of the waste in accordance with the Waste Analysis Plan pre-qualification and screening process [Appendix H]. If acceptable, the container will be moved to the designated storage location identified on the Container Inspection Form using the approved profile and fingerprint results that is established at the time the waste is approved to be received at the facility. When physically moving the container to the designated storage area, the waste already present in storage is reviewed to ensure no compatibility issues are present. It should be noted that the site does not treat, store or dispose of explosives (DOT Class 1) or radioactive materials (DOT Class 7).

All storage containers will be individually marked with the waste description and DOT hazard label to readily identify the associated hazard class. In addition, readily visible signs are used to identify the contents of each separate section of the licensed hazardous waste storage areas to assist in the prevention of inappropriate or potentially unsafe storage of hazardous wastes by personnel.

2C.3 Incompatible Waste Placed in Same Container [NR 670.0015(4)]

The facility does not process or treat reactive or incompatible wastes. The incoming material screening procedure will reveal if there are any incompatibility issues with the waste received at the facility. Incoming wastes are assessed under the Waste Analysis Plan [Appendix H] as part of the profiling, screening and compatibility testing. Any wastes identified as having a potential to liberate gases, heat, or undergo hazardous polymerization are segregated from other wastes. The results of compatibility screening will be documented as established in the Waste Analysis Plan [Appendix H]. Since identified containers of incompatible wastes are segregated and not processed or treated at the facility, incompatible wastes will not be placed together in the same container.

2C.4-2C.8 Precautions for Ignitable, Reactive and Incompatible Waste [NR 670.0017(2)(a) thru NR 670.0017(2)(e), NR 664.0117(1), NR 664.0017(2)(a) thru NR 664.0017(2)(e), and NR 664.0017(3)]

The hazards of each waste container are determined by reviewing the associated waste manifest and container labeling when the hazardous waste arrives at the facility followed by assessing the waste in accordance with the Waste Analysis Plan pre-qualification and screen process [Appendix H]. If acceptable, the container will be moved to the designated storage location. If the incoming pre-qualification and screening process reveals the material or waste is a reactive waste or has the potential to (1) liberate gases, heat or undergo hazardous polymerization, (2) produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment, (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion, (4) produce a reaction that may damage the integrity of the container or facility, or (5) produce a reaction through other means to threaten human health or the environment, and can not be safely stored the container will not be allowed to be moved storage

and will be quarantined in the designated non-conforming material area in RM 124. Under the direction of the Technical Service Manager and Operation Manger, the shipment will be routed directly to the final waste management facility for treatment/disposal or the container will be rejected back to the generator.

Prior to consolidating waste with other wastes or materials as part of hazardous waste license exempt processes or treatment the waste mixture is tested for compatibility. Compatibility is evaluated to ensure that wastes do not adversely react with one another when they are commingled in containers or tankers. See the Waste Analysis Plan - Consolidating Waste (Appendix H - Section 6.0) for specific details.

Other administrative controls that are utilized while conducting processing and treatment includes implementing hot work procedures when work needs to be conducted involving open flames, cutting, welding or other hot work, the use of EE-rated forklifts (which means the motor and switches are enclosed to prevent any sparks from reacting to the environment), the use of non-sparking tools, and employing grounding/bonding to prevent static discharge when conducting transferring operations.

In addition to the above precautions, engineering precautions and controls have been established within the physical structure of the facility. The RM 125 and RM 126 areas are designed to store ignitable wastes. The areas have an automatic foam sprinkler system, gas detection system, intrinsically safe electrical, ventilation with a minimum of six air exchanges per hour, and is separated from the other areas in the building by a 1-hour or 2-hour rated fire wall. In addition, RM 126 licensed storage and treatment room is designed with blowout panels. "No Smoking" signs are posted at all main entry points and at the outside above ground storage tank farm. Smoking is strictly prohibited on the premise.

2C.9 Documentation of Compliance with NR 664.0017(2) [NR 664.0017(3)]

The documentation to demonstrate efforts to prevent incompatibilities problems are addressed within the Waste Analysis Plan [Appendix H] as part of the profiling, screening and compatibility testing. In addition, physical segregation and precautions employed are verified and documented as part of the Facility Daily Inspections which includes container storage area inspections as part of the Total Preventative Maintenance and Inspection Plan [Appendix I].

2C.10 Placing Incompatible Waste in an Unwashed Container [NR 664.0177(2)]

The empty containers generated as the result of license exempt processing (bulking, consolidation, elementary neutralization, lab pack repackaging, and aerosol puncturing) and treatment (fuel blending), will be emptied to RCRA empty standards and receiving facility standards and closed. The label which indicates the last contained material will be left on the container. The container will either be sent off-site for recycling or reused on-site. Any empty unwashed container to be reused on-site and its previously held materials will be screened for compatibility with the material to be stored in the container in accordance with the Waste Analysis Plan - Containers [Appendix H - Section 6.3] prior to its reuse. If the evaluation determines that the material is incompatible with the container and any remaining residues, the container shall not be used.

PART 3: SECTION M. SUBCH CC - AIR EMISSION CONTROL STANDARDS - CONTAINERS AND TANKS

3M.1 Documentation of Floating Roof Cover Installed on Tanks [NR 664.1084(4)(a) or (b) and NR 670.027(1)(a)]

The facility does not store hazardous waste in storage tanks and therefore, this section is not applicable to the facility.

3M.2 Identification of Each Container Area Subject to Subpart CC [NR 670.027(1)(b)]

The facility manages hazardous waste in various container types and sizes that require either Level 1 or Level 2 emission controls. See specific container details under Subpart CC Container Emission Control (Part 2: Section 2A.4). All containers used for the storage of hazardous waste meet DOT requirements for shipping hazardous materials. None of the containers managed at the facility require Level 3 controls that vent to a control device or a container enclosure venting to a control device.

3M.3 Owner/Operator Certification to Subch. CC Requirements for Container Storage Areas [NR 670.027(1)(b)]

The facility has included the certification statement that containers subject to requirements of CC of Chapter NR 664 are met as part of the Owner's and Operator's Certification [Appendix B].

3M.4 Documentation of Enclosures Used to Control Air Emissions from Containers [NR 664.1086(5)(a)(2), NR 664.1084(4)(e) and NR 670.027(1)(c)]

The facility does not store any containers of hazardous waste subject to Container Level 3 standards nor does it store hazardous waste in storage tanks and therefore, this section is not applicable to the facility.

3M.5 Permanent Total Enclosures Used to Control Air Emissions from Containers [NR 670.027(1)(c)]

The facility does not have any permanent total enclosures and therefore, this section is not applicable to the facility.

3M.6 Closed-Vent System and Control Devices Used to Control Air Emissions from Containers [NR 670.027(1)(e)]

The facility does not have any closed-vent systems therefore, this section is not applicable to the facility.

3M.7 Control Devices Used to Control Air Emissions from Containers [NR 670.027(1)(f)]

The facility does not have any control devices therefore, this section is not applicable to the facility.

APPENDIX A: TSD LICENSE COMPLETENESS CHECKLIST

**WISCONSIN DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE LICENSE APPLICATION (FPOR)
COMPLETENESS AND TECHNICAL EVALUATION CHECKLIST
GENERAL AND SPECIFIC REQUIREMENTS FOR
CONTAINERS, TANKS AND MISCELLANEOUS UNITS**

Facility Name :	Enviro-Safe Resource Recovery
FID # :	267193300
US EPA ID #:	WIR000142877
Date Application Received :	
DNR Reviewer :	
Review Dates :	

Use this checklist as a guide to determine if the Feasibility and Plan of Operation Report (FPOR) is complete and technically adequate for the storage or treatment of hazardous waste in containers, tanks, or miscellaneous units. The license applicant should indicate the location of the required information in the FPOR. The DNR license reviewer will review the information provided and determine if it is complete and technically adequate.

Note: More detailed information is given in the Wisconsin Administrative Code citation listed for each item. The inspection forms at <http://www.dnr.state.wi.us/org/aw/wm/publications/index.html> may also be used as a guide for AA/BB/CC requirements.

PART I - GENERAL REQUIREMENTS

Licensing Standard and Code Citation	Location In Report (Page/Section/ NA)	Complete? (Y/N/NA)	Technically Adequate? (Y/N/NA)	Comments
Section A. General Requirements NR 670.010 to NR 670.014				
A.1. Two copies of license application submitted. NR 670.010(1)	FPOR Part 1: Section A (1A.1)			Two hard copies will be submitted along with electronic files
A.2. Appropriate plan review and license fees submitted. NR 670.010(12)	FPOR Part 1: Section A (1A.2)			Fees will be submitted
A.3. Report signed by a president, secretary, treasurer or vice president of a corporation or other approved signatory. NR 670.011(1)	FPOR Part 1: Section A (1A.3)			
A.4. Signature includes certification statement. NR 670.011(4)	FPOR Part 1: Section A (1A.4)			
A.5. Claims of confidentiality are met. NR 670.012	FPOR Part 1: Section A (1A.5)			
A.6. Summary of pre-application meeting, list of attendees/addresses and copies of written comments or materials submitted during meeting. NR 670.014(2)(v)	FPOR Part 1: Section A (1A.6)			
A.7. Documentation showing compliance with local approval requirements. NR 670.014(2)(w)	FPOR Part 1: Section A (1A.7)			
A.8. Complete Part A application. NR 670.013	FPOR Part 1: Section A (1A.8)			
A.9. Technical data, such as design drawings and specifications and engineering studies are certified by WI registered PE. NR 670.014(1)	FPOR Part 1: Section A (1A.9)			

A.10. General description of facility. NR 670.014(2)(a)	FPOR Part 1: Section A (1A.10)			
A.11. Description of procedures, structures or equipment used to prevent hazards in unloading operations. NR 670.014(2)(h)1.	FPOR Part 1: Section A (1A.11)			
A.12. Description of procedures, structures or equipment used to prevent runoff from hazardous waste handling areas or to prevent flooding. NR 670.014(2)(h)2.	FPOR Part 1: Section A (1A.12)			
A.13. Description of procedures, structures or equipment used to prevent contamination of water supplies. NR 670.014(2)(h)3.	FPOR Part 1: Section A (1A.13)			
A.14. Description of procedures, structures or equipment used to mitigate effects of equipment failure or power outages. NR 670.014(2)(h)4.	FPOR Part 1: Section A (1A.14)			
A.15. Description of procedures, structures or equipment used to prevent exposure of personnel. NR 670.014(2)(h)5.	FPOR Part 1: Section A (1A.15)			
A.16. Description of procedures, structures or equipment used to the atmosphere. NR 670.014(2)(h)6.	FPOR Part 1: Section A (1A.16)			
A.17. Traffic patterns, estimated traffic volume, traffic control, access road surfacing and load bearing capacity. NR 670.014(2)(j)	FPOR Part 1: Section A (1A.17)			
A.18. Chemical and physical analyses of the hazardous waste and debris to be handled at the facility. NR 670.014(2)(b)	FPOR Part 1: Section A (1A.18)			
A.19. Chemical and physical analyses contains all information that must be known to treat, store or dispose of the waste according to NR 664 requirements. NR 670.014(2)(b)	FPOR Part 1: Section A (1A.19)			
A.20. Justification of any request for a waiver of the preparedness and prevention requirements of NR 664 subch. C. NR 670.014(2)(f)	FPOR Part 1: Section A (1A.20)			
A.21. Description of precautions taken to prevent accidental ignition or reaction of ignitable, reactive or incompatible wastes, including A.22 to A.24. NR 670.014(2)(i)	FPOR Part 1: Section A (1A.21)			
A.22. Ignitable and reactive waste is separated and protected from sources of ignition or reaction. NR 664.0017(1)	FPOR Part 1: Section A (1A.22)			
A.23. Smoking and open flame are confined to specially designated locations when handling ignitable or reactive waste. NR 664.0017(1)	FPOR Part 1: Section A (1A.23)			
A.24. "No Smoking" signs are conspicuously placed where there is a hazard from ignitable or reactive waste. NR 664.0017(1)	FPOR Part 1: Section A (1A.24)			

A.25. Documentation demonstrating compliance with A.22. to A.24., including references to published scientific or engineering literature, data from trial tests, waste analysis or the results of treatment of similar waste by similar treatment under similar operating conditions. NR 664.0017(3)	FPOR Part 1: Section A (1A.25)			
Section B. Noncompliance with Plans or Orders NR 670.014(2)(x)1.				
B.1. Identification of all persons owning ≥10% legal or equitable interest in the applicant or their assets. NR 670.014(2)(x)1.a	FPOR Part 1: Section B (1B.1)			
B.2. Identification of all WI solid or hazardous waste facilities for which applicant or other identified person is named in or subject to a department order or plan approval. NR 670.014(2)(x)1.b.	FPOR Part 1: Section B (1B.2)			
B.3. Identification of all WI solid or hazardous waste facilities owned by the applicant or other identified person who owns or previously owned ≥10% interest in the assets. NR670.014(2)(x)1.c.	FPOR Part 1: Section B (1B.3)			
B.4. Statement regarding whether or not all plan approvals and orders relating to all identified facilities are being complied with. NR 670.014(2)(x)1.d.	FPOR Part 1: Section B (1B.4)			
Section C. Environmental Impact Review NR 670.014(2)(x)2.				
C.1. Purpose, history, background, relevant local, state and federal permits or approvals and zoning changes for the project. NR 670.014(2)(x)2.a.	FPOR Part 1: Section C (1C.1)			
C.2. Description of proposed physical changes related to terrestrial resources, such as soil placement, construction of roads, surface water drainage and sedimentation controls. NR 670.014(2)(x)2.b.1)	FPOR Part 1: Section C (1C.2)			
C.3. Description of proposed physical changes related to aquatic resources, such as impacts to streams, wetlands or other water bodies. NR 670.014(2)(x)2.b.2)	FPOR Part 1: Section C (1C.3)			
C.4. Description of proposed physical changes related to the construction of buildings and other structures. NR 670.014(2)(x)2.b.3)	FPOR Part 1: Section C (1C.4)			
C.5. Description of proposed physical changes related to air emissions and water discharges during facility construction, operation and closure. NR 670.014(2)(x)2.b.4)	FPOR Part 1: Section C (1C.5)			
C.6. Description of proposed physical changes related to any other changes anticipated with facility development. NR 670.014(2)(x)2.b.5)	FPOR Part 1: Section C (1C.6)			
C.7. Maps, plans or other materials needed to clarify the information provided for C.2. to C.6. NR 670.014(2)(x)2.b.6)	FPOR Part 1: Section C (1C.7)			

C.8. Description of the affects on the existing physical environment, such as topography, surface water drainage, hydrogeologic conditions, geology. NR 670.014(2)(x)2.c.1)	FPOR Part 1: Section C (1C.8)			
C.9. Description of the affects on existing dominant aquatic and terrestrial plant and animal species and habitats. NR 670.014(2)(x)2.c.2)	FPOR Part 1: Section C (1C.9)			
C.10. Description of the affects on existing land use, dominant features, and zoning in the area. NR 670.014(2)(x)2.c.3)	FPOR Part 1: Section C (1C.10)			
C.11. Description of the affects on existing social and economic conditions, such as ethnic or cultural groups. NR 670.014(2)(x)2.c.4)	FPOR Part 1: Section C (1C.11)			
C.12. Description of the affects on other existing special resources, such as archaeological, historical, state natural areas, or prime agricultural lands. NR 670.014(2)(x)2.c.5)	FPOR Part 1: Section C (1C.12)			
C.13. Discussion of the probable adverse and beneficial physical impacts associated with facility design, construction and operation. NR 670.014(2)(x)2.d.1)	FPOR Part 1: Section C (1C.13)			
C.14. Discussion of the probable adverse and beneficial biological impacts such as destruction and creation of habitat, alteration of physical environment and impacts to endangered or threatened species. NR 670.014(2)(x)2.d.2)	FPOR Part 1: Section C (1C.14)			
C.15. Discussion of the probable adverse and beneficial impacts on land use. NR 670.014(2)(x)2.d.3)	FPOR Part 1: Section C (1C.15)			
C.16. Discussion of the probable adverse and beneficial social and economic impacts to local residents, cultural groups and communities and industries served by the facility. NR 670.014(2)(x)2.d.4)	FPOR Part 1: Section C (1C.16)			
C.17. Discussion of probable adverse and beneficial impacts on other special resources, such as archaeological, historical, state natural areas and prime agricultural lands. NR 670.014(2)(x)2.d.5)	FPOR Part 1: Section C (1C.17)			
C.18. Discussion of probable adverse impacts that cannot be avoided, such as groundwater and surface water impacts, modifications of topography, loss of agricultural or forest land, displacement of wildlife and adverse aesthetic impacts for people in and around the facility. NR 670.014(2)(x)2.d.6)	FPOR Part 1: Section C (1C.18)			
C.19. Identify, describe and discuss feasible alternatives such as taking no action, enlargement, reduction or modification of the project. NR 670.014(2)(x)2.e.	FPOR Part 1: Section C (1C.19)			
C.20. Needs determination, per s. 289.28, Wis. Stat. NR 670.014(2)(x)3.	FPOR Part 1: Section C (1C.20)			

Section D. Groundwater Protection NR 670.014(3)				
D.1. If all regulated units meet NR 664.0090(2), this Section is not applicable.	N/A	N/A	N/A	The groundwater protection requirements do not apply because Enviro-Safe does not contain or propose any regulated units (land disposal units) as defined in NR 664.0090(1).
D.2. Summary of groundwater monitoring data from interim license period. NR 670.014(3)(a)	N/A	N/A	N/A	
D.3. Uppermost aquifer and aquifers hydraulically interconnected beneath the facility property, groundwater flow direction and rate, and basis of identification. NR 670.014(3)(b)	N/A	N/A	N/A	
D.4. Topographic map delineating waste management area, property boundary, point of compliance and proposed location of monitoring wells. NR 670.014(3)(c)	N/A	N/A	N/A	
D.5. Description of contamination plume that entered the groundwater from a regulated unit at the time of the application, delineation of the extent of the plume on the topographic map and identification of hazardous constituent concentrations in the plume. NR 670.014(3)(d)	N/A	N/A	N/A	
D.6. Detailed plans and engineering report describing the proposed groundwater monitoring program to be implemented per NR 664.0097. NR 670.014(3)(e)	N/A	N/A	N/A	
D.7. If hazardous constituents have not been detected in the groundwater at the time of the license application, sufficient information, supporting data and analyses to establish a detection monitoring program which meets NR 664.0098. NR 670.014(3)(f)	N/A	N/A	N/A	
D.8. If hazardous constituents have been detected in the groundwater at the point of compliance at the time of the license application, sufficient information, supporting data and analyses to establish a compliance monitoring program meeting NR 664.0099. NR 670.014(3)(g)	N/A	N/A	N/A	
D.9. If hazardous constituents have been measured in the groundwater exceeding concentration limits in NR 664.0094 Table 1 or if groundwater monitoring conducted at the time of the license application at the waste boundary indicates the presence of hazardous waste constituents from the facility, sufficient information, supporting data and analyses to establish a corrective action program meeting NR 664.0100. NR 670.014(3)(h)	N/A	N/A	N/A	
Section E. Corrective Action and Solid Waste Management Units NR 670.014(4)				

E.1. If applicable, information regarding groundwater protection if there is a release from a SWMU. NR 670.014(3)	FPOR Part 1: Section E (1E.1)			
E.2. Topographic map showing location of SWMU. NR 670.014(4)(a)1.	FPOR Part 1: Section E (1E.2)			
E.3. Designate type of SWMU. NR 670.014(4)(a)2.	FPOR Part 1: Section E (1E.3)			
E.4. General dimensions and structural description of SWMU. NR 670.014(4)(a)3.	FPOR Part 1: Section E (1E.4)			
E.5. When the SWMU was operated. NR 670.014(4)(a)4.	FPOR Part 1: Section E (1E.5)			
E.6. All wastes managed at the SWMU are specified. NR 670.014(4)(a)5.	FPOR Part 1: Section E (1E.6)			
E.7. All available information pertaining to releases of hazardous waste constituents from hazardous waste units. NR 670.014(4)(b)	FPOR Part 1: Section E (1E.7)			
E.8. Results of sampling and analysis of surface or groundwater, soil and air sampling if the department determines a RFA is necessary. NR 670.014(4)(c)	FPOR Part 1: Section E (1E.8)			
Section F. Location Standards NR 670.014(2)(k) and NR 670.014(2)(s)				
F.1. Identify if facility is in a 100-year floodplain and source of data. NR 670.014(2)(k)3.	FPOR Part 1: Section F (1F.1)			
F.2. Copy of federal insurance administration flood map, or calculations and maps if FIA map is not available. NR 670.014(2)(k)3.	FPOR Part 1: Section F (1F.2)			
F.3. Identify 100-year flood level and other flooding factors (wave action) considered in design, construction, operation or maintenance of facility to withstand washout from 100 year flood. NR 670.014(2)(k)3.	FPOR Part 1: Section F (1F.3)			
F.4. If facility is located in 100 year flood plain, engineering analysis of various hydrodynamic and hydrostatic forces. NR 670.014(2)(k)4.a. AND	FPOR Part 1: Section F (1F.4)			
F.5. Structural or other engineering studies showing design of operational units and flood protection devices and how they will prevent washout. NR 670.014(2)(k)4.b. OR	FPOR Part 1: Section F (1F.5)			
F.6. Description of procedures to move hazardous waste before flooding, including timing; new approved or licensed location; resources needed; and, potential of discharge during move. NR 670.014(2)(k)4.c.	FPOR Part 1: Section F (1F.6)			
F.7. If a facility located in a 100-year floodplain is not designed, constructed, operated and maintained to prevent washout, a demonstration that procedures in effect to move the waste safely to a location that is not vulnerable to flood waters before flood waters reach the facility. NR 664.0018(2)(a)	FPOR Part 1: Section F (1F.7)			

F.8. If an existing facility is not in compliance with F.7., a plan and schedule to bring the facility into compliance. NR 670.014(2)(k)5.	FPOR Part 1: Section F (1F.8)			
F.9. A dated topographic map showing a distance of 1,000 feet around the facility, with a scale of no more than 1 inch to 200 feet, and contour intervals that clearly shows pattern of surface water flow of waste management unit. NR 670.014(2)(s)	FPOR Part 1: Section F (1F.9)			
F.10. Map shows map scale and date. NR 670.014(2)(s)1.	FPOR Part 1: Section F (1F.10)			
F.11. Map shows 100 year flood plain area. NR 670.014(2)(s)2.	FPOR Part 1: Section F (1F.11)			
F.12. Map shows surface waters, including intermittent streams. NR 670.014(2)(s)3	FPOR Part 1: Section F (1F.12)			
F.13. Map shows surrounding land uses (residential, commercial, agricultural, recreational). NR 670.014(2)(s)4	FPOR Part 1: Section F (1F.13)			
F.14. Map shows wind rose (prevailing wind speed and direction). NR 670.014(2)(s)5	FPOR Part 1: Section F (1F.14)			
F.15. Map shows map orientation. NR 670.014(2)(s)6	FPOR Part 1: Section F (1F.15)			
F.16. Map shows legal boundaries of the hazardous waste facility. NR 670.014(2)(s)7	FPOR Part 1: Section F (1F.16)			
F.17. Map shows access control (fence, gates). NR 670.014(2)(s)8	FPOR Part 1: Section F (1F.17)			
F.18. Map shows location of injection or supply wells on-site and off-site. NR 670.014(2)(s)9	FPOR Part 1: Section F (1F.18)			
F.19. Map shows buildings and storage, treatment or disposal operations. NR 670.014(2)(s)10.	FPOR Part 1: Section F (1F.19)			
F.20. Map shows other structures such as recreation areas, runoff control systems, roads, sewers, loading, unloading areas, etc. NR 670.014(2)(s)10.	FPOR Part 1: Section F (1F.20)			
F.21. Map shows barriers for drainage or flood control. NR 670.014(2)(s)11.	FPOR Part 1: Section F (1F.21)			
F.22. Map shows location of operational units where hazardous waste will be treated, stored or disposed. NR 670.014(2)(s)12.	FPOR Part 1: Section F (1F.22)			
F.23. Facility is not located in a wetland. NR 670.014(2)(k)6.b.	FPOR Part 1: Section F (1F.23)			
F.24. Facility is not located in a critical habitat for threatened or endangered species. NR 670.014(2)(k)6.a.	FPOR Part 1: Section F (1F.24)			
Section G: Waste Analysis Plan Requirements NR 670.014(2)(c)				
G.1. Procedures for obtaining chemical and physical analyses of hazardous waste managed at facility. NR 664.0013(1)(a)	FPOR Part 1: Section G (1G.1)			
G.2. Analysis by WI certified labs. NR 664.0013(1)(a)1.	FPOR Part 1: Section G (1G.2)			

G.3. Description of other data to be used rather than lab analysis. NR 664.0013(1)(b)	FPOR Part 1: Section G (1G.3)			
G.4. For off-site waste, analysis upon receipt to verify waste matches description on manifest. NR 670.0013(1)(d)	FPOR Part 1: Section G (1G.4)			
G.5. Parameters for which waste will be analyzed and rationale. NR 664.0013(2)(a)	FPOR Part 1: Section G (1G.5)			
G.6. Test methods that will be used. NR 664.0013(2)(b)	FPOR Part 1: Section G (1G.6)			
G.7. Sampling methods to obtain representative sample. NR 664.0013(2)(c)	FPOR Part 1: Section G (1G.7)			
G.8. Frequency of repeating initial analysis to ensure it is accurate and up to date. NR 664.0013(2)(d)	FPOR Part 1: Section G (1G.8)			
G.9. At a minimum, analysis is repeated if the process generating the waste has changed or when the inspection upon receiving the waste does not match the description on the manifest. NR 664.0013(1)(c).	FPOR Part 1: Section G (1G.9)			
G.10. For off-site waste, the waste analysis generators agree to supply. NR 664.0013(2)(e)	FPOR Part 1: Section G (1G.10)			
G.11. If ignitable, reactive or incompatible wastes are managed, the waste analysis methods used to comply with NR 664.0017(3). NR 664.0013(2)(f)	FPOR Part 1: Section G (1G.11)			
G.12. If the facility is subject to NR 664 subch. AA standards for process vents, the test methods and procedures used to comply with NR 664.1034(4). NR 664.0013(2)(f)	FPOR Part 1: Section G (1G.12)			
G.13. If the facility is subject to NR 664 subch. BB standards for equipment leaks, the test methods and procedures used to comply with NR 664.1063(4). NR 664.0013(2)(f)	FPOR Part 1: Section G (1G.13)			
G.14. If the facility is subject to NR 664 subch. CC standards for containers or tanks, the waste determination procedures in NR 664.1083. NR 664.0013(2)(f)	FPOR Part 1: Section G (1G.14)			
G.15. The testing performed to determine if the waste meets or exceeds LDR standards, as required by NR 668.07. NR 664.0013(2)(f)	FPOR Part 1: Section G (1G.15)			
G.16. Information if seeking exemption to subch. CC requirements. NR 664.0013(2)(h)	FPOR Part 1: Section G (1G.16)			
G.17. For off-site waste, procedures used to inspect, and if necessary, analyze each movement of waste to ensure it matches the identity of the waste designated on the manifest. NR 664.0013(3)	FPOR Part 1: Section G (1G.17)			
Section H: Security Requirements NR 670.014(2)(d)				
H.1. Security procedures to prevent unknowing entry by a 24 hour surveillance system which continuously monitors and controls entry. NR 664.0014(2)(a) OR,	FPOR Part 1: Section H (1H.1)			

H.2. The artificial or natural barrier surrounding active portions of facility and other means of controlled entry, such as gates or locked entrance AND NR 664.0014(2)(b)	FPOR Part 1: Section H (1H.2)			
H.3. The placement of "Danger – Unauthorized Persons Keep Out" signs at entrances and other locations. NR 664.0014(3)	FPOR Part 1: Section H (1H.3)			
H.4. Demonstration that the above security requirements are not necessary. NR 664.0014(1)	FPOR Part 1: Section H (1H.4)			
Section I. General Inspection Requirements NR 670.014(2)(e)				
I.1. Description of the equipment and devices inspected. NR 664.0015(2)(a)	FPOR Part 1: Section I (1H.1)			
I.2. Description of problems checked during the inspection. NR 664.0015(2)(c)	FPOR Part 1: Section I (1H.2)			
I.3. Inspection schedule for closed vent system and control device, required by NR 664.1033. NR 670.014(2)(d)	FPOR Part 1: Section I (1H.3)			
I.4. Inspection schedule for subch. BB pumps in light liquid service, required by NR 664.1052. NR 670.014(2)(d)	FPOR Part 1: Section I (1H.4)			
I.5. Inspection schedule for subch. BB compressors, required by NR 664.1053. NR 670.014(2)(d)	FPOR Part 1: Section I (1H.5)			
I.6. Inspection schedule for subch. BB pumps and valves in heavy liquid service, pressure relief devices and connectors, required by NR 664.1058. NR 670.014(2)(d)	FPOR Part 1: Section I (1H.6)			
I.7. The inspection frequency for pumps, valves, pressure relief devices or connectors subject to subch. BB is adequate to prevent environmental or human health incidents. NR 664.0015(2)(d)	FPOR Part 1: Section I (1H.7)			
I.8. Areas subject to spills inspected daily when in use. NR 664.0015(2)(d)	FPOR Part 1: Section I (1H.8)			
I.9. Inspection frequency for other areas based on deterioration of equipment and probability of environmental or human health incident if problem goes undetected between inspections. NR 664.0015(2)(d)	FPOR Part 1: Section I (1H.9)			
I.10. Schedule to remedy ensures problem does not lead to environmental or health hazard. NR 664.0015(3)	FPOR Part 1: Section I (1H.10)			
I.11. Inspection log will be kept for at least 3 years and includes date and time of inspection; inspector name; observations made; date and type of remedial actions. NR 664.0015(4)	FPOR Part 1: Section I (1H.11)			
Section J. Contingency Plan Requirements NR 670.014(2)(g)				
J.1. Copy of Contingency Plan. NR 670.014(2)(g)	FPOR Part 1: Section J (1J.1)			
J.2. Plan is designed to minimize hazards to human health or the environment in the event of a release. NR 664.0051(1)	FPOR Part 1: Section J (1J.2)			

J.3. Provisions in the plan will be carried out immediately if release threatens human health or the environment. NR 664.0051(2)	FPOR Part 1: Section J (1J.3)			
J.4. Describes actions facility personnel will take if a release. NR 664.0052(1)	FPOR Part 1: Section J (1J.4)			
J.5. If using SPCC, it has been amended to incorporate hazardous waste provisions. NR 664.0052(2)	N/A	N/A	N/A	Enviro-Safe maintains a SPCC Plan separate from the Contingency Plan.
J.6. Describes arrangements with local emergency agencies, hospitals and contractors. NR 664.0052(3)	FPOR Part 1: Section J (1J.6)			
J.7. Current list of emergency coordinator (primary and alternate) names, addresses and home/office phone numbers. NR 664.0052(4)	FPOR Part 1: Section J (1J.7)			
J.8. Current list of emergency equipment, describing location, physical description and capability of each item. NR 664.0052(5)	FPOR Part 1: Section J (1J.8)			
J.9. Evacuation plan, signals to begin evacuation and alternate routes. NR 664.0052(6)	FPOR Part 1: Section J (1J.9)			
J.10. Copy of plan kept at facility and copy sent to police and fire depts., hospital, and state and local response teams. NR 664.0053	FPOR Part 1: Section J (1J.10)			
J.11. Plan will be reviewed and amended, as necessary. NR 664.0054	FPOR Part 1: Section J (1J.11)			
J.12. Emergency coordinator always on premises or on call. NR 664.0055	FPOR Part 1: Section J (1J.12)			
J.13. Emergency coordinator is thoroughly familiar with plan, site operations, waste types handled, facility records and layout. NR 664.0055	FPOR Part 1: Section J (1J.13)			
J.14. Emergency coordinator has authority to commit resources to carry out contingency plan. NR 664.0055	FPOR Part 1: Section J (1J.14)			
J.15. Emergency coordinator activates alarms and notifies state or local agencies. NR 664.0056(1)	FPOR Part 1: Section J (1J.15)			
J.16. Emergency coordinator identifies the character, sources, amount and extent of release. NR 664.0056(2)	FPOR Part 1: Section J (1J.16)			
J.17. Emergency coordinator assesses possible hazards to human health and environment. NR 664.0056(3)	FPOR Part 1: Section J (1J.17)			
J.18. Emergency coordinator notifies local authorities if evacuation is necessary. NR 664.0056(4)(a)	FPOR Part 1: Section J (1J.18)			
J.19. Emergency coordinator notifies emergency response officials of release outside of facility. NR 664.0056(4)(b)	FPOR Part 1: Section J (1J.19)			
J.20. Emergency coordinator takes reasonable measures to ensure fire, explosion or release do not occur or spread to other hazardous waste. NR 664.0056(5)	FPOR Part 1: Section J (1J.20)			
J.21. Emergency coordinator monitors for leaks, pressure build-up, and gas generation if operations stop. NR 664.0056(6)	FPOR Part 1: Section J (1J.21)			

J.22. Emergency coordinator arranges for treatment, storage, or disposal of materials after emergency. NR 664.0056(7)	FPOR Part 1: Section J (1J.22)			
J.23. Emergency coordinator ensures no incompatible waste is treated, stored or disposed until cleanup is completed. NR 664.0056(8)(a)	FPOR Part 1: Section J (1J.23)			
J.24. Emergency coordinator ensures all emergency equipment is clean and fit for use before operations resume. NR 664.0056(8)(b)	FPOR Part 1: Section J (1J.24)			
J.25. Owner or operator notifies department and state and local authorities before resuming operations. NR 664.0056(9)	FPOR Part 1: Section J (1J.25)			
J.26. Implementation of plan will be noted in operating log and incident report sent to WDNR in 15 days. NR 664.0056(10)	FPOR Part 1: Section J (1J.26)			
Section K. Training Plan Requirements NR 670.014(2)(L)				
K.1. Outline of both introductory and continuing training programs to prepare persons to operate or maintain facility in a safe manner. NR 670.014(2)(L)	FPOR Part 1: Section K (1K.1)			
K.2. Training program teaches personnel hazardous waste management procedures relevant to the positions in which they are employed. NR 664.0016(1)(b)	FPOR Part 1: Section K (1K.2)			
K.3. Training program ensures facility personnel can respond effectively to emergencies by familiarizing them with emergency procedures, equipment and systems. NR 664.0016(1)(c)	FPOR Part 1: Section K (1K.3)			
K.4. Personnel complete training within 6 months of being in new position and before working in unsupervised positions. NR 664.0016(2)	FPOR Part 1: Section K (1K.4)			
K.5. Training documentation includes job title, job description, type and amount of training to be given and training that is completed. NR 664.0016(4)	FPOR Part 1: Section K (1K.5)			
K.6. Brief description of how training will be designed to meet actual job tasks. NR 670.014(2)(L)	FPOR Part 1: Section K (1K.6)			
Section L. Closure Plan Requirements NR 670.014(2)(m)				
L.1. Copy of Closure Plan. NR 670.014(2)(m)	FPOR Part 1: Section L (1L.1)			
L.2. Description of how each unit will close during partial or final closure to minimize the need for further maintenance. NR 664.0112(2)(a)	FPOR Part 1: Section L (1L.2)			
L.3. Description of how each unit will close during partial or final closure to control, minimize or eliminate post-closure escape of hazardous waste constituents. NR 664.0112(2)(a)	FPOR Part 1: Section L (1L.3)			
L.4. Description of the maximum extent of operations during the active life of the facility. NR 664.0112(2)(b)	FPOR Part 1: Section L (1L.4)			

L.5. Estimate of maximum inventory during active life of facility. NR 664.0112(2)(c)	FPOR Part 1: Section L (1L.5)			
L.6. Description of methods used to remove, transport, treat, store, and dispose of all hazardous waste during partial and final closure. NR 664.0112(2)(c)	FPOR Part 1: Section L (1L.6)			
L.7. Identification of the types of off-site hazardous waste management units to be used. NR 664.0112(2)(c)	FPOR Part 1: Section L (1L.7)			
L.8. Detailed description of steps needed to remove or decontaminate all hazardous waste residues and contaminated equipment, structures and soils during partial and final closure. NR 664.0112(2)(d)	FPOR Part 1: Section L (1L.8)			
L.9 Detailed description of other activities necessary to ensure all partial and final closures satisfy the closure performance standards. NR 664.0112(2)(e)	FPOR Part 1: Section L (1L.9)			
L.10. During closure of container areas, all hazardous waste and residues will be removed from the containment system; remaining contaminated structures and soil will be decontaminated or removed. NR 664.0178	FPOR Part 1: Section L (1L.10)			
L.11. During closure of tank systems, all waste residues, contaminated containment system components, soils, structures and equipment is decontaminated or removed. NR 664.0197(1)	FPOR Part 1: Section L (1L.11)			
L.12. Schedule for closure of each hazardous waste management unit and final closure of the facility. NR 664.0112(2)(f)	FPOR Part 1: Section L (1L.12)			
L.13. The estimated year of final closure if the financial mechanism is a trust fund and the facility expects to close before the operating license expires. NR 664.0112(2)(g)	FPOR Part 1: Section L (1L.13)			
L.14. Alternative requirements for closure established by the department. NR 664.0112(2)(h)	FPOR Part 1: Section L (1L.14)			
L.15. Department will be notified at least 180 days prior to partial or final closure. NR 664.0112(4)(a)	FPOR Part 1: Section L (1L.15)			
L.16. Within 90 days of receiving the final volume of hazardous waste, all hazardous waste is treated, or removed from the unit or facility. NR 664.0113(1)	FPOR Part 1: Section L (1L.16)			
L.17. Partial and final closure activities are completed within 180 days after receiving the final volume of hazardous waste. NR 664.0113(2)	FPOR Part 1: Section L (1L.17)			
L.18. All contaminated equipment, structures, and soils will be properly disposed of or decontaminated. NR 664.0114	FPOR Part 1: Section L (1L.18)			
L.19. Within 60 days of completing final closure, a certification of closure will be sent to the department. NR 664.0115	FPOR Part 1: Section L (1L.19)			

Section M: Closure Cost Estimate and Financial Responsibility NR 670.014(2)(o)

M.1. The most recent detailed written closure cost estimate in current dollars for closing the facility in accordance with the approved closure plan. NR 664.0142(1)	FPOR Part 1: Section M (1M.1)			
M.2. Cost estimate equals the cost of final closure when facility operations make closure the most expensive. NR 664.0142(1)(a)	FPOR Part 1: Section M (1M.2)			
M.3. Cost estimate is based on hiring a third party to close the facility. NR 664.0142(1)(b)	FPOR Part 1: Section M (1M.3)			
M.4. Cost estimate does not incorporate any salvage value of hazardous waste, structures, equipment, land or assets. NR 664.0142(1)(c)	FPOR Part 1: Section M (1M.4)			
M.5. Closure estimate does not include a zero cost for hazardous waste that might have economic value. NR 664.0142(1)(d)	FPOR Part 1: Section M (1M.5)			
M.6. Facility has established financial assurance that covers the closure cost estimate. NR 664.0143	FPOR Part 1: Section M (1M.6)			
M.7. The financial assurance mechanism meets all applicable requirements in NR 664.0143.	FPOR Part 1: Section M (1M.7)			
M.8. If a new facility, the financial assurance is submitted 60 days prior to initial receipt of waste. NR 670.014(2)(o)	FPOR Part 1: Section M (1M.8)			

Section N: Pollution Liability Insurance NR 670.014(2)(q)

N.1. Copy of the insurance policy or other documentation demonstrating liability coverage. NR 670.014(2)(q)	FPOR Part 1: Section N (1N.1)			
N.2. Financial responsibility covers bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility. NR 664.0147(1)	FPOR Part 1: Section N (1N.2)			
N.3. Coverage for sudden accidental occurrences of at least \$1 million per occurrence with annual aggregate of at least \$2 million. NR 664.0147(1)	FPOR Part 1: Section N (1N.3)			
N.4. If a new facility, documentation showing the amount of insurance to be in place before the initial receipt of waste. NR 670.014(2)(q).	FPOR Part 1: Section N (1N.4)			

PART II - UNIT REQUIREMENTS - CONTAINERS

Licensing Standard and Code Citation	Location In Report (Page, Section or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
Section A: Container Standards – Inspections NR 670.014(2)(e)				
A.1. Container storage areas inspected at least weekly for leaking containers and the deterioration of containers and containment system. NR 664.0174	FPOR Part 2: Section A (2A.1)			

A.2. Inspection frequency of container storage areas is adequate to prevent environmental or human health incident. NR 664.0015(2)(d)	FPOR Part 2: Section A (2A.2)			
A.3. Inspection schedule for subch. CC containers, as required by 664.1086. NR 670.014(2)(e)	FPOR Part 2: Section A (2A.3)			
A.4. Inspection schedule includes inspection and monitoring requirements in NR 664.1088 for containers. NR 670.014(2)(e)	FPOR Part 2: Section A (2A.4)			
A.5. The inspection frequencies required by subch. CC for containers are adequate to prevent environmental or human health incidents. NR 664.0015(2)(d)	FPOR Part 2: Section A (2A.5)			
Section B. Container Standards – Containment NR 670.015(1)				
B.1. Base of containment system is designed and operated to be free of cracks or gaps and sufficiently impervious to leaks and precipitation until material is removed. NR 664.0175(2)(a)	FPOR Part 2: Section B (2B.1)			
B.2. Base is sloped or containment system is designed and operated to drain and remove liquids from leaks or precipitation OR containers are elevated or otherwise protected from contacting accumulated liquids. NR 664.0175(2)(b)	FPOR Part 2: Section B (2B.2)			
B.3. Capacity of containment system is 10% of the volume of containers or the volume of the largest container, which ever is greater. Containers without free liquids need not be considered. NR 664.0175(2)(c)	FPOR Part 2: Section B (2B.3)			
B.4. Run-on into the containment system is prevented unless the containment system has sufficient excess capacity to contain it. NR 664.0175(2)(d)	FPOR Part 2: Section B (2B.4)			
B.5. Spilled waste and precipitation are removed from sump or collection area in a timely manner to prevent overflow. NR 664.0175(2)(e)	FPOR Part 2: Section B (2B.5)			
B.6. The design and operation of the containment structure complies with B.1. to B.5. for containers of F020-F023 and F026- F027 wastes that do not contain free liquids. NR 664.0175(4)	FPOR Part 2: Section B (2B.6)			
B.7. Description of basic design parameters, dimensions and materials of construction of the containment system. NR 670.015(1)(a)	FPOR Part 2: Section B (2B.7)			
B.8. Description of how the design of the containment system promotes drainage or how containers are kept from contacting standing liquids. NR 670.015(1)(b)	FPOR Part 2: Section B (2B.8)			
B.9. Description of the capacity of the containment system relative to the number and volume of containers to be stored. NR 670.015(1)(c)	FPOR Part 2: Section B (2B.9)			
B.10. Provisions for preventing or managing run-on. NR 670.015(1)(d)	FPOR Part 2: Section B (2B.10)			
B.11. How accumulated liquids will be analyzed and removed to prevent overflow. NR 670.015(1)(e)	FPOR Part 2: Section B (2B.11)			

B.12. Other than B.6., if all containers do not contain free liquids, either the storage area is sloped or otherwise designed to drain and remove precipitation; or, the containers are elevated or otherwise protected from contact with accumulated liquid. NR 670.015(2)	FPOR Part 2: Section B (2B.12)			
B.13. Test procedures and results or other documentation or information showing waste in B.12. does not contain free liquids. NR 670.015(2)(a)	FPOR Part 2: Section B (2B.13)			
B.14. Description of how the storage area for waste in B.12. is designed or operated to drain and remove liquids, or how containers with no free liquids are kept from contacting standing liquids. NR 670.015(2)(b)	FPOR Part 2: Section B (2B.14)			
Section C: Container Standards – Incompatible, Reactive, Ignitable Waste NR 670.015(3) and NR 670.015(4)				
C.1. Sketches, drawings or data demonstrating containers of ignitable or reactive waste are located at least 50 feet from the facility property line. NR 664.0176	FPOR Part 2: Section C (2C.1)			
C.2. Sketches, drawings or data demonstrating storage containers of hazardous waste that are incompatible with other waste or materials stored nearby in other containers, piles or open tanks are separated or protected by a dike, berm, wall or other device. NR 664.0177(3)	FPOR Part 2: Section C (2C.2)			
C.3. Description of procedures to ensure incompatible wastes are not placed in the same container unless the requirements in C.4. to C.10. are met. NR 670.0015(4)	FPOR Part 2: Section C (2C.3)			
C.4. Precautions taken to prevent reactions generating extreme heat or pressure, fire or explosions or violent reactions. NR 664.0017(2)(a)	FPOR Part 2: Section C (2C.4)			
C.5. Precautions taken to prevent reactions producing uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment. NR 664.0017(2)(b)	FPOR Part 2: Section C (2C.5)			
C.6. Precautions taken to prevent reactions producing uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion. NR 664.0017(2)(c)	FPOR Part 2: Section C (2C.6)			
C.7. Precautions taken to prevent reactions damaging the structural integrity of the device or facility. NR 664.0017(2)(d)	FPOR Part 2: Section C (2C.7)			
C.8. Precautions taken to prevent reactions through other means to threaten human health or the environment. NR 664.0017(2)(e)	FPOR Part 2: Section C (2C.8)			

C.9. Documentation of compliance with C.4. to C.8., based on references to published scientific or engineering literature, data from trial tests, waste analyses or the results of treatment of similar wastes or similar treatment processes and under similar operating conditions. NR 664.0017(3)	FPOR Part 2: Section C (2C.9)			
C.10. Description of procedures to ensure hazardous waste is not placed in an unwashed container that previously held an incompatible waste or material. NR 664.0177(2)	FPOR Part 2: Section C (2C.10)			

PART II - UNIT REQUIREMENTS - TANKS

Licensing Standard and Code Citation	Location In Report (Page, Section or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
Section D: Tank Standards – General NR 670.016				
D.1. Dimensions and capacity of each tank. NR 670.016(2)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
D.2. Description of feed systems, safety cutoff, bypass systems and pressure controls. NR 670.016(3)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
D.3. Diagram of piping, instrumentation and process flow for each tank system. NR 670.016(4)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
D.4. Description of spill prevention controls, such as check valves, dry disconnect couplings. NR 664.0194(2)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
D.5. Description of overflow prevention controls, such as level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank. NR 664.0194(2)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
D.6. Description of how sufficient freeboard in uncovered tanks will be maintained to prevent overtopping by wave or wind action or precipitation. NR 664.0194(2)(c)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
Section E: Tank Standards – Inspections NR 670.014(2)(e)				
E.1. Inspection schedule for tank overflow controls. NR 664.0195(1).	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
E.2. Aboveground portions of tank systems inspected at least once each operating day to detect corrosion or releases of waste. NR 664.1095(2)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
E.3. Construction materials and area immediately surrounding tank systems inspected at least once each operating day to detect erosion or signs of releases. NR 664.1095(2)(c)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.

E.4. Data gathered from monitoring and leak detection equipment inspected at least once each operating day to ensure the tank system is operated according to design. NR 664.1095(2)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
E.5. Proper operation of the cathodic protection system is confirmed by inspection within 6 months of initial installation and annually thereafter. NR 664.1095(3)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
E.6. All sources of impressed current inspected and/or tested, as appropriate, at least every other month. NR 664.1095(3)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
E.7. Inspection schedule for subch. CC tank requirements, as stated in 664.1084 and 664.1088. NR 670.014(2)(e)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
E.8. Inspection frequencies required by subch. CC for tanks are adequate to prevent environmental or human health incidents. NR 664.0015(2)(d)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
Section F: Tank Standards – Existing Tanks NR 670.016(1)				
F.1. For each tank system installed before March 1, 1991, a written assessment reviewed and certified by an independent, qualified, registered PE as to the structural integrity and suitability for handling hazardous waste which includes the information in F.2. to F.8. NR 670.016(1)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.2. Design standards for construction of the tank and ancillary equipment. NR 664.0191(2)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.3. Hazardous characteristics for the wastes handled. NR 664.0191(2)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.4. Existing corrosion protection measures. NR 664.0191(2)(c)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.5. The age of the tank system, either documented or estimated. NR 664.0191(2)(d)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.6. Results of a leak test, internal inspection or other tank integrity examination. NR 664.0191(2)(e)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.7. If underground tanks cannot be entered, a leak test capable of taking into account the effects of temperature variations, tank end deflection, vapor pockets and high water table effects. NR 664.0191(2)(e)1.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.8. If other tanks cannot be entered, a leak test or other integrity examination certified by a PE that addresses cracks, leaks, corrosion, and erosion. NR 664.0191(2)(e)2.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.

F.9. If, as a result of the assessment, the tank was found to be leaking or unfit for use, steps were taken to comply with F.10. to F.22. NR 664.0191(4)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.10. Tank system or secondary containment system removed from service immediately. NR 664.0196	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.11. Flow of hazardous waste into the tank system or secondary containment system stopped immediately and the system inspected to determine the cause of the release. NR 664.0196(1)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.12. If the release was from the tank system, as much waste as necessary was removed to prevent further releases and to allow inspection and repair of the tank system within 24 hours after detection or at the earliest practicable time. NR 664.0196(2)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.13. If the material was released to a secondary containment system, all released material was removed within 24 hours or in a timely manner to prevent harm to human health and the environment. NR 664.0196(2)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.14. Visual inspection of the release conducted. NR 664.0196(3)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.15. Further migration of the spill to soils or surface water was prevented. NR 664.0196(3)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.16. Visible contamination of the soil or surface water was removed and properly disposed. NR 664.0196(3)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.17. Release reported to the Department within 24 hours of its detection, unless less than one pound was released and material was contained and cleaned up immediately. NR 664.0196(4)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.18. Written report submitted to the Department within 30 days of detecting the release. NR 664.0196(4)(c)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.19. System was returned to service after cleanup and repairs if the integrity of the tank system was not damaged. NR 664.0196(5)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.20. If the leak was from the tank system into secondary containment, the system was repaired before the tank was returned to service. NR 664.0196(5)(c)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
F.21. If the leak was from a component that did not have secondary containment, either secondary containment will be provided or repairs are made if the component can be visually inspected. NR 664.0196(5)(d)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.

F.22. If major repairs were made, a PE certification was submitted to the Department within 7 days of returning the tank system to use. NR 664.0196(6)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
Section G: Tank Standards – New Tanks NR 670.016(1) and NR 670.016(6)				
G.1. For each new tank system, a written assessment reviewed and certified by an independent, qualified, registered PE as to the structural integrity and suitability for handling hazardous waste which includes the information in G.2. to G.19. NR 670.016(1)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.2. Design standards to which the tanks and ancillary equipment are constructed. NR 664.0192(1)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.3. Hazardous characteristics of the wastes to be handled. NR 664.0192(1)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.4. If the external shell of the metal tank or any external metal component of the tank system will be in contact with soil or water, a determination by a corrosion expert of factors affecting the potential for corrosion, including G.5. to G.9, at a minimum. NR 664.0192(1)(c)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.5. Soil moisture content, pH, sulfides level, and resistivity. NR 664.0192(1)(c)1	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.6. Structure to soil potential. NR 664.0192(1)(c)1	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.7. Influence of nearby underground metal structures, such as piping. NR 664.0192(1)(c)1	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.8. Existence of stray electric current. NR 664.0192(1)(c)1	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.9. Existing corrosion-protection measures. NR 664.0192(1)(c)1	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.10. A description of materials and equipment used to provide external corrosion protection to ensure the integrity of the tank system during its use, including one or more of those in G.11 to G.13. NR 664.0192(1)(c)2	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.11. Corrosion-resistant materials of construction such as special alloys, fiberglass, reinforced plastic, etc. NR 664.0192(1)(c)2.a.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.12. Corrosion-resistant coating with cathodic protection. NR 664.0192(1)(c)2.b.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.

G.13. Electrical isolation devices such as insulating joints, flanges, etc. NR 664.0192(1)(c)2.c.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.14. For underground tank system components that are likely to be adversely affected by vehicular traffic, the design or operational measures that will protect the tank system against potential damage. NR 664.0192(1)(d)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.15. Design considerations to ensure tank foundations will maintain the load of a full tank. NR 664.0192(1)(e)1.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.16. Design considerations to ensure tank systems will be anchored to prevent flotation or dislodgment when the tank system is placed in a saturated zone. NR 664.0192(1)(e)2.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.17. Design considerations to ensure tank systems will withstand the effects of frost heave. NR 664.0192(1)(e)3.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.18. Foundation, structural support, seams, connections and pressure controls, if needed, are adequately designed to ensure the tank system will not collapse, rupture or fail. NR 664.0192(1)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.19. The tank system has sufficient structural strength, compatibility with the wastes to be stored or treated and corrosion protection to ensure it will not collapse, rupture or fail. NR 664.0192(1)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.20. A detailed description of how the tank systems will be installed in compliance with G.21. to G.28. NR 670.016(6)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.21. Before covering, enclosing or placing a new tank system or component in use, an independent qualified installation inspector or registered PE who is trained and experienced in the proper installation of tank systems or components will inspect the system for the presence of weld breaks, punctures, scrapes of protective coatings, cracks, corrosion and other structural damage or inadequate construction or installation. NR 664.0192(2)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.22. All structural damage or inadequate construction or installation will be remedied before the tank system is covered, enclosed or placed in use. NR 664.0192(2)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.23. For tank systems or components placed underground, the backfill material is noncorrosive, porous and homogeneous, installed so the backfill is placed completely around the tank, and compacted to ensure the tank and piping are fully and uniformly supported. NR 664.0192(3)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.

G.24. All tanks and ancillary equipment will be tightness tested before being covered, enclosed or placed in use. NR 664.0192(4)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.25. If the tank system is found not to be tight, all repairs necessary to remedy the leaks in the system will be performed before the tank system is covered, enclosed or placed into use. NR 664.0192(4)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.26. Ancillary equipment is supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction. NR 664.0192(5)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.27. The type and degree of corrosion protection recommended by an independent corrosion expert is provided. NR 664.0192(6)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
G.28. If field fabricated, a corrosion expert will supervise the installation of the corrosion protection system to ensure proper installation. NR 664.0192(6)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
Section H: Tank Standards – Secondary Containment NR 670.016(7) and NR 670.016(8)				
H.1. Detailed plans and description of how the secondary containment system for each tank system meets the requirements stated in H.2. to H.9. NR 670.016(7)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.2. Designed, constructed and operated to prevent the migration of wastes or accumulated liquid out of the system to the soil, groundwater or surface water at any time during use of the tank system. NR 664.0193(2)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.3. Designed, constructed and operated to detect and collect releases and accumulated liquid until the material is removed. NR 664.0193(2)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.4. Constructed of or lined with materials that are compatible with the wastes to be placed in the tank system. NR 664.0193(3)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.5. Has sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions and stress of daily operation. NR 664.0193(3)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.6. Placed on a foundation or base capable of providing support and resistance to pressure gradients above and below the system, and preventing failure due to settlement, compression or uplift. NR 664.0193(3)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.

H.7. Provided with a leak detection system designed and operated to detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours or at the earliest practicable time unless demonstrated that existing detection technologies or site conditions will not allow detection of a release within 24 hours. NR 664.0193(3)(c)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.8. Sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation. NR 664.0193(3)(d)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.9. Spilled or leaked waste and accumulated precipitation will be removed from the secondary containment system within 24 hours or in a timely manner that prevents harm to human health and the environment if demonstrated that the material cannot be removed in 24 hours. NR 664.0193(3)(d)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.10. Detailed plans and description of how an external liner system for each tank system meets the requirements stated in H.11. to H.14. NR 670.016(7)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.11. Designed or operated to contain 100% of the capacity of the largest tank within its boundary. NR 664.0193(5)(a)1.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.12. Designed or operated to prevent run-on or infiltration of precipitation into the external liner system unless the collection system has sufficient excess capacity to contain run-on or infiltration from a 25 year, 24 hour rainfall event. NR 664.0193(5)(a)2.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.13. Free of cracks and gaps. NR 664.0193(5)(a)3.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.14. Designed and installed to surround the tank completely and cover all surrounding earth likely to come into contact with the waste if a release from the tank (capable of preventing lateral and vertical migration of waste). NR 664.0193(5)(a)4.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.15. Detailed plans and description of how a vault system for each tank system meets the requirements stated in H.16. to H.21. NR 670.016(7)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.16. Designed or operated to contain 100% of the capacity of the largest tank within its boundary. NR 664.0193(5)(b)1.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.17. Designed or operated to prevent run-on or infiltration of precipitation into the vault system unless the collection system has sufficient excess capacity to contain run-on or infiltration from a 25 year, 24 hour rainfall event. NR 664.0193(5)(b)2.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.

H.18. Constructed with chemical-resistant water stops in place at all joints. NR 664.0193(5)(b)3.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.19. Provided with an impermeable interior coating or lining compatible with the stored waste to prevent migration of waste into the concrete. NR 664.0193(5)(b)4.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.20. Provided with a means to protect against the formation and ignition of vapors within the vault, if the waste stored or treated is ignitable waste or reactive waste capable of forming ignitable or explosive vapor. NR 664.0193(5)(b)5.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.21. Provided with an exterior moisture barrier or otherwise designed or operated to prevent migration of moisture into the vault if it is subject to hydraulic pressure. NR 664.0193(5)(b)6.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.22. Detailed plans and description of how a double-walled tank system for each tank system meets the requirements stated in H.23. to H.25. NR 670.016(7)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.23. Designed as an integral structure so that the outer shell contains any release from the inner tank. NR 664.0193(5)(c)1.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.24. Protected, if constructed of metal, from both corrosion of the primary tank interior and of the external surface of the outer shell. NR 664.0193(5)(c)2.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.25. Provided with a built-in continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time if demonstrated that existing detection technology or site conditions would not allow detection of a release within 24 hours. NR 664.0193(5)(c)3.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.26. Detailed plans and description of how ancillary equipment for each tank system will be provided with secondary containment except for aboveground piping; welded flanges, joints and connections; sealless or magnetic coupling pumps and sealless valves; and, pressurized aboveground piping systems with automatic shut-off devices that are visually inspected for leaks on a daily basis. NR 664.0193(6)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
H.27. If seeking an alternative to the requirements of this section, detailed plans and engineering and hydrogeologic reports describing alternate design and operating practices; and, an evaluation of location characteristics which demonstrate the migration of hazardous waste or constituents into groundwater or surface water during the life of the facility is prevented. NR 670.016(8)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.

H.28. If seeking an alternative to the requirements of this section, a detailed assessment of the substantial present or potential hazards posed to human health or the environment should a release enter the environment. NR 670.016(8)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
Section I: Tank Standards – Ignitable, Reactive and Incompatible Wastes NR 670.016(10)				
I.1. If ignitable or reactive waste is treated, rendered or mixed before or immediately after placement in the tank system, a description of how operating procedures and tank system and facility design will ensure the resulting waste, mixture or dissolved material no longer meets the definition of ignitable or reactive waste. NR 664.0198(1)(a)1.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
I.2. If ignitable or reactive waste is treated, rendered or mixed before or immediately after placement in the tank system, a description of how operating procedures and tank system and facility design will ensure I.3. to I.7. will be met. NR 664.0198(1)(a)2.	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
I.3. Precautions taken to prevent reactions generating extreme heat or pressure, fire or explosions or violent reactions. NR 664.0017(2)(a)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
I.4. Precautions taken to prevent reactions producing uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment. NR 664.0017(2)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
I.5. Precautions taken to prevent reactions producing uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion. NR 664.0017(2)(c)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
I.6. Precautions taken to prevent reactions damaging the structural integrity of the device or facility. NR 664.0017(2)(d)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
I.7. Precautions taken to prevent reactions which, through other means, threaten human health or the environment. NR 664.0017(2)(e)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
I.8. Documentation demonstrating compliance with I.2.. to I.7., including references to published scientific or engineering literature, data from trial tests, waste analysis or the results of treatment of similar waste by similar treatment under similar operating conditions. NR 664.0017(3)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.

I.9. If ignitable or reactive waste is placed in the tank system, an alternative to I.2. to I.8. is to provide a description of how operating procedures and tank system and facility design will ensure the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react. NR 664.0198(1)(b)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
I.10. If ignitable or reactive waste is placed in the tank system, an alternative to I.2 to I.8 or I.9. is to provide a description of how operating procedures, the tank system and facility design will ensure the tank system is used solely for emergencies. NR 664.0198(1)(c)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
I.11. If the facility stores or treats ignitable or reactive waste in a tank, demonstrate compliance with the requirements to maintain protective distances between the waste management area and any public ways, streets, alleys or an adjoining property line that can be built upon, as required by Tables 2-1 to 2-6 of NFPA's "Flammable and Combustible Liquids Code. NR 664.0198(2)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
I.12. Incompatible wastes are not placed in the same tank system unless the requirements in I.3. to I.8. are met. NR 664.0199(1)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.
I.13. Hazardous waste is not placed in a tank system that previously held an incompatible waste and has not been decontaminated unless the requirements of I.3. to I.8. are met. NR 664.0199(2)	N/A	N/A	N/A	The facility does not have any hazardous waste storage tanks on-site. The site only has DOT hazardous material storage tanks.

PART II - UNIT REQUIREMENTS - MISCELLANEOUS UNITS				
Licensing Standard and Code Citation	Location In Report (Page, Section or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
Section J: Standards for Miscellaneous Units – Storage and Treatment NR 670.023				
J.1. Detailed description of the unit being used or proposed for use. NR 670.023(1)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.2. Detailed description of the physical characteristics, materials of construction and dimensions of the unit. NR 670.023(1)(a)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.3. Detailed plans and engineering reports describing how the unit will be located, designed, constructed, operated, maintained, monitored, inspected and closed to comply with J.4. to J.34. NR 670.023(1)(b)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.4. Prevention of releases that may have adverse effects on human health or the environment due to migration of waste constituents in the groundwater or subsurface environment, considering items J.5. to J.13. NR 664.0601(1)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.

J.5. The volume and physical and chemical characteristics of the waste in the unit, including potential for migration through soil, liners or other containing structures. NR 664.0601(1)(a)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.6. The hydrologic and geologic characteristics of the unit and surrounding area. NR 664.0601(1)(b)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.7. The existing quality of groundwater, including other sources of contamination and their cumulative impact on groundwater. NR 664.0601(1)(c)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.8. Quantity and direction of groundwater flow. NR 664.0601(1)(d)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.9. Proximity to and withdrawal rates of current and potential groundwater users. NR 664.0601(1)(e)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.10. Patterns of land use in the region. NR 664.0601(1)(f)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.11. Potential of migration or deposition of waste constituents into subsurface physical structures and into the root zone of food-chain crops and other vegetation. NR 664.0601(1)(g)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.12. Potential for health risks caused by human exposure to waste constituents. NR 664.0601(1)(h)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.13. Potential for damage to domestic animals, wildlife, crops, vegetation and physical structures caused by exposure to waste constituents. NR 664.0601(1)(i)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.14. Prevention of any releases that may have adverse effects on human health or the environment due to migration of waste constituents in surface water, wetlands, or on soil surface, considering J.15.- J.25. NR 664.0601(2)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.15. Volume and physical and chemical characteristics of the waste in the unit. NR 664.0601(2)a.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.16. Effectiveness and reliability of containing, confining and collecting systems and structures in preventing migration. NR 664.0601(2)b.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.17. Hydrologic characteristics of the unit and the surrounding area, including the topography of the land around the unit. NR 664.0601(2)c.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.18. Precipitation patterns in the region. NR 664.0601(2)d.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.19. Quantity, quality and direction of groundwater flow. NR 664.0601(2)e.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.20. Proximity of the unit to surface waters. NR 664.0601(2)f.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.21. Current and potential uses of nearby surface waters and any water quality standards established for those surface waters. NR 664.0601(2)g.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.

J.22. Existing quality of surface waters and surface soils, including other sources of contamination and their cumulative impact on surface waters and surface soils. NR 664.0601(2)(h)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.23. Land use patterns in the region. NR 664.0601(2)(i)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.24. Potential for health risks caused by human exposure to waste constituents. NR 664.0601(2)(j)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.25. Potential for damage to domestic animals, wildlife, crops, vegetation and physical structures caused by exposure to waste constituents. NR 664.0601(2)(k)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.26. Prevention of releases that may have adverse effects on human health or the environment due to migration of waste constituents in the air, considering J.27. to J.33. NR 664.0601(3)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.27. Volume, physical and chemical characteristics of the waste in the unit, including its potential for the emission and dispersal of gases, aerosols and particulates. NR 664.0601(3)a.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.28. Effectiveness and reliability of systems and structures to reduce or prevent emissions of hazardous constituents to the air. NR 664.0601(3)b.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.29. Operating characteristics of the unit. NR 664.0601(3)c.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.30. Atmospheric, meteorologic and topographic characteristics of the unit and the surrounding area. NR 664.0601(3)d.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.31. Existing quality of the air, including other sources of contamination and their cumulative impact on the air. NR 664.0601(3)e.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.32. Potential for health risks caused by human exposure to waste constituents. NR 664.0601(3)f.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.33. Potential for damage to domestic animals, wildlife, crops, vegetation and physical structures caused by exposure to waste constituents. NR 664.0601(3)g.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.34. Inspection procedures and frequencies minimize or prevent releases that may have adverse effects on human health or the environment. NR 664.0602	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.35. Detailed hydrologic, geologic and meteorologic assessments and land-use maps for the region surrounding the site that address and ensure compliance of the unit with each factor in J.4. to J.33. NR 670.023(2)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.

J.36. Only preliminary hydrologic, geologic and meteorologic assessments are submitted if the applicant demonstrates they do not violate the environmental performance standards in J.4. to J.33. NR 670.023(2)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.37. Information on the potential pathways of exposure of humans or environmental receptors to hazardous waste constituents and the potential magnitude and nature of exposures. NR 670.023(3)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.38. For treatment units, a report on a demonstration of the effectiveness of the treatment based on laboratory or field data. NR 670.023(4)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.39. Additional information necessary to evaluate if the unit complies with the environmental performance standards in J.4 to J.33., as determined by the department. NR 670.023(5)	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.40. If an existing miscellaneous unit located in a 100-year floodplain is not designed, constructed, operated and maintained to prevent washout, a demonstration that no adverse effects on human health or the environment will result if washout occurs, considering the volume and physical and chemical characteristics of the waste, and the concentrations and potential impacts of hazardous constituents on surface waters, sediments or soils. NR 664.0018(2)(a)2	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.
J.41. If an existing miscellaneous unit is not in compliance with J.40. and there are no procedures to move the waste to a location that is not vulnerable to flood waters, a plan and schedule to bring the facility into compliance. NR 670.014(2)(k)5.	N/A	N/A	N/A	The facility does not treat, store or dispose of hazardous waste in miscellaneous units.

PART III - AA

Licensing Standard and Code Citation	Location In Report (Page, Section or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
Section K: Subch. AA – Air Emission Control Standards for Process Vents NR 670.024				
K.1. Documentation of compliance with the process vent standards in NR 664.1032, including K.2. to K.6. NR 670.024(2)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.2. A facility plot plan and information identifying the hazardous waste management units in the facility, the approximate location of each affected hazardous waste management unit in the facility and all affected process vents. NR 670.024(2)(a)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.

K.3. Information on annual throughput and operating hours of each affected unit, estimated emission rates for each affected vent and the overall facility. NR 670.024(2)(a)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.4. Information and data supporting estimates of vent emissions and emission reduction achieved by add-on control devices based on engineering calculations or source tests. NR 670.024(2)(b)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.5. Estimates of vent emissions and emission reductions are made using operating parameter values that represent the conditions that exist when the waste management unit is operating at the highest load or capacity level reasonably expected to occur. NR 670.024(2)(b)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.6. Information and data used to determine whether or not a process vent is subject to NR 664.1032. NR 670.024(2)(c)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.7. Documentation of compliance with NR 664.1033, including information in K.8 to K.13. NR 670.024(4)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.8. List of all information references and sources used in preparing the documentation. NR 670.024(4)(a)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.9. Records, including the dates of each compliance test required by NR 664.1033(11). NR 670.024(4)(b)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.10. Design analysis, specifications, drawings, schematics, and piping and instrumentation diagrams based on APTI Course 41.5 or other acceptable references. NR 670.024(4)(c)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.11. Design analysis addresses the vent stream characteristic and control device operation parameters specified in NR 664.1035(2)(d). NR 670.024(4)(c)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.12. Statement signed and dated by the owner/operator certifying the operating parameters used in the design analysis reasonably represent conditions that exist when the unit operates at the highest capacity reasonably expected to occur. NR 670.024(4)(d)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.13. Statement signed and dated by the owner/operator certifying the control device for the affected process vents is designed to operate at the required efficiency levels. NR 670.024(4)(e)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.
K.14. If applying to use an alternate control device, a performance test plan if using test data. NR 670.024(3)	N/A	N/A	N/A	The facility does not have process vents subject to NR 664 subch. AA.

PART III - BB				
Licensing Standard and Code Citation	Location In Report (Page, Section or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments

Section L: Subch. BB – Air Emission Control Standards for Equipment NR 670.025				
L.1. For each piece of equipment subject to subch. BB, the information in L.2. to L.7. NR 670.025(1)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.2. Equipment identification number and hazardous waste management unit identification. NR 670.025(1)(a)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.3. Approximate location within the facility, as identified on a facility plot plan. NR 670.025(1)(b)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.4. Type of equipment. NR 670.025(1)(c)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.5. Percent by weight total organics in the hazardous waste stream at each piece of equipment. NR 670.025(1)(d)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.6. Hazardous waste state (gas, vapor, etc.) at each piece of equipment. NR 670.025(1)(e)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.7. Method of compliance with the applicable subch. BB standard. NR 670.025(1)(f)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.8. Documentation demonstrating compliance with the equipment standards in NR 664.1052 to 664.1059, including records required by NR 664.1064. NR 670.025(4)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.9. Additional documentation necessary to determine compliance with the subch. BB standards. NR 670.025(4)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.10. Documentation demonstrating compliance with NR 664.1060 includes the information in L.11 to L.17. NR 670.025(5)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.11. List of all information references and sources used to prepare the documentation. NR 670.025(5)(a)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.12. Records, including the dates, of each compliance test required by NR 664.1033(10). NR 670.025(5)(b)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.13. Design analysis, specifications, drawings, schematics and piping and instrumentation diagrams based on the appropriate sections of ATPI Course 415 or other engineering text that present basic control device design information. NR 670.025(5)(c)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.14. Design analysis addresses the vent stream characteristics and control device operation parameters in NR 664.1035(2)(d)3. NR 670.025(5)(c)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.15. Statement signed and dated by the owner/operator certifying the operating parameters used in the design analysis reasonably represent the conditions when the unit is operating at the highest capacity level reasonably expected to occur. NR 670.025(5)(d)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
L.16. Statement signed and dated by the owner/operator certifying the control device is designed to operate at an efficiency of ≥ 95 weight %. NR 670.025(5)(e)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.

L.17. If applying to use an alternate control device, a performance test plan if using test data. NR 670.025(3)	N/A	N/A	N/A	The facility does not have equipment subject to NR 664 subch. BB.
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PART III - CC				
Licensing Standard and Code Citation	Location In Report (Page, Section or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
Section M: Subch. CC – Air Emission Control Standards for Containers and Tanks NR 670.027				
M.1. Documentation for each floating roof cover installed on a tank subject to NR 664.1084(4)(a) or (b). NR 670.027(1)(a)	FPOR Part 3: Section M (3M.1)			
M.2. Identification of each container area subject to subch. CC. NR 670.027(1)(b)	FPOR Part 3: Section M (3M.2)			
M.3. Owner/operator certification that the requirements of subch. CC are met for container storage areas. NR 670.027(1)(b)	FPOR Part 3: Section M (3M.3)			
M.4. Documentation for each enclosure used to control air emissions from containers per NR 664.1086(5)(a)2 and tanks per NR 664.1084(4)(e). NR 670.027(1)(c)	FPOR Part 3: Section M (3M.4)			
M.5. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria of a permanent total enclosure as specified by Procedure T in 40 CFR 52.741, appendix B. NR 670.027(1)(c)	FPOR Part 3: Section M (3M.5)			
M.6. Documentation for each closed-vent system and control device installed according to NR 664.1087, including design and performance information. NR 670.027(1)(e)	FPOR Part 3: Section M (3M.6)			
M.7. An emission monitoring plan for Method 21 in 40 CFR part 60 Appendix A and control device monitoring methods. NR 670.027(1)(f)	FPOR Part 3: Section M (3M.7)			

APPENDIX B: OWNER, OPERATOR, SUBPART CC AND PE CERTIFICATIONS

B-01 Owner's and Operator's Certification Statement

B-02 PE Certification

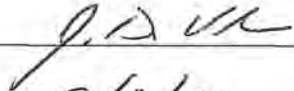
B-03 Subpart CC Certification

APPENDIX B-01

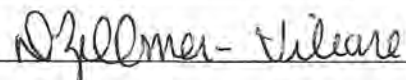
Owner's and Operator's Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner's Certification

NAME: Jeffrey D. Vilione
TITLE: Founder/President
COMPANY: JDV Real Estate Holding, LLC.
SIGNATURE: 
DATE: 9/2/22

Operator's Certification

NAME: Dawn Zellmer-Vilione
TITLE: CEO/Operations
COMPANY: Enviro-Safe Resource Recovery
SIGNATURE: 
DATE: 9/2/2022

APPENDIX B-02 Professional Engineer Certification

I, Gregg Prossen, hereby certify that I am a licensed professional engineer in the State of Wisconsin in accordance with the requirements of chapter A-E 4, Wisconsin Adm. Code, and that the below listed technical data, such as design drawings and specifications and engineering studies, to the best of my knowledge, is correct and the documents were prepared in compliance with all applicable requirements in chs. NR670, Wis. Adm. Code. In addition, I certify that the facility has been constructed in substantial compliance with the Feasibility and Plan of Operation Report per NR 664.0025.

- G-03 Topographical Map
- G-04 Facility Map
- G-05 Secondary Containment Map
- G-08 Container Storage Map

NAME: Gregg M. Prossen, P.E.

TITLE: Principle

COMPANY: The Consortium ae, LLC.

REGISTRATION NO: E-28075

STATE: Wisconsin



APPENDIX B-03 Subpart CC Certification Statement

In accordance with the specific feasibility and plan of operation report information requirements for air emission controls for tanks, surface impoundments, and containers [WDNR NR 670.027(1)(b)], Enviro-Safe Consulting, LLC. (dBA Enviro-Safe Resource Recovery) certifies that the following container storage area located at W130 N10500 Washington Driver, Germantown, Wisconsin are subject to Subpart CC Ch. NR 664 and the requirements of this subchapter are met.

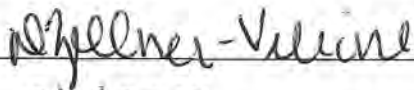
- Container Storage Area (RM 124)
- Container Storage Area (RM 125)
- Container Storage Area (RM 126)
- Container Storage Area (East Loading Docks #2, #3 and #4)
- Container Storage Area (Tanker Loading Pads #1 and #2)

CERTIFICATION

NAME: Dawn Zellmer-Vilione

TITLE: CEO/Operations

COMPANY: Enviro-Safe Resource Recovery

SIGNATURE: 

DATE: 9/2/2022

APPENDIX C: PART A APPLICATION

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM



1. Reason for Submittal (Select only one.)

<input type="checkbox"/>	Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity)
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility and/or generator of $\geq 1,000$ kg of non-acute hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input type="checkbox"/>	Submitting a new or revised Part A Form

2. Site EPA ID Number

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3. Site Name

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4. Site Location Address

Street Address		
City, Town, or Village		County
State	Country	Zip Code

5. Site Mailing Address

Same as Location Address

Street Address		
City, Town, or Village		
State	Country	Zip Code

6. Site Land Type

<input type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal	<input type="checkbox"/> Tribal	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
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7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary)	C.
B.	D.

EPA ID Number

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8. Site Contact Information

Same as Location Address

First Name	MI	Last Name
Title		
Street Address		
City, Town, or Village		
State	Country	Zip Code
Email		
Phone	Ext	Fax

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner

Same as Location Address

Full Name	Date Became Owner (mm/dd/yyyy)
Owner Type <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
Street Address	
City, Town, or Village	
State	Country
Zip Code	
Email	
Phone	Ext
Fax	
Comments	

B. Name of Site's Legal Operator

Same as Location Address

Full Name	Date Became Operator (mm/dd/yyyy)
Operator Type <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
Street Address	
City, Town, or Village	
State	Country
Zip Code	
Email	
Phone	Ext
Fax	
Comments	

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities

<input type="checkbox"/> Y	<input type="checkbox"/> N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c	
	<input type="checkbox"/>	a. LQG	-Generates, in any calendar month (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
	<input type="checkbox"/>	b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
	<input type="checkbox"/>	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
<input type="checkbox"/> Y	<input type="checkbox"/> N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section. <i>Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.</i>	
<input type="checkbox"/> Y	<input type="checkbox"/> N	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities.	
<input type="checkbox"/> Y	<input type="checkbox"/> N	4. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y	<input type="checkbox"/> N	5 Recycler of Hazardous Waste	
	<input type="checkbox"/>	a. Recycler who stores prior to recycling	
	<input type="checkbox"/>	b. Recycler who does not store prior to recycling	
<input type="checkbox"/> Y	<input type="checkbox"/> N	6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.	
	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption	
	<input type="checkbox"/>	b. Smelting, Melting, and Refining Furnace Exemption	

B. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page if more spaces are needed.

C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes. Please list the waste codes of the State hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

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11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)

A. Other Waste Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	1. Transporter of Hazardous Waste—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Underground Injection Control
<input type="checkbox"/> Y <input type="checkbox"/> N	3. United States Importer of Hazardous Waste
<input type="checkbox"/> Y <input type="checkbox"/> N	4. Recognized Trader—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter
<input type="checkbox"/> Y <input type="checkbox"/> N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter

B. Universal Waste Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If “Yes” mark all that apply. Note: Refer to your State regulations to determine what is regulated.
<input type="checkbox"/>	a. Batteries
<input type="checkbox"/>	b. Pesticides
<input type="checkbox"/>	c. Mercury containing equipment
<input type="checkbox"/>	d. Lamps
<input type="checkbox"/>	e. Other (specify) _____
<input type="checkbox"/>	f. Other (specify) _____
<input type="checkbox"/>	g. Other (specify) _____
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	1. Used Oil Transporter—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Used Oil Processor and/or Re-refiner—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Processor
<input type="checkbox"/>	b. Re-refiner
<input type="checkbox"/> Y <input type="checkbox"/> N	3. Off-Specification Used Oil Burner
<input type="checkbox"/> Y <input type="checkbox"/> N	4. Used Oil Fuel Marketer—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
<input type="checkbox"/>	b. Marketer Who First Claims the Used Oil Meets the Specifications

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D. Pharmaceutical Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	1. Operating under 40 CFR 266 Subpart P for the management of hazardous waste pharmaceuticals—if “Yes”, mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor.
<input type="checkbox"/>	a. Healthcare Facility
<input type="checkbox"/>	b. Reverse Distributor
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Withdrawing from operating under 40 CFR 266 Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is no longer an LQG or SQG.

12. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR 262 Subpart K.

<input type="checkbox"/> Y <input type="checkbox"/> N	A. Opting into or currently operating under 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories— If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
<input type="checkbox"/>	1. College or University
<input type="checkbox"/>	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/>	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/> Y <input type="checkbox"/> N	B. Withdrawing from 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories.

13. Episodic Generation

<input type="checkbox"/> Y <input type="checkbox"/> N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If “Yes”, you must fill out the Addendum for Episodic Generator?
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14. LQG Consolidation of VSQG Hazardous Waste

<input type="checkbox"/> Y <input type="checkbox"/> N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If “Yes”, you must fill out the Addendum for LQG Consolidation of VSQGs hazardous waste.
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15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

<input type="checkbox"/> Y <input type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
A. <input type="checkbox"/> Central Accumulation Area (CAA) or <input type="checkbox"/> Entire Facility	
B. Expected closure date: _____ mm/dd/yyyy	
C. Requesting new closure date: _____ mm/dd/yyyy	
D. Date closed : _____ mm/dd/yyyy	
<input type="checkbox"/> 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8)	
<input type="checkbox"/> 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)	

16. Notification of Hazardous Secondary Material (HSM) Activity

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
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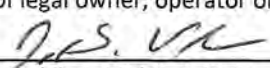
17. Electronic Manifest Broker

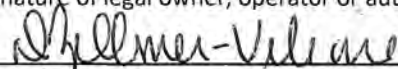
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
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18. Comments (include item number for each comment)

The RCRA Subtitle C Activity Form (Site Identification Form 8700-12) is being submitted as part of the application for a hazardous waste treatment, storage and disposal facility (TSDF) license and Feasibility and Plan of Operation Report (FPOR) and is accompanied by EPA Hazardous Waste Permit Part A Form (8700-23) and EPA Notification of Hazardous Secondary Material addendum.

19. Certification I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
	9/2/22
Printed Name (First, Middle Initial Last)	Title
Jeffrey D. Villone	Founder/President
Email	
jvillone@enviro-safe.vome	

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
	9/2/2022
Printed Name (First, Middle Initial Last)	Title
Dawn E. Zellmer-Vilione	CEO
Email	
dzellmer@enviro-safe.com	

RCRA Subtitle C Site Identification Form**Section 10.B: Continuation of Waste Codes for Federally Regulated Hazardous Waste**

D033	D034	D035	D036	D037	D038	D039	D040	D041	D042	D043	F001	F002
F003	F004	F005	F006	F007	F008	F009	F010	F011	F012	F019	F020	F021
F022	F023	F024	F025	F026	F027	F028	F032	F034	F035	F037	F038	F039
K001	K002	K003	K004	K005	K006	K007	K008	K009	K010	K011	K013	K014
K015	K016	K017	K018	K019	K020	K021	K022	K023	K024	K025	K026	K027
K028	K029	K030	K031	K032	K033	K034	K035	K036	K037	K038	K039	K040
K041	K042	K043	K044	K045	K046	K047	K048	K049	K050	K051	K052	K060
K061	K062	K069	K071	K073	K083	K084	K085	K086	K087	K088	K093	K094
K095	K096	K097	K098	K099	K100	K101	K102	K103	K104	K105	K106	K107
K108	K109	K110	K111	K112	K113	K114	K115	K116	K117	K118	K123	K124
K125	K126	K131	K132	K136	K141	K142	K143	K144	K145	K147	K148	K149
K150	K151	K156	K157	K158	K159	K161	K169	K170	K171	K172	K174	K175
K176	K177	K178	K181	P001	P002	P003	P004	P005	P006	P007	P008	P009
P010	P011	P012	P013	P014	P015	P016	P017	P018	P020	P021	P022	P023
P024	P026	P027	P028	P029	P030	P031	P033	P034	P036	P037	P038	P039
P040	P041	P042	P043	P044	P045	P046	P047	P048	P049	P050	P051	P054
P056	P057	P058	P059	P060	P062	P063	P064	P065	P066	P067	P068	P069
P070	P071	P072	P073	P074	P075	P076	P077	P078	P081	P082	P084	P085
P087	P088	P089	P092	P093	P094	P095	P096	P097	P098	P099	P101	P102
P103	P104	P105	P106	P108	P109	P110	P111	P112	P113	P114	P115	P116
P118	P119	P120	P121	P122	P123	P127	P128	P185	P188	P189	P190	P191
P192	P194	P196	P197	P198	P199	P201	P202	P203	P204	P205	U001	U002
U003	U004	U005	U006	U007	U008	U009	U010	U011	U012	U014	U015	U016
U017	U018	U019	U020	U021	U022	U023	U024	U025	U026	U027	U028	U029
U030	U031	U032	U033	U034	U035	U036	U037	U038	U039	U041	U042	U043
U044	U045	U046	U047	U048	U049	U050	U051	U052	U053	U055	U056	U057
U058	U059	U060	U061	U062	U063	U064	U066	U067	U068	U069	U070	U071
U072	U073	U074	U075	U076	U077	U078	U079	U080	U081	U082	U083	U084

U085 U086 U087 U088 U089 U090 U091 U092 U093 U094 U095 U096 U097
U098 U099 U101 U102 U103 U105 U106 U107 U108 U109 U110 U111 U112
U113 U114 U115 U116 U117 U118 U119 U120 U121 U122 U123 U124 U125
U126 U127 U128 U129 U130 U131 U132 U133 U134 U135 U136 U137 U138
U140 U141 U142 U143 U144 U145 U146 U147 U148 U149 U150 U151 U152
U153 U154 U155 U156 U157 U158 U159 U160 U161 U162 U163 U164 U165
U166 U167 U168 U169 U170 U171 U172 U173 U174 U176 U177 U178 U179
U180 U181 U182 U183 U184 U185 U186 U187 U188 U189 U190 U191 U192
U193 U194 U196 U197 U200 U201 U202 U203 U204 U205 U206 U207 U208
U209 U210 U211 U213 U214 U215 U216 U217 U218 U219 U220 U221 U222
U223 U225 U226 U227 U228 U234 U235 U236 U237 U238 U239 U240 U243
U244 U246 U247 U248 U249 U271 U278 U279 U280 U328 U353 U359 U364
U367 U372 U373 U387 U389 U394 U395 U404 U409 U410 U411

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ADDENDUM TO THE SITE IDENTIFICATION FORM: NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY



ONLY fill out this form if:

- You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 260.30, 261.4(a)(23), (24), (25), or (27) (or state equivalent; See <https://www.epa.gov/epawaste/hazard/dsw/statespf.htm> for a list of eligible states; AND
- You are or will be managing excluded HSM in compliance with 40 CFR 260.30, 261.4(a)(23), (24), (25), or (27) (or state equivalent) or have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section. Note: If your facility was granted a solid waste variance under 40 CFR 260.30 prior to July 13, 2015, your management of HSM under 40 CFR 260.30 is grandfathered under the previous regulations and you are not required to notify for the HSM management activity excluded under 40 CFR 260.30.

1. Reason for Notification (Include dates where requested)

Facility will begin managing excluded HSM as of _____ (mm/dd/yyyy).

Facility is still managing excluded HSM/re-notifying as required by March 1 of each even-numbered year.

Facility has stopped managing excluded HSM as of _____ (mm/dd/yyyy) and is notifying as required.

2. Description of Excluded HSM Activity. Please list the appropriate codes (see Code List section of the instructions) and quantities, in short tons, to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

A. Facility Code	B. Waste Code(s) for HSM	C. Estimate Short Tons of excluded HSM to be managed annually	D. Actual Short Tons of excluded HSM that was managed during the most recent odd-numbered year	E. Land-based Unit Code

Notification of Hazardous Secondary Material Activity**Section 2.B: Description of Excluded HSM Activity - Waste Code(s) for HSM**

D001	D002	D003	D004	D005	D006	D007	D008	D009	D010	D011	D012	D013
D014	D015	D016	D017	D018	D019	D020	D021	D022	D023	D024	D025	D026
D027	D028	D029	D030	D031	D032	D033	D034	D035	D036	D037	D038	D039
D040	D041	D042	D043	F001	F002	F003	F004	F005	F006	F007	F008	F009
F010	F011	F012	F019	F020	F021	F022	F023	F024	F025	F026	F027	F028
F032	F034	F035	F037	F038	F039	K001	K002	K003	K004	K005	K006	K007
K008	K009	K010	K011	K013	K014	K015	K016	K017	K018	K019	K020	K021
K022	K023	K024	K025	K026	K027	K028	K029	K030	K031	K032	K033	K034
K035	K036	K037	K038	K039	K040	K041	K042	K043	K044	K045	K046	K047
K048	K049	K050	K051	K052	K060	K061	K062	K069	K071	K073	K083	K084
K085	K086	K087	K088	K093	K094	K095	K096	K097	K098	K099	K100	K101
K102	K103	K104	K105	K106	K107	K108	K109	K110	K111	K112	K113	K114
K115	K116	K117	K118	K123	K124	K125	K126	K131	K132	K136	K141	K142
K143	K144	K145	K147	K148	K149	K150	K151	K156	K157	K158	K159	K161
K169	K170	K171	K172	K174	K175	K176	K177	K178	K181	P001	P002	P003
P004	P005	P006	P007	P008	P009	P010	P011	P012	P013	P014	P015	P016
P017	P018	P020	P021	P022	P023	P024	P026	P027	P028	P029	P030	P031
P033	P034	P036	P037	P038	P039	P040	P041	P042	P043	P044	P045	P046
P047	P048	P049	P050	P051	P054	P056	P057	P058	P059	P060	P062	P063
P064	P065	P066	P067	P068	P069	P070	P071	P072	P073	P074	P075	P076
P077	P078	P081	P082	P084	P085	P087	P088	P089	P092	P093	P094	P095
P096	P097	P098	P099	P101	P102	P103	P104	P105	P106	P108	P109	P110
P111	P112	P113	P114	P115	P116	P118	P119	P120	P121	P122	P123	P127
P128	P185	P188	P189	P190	P191	P192	P194	P196	P197	P198	P199	P201
P202	P203	P204	P205	U001	U002	U003	U004	U005	U006	U007	U008	U009
U010	U011	U012	U014	U015	U016	U017	U018	U019	U020	U021	U022	U023
U024	U025	U026	U027	U028	U029	U030	U031	U032	U033	U034	U035	U036

U037 U038 U039 U041 U042 U043 U044 U045 U046 U047 U048 U049 U050
U051 U052 U053 U055 U056 U057 U058 U059 U060 U061 U062 U063 U064
U066 U067 U068 U069 U070 U071 U072 U073 U074 U075 U076 U077 U078
U079 U080 U081 U082 U083 U084 U085 U086 U087 U088 U089 U090 U091
U092 U093 U094 U095 U096 U097 U098 U099 U101 U102 U103 U105 U106
U107 U108 U109 U110 U111 U112 U113 U114 U115 U116 U117 U118 U119
U120 U121 U122 U123 U124 U125 U126 U127 U128 U129 U130 U131 U132
U133 U134 U135 U136 U137 U138 U140 U141 U142 U143 U144 U145 U146
U147 U148 U149 U150 U151 U152 U153 U154 U155 U156 U157 U158 U159
U160 U161 U162 U163 U164 U165 U166 U167 U168 U169 U170 U171 U172
U173 U174 U176 U177 U178 U179 U180 U181 U182 U183 U184 U185 U186
U187 U188 U189 U190 U191 U192 U193 U194 U196 U197 U200 U201 U202
U203 U204 U205 U206 U207 U208 U209 U210 U211 U213 U214 U215 U216
U217 U218 U219 U220 U221 U222 U223 U225 U226 U227 U228 U234 U235
U236 U237 U238 U239 U240 U243 U244 U246 U247 U248 U249 U271 U278
U279 U280 U328 U353 U359 U364 U367 U372 U373 U387 U389 U394 U395
U404 U409 U410 U411

EPA ID Number

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United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT PART A FORM



1. Facility Permit Contact

First Name	MI	Last Name
Title		
Email		
Phone	Ext	Fax

2. Facility Permit Contact Mailing Address

Street Address		
City, Town, or Village		
State	Country	Zip Code

3. Facility Existence Date (mm/dd/yyyy)

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4. Other Environmental Permits

A. Permit Type	B. Permit Number												C. Description	

5. Nature of Business

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EPA ID Number

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6. Process Codes and Design Capacities

Line Number	A. Process Code				B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes																
				(1) Process Codes					(2) Process Description (if code is not entered in 7.D1)											
See Additional Pages																				

8. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

9. Facility Drawing

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

10. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. See instructions for more detail.

11. Comments

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
							(1) Process Codes								(2) Process Description (if code is not entered in 7.D1)		
X	1	D	0	0	1	8800	T	S	0	1	T	0	4	0	0	0	
X	2	D	0	0	2	250	T	S	0	1	T	0	4	0	0	0	
X	3	D	0	0	3	250	T	S	0	1	T	0	4	0	0	0	
X	4	D	0	0	4	250	T	S	0	1	T	0	4	0	0	0	
X	5	D	0	0	5	250	T	S	0	1	T	0	4	0	0	0	
X	6	D	0	0	6	250	T	S	0	1	T	0	4	0	0	0	
X	7	D	0	0	7	250	T	S	0	1	T	0	4	0	0	0	
X	8	D	0	0	8	250	T	S	0	1	T	0	4	0	0	0	
X	9	D	0	0	9	250	T	S	0	1	T	0	4	0	0	0	
1	0	D	0	1	0	250	T	S	0	1	T	0	4	0	0	0	
1	1	D	0	1	1	250	T	S	0	1	T	0	4	0	0	0	
1	1	D	0	1	1	50	T	S	0	1	T	0	4	0	0	0	
1	2	D	0	1	2	50	T	S	0	1	T	0	4	0	0	0	
1	3	D	0	1	3	50	T	S	0	1	T	0	4	0	0	0	
1	4	D	0	1	4	50	T	S	0	1	T	0	4	0	0	0	
1	5	D	0	1	5	50	T	S	0	1	T	0	4	0	0	0	
1	6	D	0	1	6	50	T	S	0	1	T	0	4	0	0	0	
1	7	D	0	1	7	50	T	S	0	1	T	0	4	0	0	0	
1	8	D	0	1	8	50	T	S	0	1	T	0	4	0	0	0	
1	9	D	0	1	9	50	T	S	0	1	T	0	4	0	0	0	
2	0	D	0	2	0	50	T	S	0	1	T	0	4	0	0	0	
2	1	D	0	2	1	50	T	S	0	1	T	0	4	0	0	0	
2	2	D	0	2	2	50	T	S	0	1	T	0	4	0	0	0	
2	3	D	0	2	3	50	T	S	0	1	T	0	4	0	0	0	
2	4	D	0	2	4	50	T	S	0	1	T	0	4	0	0	0	
2	5	D	0	2	5	50	T	S	0	1	T	0	4	0	0	0	
2	6	D	0	2	6	50	T	S	0	1	T	0	4	0	0	0	
2	7	D	0	2	7	50	T	S	0	1	T	0	4	0	0	0	
2	8	D	0	2	8	50	T	S	0	1	T	0	4	0	0	0	
2	9	D	0	2	9	50	T	S	0	1	T	0	4	0	0	0	
3	0	D	0	3	0	50	T	S	0	1	T	0	4	0	0	0	
3	1	D	0	3	1	50	T	S	0	1	T	0	4	0	0	0	
3	2	D	0	3	2	50	T	S	0	1	T	0	4	0	0	0	
3	3	D	0	3	3	50	T	S	0	1	T	0	4	0	0	0	
3	4	D	0	3	4	50	T	S	0	1	T	0	4	0	0	0	
3	5	D	0	3	5	100	T	S	0	1	T	0	4	0	0	0	
3	6	D	0	3	6	50	T	S	0	1	T	0	4	0	0	0	
3	7	D	0	3	7	50	T	S	0	1	T	0	4	0	0	0	
3	8	D	0	3	8	50	T	S	0	1	T	0	4	0	0	0	
3	9	D	0	3	9	50	T	S	0	1	T	0	4	0	0	0	
4	0	D	0	4	0	50	T	S	0	1	T	0	4	0	0	0	
4	1	D	0	4	1	50	T	S	0	1	T	0	4	0	0	0	
4	2	D	0	4	2	50	T	S	0	1	T	0	4	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
							(1) Process Codes										(2) Process Description (if code is not entered in 7.D1)
4	3	D	0	4	3	50	T	S	0	1	T	0	4	0	0	0	
4	4	F	0	0	1	250	T	S	0	1	T	0	4	0	0	0	
4	5	F	0	0	2	250	T	S	0	1	T	0	4	0	0	0	
4	6	F	0	0	3	250	T	S	0	1	T	0	4	0	0	0	
4	7	F	0	0	4	250	T	S	0	1	T	0	4	0	0	0	
4	8	F	0	0	5	500	T	S	0	1	T	0	4	0	0	0	
4	9	F	0	0	6	100	T	S	0	1	T	0	4	0	0	0	
5	0	F	0	0	7	50	T	S	0	1	T	0	4	0	0	0	
5	1	F	0	0	8	50	T	S	0	1	T	0	4	0	0	0	
5	2	F	0	0	9	50	T	S	0	1	T	0	4	0	0	0	
5	3	F	0	1	0	50	T	S	0	1	T	0	4	0	0	0	
5	4	F	0	1	1	50	T	S	0	1	T	0	4	0	0	0	
5	5	F	0	1	2	50	T	S	0	1	T	0	4	0	0	0	
5	6	F	0	1	9	50	T	S	0	1	T	0	4	0	0	0	
5	7	F	0	2	0	2	T	S	0	1	0	0	0	0	0	0	
5	8	F	0	2	1	2	T	S	0	1	0	0	0	0	0	0	
5	9	F	0	2	2	2	T	S	0	1	0	0	0	0	0	0	
6	0	F	0	2	3	2	T	S	0	1	0	0	0	0	0	0	
6	1	F	0	2	4	50	T	S	0	1	0	0	0	0	0	0	
6	2	F	0	2	5	50	T	S	0	1	0	0	0	0	0	0	
6	3	F	0	2	6	2	T	S	0	1	0	0	0	0	0	0	
6	4	F	0	2	7	2	T	S	0	1	0	0	0	0	0	0	
6	5	F	0	2	8	2	T	S	0	1	0	0	0	0	0	0	
6	6	F	0	3	2	50	T	S	0	1	T	0	4	0	0	0	
6	7	F	0	3	4	50	T	S	0	1	T	0	4	0	0	0	
6	8	F	0	3	5	50	T	S	0	1	T	0	4	0	0	0	
6	9	F	0	3	7	50	T	S	0	1	T	0	4	0	0	0	
7	0	F	0	3	8	50	T	S	0	1	T	0	4	0	0	0	
7	1	F	0	3	9	50	T	S	0	1	T	0	4	0	0	0	
7	2	K	0	0	1	50	T	S	0	1	T	0	4	0	0	0	
7	3	K	0	0	2	50	T	S	0	1	T	0	4	0	0	0	
7	4	K	0	0	3	50	T	S	0	1	T	0	4	0	0	0	
7	5	K	0	0	4	50	T	S	0	1	T	0	4	0	0	0	
7	6	K	0	0	5	50	T	S	0	1	T	0	4	0	0	0	
7	7	K	0	0	6	50	T	S	0	1	T	0	4	0	0	0	
7	8	K	0	0	7	50	T	S	0	1	T	0	4	0	0	0	
7	9	K	0	0	8	50	T	S	0	1	T	0	4	0	0	0	
8	0	K	0	0	9	50	T	S	0	1	T	0	4	0	0	0	
8	1	K	0	1	0	50	T	S	0	1	T	0	4	0	0	0	
8	2	K	0	1	1	50	T	S	0	1	T	0	4	0	0	0	
8	3	K	0	1	3	50	T	S	0	1	T	0	4	0	0	0	
8	4	K	0	1	4	50	T	S	0	1	T	0	4	0	0	0	
8	5	K	0	1	5	50	T	S	0	1	T	0	4	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.					B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									
								(1) Process Codes								(2) Process Description (if code is not entered in 7.D1)	
8	6	K	0	1	6	50	T	S	0	1	T	0	4	0	0	0	
8	7	K	0	1	7	50	T	S	0	1	T	0	4	0	0	0	
8	8	K	0	1	8	50	T	S	0	1	T	0	4	0	0	0	
8	9	K	0	1	9	50	T	S	0	1	T	0	4	0	0	0	
9	0	K	0	2	0	50	T	S	0	1	T	0	4	0	0	0	
9	1	K	0	2	1	50	T	S	0	1	T	0	4	0	0	0	
9	2	K	0	2	2	50	T	S	0	1	T	0	4	0	0	0	
9	3	K	0	2	3	50	T	S	0	1	T	0	4	0	0	0	
9	4	K	0	2	4	50	T	S	0	1	T	0	4	0	0	0	
9	5	K	0	2	5	50	T	S	0	1	T	0	4	0	0	0	
9	6	K	0	2	6	50	T	S	0	1	T	0	4	0	0	0	
9	7	K	0	2	7	50	T	S	0	1	T	0	4	0	0	0	
9	8	K	0	2	8	50	T	S	0	1	T	0	4	0	0	0	
9	9	K	0	2	9	50	T	S	0	1	T	0	4	0	0	0	
10	0	K	0	3	0	50	T	S	0	1	T	0	4	0	0	0	
10	1	K	0	3	1	50	T	S	0	1	T	0	4	0	0	0	
10	2	K	0	3	2	50	T	S	0	1	T	0	4	0	0	0	
10	3	K	0	3	3	50	T	S	0	1	T	0	4	0	0	0	
10	4	K	0	3	4	50	T	S	0	1	T	0	4	0	0	0	
10	5	K	0	3	5	50	T	S	0	1	T	0	4	0	0	0	
10	6	K	0	3	6	50	T	S	0	1	T	0	4	0	0	0	
10	7	K	0	3	7	50	T	S	0	1	T	0	4	0	0	0	
10	8	K	0	3	8	50	T	S	0	1	T	0	4	0	0	0	
10	9	K	0	3	9	50	T	S	0	1	T	0	4	0	0	0	
11	0	K	0	4	0	50	T	S	0	1	T	0	4	0	0	0	
11	1	K	0	4	1	50	T	S	0	1	T	0	4	0	0	0	
11	2	K	0	4	2	50	T	S	0	1	T	0	4	0	0	0	
11	3	K	0	4	3	50	T	S	0	1	T	0	4	0	0	0	
11	4	K	0	4	4	50	T	S	0	1	T	0	4	0	0	0	
11	5	K	0	4	5	50	T	S	0	1	T	0	4	0	0	0	
11	6	K	0	4	6	50	T	S	0	1	T	0	4	0	0	0	
11	7	K	0	4	7	50	T	S	0	1	T	0	4	0	0	0	
11	8	K	0	4	8	50	T	S	0	1	T	0	4	0	0	0	
11	9	K	0	4	9	50	T	S	0	1	T	0	4	0	0	0	
12	0	K	0	5	0	50	T	S	0	1	T	0	4	0	0	0	
12	1	K	0	5	1	50	T	S	0	1	T	0	4	0	0	0	
12	2	K	0	5	2	50	T	S	0	1	T	0	4	0	0	0	
12	3	K	0	6	0	50	T	S	0	1	T	0	4	0	0	0	
12	4	K	0	6	1	50	T	S	0	1	T	0	4	0	0	0	
12	5	K	0	6	2	50	T	S	0	1	T	0	4	0	0	0	
12	6	K	0	6	9	50	T	S	0	1	T	0	4	0	0	0	
12	7	K	0	7	1	50	T	S	0	1	T	0	4	0	0	0	
12	8	K	0	7	3	50	T	S	0	1	T	0	4	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
							(1) Process Codes								(2) Process Description <small>(if code is not entered in 7.D1)</small>		
12	9	K	0	8	3	50	T	S	0	1	T	0	4	0	0	0	
13	0	K	0	8	4	50	T	S	0	1	T	0	4	0	0	0	
13	1	K	0	8	5	50	T	S	0	1	T	0	4	0	0	0	
13	2	K	0	8	6	50	T	S	0	1	T	0	4	0	0	0	
13	3	K	0	8	7	50	T	S	0	1	T	0	4	0	0	0	
13	4	K	0	8	8	50	T	S	0	1	T	0	4	0	0	0	
13	5	K	0	9	3	50	T	S	0	1	T	0	4	0	0	0	
13	6	K	0	9	4	50	T	S	0	1	T	0	4	0	0	0	
13	7	K	0	9	5	50	T	S	0	1	T	0	4	0	0	0	
13	8	K	0	9	6	50	T	S	0	1	T	0	4	0	0	0	
13	9	K	0	9	7	50	T	S	0	1	T	0	4	0	0	0	
14	0	K	0	9	8	50	T	S	0	1	T	0	4	0	0	0	
14	1	K	0	9	9	50	T	S	0	1	T	0	4	0	0	0	
14	2	K	1	0	0	50	T	S	0	1	T	0	4	0	0	0	
14	3	K	1	0	1	50	T	S	0	1	T	0	4	0	0	0	
14	4	K	1	0	2	50	T	S	0	1	T	0	4	0	0	0	
14	5	K	1	0	3	50	T	S	0	1	T	0	4	0	0	0	
14	6	K	1	0	4	50	T	S	0	1	T	0	4	0	0	0	
14	7	K	1	0	5	50	T	S	0	1	T	0	4	0	0	0	
14	8	K	1	0	6	50	T	S	0	1	T	0	4	0	0	0	
14	9	K	1	0	7	50	T	S	0	1	T	0	4	0	0	0	
15	0	K	1	0	8	50	T	S	0	1	T	0	4	0	0	0	
15	1	K	1	0	9	50	T	S	0	1	T	0	4	0	0	0	
15	2	K	1	1	0	50	T	S	0	1	T	0	4	0	0	0	
15	3	K	1	1	1	50	T	S	0	1	T	0	4	0	0	0	
15	4	K	1	1	2	50	T	S	0	1	T	0	4	0	0	0	
15	5	K	1	1	3	50	T	S	0	1	T	0	4	0	0	0	
15	6	K	1	1	4	50	T	S	0	1	T	0	4	0	0	0	
15	7	K	1	1	5	50	T	S	0	1	T	0	4	0	0	0	
15	8	K	1	1	6	50	T	S	0	1	T	0	4	0	0	0	
15	9	K	1	1	7	50	T	S	0	1	T	0	4	0	0	0	
16	0	K	1	1	8	50	T	S	0	1	T	0	4	0	0	0	
16	1	K	1	2	3	50	T	S	0	1	T	0	4	0	0	0	
16	2	K	1	2	4	50	T	S	0	1	T	0	4	0	0	0	
16	3	K	1	2	5	50	T	S	0	1	T	0	4	0	0	0	
16	4	K	1	2	6	50	T	S	0	1	T	0	4	0	0	0	
16	5	K	1	3	1	50	T	S	0	1	T	0	4	0	0	0	
16	6	K	1	3	2	50	T	S	0	1	T	0	4	0	0	0	
16	7	K	1	3	6	50	T	S	0	1	T	0	4	0	0	0	
16	8	K	1	4	1	50	T	S	0	1	T	0	4	0	0	0	
16	9	K	1	4	2	50	T	S	0	1	T	0	4	0	0	0	
17	0	K	1	4	3	50	T	S	0	1	T	0	4	0	0	0	
17	1	K	1	4	4	50	T	S	0	1	T	0	4	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
							(1) Process Codes									(2) Process Description (if code is not entered in 7.D1)	
17	2	K	1	4	5	50	T	S	0	1	T	0	4	0	0	0	
17	3	K	1	4	7	50	T	S	0	1	T	0	4	0	0	0	
17	4	K	1	4	8	50	T	S	0	1	T	0	4	0	0	0	
17	5	K	1	4	9	50	T	S	0	1	T	0	4	0	0	0	
17	6	K	1	5	0	50	T	S	0	1	T	0	4	0	0	0	
17	7	K	1	5	1	50	T	S	0	1	T	0	4	0	0	0	
17	8	K	1	5	6	50	T	S	0	1	T	0	4	0	0	0	
17	9	K	1	5	7	50	T	S	0	1	T	0	4	0	0	0	
18	0	K	1	5	8	50	T	S	0	1	T	0	4	0	0	0	
18	1	K	1	5	9	50	T	S	0	1	T	0	4	0	0	0	
18	2	K	1	6	1	50	T	S	0	1	T	0	4	0	0	0	
18	3	K	1	6	9	50	T	S	0	1	T	0	4	0	0	0	
18	4	K	1	7	0	50	T	S	0	1	T	0	4	0	0	0	
18	5	K	1	7	1	50	T	S	0	1	T	0	4	0	0	0	
18	6	K	1	7	2	50	T	S	0	1	T	0	4	0	0	0	
18	7	K	1	7	4	50	T	S	0	1	T	0	4	0	0	0	
18	8	K	1	7	5	50	T	S	0	1	T	0	4	0	0	0	
18	9	K	1	7	6	50	T	S	0	1	T	0	4	0	0	0	
19	0	K	1	7	7	50	T	S	0	1	T	0	4	0	0	0	
19	1	K	1	7	8	50	T	S	0	1	T	0	4	0	0	0	
19	2	K	1	8	1	50	T	S	0	1	T	0	4	0	0	0	
19	3	P	0	0	1	50	T	S	0	1	0	0	0	0	0	0	
19	4	P	0	0	2	50	T	S	0	1	0	0	0	0	0	0	
19	5	P	0	0	3	50	T	S	0	1	0	0	0	0	0	0	
19	6	P	0	0	4	50	T	S	0	1	0	0	0	0	0	0	
19	7	P	0	0	5	50	T	S	0	1	0	0	0	0	0	0	
19	8	P	0	0	6	50	T	S	0	1	0	0	0	0	0	0	
19	9	P	0	0	7	50	T	S	0	1	0	0	0	0	0	0	
20	0	P	0	0	8	50	T	S	0	1	0	0	0	0	0	0	
20	1	P	0	0	9	50	T	S	0	1	0	0	0	0	0	0	
20	2	P	0	1	0	50	T	S	0	1	0	0	0	0	0	0	
20	3	P	0	1	1	50	T	S	0	1	0	0	0	0	0	0	
20	4	P	0	1	2	50	T	S	0	1	0	0	0	0	0	0	
20	5	P	0	1	3	50	T	S	0	1	0	0	0	0	0	0	
20	6	P	0	1	4	50	T	S	0	1	0	0	0	0	0	0	
20	7	P	0	1	5	50	T	S	0	1	0	0	0	0	0	0	
20	8	P	0	1	6	50	T	S	0	1	0	0	0	0	0	0	
20	9	P	0	1	7	50	T	S	0	1	0	0	0	0	0	0	
21	0	P	0	1	8	50	T	S	0	1	0	0	0	0	0	0	
21	1	P	0	2	0	50	T	S	0	1	0	0	0	0	0	0	
21	2	P	0	2	1	50	T	S	0	1	0	0	0	0	0	0	
21	3	P	0	2	2	50	T	S	0	1	0	0	0	0	0	0	
21	4	P	0	2	3	50	T	S	0	1	0	0	0	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
							(1) Process Codes								(2) Process Description (if code is not entered in 7.D1)		
21	5	P	0	2	4	50	T	S	0	1	0	0	0	0	0	0	
21	6	P	0	2	6	50	T	S	0	1	0	0	0	0	0	0	
21	7	P	0	2	7	50	T	S	0	1	0	0	0	0	0	0	
21	8	P	0	2	8	50	T	S	0	1	0	0	0	0	0	0	
21	9	P	0	2	9	50	T	S	0	1	0	0	0	0	0	0	
22	0	P	0	3	0	50	T	S	0	1	0	0	0	0	0	0	
22	1	P	0	3	1	50	T	S	0	1	0	0	0	0	0	0	
22	2	P	0	3	3	50	T	S	0	1	0	0	0	0	0	0	
22	3	P	0	3	4	50	T	S	0	1	0	0	0	0	0	0	
22	4	P	0	3	6	50	T	S	0	1	0	0	0	0	0	0	
22	5	P	0	3	7	50	T	S	0	1	0	0	0	0	0	0	
22	6	P	0	3	8	50	T	S	0	1	0	0	0	0	0	0	
22	7	P	0	3	9	50	T	S	0	1	0	0	0	0	0	0	
22	8	P	0	4	0	50	T	S	0	1	0	0	0	0	0	0	
22	9	P	0	4	1	50	T	S	0	1	0	0	0	0	0	0	
23	0	P	0	4	2	50	T	S	0	1	0	0	0	0	0	0	
23	1	P	0	4	3	50	T	S	0	1	0	0	0	0	0	0	
23	2	P	0	4	4	50	T	S	0	1	0	0	0	0	0	0	
23	3	P	0	4	5	50	T	S	0	1	0	0	0	0	0	0	
23	4	P	0	4	6	50	T	S	0	1	0	0	0	0	0	0	
23	5	P	0	4	7	50	T	S	0	1	0	0	0	0	0	0	
23	6	P	0	4	8	50	T	S	0	1	0	0	0	0	0	0	
23	7	P	0	4	9	50	T	S	0	1	0	0	0	0	0	0	
23	8	P	0	5	0	50	T	S	0	1	0	0	0	0	0	0	
23	9	P	0	5	1	50	T	S	0	1	0	0	0	0	0	0	
24	0	P	0	5	4	50	T	S	0	1	0	0	0	0	0	0	
24	1	P	0	5	6	50	T	S	0	1	0	0	0	0	0	0	
24	2	P	0	5	7	50	T	S	0	1	0	0	0	0	0	0	
24	3	P	0	5	8	50	T	S	0	1	0	0	0	0	0	0	
24	4	P	0	5	9	50	T	S	0	1	0	0	0	0	0	0	
24	5	P	0	6	0	50	T	S	0	1	0	0	0	0	0	0	
24	6	P	0	6	2	50	T	S	0	1	0	0	0	0	0	0	
24	7	P	0	6	3	50	T	S	0	1	0	0	0	0	0	0	
24	8	P	0	6	4	50	T	S	0	1	0	0	0	0	0	0	
24	9	P	0	6	5	50	T	S	0	1	0	0	0	0	0	0	
25	0	P	0	6	6	50	T	S	0	1	0	0	0	0	0	0	
25	1	P	0	6	7	50	T	S	0	1	0	0	0	0	0	0	
25	2	P	0	6	8	50	T	S	0	1	0	0	0	0	0	0	
25	3	P	0	6	9	50	T	S	0	1	0	0	0	0	0	0	
25	4	P	0	7	0	50	T	S	0	1	0	0	0	0	0	0	
25	5	P	0	7	1	50	T	S	0	1	0	0	0	0	0	0	
25	6	P	0	7	2	50	T	S	0	1	0	0	0	0	0	0	
25	7	P	0	7	3	50	T	S	0	1	0	0	0	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									
							(1) Process Codes							(2) Process Description (if code is not entered in 7.D1)		
25	8	P	0	7	4	50	T	S	0	1	0	0	0	0	0	
25	9	P	0	7	5	50	T	S	0	1	0	0	0	0	0	
26	0	P	0	7	6	50	T	S	0	1	0	0	0	0	0	
26	1	P	0	7	7	50	T	S	0	1	0	0	0	0	0	
26	2	P	0	7	8	50	T	S	0	1	0	0	0	0	0	
26	3	P	0	8	1	50	T	S	0	1	0	0	0	0	0	
26	4	P	0	8	2	50	T	S	0	1	0	0	0	0	0	
26	5	P	0	8	4	50	T	S	0	1	0	0	0	0	0	
26	6	P	0	8	5	50	T	S	0	1	0	0	0	0	0	
26	7	P	0	8	7	50	T	S	0	1	0	0	0	0	0	
26	8	P	0	8	8	50	T	S	0	1	0	0	0	0	0	
26	9	P	0	8	9	50	T	S	0	1	0	0	0	0	0	
27	0	P	0	9	2	50	T	S	0	1	0	0	0	0	0	
27	1	P	0	9	3	50	T	S	0	1	0	0	0	0	0	
27	2	P	0	9	4	50	T	S	0	1	0	0	0	0	0	
27	3	P	0	9	5	50	T	S	0	1	0	0	0	0	0	
27	4	P	0	9	6	50	T	S	0	1	0	0	0	0	0	
27	5	P	0	9	7	50	T	S	0	1	0	0	0	0	0	
27	6	P	0	9	8	50	T	S	0	1	0	0	0	0	0	
27	7	P	0	9	9	50	T	S	0	1	0	0	0	0	0	
27	8	P	1	0	1	50	T	S	0	1	0	0	0	0	0	
27	9	P	1	0	2	50	T	S	0	1	0	0	0	0	0	
28	0	P	1	0	3	50	T	S	0	1	0	0	0	0	0	
28	1	P	1	0	4	50	T	S	0	1	0	0	0	0	0	
28	2	P	1	0	5	50	T	S	0	1	0	0	0	0	0	
28	3	P	1	0	6	50	T	S	0	1	0	0	0	0	0	
28	4	P	1	0	8	50	T	S	0	1	0	0	0	0	0	
28	5	P	1	0	9	50	T	S	0	1	0	0	0	0	0	
28	6	P	1	1	0	50	T	S	0	1	0	0	0	0	0	
28	7	P	1	1	1	50	T	S	0	1	0	0	0	0	0	
28	8	P	1	1	2	50	T	S	0	1	0	0	0	0	0	
28	9	P	1	1	3	50	T	S	0	1	0	0	0	0	0	
29	0	P	1	1	4	50	T	S	0	1	0	0	0	0	0	
29	1	P	1	1	5	50	T	S	0	1	0	0	0	0	0	
29	2	P	1	1	6	50	T	S	0	1	0	0	0	0	0	
29	3	P	1	1	8	50	T	S	0	1	0	0	0	0	0	
29	4	P	1	1	9	50	T	S	0	1	0	0	0	0	0	
29	5	P	1	2	0	50	T	S	0	1	0	0	0	0	0	
29	6	P	1	2	1	50	T	S	0	1	0	0	0	0	0	
29	7	P	1	2	2	50	T	S	0	1	0	0	0	0	0	
29	8	P	1	2	3	50	T	S	0	1	0	0	0	0	0	
29	9	P	1	2	7	50	T	S	0	1	0	0	0	0	0	
30	0	P	1	2	8	50	T	S	0	1	0	0	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
							(1) Process Codes										(2) Process Description (if code is not entered in 7.D1)
30	1	P	1	8	5	50	T	S	0	1	0	0	0	0	0	0	
30	2	P	1	8	8	50	T	S	0	1	0	0	0	0	0	0	
30	3	P	1	8	9	50	T	S	0	1	0	0	0	0	0	0	
30	4	P	1	9	0	50	T	S	0	1	0	0	0	0	0	0	
30	5	P	1	9	1	50	T	S	0	1	0	0	0	0	0	0	
30	6	P	1	9	2	50	T	S	0	1	0	0	0	0	0	0	
30	7	P	1	9	4	50	T	S	0	1	0	0	0	0	0	0	
30	8	P	1	9	6	50	T	S	0	1	0	0	0	0	0	0	
30	9	P	1	9	7	50	T	S	0	1	0	0	0	0	0	0	
31	0	P	1	9	8	50	T	S	0	1	0	0	0	0	0	0	
31	1	P	1	9	9	50	T	S	0	1	0	0	0	0	0	0	
31	2	P	2	0	1	50	T	S	0	1	0	0	0	0	0	0	
31	3	P	2	0	2	50	T	S	0	1	0	0	0	0	0	0	
31	4	P	2	0	3	50	T	S	0	1	0	0	0	0	0	0	
31	5	P	2	0	4	50	T	S	0	1	0	0	0	0	0	0	
31	6	P	2	0	5	50	T	S	0	1	0	0	0	0	0	0	
31	7	U	0	0	1	50	T	S	0	1	T	0	4	0	0	0	
31	8	U	0	0	2	50	T	S	0	1	T	0	4	0	0	0	
31	9	U	0	0	3	50	T	S	0	1	T	0	4	0	0	0	
32	0	U	0	0	4	50	T	S	0	1	T	0	4	0	0	0	
32	1	U	0	0	5	50	T	S	0	1	T	0	4	0	0	0	
32	2	U	0	0	6	50	T	S	0	1	T	0	4	0	0	0	
32	3	U	0	0	7	50	T	S	0	1	T	0	4	0	0	0	
32	4	U	0	0	8	50	T	S	0	1	T	0	4	0	0	0	
32	5	U	0	0	9	50	T	S	0	1	T	0	4	0	0	0	
32	6	U	0	1	0	50	T	S	0	1	T	0	4	0	0	0	
32	7	U	0	1	1	50	T	S	0	1	T	0	4	0	0	0	
32	8	U	0	1	2	50	T	S	0	1	T	0	4	0	0	0	
32	9	U	0	1	4	50	T	S	0	1	T	0	4	0	0	0	
33	0	U	0	1	5	50	T	S	0	1	T	0	4	0	0	0	
33	1	U	0	1	6	50	T	S	0	1	T	0	4	0	0	0	
33	2	U	0	1	7	50	T	S	0	1	T	0	4	0	0	0	
33	3	U	0	1	8	50	T	S	0	1	T	0	4	0	0	0	
33	4	U	0	1	9	50	T	S	0	1	T	0	4	0	0	0	
33	5	U	0	2	0	50	T	S	0	1	T	0	4	0	0	0	
33	6	U	0	2	1	50	T	S	0	1	T	0	4	0	0	0	
33	7	U	0	2	2	50	T	S	0	1	T	0	4	0	0	0	
33	8	U	0	2	3	50	T	S	0	1	T	0	4	0	0	0	
33	9	U	0	2	4	50	T	S	0	1	T	0	4	0	0	0	
34	0	U	0	2	5	50	T	S	0	1	T	0	4	0	0	0	
34	1	U	0	2	6	50	T	S	0	1	T	0	4	0	0	0	
34	2	U	0	2	7	50	T	S	0	1	T	0	4	0	0	0	
34	3	U	0	2	8	50	T	S	0	1	T	0	4	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
							(1) Process Codes									(2) Process Description (if code is not entered in 7.D1)	
34	4	U	0	2	9	50	T	S	0	1	T	0	4	0	0	0	
34	5	U	0	3	0	50	T	S	0	1	T	0	4	0	0	0	
34	6	U	0	3	1	50	T	S	0	1	T	0	4	0	0	0	
34	7	U	0	3	2	50	T	S	0	1	T	0	4	0	0	0	
34	8	U	0	3	3	50	T	S	0	1	T	0	4	0	0	0	
34	9	U	0	3	4	50	T	S	0	1	T	0	4	0	0	0	
35	0	U	0	3	5	50	T	S	0	1	T	0	4	0	0	0	
35	1	U	0	3	6	50	T	S	0	1	T	0	4	0	0	0	
35	2	U	0	3	7	50	T	S	0	1	T	0	4	0	0	0	
35	3	U	0	3	8	50	T	S	0	1	T	0	4	0	0	0	
35	4	U	0	3	9	50	T	S	0	1	T	0	4	0	0	0	
35	5	U	0	4	1	50	T	S	0	1	T	0	4	0	0	0	
35	6	U	0	4	2	50	T	S	0	1	T	0	4	0	0	0	
35	7	U	0	4	3	50	T	S	0	1	T	0	4	0	0	0	
35	8	U	0	4	4	50	T	S	0	1	T	0	4	0	0	0	
35	9	U	0	4	5	50	T	S	0	1	T	0	4	0	0	0	
36	0	U	0	4	6	50	T	S	0	1	T	0	4	0	0	0	
36	1	U	0	4	7	50	T	S	0	1	T	0	4	0	0	0	
36	2	U	0	4	8	50	T	S	0	1	T	0	4	0	0	0	
36	3	U	0	4	9	50	T	S	0	1	T	0	4	0	0	0	
36	4	U	0	5	0	50	T	S	0	1	T	0	4	0	0	0	
36	5	U	0	5	1	50	T	S	0	1	T	0	4	0	0	0	
36	6	U	0	5	2	50	T	S	0	1	T	0	4	0	0	0	
36	7	U	0	5	3	50	T	S	0	1	T	0	4	0	0	0	
36	8	U	0	5	5	50	T	S	0	1	T	0	4	0	0	0	
36	9	U	0	5	6	50	T	S	0	1	T	0	4	0	0	0	
37	0	U	0	5	7	50	T	S	0	1	T	0	4	0	0	0	
37	1	U	0	5	8	50	T	S	0	1	T	0	4	0	0	0	
37	2	U	0	5	9	50	T	S	0	1	T	0	4	0	0	0	
37	3	U	0	6	0	50	T	S	0	1	T	0	4	0	0	0	
37	4	U	0	6	1	50	T	S	0	1	T	0	4	0	0	0	
37	5	U	0	6	2	50	T	S	0	1	T	0	4	0	0	0	
37	6	U	0	6	3	50	T	S	0	1	T	0	4	0	0	0	
37	7	U	0	6	4	50	T	S	0	1	T	0	4	0	0	0	
37	8	U	0	6	6	50	T	S	0	1	T	0	4	0	0	0	
37	9	U	0	6	7	50	T	S	0	1	T	0	4	0	0	0	
38	0	U	0	6	8	50	T	S	0	1	T	0	4	0	0	0	
38	1	U	0	6	9	50	T	S	0	1	T	0	4	0	0	0	
38	2	U	0	7	0	50	T	S	0	1	T	0	4	0	0	0	
38	3	U	0	7	1	50	T	S	0	1	T	0	4	0	0	0	
38	4	U	0	7	2	50	T	S	0	1	T	0	4	0	0	0	
38	5	U	0	7	3	50	T	S	0	1	T	0	4	0	0	0	
38	6	U	0	7	4	50	T	S	0	1	T	0	4	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
							(1) Process Codes							(2) Process Description (if code is not entered in 7.D1)			
38	7	U	0	7	5	50	T	S	0	1	T	0	4	0	0	0	
38	8	U	0	7	6	50	T	S	0	1	T	0	4	0	0	0	
38	9	U	0	7	7	50	T	S	0	1	T	0	4	0	0	0	
39	0	U	0	7	8	50	T	S	0	1	T	0	4	0	0	0	
39	1	U	0	7	9	50	T	S	0	1	T	0	4	0	0	0	
39	2	U	0	8	0	50	T	S	0	1	T	0	4	0	0	0	
39	3	U	0	8	1	50	T	S	0	1	T	0	4	0	0	0	
39	4	U	0	8	2	50	T	S	0	1	T	0	4	0	0	0	
39	5	U	0	8	3	50	T	S	0	1	T	0	4	0	0	0	
39	6	U	0	8	4	50	T	S	0	1	T	0	4	0	0	0	
39	7	U	0	8	5	50	T	S	0	1	T	0	4	0	0	0	
39	8	U	0	8	6	50	T	S	0	1	T	0	4	0	0	0	
39	9	U	0	8	7	50	T	S	0	1	T	0	4	0	0	0	
40	0	U	0	8	8	50	T	S	0	1	T	0	4	0	0	0	
40	1	U	0	8	9	50	T	S	0	1	T	0	4	0	0	0	
40	2	U	0	9	0	50	T	S	0	1	T	0	4	0	0	0	
40	3	U	0	9	1	50	T	S	0	1	T	0	4	0	0	0	
40	4	U	0	9	2	50	T	S	0	1	T	0	4	0	0	0	
40	5	U	0	9	3	50	T	S	0	1	T	0	4	0	0	0	
40	6	U	0	9	4	50	T	S	0	1	T	0	4	0	0	0	
40	7	U	0	9	5	50	T	S	0	1	T	0	4	0	0	0	
40	8	U	0	9	6	50	T	S	0	1	T	0	4	0	0	0	
40	9	U	0	9	7	50	T	S	0	1	T	0	4	0	0	0	
41	0	U	0	9	8	50	T	S	0	1	T	0	4	0	0	0	
41	1	U	0	9	9	50	T	S	0	1	T	0	4	0	0	0	
41	2	U	1	0	1	50	T	S	0	1	T	0	4	0	0	0	
41	3	U	1	0	2	50	T	S	0	1	T	0	4	0	0	0	
41	4	U	1	0	3	50	T	S	0	1	T	0	4	0	0	0	
41	5	U	1	0	5	50	T	S	0	1	T	0	4	0	0	0	
41	6	U	1	0	6	50	T	S	0	1	T	0	4	0	0	0	
41	7	U	1	0	7	50	T	S	0	1	T	0	4	0	0	0	
41	8	U	1	0	8	50	T	S	0	1	T	0	4	0	0	0	
41	9	U	1	0	9	50	T	S	0	1	T	0	4	0	0	0	
42	0	U	1	1	0	50	T	S	0	1	T	0	4	0	0	0	
42	1	U	1	1	1	50	T	S	0	1	T	0	4	0	0	0	
42	2	U	1	1	2	50	T	S	0	1	T	0	4	0	0	0	
42	3	U	1	1	3	50	T	S	0	1	T	0	4	0	0	0	
42	4	U	1	1	4	50	T	S	0	1	T	0	4	0	0	0	
42	5	U	1	1	5	50	T	S	0	1	T	0	4	0	0	0	
42	6	U	1	1	6	50	T	S	0	1	T	0	4	0	0	0	
42	7	U	1	1	7	50	T	S	0	1	T	0	4	0	0	0	
42	8	U	1	1	8	50	T	S	0	1	T	0	4	0	0	0	
42	9	U	1	1	9	50	T	S	0	1	T	0	4	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
							(1) Process Codes								(2) Process Description (if code is not entered in 7.D1)		
43	0	U	1	2	0	50	T	S	0	1	T	0	4	0	0	0	
43	1	U	1	2	1	50	T	S	0	1	T	0	4	0	0	0	
43	2	U	1	2	2	50	T	S	0	1	T	0	4	0	0	0	
43	3	U	1	2	3	50	T	S	0	1	T	0	4	0	0	0	
43	4	U	1	2	4	50	T	S	0	1	T	0	4	0	0	0	
43	5	U	1	2	5	50	T	S	0	1	T	0	4	0	0	0	
43	6	U	1	2	6	50	T	S	0	1	T	0	4	0	0	0	
43	7	U	1	2	7	50	T	S	0	1	T	0	4	0	0	0	
43	8	U	1	2	8	50	T	S	0	1	T	0	4	0	0	0	
43	9	U	1	2	9	50	T	S	0	1	T	0	4	0	0	0	
44	0	U	1	3	0	50	T	S	0	1	T	0	4	0	0	0	
44	1	U	1	3	1	50	T	S	0	1	T	0	4	0	0	0	
44	2	U	1	3	2	50	T	S	0	1	T	0	4	0	0	0	
44	3	U	1	3	3	50	T	S	0	1	T	0	4	0	0	0	
44	4	U	1	3	4	50	T	S	0	1	T	0	4	0	0	0	
44	5	U	1	3	5	50	T	S	0	1	T	0	4	0	0	0	
44	6	U	1	3	6	50	T	S	0	1	T	0	4	0	0	0	
44	7	U	1	3	7	50	T	S	0	1	T	0	4	0	0	0	
44	8	U	1	3	8	50	T	S	0	1	T	0	4	0	0	0	
44	9	U	1	4	0	50	T	S	0	1	T	0	4	0	0	0	
45	0	U	1	4	1	50	T	S	0	1	T	0	4	0	0	0	
45	1	U	1	4	2	50	T	S	0	1	T	0	4	0	0	0	
45	2	U	1	4	3	50	T	S	0	1	T	0	4	0	0	0	
45	3	U	1	4	4	50	T	S	0	1	T	0	4	0	0	0	
45	4	U	1	4	5	50	T	S	0	1	T	0	4	0	0	0	
45	5	U	1	4	6	50	T	S	0	1	T	0	4	0	0	0	
45	6	U	1	4	7	50	T	S	0	1	T	0	4	0	0	0	
45	7	U	1	4	8	50	T	S	0	1	T	0	4	0	0	0	
45	8	U	1	4	9	50	T	S	0	1	T	0	4	0	0	0	
45	9	U	1	5	0	50	T	S	0	1	T	0	4	0	0	0	
46	0	U	1	5	1	50	T	S	0	1	T	0	4	0	0	0	
46	1	U	1	5	2	50	T	S	0	1	T	0	4	0	0	0	
46	2	U	1	5	3	50	T	S	0	1	T	0	4	0	0	0	
46	3	U	1	5	4	50	T	S	0	1	T	0	4	0	0	0	
46	4	U	1	5	5	50	T	S	0	1	T	0	4	0	0	0	
46	5	U	1	5	6	50	T	S	0	1	T	0	4	0	0	0	
46	6	U	1	5	7	50	T	S	0	1	T	0	4	0	0	0	
46	7	U	1	5	8	50	T	S	0	1	T	0	4	0	0	0	
46	8	U	1	5	9	50	T	S	0	1	T	0	4	0	0	0	
46	9	U	1	6	0	50	T	S	0	1	T	0	4	0	0	0	
47	0	U	1	6	1	50	T	S	0	1	T	0	4	0	0	0	
47	1	U	1	6	2	50	T	S	0	1	T	0	4	0	0	0	
47	2	U	1	6	3	50	T	S	0	1	T	0	4	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
							(1) Process Codes									(2) Process Description (if code is not entered in 7.D1)	
47	3	U	1	6	4	50	T	S	0	1	T	0	4	0	0	0	
47	4	U	1	6	5	50	T	S	0	1	T	0	4	0	0	0	
47	5	U	1	6	6	50	T	S	0	1	T	0	4	0	0	0	
47	6	U	1	6	7	50	T	S	0	1	T	0	4	0	0	0	
47	7	U	1	6	8	50	T	S	0	1	T	0	4	0	0	0	
47	8	U	1	6	9	50	T	S	0	1	T	0	4	0	0	0	
47	9	U	1	7	0	50	T	S	0	1	T	0	4	0	0	0	
48	0	U	1	7	1	50	T	S	0	1	T	0	4	0	0	0	
48	1	U	1	7	2	50	T	S	0	1	T	0	4	0	0	0	
48	2	U	1	7	3	50	T	S	0	1	T	0	4	0	0	0	
48	3	U	1	7	4	50	T	S	0	1	T	0	4	0	0	0	
48	4	U	1	7	6	50	T	S	0	1	T	0	4	0	0	0	
48	5	U	1	7	7	50	T	S	0	1	T	0	4	0	0	0	
48	6	U	1	7	8	50	T	S	0	1	T	0	4	0	0	0	
48	7	U	1	7	9	50	T	S	0	1	T	0	4	0	0	0	
48	8	U	1	8	0	50	T	S	0	1	T	0	4	0	0	0	
48	9	U	1	8	1	50	T	S	0	1	T	0	4	0	0	0	
49	0	U	1	8	2	50	T	S	0	1	T	0	4	0	0	0	
49	1	U	1	8	3	50	T	S	0	1	T	0	4	0	0	0	
49	2	U	1	8	4	50	T	S	0	1	T	0	4	0	0	0	
49	3	U	1	8	5	50	T	S	0	1	T	0	4	0	0	0	
49	4	U	1	8	6	50	T	S	0	1	T	0	4	0	0	0	
49	5	U	1	8	7	50	T	S	0	1	T	0	4	0	0	0	
49	6	U	1	8	8	50	T	S	0	1	T	0	4	0	0	0	
49	7	U	1	8	9	50	T	S	0	1	T	0	4	0	0	0	
49	8	U	1	9	0	50	T	S	0	1	T	0	4	0	0	0	
49	9	U	1	9	1	50	T	S	0	1	T	0	4	0	0	0	
50	0	U	1	9	2	50	T	S	0	1	T	0	4	0	0	0	
50	1	U	1	9	3	50	T	S	0	1	T	0	4	0	0	0	
50	2	U	1	9	4	50	T	S	0	1	T	0	4	0	0	0	
50	3	U	1	9	6	50	T	S	0	1	T	0	4	0	0	0	
50	4	U	1	9	7	50	T	S	0	1	T	0	4	0	0	0	
50	5	U	2	0	0	50	T	S	0	1	T	0	4	0	0	0	
50	6	U	2	0	1	50	T	S	0	1	T	0	4	0	0	0	
50	7	U	2	0	2	50	T	S	0	1	T	0	4	0	0	0	
50	8	U	2	0	3	50	T	S	0	1	T	0	4	0	0	0	
50	9	U	2	0	4	50	T	S	0	1	T	0	4	0	0	0	
51	0	U	2	0	5	50	T	S	0	1	T	0	4	0	0	0	
51	1	U	2	0	6	50	T	S	0	1	T	0	4	0	0	0	
51	2	U	2	0	7	50	T	S	0	1	T	0	4	0	0	0	
51	3	U	2	0	8	50	T	S	0	1	T	0	4	0	0	0	
51	4	U	2	0	9	50	T	S	0	1	T	0	4	0	0	0	
51	5	U	2	1	0	50	T	S	0	1	T	0	4	0	0	0	

7. Description of Hazardous Waste (Enter codes for Items 7.A, 7.C and 7.D(1))																	
Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										
							(1) Process Codes						(2) Process Description (if code is not entered in 7.D1)				
51	6	U	2	1	1	50	T	S	0	1	T	0	4	0	0	0	
51	7	U	2	1	3	50	T	S	0	1	T	0	4	0	0	0	
51	8	U	2	1	4	50	T	S	0	1	T	0	4	0	0	0	
51	9	U	2	1	5	50	T	S	0	1	T	0	4	0	0	0	
52	0	U	2	1	6	50	T	S	0	1	T	0	4	0	0	0	
52	1	U	2	1	7	50	T	S	0	1	T	0	4	0	0	0	
52	2	U	2	1	8	50	T	S	0	1	T	0	4	0	0	0	
52	3	U	2	1	9	50	T	S	0	1	T	0	4	0	0	0	
52	4	U	2	2	0	50	T	S	0	1	T	0	4	0	0	0	
52	5	U	2	2	1	50	T	S	0	1	T	0	4	0	0	0	
52	6	U	2	2	2	50	T	S	0	1	T	0	4	0	0	0	
52	7	U	2	2	3	50	T	S	0	1	T	0	4	0	0	0	
52	8	U	2	2	5	50	T	S	0	1	T	0	4	0	0	0	
52	9	U	2	2	6	50	T	S	0	1	T	0	4	0	0	0	
53	0	U	2	2	7	50	T	S	0	1	T	0	4	0	0	0	
53	1	U	2	2	8	50	T	S	0	1	T	0	4	0	0	0	
53	2	U	2	3	4	50	T	S	0	1	T	0	4	0	0	0	
53	3	U	2	3	5	50	T	S	0	1	T	0	4	0	0	0	
53	4	U	2	3	6	50	T	S	0	1	T	0	4	0	0	0	
53	5	U	2	3	7	50	T	S	0	1	T	0	4	0	0	0	
53	6	U	2	3	8	50	T	S	0	1	T	0	4	0	0	0	
53	7	U	2	3	9	50	T	S	0	1	T	0	4	0	0	0	
53	8	U	2	4	0	50	T	S	0	1	T	0	4	0	0	0	
53	9	U	2	4	3	50	T	S	0	1	T	0	4	0	0	0	
54	0	U	2	4	4	50	T	S	0	1	T	0	4	0	0	0	
54	1	U	2	4	6	50	T	S	0	1	T	0	4	0	0	0	
54	2	U	2	4	7	50	T	S	0	1	T	0	4	0	0	0	
54	3	U	2	4	8	50	T	S	0	1	T	0	4	0	0	0	
54	4	U	2	4	9	50	T	S	0	1	T	0	4	0	0	0	
54	5	U	2	7	1	50	T	S	0	1	T	0	4	0	0	0	
54	6	U	2	7	8	50	T	S	0	1	T	0	4	0	0	0	
54	7	U	2	7	9	50	T	S	0	1	T	0	4	0	0	0	
54	8	U	2	8	0	50	T	S	0	1	T	0	4	0	0	0	
54	9	U	3	2	8	50	T	S	0	1	T	0	4	0	0	0	
55	0	U	3	5	3	50	T	S	0	1	T	0	4	0	0	0	
55	1	U	3	5	9	50	T	S	0	1	T	0	4	0	0	0	
55	2	U	3	6	4	50	T	S	0	1	T	0	4	0	0	0	
55	3	U	3	6	7	50	T	S	0	1	T	0	4	0	0	0	
55	4	U	3	7	2	50	T	S	0	1	T	0	4	0	0	0	
55	5	U	3	7	3	50	T	S	0	1	T	0	4	0	0	0	
55	6	U	3	8	7	50	T	S	0	1	T	0	4	0	0	0	
55	7	U	3	8	9	50	T	S	0	1	T	0	4	0	0	0	

55	8	U	3	9	4	50	T	S	0	1	T	0	4	0	0	0
55	9	U	3	9	5	50	T	S	0	1	T	0	4	0	0	0
56	0	U	4	0	4	50	T	S	0	1	T	0	4	0	0	0
56	1	U	4	0	9	50	T	S	0	1	T	0	4	0	0	0
56	2	U	4	1	0	50	T	S	0	1	T	0	4	0	0	0
56	3	U	4	1	1	50	T	S	0	1	T	0	4	0	0	0

APPENDIX D: SITE PHOTOS

Photo #1: Facility Entrance (Outside - Southwest)



Photo #2 - East Building (Outside - East)



Photo #3 - East Loading Docks #1, #2, #3 and #4 (to RM 124) and Dock #5 (to RM 126) (Outside - East)



Photo #4 - East Loading Docks #1, #2, #3 and #4 Trench (Outside - East)



Photo #5 - Above Ground Storage Tanks #1 and #2 (Outside - East)



Photo #6 - Storage Tank Secondary Containment Sump (Outside - East)



Photo #7 - Outdoor Stormwater Drain Controls (Outside - East)



Photo #8 - Tanker Filling Area Pads #1 and #2 (Outside - East)



Photo #9 - Pond and East Wetland (Outside - East)



Photo #10 - Northside Building (Outside - North)



Photo #11 - Westside Building (Outside - West)



Photo #13 - Warehouse RM 124 - Loading Docks #2, #3 and #4 (Inside)



Photo #14 - Warehouse RM 124 - Staging (Inside)



Photo #15 - Warehouse RM 124 - Storage (Inside)



Photo #16 - Warehouse RM 125 - Storage Areas 1, 2 and 3 (Inside)



Photo #17 - Warehouse RM 125 - Storage Area 4 (Inside)



Photo #18 - Warehouse RM 126 - Storage and Treatment (Inside)

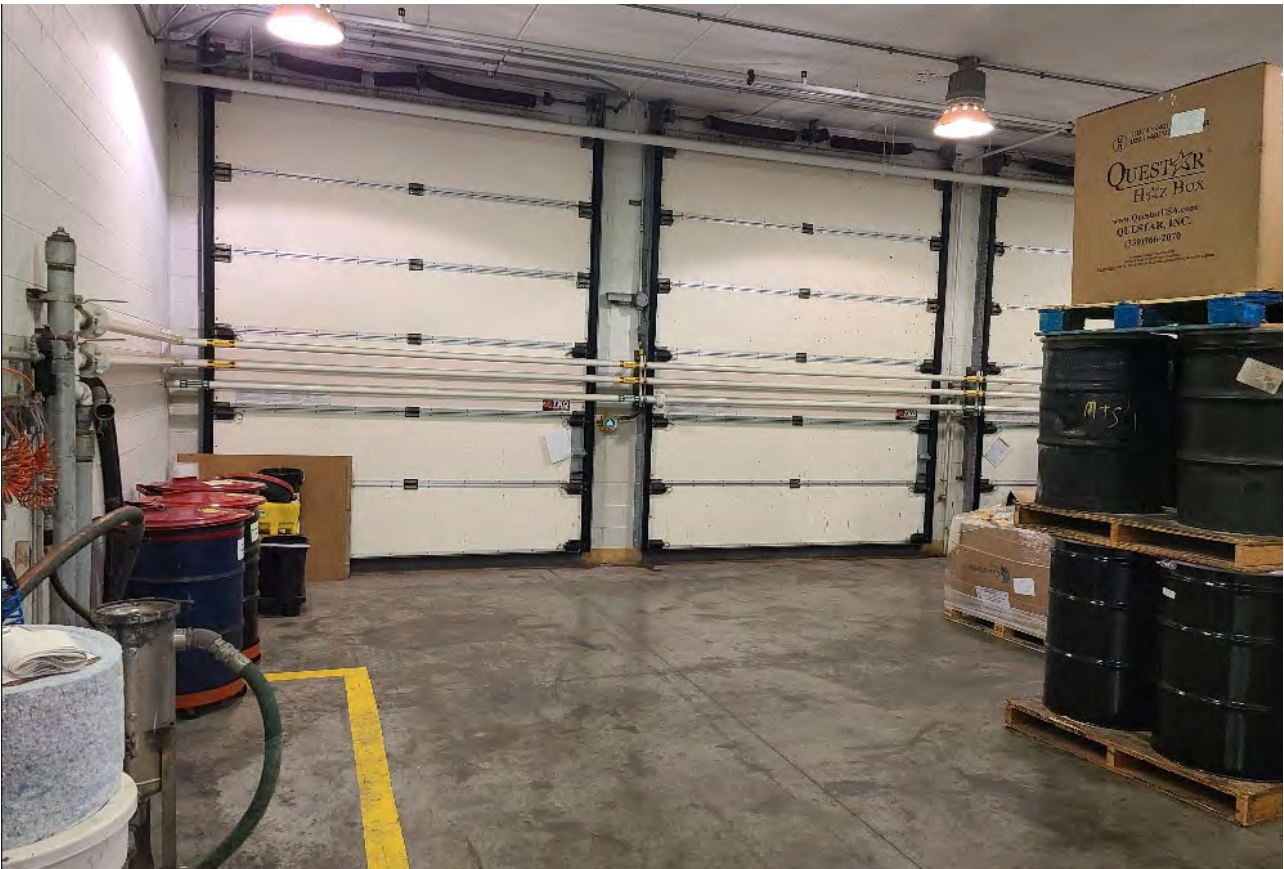


Photo #19 - Warehouse RM 126 - Storage and Treatment (Inside)



Photo #20 - Warehouse RM 126 - Storage and Treatment (Inside)

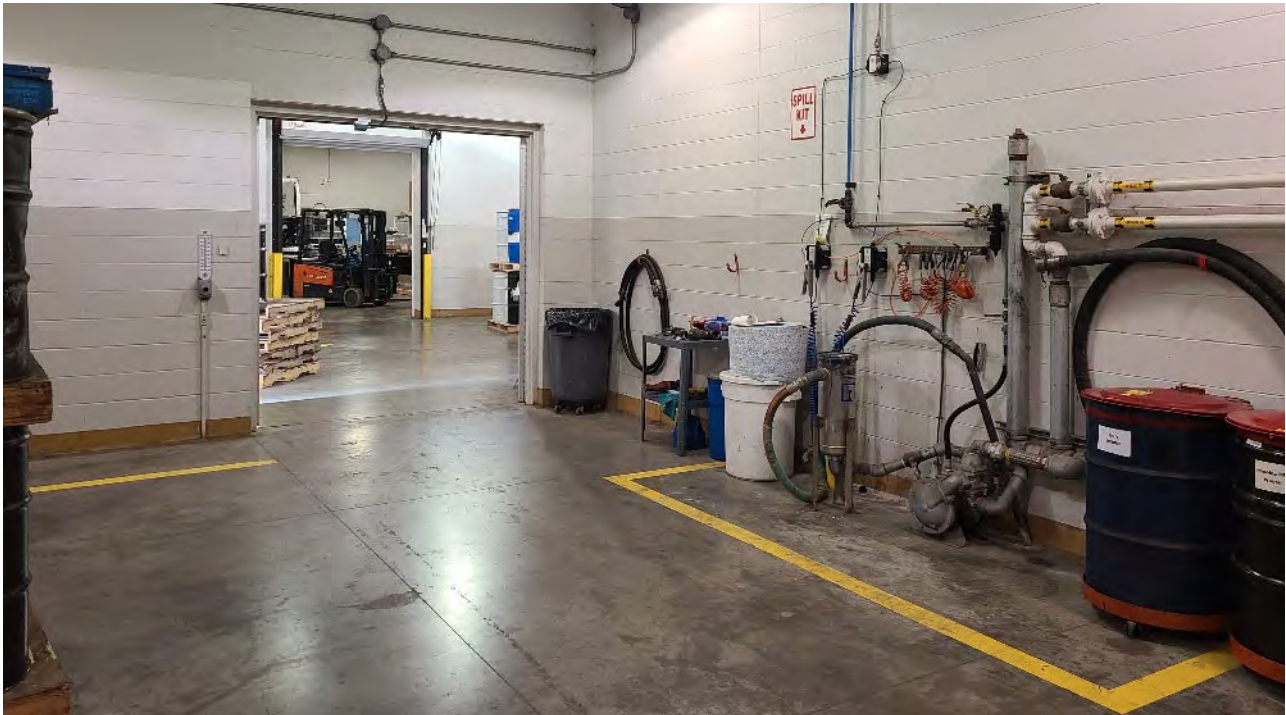


Photo #21 - Warehouse RM 127 - Solid Waste Storage and Processing (Inside)



Photo #22 - Warehouse RM 127 - Solid Waste Storage and Processing (Inside)



Photo #23 - Warehouse RM 127 - Above Ground Storage Tanks #7 thru #10 (Inside)



Photo #24 - Laboratory (Inside)



Photo #25 - Laboratory (Inside)



APPENDIX E: PRE-PLANNING MEETING DOCUMENTATION

Public Meeting Summary

A pre-application meeting was held on Monday, September 30, 2019 at 7:00pm at the Germantown Community Library located at N112 W16957 Mequon Road in Germantown. A public notice of the meeting was published in the Germantown Express News the week of August 16-23, 2019. Attending the meeting were Jeff Vilione, Dawn Zellmer, Ray Moody and Andy Kruis of Enviro-Safe. There were no other people in attendance at the meeting and therefore no comments were received. A copy of the presentation, sign-in sheet, affidavit of publication, confirmation of broadcast media spot and a copy of the facility sign are included in the following pages.



Enviro-Safe Consulting, LLC. / dba ENVIRO-SAFE RESOURCE RECOVERY

Welcome to the Germantown
Community

Informational Meeting Pertaining to
our WDNR License Application

September 30, 2019

Introductions



Enviro-Safe Resource Recovery

- Jeffrey D. Vilione: President and CEO
- Dawn Vilione: Exec. V.P. of Operations/Compliance
- Ray Moody: Business Development Manger

Meeting Purpose



- Services and Site Overview
- Discuss the Feasibility and Plan of Operations Report (FPOR) Submission for Issuance of RCRA License
- Provide Information on Current and Proposed Activities
- Opportunity to Inform the Community and Solicit Questions

Enviro-Safe's Service Overview



- US EPA / WDNR Environmental Programs: Air, Water, Waste Management, On-Site (Manufacturing) Compliance, Reporting, Training, Recycling, Alternative Use and Sustainability Programs
- OSHA Programs: General Industry Programs, On-Site (Manufacturing) Compliance and Training
- DOT Programs: Training

Enviro-Safe's Site Overview

- Company Established in April, 2002
 - Typical Start-up Company - 1Phone, 1 Computer and 1 Car
- Located in Brookfield for First 10-Years
- Built our Facility in 2012 in the Germantown Industrial Park
 - Storage Containers Consist of Above Ground Storage Tanks, Drums, Totes and Gaylord Boxes
 - Permitted to Transfer, Store and Process Waste
 - 2012 Solid Waste Transferring License
 - 2012 Solid Waste/Recyclables Transportation License
 - 2012 Hazardous Waste Transportation License (10-Day Limit)
 - 2015 Solid Waste Processing License
- Focused on Servicing the Midwest Industrial Markets



Purpose of Enviro-Safe's Industrial Recycling Facility



To Accommodate Recycling and Alternative Use Programs which include:

- Solvents
- Used Oil
- Oil Filters/Absorbents
- Antifreeze
- Non-Hazardous (Non-RCRA) Liquids and Solids
- Universal Waste Recycling
- E-Waste

Leaders In Sustainability Programs and Waste Management Solutions

Common Industrial Materials Recycled



- Latex Paints
- Waterbase Inks
- Waterbase Products
- Organic Solvents
- Antifreeze and Glycols
- Coolants
- Batteries
- Pesticides
- Mercury Thermostats
- Fluorescent Lamps
- Propylene Glycols
- Glues/Adhesives
- Pharmaceuticals
- Cosmetics
- Used Oils
- Oily Debris/Absorbents
- Oily Waters, Oil Filters
- Solvent Base Paints
- Off-Spec Products
- Consumer Commodities

Awards and Recognitions



Best of Local Businesses – Environmental/Ecological Services (2008, 2009, 2010, 2011)

Inc. 5000 Company (2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016)

MMAC Future 50 Company (2005, 2006, 2019)

Milwaukee Business Journal Fastest Growing Firms (2016)

WMC Business Friend of the Environment (2007)

Waukesha County Top 10 Businesses (2010, 2011)

Zweig's Hot Firm List (2011, 2012)

What is a FPOR?



- “Feasibility and Plan of Operation Report” means a report required by the WDNR under 289.30(3), Stats.
- FPOR includes a description of the facility and operations in terms of land use, topography, soils, geology, groundwater, surface water, design, construction, operation, maintenance, closure and long-term care.

FPOR License



Reason for License

- Accommodate Growth and Capacity
- Allows for Additional Non-RCRA Storage
- Allows for Additional RCRA Processing
- Allows for Additional Hazardous (RCRA) Waste Storage

Thank-You



We would like to thank the Village of Germantown, Washington County and WDNR for their continued support and for all of you for attending this informational meeting.

Please let me know if there are any questions.



Enviro-Safe Consulting, LLC. dBA Enviro-Safe Resource Recovery
Public Meeting for Licensing for Storage and Treatment of Hazardous Waste
Comments and Questions

Name: _____

Address: _____

Phone: _____

Email: _____

Comments/Questions: If you have any comments or questions about tonight's topic and/or any questions regarding Enviro-Safe, please complete this form. These forms shall be submitted to the WDNR as part of the application to license submittal.

STATE OF WISCONSIN)
)ss
COUNTY OF WASHINGTON)

Debra Merkel, being duly sworn, on oath, says that he/she is one of the printers of EXPRESS NEWS/HOMETOWN PUBLICATIONS, a weekly newspaper published in the City of GERMANTOWN, County of WASHINGTON, State of Wisconsin, and that a notice, of which the annexed printed slip is a true copy, has been published in the said EXPRESS NEWS/HOMETOWN PUBLICATIONS for the term of 1 week(s), once each week successively, commencing the 16th day of August, and ending the 23th day of August, 2019

Debra J Merkel
(signed)

Subscribed and sworn to before me
this the 26th day of August, 2019.

Pete J Salze
Notary Public, State of Wisconsin
My Commission Expires ~~_____~~ /is permanent.

(attach an original copy
of the paper clipping)

Express NEWS Classified Advertising

1000-1999 Notices

1005 Legal Notices

IN RE: THE MARRIAGE OF

Petitioner: Glenda Lorraine Truse
and Respondent Stephen Henry Truse
Case #19-FA-254

You are notified that the petitioner above has filled a petition for divorce or legal separation against you. You must respond with a written demand for a copy of the petition within 40 days from the day after the first day of publication.

The demand must be sent or delivered to the court at clerk of court Dodge County court house 210 West Center Street, Juneau WI 53039 and to Glenda L. Truse 344 Oakdale Drive P.O. Box 112 Brownsville WI 53006. It is recommended, but not required, that you have an attorney help or represent you. If you do not demand a copy of the petition within 40 days, the court may grant judgment against you for the award of money or other legal action requested in the petition, and you may lose your right to object to anything that is or may be incorrect in the petition. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property. You are notified of the availability of information from the Circuit Court Commissioner as set forth in 767.105 WI Stats

RECLINE.

Public Notice

Feasibility and Plan of Operations Report Enviro-Safe Consulting, LLC. dba Enviro-Safe Resource Recovery (Enviro-Safe) is applying for a hazardous waste treatment, storage and disposal facility license for their facility located at W130 N10500 Washington Drive, Germantown, Wisconsin in the Village of Germantown, Washington County. The EPA ID number is WIR000142877. Enviro-Safe is preparing a license application to be submitted to the Wisconsin Department of Natural Resources. Pursuant to Wisconsin Administrative Code NR 670.431 Enviro-Safe will hold a pre-application public informational meeting on September 30, 2019 at 7:00pm at the Germantown Community Library, N112 W16957 Mequon Road, Germantown, WI in the Public Meeting Room. The public meeting is intended to inform the community of the licensing application and to solicit questions from the community. Enviro-Safe has been in business at the current location since 2012. The licensing efforts will not significantly change operations or the types of waste handled since Enviro-Safe currently operates a licensed solid waste processing facility and a hazardous and solid waste transportation license. Individuals with disabilities are encouraged to contact Enviro-Safe at least 72 hours before the meeting if they need special access to participate in the meeting. The contact person at Enviro-Safe is Jeffrey Vilone, President/

1007 Personals

FARMERS, LANDSCAPERS or GARDENERS, did you or a loved one use Roundup Weed Killer and were diagnosed with NON-HODGKINS LYMPHOMA (Cancer)? You may be entitled to compensation. Call Attorney Charles Johnson 1-800-535-5727

Need help finding my 1966 Chevrolet. Last seen in a Menomonee Falls barn in the mid 90's. VIN 136176F137454. Call Jamie at 414-350-7389

2000-2999 Services

2012 Home Improvement

CHIMNEY ROOFING & SIDING. Roof/roof repair, chimney rebuild and tuckpointing. Vinyl LP siding and aluminum fascia and soffit. Gutter cleaning. Free estimates 262-442-5913

2024 Tree Service

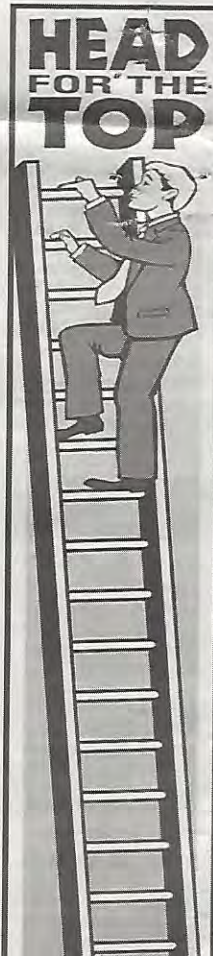
TREE & SHRUB SERVICE Trimming & removal. Over 25 Years working with you and for you. Call John 414-963-6134

4000-4999 Rummage

4013 Rummage Richfield

MULTI-FAMILY RUMMAGE - Fri Aug 23 - Sun Aug 25 8 am - 6 pm Elec Tools, Radial Arm Saw, Vintage Toys, Trains, Schwinn bike, Sewing machine & other Collectibles, Hunting/Fishing, Household Items, Recliner, Mens, Womens Jrs Plus Clothing (new and used)

Sept 1 Everything 80% Off - 10 AM - 4 PM Everyday of sale. Highlights of Sale are: Cub Cadet Riding Mower, Three Dining Rooms Sets, Living Room Set, Work Out Equipment, Packers Memorabilia, Department 56, Snowbabies, Precious moments, Brio Train Table, Metal Trucks & Cars, Tournament Sized Pool Table, Pressure Sprayer, Electric Rototiller, Garden Trailer, Wood Three Piece Patio Rocker Set, Ladders, Chipper, Air Compressor, Two Wheel Wheel Barrel, Organ, China Cabinets, Vacuums, Medical Items, Lionel Train Set, And so much more... Credit Cards taken over \$20.00 - All Sales are Final - No Early Sales - Bids taken on items over \$100.00
1458 Heather Circle Hubertus WI 53033



Public Notice
Feasibility and Plan of Operations Report

Enviro-Safe Consulting, LLC. dba Enviro-Safe Resource Recovery (Enviro-Safe) is applying for a hazardous waste treatment, storage and disposal facility license for their facility located at W130 N10500 Washington Drive, Germantown, Wisconsin in the Village of Germantown, Washington County. The EPA ID number is WIR000142877. Enviro-Safe is preparing a license application to be submitted to the Wisconsin Department of Natural Resources.

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Individuals with disabilities are encouraged to contact Enviro-Safe at least 72 hours before the meeting if they need special access to participate in the meeting.

The contact person at Enviro-Safe is Jeffrey Vilione, President/CEO, Enviro-Safe Consulting, LLC., W130 N10500 Washington Drive, Germantown, WI 53022, (262) 790-2500.

Additional information is available from the Department of Natural Resources contact person, Douglas Coenen, Waste Management Specialist, at (608) 264-9258.



Payment Success

[Make Another Payment](#) [Payment History](#)

A **Visa** payment (XXXXXXXXXXXX5275) in the amount of **400.00** on 8/21/2019 was made for the following items:

Payment Number: PN135471

Authorization Code: 00143G

Station	Invoice #	Advertiser Name	Amount
WKLH-FM	Pre-payment		400.00
Total Payment:			400.00

INSTALL PICKUP SHIP

REMOVE EXISTING GRAPHICS YES NO

WORK ORDER # 19184

QTY: 1
3mil Coroplast Sign
Single Sided

QTY: 2
Step Stakes

Public Notice
Feasibility and Plan of Operations Report

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Additional information is available from the Department of Natural Resources contact person, Douglas Coenen, Waste Management Specialist, at (608) 264-9258.

ARTWORK CHARGE – With your drawing/estimate, you are allowed one artwork revision. There will be an artwork charge for any additional drawings **DESIGN LAYOUTS ARE COPYRIGHT © 2019.**

ARTWORK APPROVAL

-PLEASE PROOFREAD CAREFULLY-

I have checked the DETAILS. Signs & Lines by Stretch is not responsible for typographical errors.

- Spelling
- Copy Content
- Placement

X _____

APPROVE - SIGNATURE

UNIT # N/A
 USDOT # N/A
 DRAWN BY: Bobby Boelter
 DATE: 8/14/19
 FILE NAME: Public Notice Sign.PLT

DATE

MATERIALS USED

 Direct Print on
 10mil Coroplast

APPENDIX F: PRE-APPLICATION DOCUMENTATION FOR LOCAL APPROVAL

Local and State Approval Summary

Enviro-Safe provided written request, including the standard notice, to each affected municipality, including a request for any additional local approvals that may be required. It was determined that the Enviro-Safe Resource Recovery facility is not within 1,500 feet of any other town, city, village or county boundaries (County Line Road – East and West and Highway 45 – North and South).

Local Municipalities Applicable to ESRR

Village	Germantown Village Clerk Ms. Barbara Goeckner N112 W17001 Mequon Road Germantown, WI 53022	Submitted 6/20/2019 Certified Mail w/Return Receipt 7015 1730 0001 8281 7740
County	Washington County Clerk Ms. Brenda Jazewski* 432 East Washington Street, Suite 2027 West Bend, WI 53095	Submitted 6/20/2019 Certified Mail w/Return Receipt 7013 1090 0001 6922 0922

*I received a call today (7/31/2019) from Ashley Reichert from the Washington County Clerk Office and was informed that she has taken the position previously held by Brenda Jazewski and all correspondences in the future should be routed to her. Her additional contact information is (262) 355-4305 or ashley.reichert@co.washington.wi.us.

Wisconsin Waste Facility Siting Board

State	State of Wisconsin Waste Facility Siting Board 5005 University Avenue, Suite 201 Madison, WI 53705-5400	Submitted 7/22/2019 Certified Mail w/Return Receipt 7013 1090 0001 6922 0953
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RECEIVED

SEP 20 2019



**State of Wisconsin
Waste Facility Siting Board**

4822 Madison Yards Way, 5th Floor, Madison, WI 53705

Phone: (608) 266-7709

Fax: (608) 264-9885

e-mail: dhamail@wisconsin.gov

Dale Shaver
Chairman

Brian Hayes
Executive Director

September 18, 2019

Washington County Clerk
Ms. Brenda Jazewski
432 East Washington Street,
Suite 2027
West Bend, WI 53095

Germantown Village Clerk
Ms. Barbara Goeckner
N112 W17001 Mequon Road
Germantown, WI 53022

Re: Enviro-Safe Consulting, LLC (dba Enviro-Safe Resource Recovery) Germantown, Wisconsin
WFSB # 231

Dear Clerks:

On June 20, 2019, the Waste Facility Siting Board received copies of written requests for local approvals, along with copies of the certified return receipts, sent by Enviro-Safe Consulting, LLC, (dba Enviro-Safe Resource Recovery), Germantown, Wisconsin to the municipalities listed above regarding the expansion of its current solid waste landfill facility located within the municipalities. The requests were received by the Washington County Clerk and the Germantown Village Clerk on June 20, 2019.

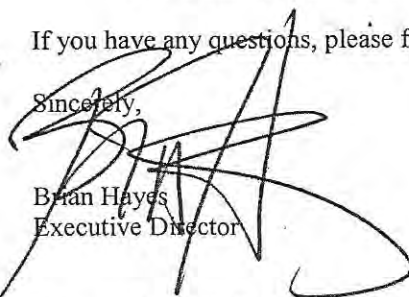
The law allows an affected municipality to participate in the negotiation-arbitration process if the governing body adopts a siting resolution and appoints members to the local committee within **sixty days of receiving the written request from the applicant**. Wis. Stats. § 289.33(6)(a).

In this case, neither affected municipality adopted and filed a siting resolution with the WFSB. Thus, all of the municipalities have waived their right to negotiate or arbitrate with Enviro-Safe Consulting, LLC, concerning the expansion of their facility.

As a result, pursuant to law, the Waste Facility Siting Board considers this case closed.

If you have any questions, please feel free to contact me.

Sincerely,


Brian Hayes
Executive Director

Cc: Dawn Zellmer, V.P. of Operations/Compliance, Enviro-Safe Consulting, LLC.



**Leaders in Resource Recovery Services
and Waste Management Sustainability Programs**

www.enviro-safe.com

July 22, 2019

State of Wisconsin
Waste Facility Sitting Board
5005 University Avenue, Suite 201
Madison, WI 53705-5400

Certified Mail w/Return Receipt
7013 1090 0001 6922 0953

Subject: Enviro-Safe Consulting, LLC. (dba Enviro-Safe Resource Recovery)
Germantown, Wisconsin
EPA ID No. WIR000142877

Dear Sir or Madam,

Enviro-Safe Resource Recovery (Enviro-Safe) operates a licensed solid waste processing facility located in Germantown, Wisconsin and plans to apply for a treatment, storage and disposal license from the Wisconsin Department of Natural Resources (WDNR) to allow for the management of hazardous waste generated by businesses and institutions in Wisconsin, as well as, from other states. Enviro-Safe Transportation, LLC., also operates a hazardous and solid waste transportation license. Enviro-Safe plans to submit the license application and a feasibility plan of operation report to the WDNR 135-days after receipt by the municipality of the written request or 120-days after receipt of the response from the municipality indicating that there are no local approval requirements, whichever occurs first.

One requirement is to notify local municipalities to determine if there any applicable local approval requirements that shall apply to the facility. Enclosed please find a copy of each letter submitted to local municipalities, their confirmation of receipt via returned certified mail and their response if received. Please note that no response was provided to Enviro-Safe Resource from Washington County.

If you have any questions regarding this submittal, please contact me at (262) 790-2500.

Sincerely,
Enviro-Safe Resource Recovery

A handwritten signature in black ink that reads "Dawn Zellmer".

Dawn Zellmer
V.P. of Operations and Compliance

c: WDNR - Douglas Coenen
File

7013 1090 0001 6922 0953

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)



For delivery information visit our website at www.usps.com

MADISON, WI 53705

Postage	\$3.50	0022 12
Certified Fee	\$2.80	
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
	\$1.60	
Total Postage & Fees	\$7.90	



Sent to
State of Wisconsin
 Street, Apt. No.,
 or PO Box No. **5005 University Avenue**
 City, State, ZIP+4
Madison WI 53705

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature 	
1. Article Addressed to: State of Wisconsin Waste Facility Siting Board 5005 University Avenue Suite 201 Madison WI 53705-5400  9590 9402 4765 8344 6094 97	B. Received by (Printed Name) Larry W Hill	C. Date of Delivery 8/5/19
2. Article Number (Transfer from service label) 7013 1090 0001 6922 0953	D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No 4822 Madison Yards Way Madison, WI 53705	
PS Form 3811, July 2015 PSN 7530-02-000-9053	3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Mail Restricted Delivery (00) <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	
	Domestic Return Receipt	



State of Wisconsin
Waste Facility Siting Board
4822 Madison Yards Way, 5th Floor,
Madison, WI 53707-7875
Phone: (608) 266-7709
Fax: (608) 264-9885
e-mail: dhamail@wisconsin.gov

Dale Shaver
Chairman

Brian Hayes
Executive Director

June 27, 2019

CERTIFIED MAIL

Washington County Clerk
Ms. Brenda Jazewski
432 East Washington Street, Suite 2027
West Bend, WI 53095

Germantown Village Clerk
Ms. Barbara Goeckner
N112 W17001 Mequon Road
Germantown, WI 53022

Re: Enviro-Safe Consulting, LLC (dba Enviro-Safe Resource Recovery)
Germantown, Wisconsin
WFSB # 231

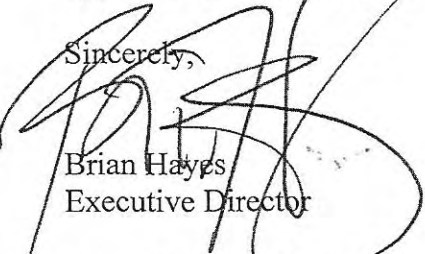
Dear Clerks:

On June 24, 2019 the Waste Facility Siting Board received a copy of a written request for a local approval, along with copies of certified return receipts, sent by Enviro-Safe Resource Recovery to Washington County Clerk and Germantown Village Clerk, regarding the expansion of its current solid waste landfill facility located within the municipalities. The requests were received by the Washington County Clerk on June 20, 2019 and Germantown Village Clerk on June 20, 2019.

If a municipality wishes to participate in the negotiation-arbitration process, it must adopt a siting resolution and appoint members to the local committee within **sixty days of receiving the written request from the applicant**. Wis. Stats. § 289.33(6)(a). A copy of the siting resolution and the names of the members who are appointed to the committee must be sent to the Waste Facility Siting Board within **seven days of the adoption of the siting resolution**. Each member

appointed to a local committee must file a statement of economic interest with the board within **fifteen days of appointment**. A Statement of Economic Interest form can be found on our website at <http://dha.state.wi.us>.

Sincerely,



Brian Hayes
Executive Director

cc: Dawn Zellmer



**Leaders in Resource Recovery Services
and Waste Management Sustainability Programs**
www.enviro-safe.com

June 20, 2019

Germantown Village Clerk
Ms. Barbara Goeckner
N112 W17001 Mequon Road
Germantown, WI 53022

Certified Mail w/Return Receipt
7015 1730 0001 8281 7740

Subject: Enviro-Safe Consulting, LLC. (dba Enviro-Safe Resource Recovery)
Germantown, Wisconsin
EPA ID No. WIR000142877

Dear Ms. Goeckner,

Enviro-Safe Resource Recovery (Enviro-Safe) operates a licensed solid waste processing facility located in Germantown, Wisconsin and plans to apply for a treatment, storage and disposal license from the Wisconsin Department of Natural Resources (WDNR) to allow for the management of hazardous waste generated by businesses and institutions in Wisconsin, as well as, from other states. Enviro-Safe Transportation, LLC., also operates a hazardous and solid waste transportation license. Enviro-Safe plans to submit the license application and a feasibility plan of operation report to the WDNR 135-days after receipt by the municipality of the written request or 120-days after receipt of the response from the municipality indicating that there are no local approval requirements, whichever occurs first.

The purpose of this letter is to comply with provisions of Wisconsin Statute 289.22, addressing the approval process for an operating license, as well as, to inquire if any applicable local approval requirements that shall apply to the facility. Please note that the statute requires that each affected municipality respond within fifteen (15) days upon receipt of this letter. As part of the regulatory obligation under Section 289.22(2), enclosed is a copy of the printed notice prepared by the Wisconsin Waste Facility Sitting Board.

If you have any questions regarding this information, please contact me at any time. Additionally, Douglas Coenen (WDNR Hazardous Waste Specialist) can be contacted at (608) 264-9258 or Douglas.Coenen@wisconsin.gov.

If you have any questions regarding this submittal, please contact me at (262) 790-2500.

Sincerely,
Enviro-Safe Resource Recovery

A handwritten signature in blue ink that reads "DZellmer".

Dawn Zellmer
V.P. of Operations and Compliance

c: WDNR - Douglas Coenen
File



**State of Wisconsin
Waste Facility Siting Board**

4822 Madison Yards Way, 5th Floor North
Madison WI 53705-5400
Phone: (608) 266-7709
Fax: (608) 264-9885
e-mail: dhamail@wisconsin.gov

Dale Shaver
Chairman

Brian Hayes
Executive Director

STANDARD NOTICE

**TIME LIMITS AND REQUIREMENTS FOR MUNICIPALITIES
TO PARTICIPATE IN THE NEGOTIATION AND ARBITRATION PROCESS
FOR THE SITING OF A SOLID OR HAZARDOUS WASTE FACILITY
UNDER SEC. 289.33, WISCONSIN STATUTES.**

PLEASE READ ALL PAGES CAREFULLY.

This notice informs a municipality of the actions and deadlines required to qualify for participation in negotiations and arbitration concerning the proposed siting of all new or expanded solid or hazardous waste facilities in the state of Wisconsin.

This standard notice shall be submitted with any written requests for local approvals by the applicant to the clerk of each affected municipality and to the main public library in each affected municipality. s. 289.22(1m)(2) and s. 289.32, Wis. Stats.

Who is the Waste Facility Siting Board?

The Waste Facility Siting Board is an impartial body composed of six members. These members include the secretaries, or their formally appointed designees, of the Departments of Agriculture, Trade and Consumer Protection, Transportation, Safety and Professional Services and two town elected officials and one county elected official appointed by the governor for three year terms.

What does the Waste Facility Siting Board do?

The Waste Facility Siting Board administers the negotiation and arbitration process for the siting of every solid and hazardous waste facility in the state of Wisconsin.

The board's authority is created by law in Chapter 289, Subchapter III, Wis. Stats. The intent of the law is to create and maintain a comprehensive and effective policy of negotiation and

arbitration between an applicant for a waste facility license and a local committee representing the affected municipalities.

Who is an Applicant?

An “applicant” is any person applying for a license or the owner or operator of a facility.

What is an Affected Municipality?

An affected municipality is any town, village, city, or county:

- (a) where any or all of the proposed waste site will be located, or
- (b) whose boundary is within 1500 feet of the facility designated in the feasibility report for the disposal of solid waste or the treatment, storage or disposal of hazardous waste.

An applicant that is a municipality or is under contract with a municipality for development of the site, is not considered an affected municipality for purposes of negotiation.

What is an Additional Municipality?

An additional municipality is any town, city, village, or county which does not qualify as an affected municipality but is included in the negotiation and arbitration process by written agreement of the applicant and the participating affected municipalities.

How does the negotiation-arbitration process begin?

The process is initiated by the applicant. Before submitting a feasibility report to the Department of Natural Resources (DNR), the applicant must submit by certified mail to the clerk of each affected municipality a written request for specification of all applicable local approvals. The municipality has 15 days to respond.

What is a “local approval”?

The term “local approval” is defined in s. 289.33(3)(d), Stats. It essentially means any requirement, restriction, condition, or prohibition imposed by a municipality on a waste facility site by ordinance, resolution, or regulation.

The law gives special weight to “pre-existing local approvals.” Pre-existing local approvals are those that have been in effect at least 15 months before the applicant submits to DNR an initial site report or a feasibility report, whichever happens first. A new or expanded waste facility is subject to pre-existing local approvals unless specified as inapplicable in a negotiated agreement or an arbitration award. A new or expanded waste facility is not subject to other local approvals unless specified as applicable in a negotiated agreement.

If an Affected Municipality wants to negotiate with the applicant concerning the site what is required?

There are three requirements.

First, an affected municipality must pass a siting resolution within 60 days of receipt of the applicant's initial written request for local approvals. If this deadline is missed, a municipality may not participate in negotiations. A copy of the siting resolution must be sent to the board within 7 days of passage.

Each affected municipality that wishes to negotiate with the applicant about the proposed facility must pass a siting resolution which shall state the following:

- (1) the name and location of the municipality,
- (2) the name and location of the applicant,
- (3) the specific location of the proposed facility, and
- (4) the municipality's intent to negotiate and, if necessary, arbitrate with the applicant concerning the proposed facility.

Second, an affected municipality must appoint members to the local committee within 60 days of receipt of the applicant's request for local approvals. Names and addresses of local committee members must be sent to the Waste Facility Siting Board within 7 days of appointment.

Each affected municipality that wishes to negotiate with the applicant must appoint members to the local negotiating committee. Each town, village, or city where all or part of the proposed waste facility is to be located may appoint 4 members, or 2 more than the total number of all other members, whichever number is greater; no more than 2, however, may be elected officials or municipal employees. Each county where all or any part of the proposed waste facility will be located may appoint 2 members. Every other town, village, city, or county within 1500 feet of the proposed waste facility may appoint 1 member. Appointment of members may be included in the siting resolution or in a separate resolution.

Third, each member appointed to the local committee must file with the Waste Facility Siting Board a Statement of Economic Interests within 15 days of appointment. A member who fails to file a Statement of Economic Interests may not serve on the local committee.

These forms are available at no cost from the Waste Facility Siting Board.

What is required if an Additional Municipality wants to negotiate with the applicant concerning the site?

There are four requirements.

First, an additional municipality must receive written agreement of all parties to be added to the process.

Second, an additional municipality must pass a siting resolution within 30 days of the agreement between the parties to allow participation by the additional municipality. A copy of the siting resolution must be sent to the board within 7 days of passage.

The siting resolution must state the following:

- (1) the name and location of the municipality,

- (2) the name and location of the applicant,
- (3) the specific location of the proposed facility, and
- (4) the municipality's intent to negotiate and, if necessary, arbitrate with the applicant concerning the proposed facility.

Third, an additional municipality must appoint one member to the local committee within 60 days. The name and address of the local committee member must be sent to the Waste Facility Siting Board within 7 days of appointment.

Fourth, the appointed member to the local committee must file with the Waste Facility Siting Board a Statement of Economic Interests within 15 days of appointment. A member who fails to file a Statement of Economic Interests may not serve on the local committee.

These forms are available at no cost from the Waste Facility Siting Board.

When may negotiations begin?

Negotiations may begin at any time after notification by the Waste Facility Siting Board. The board will send a notification of participation to the applicant and the clerk of each participating municipality within 5 days after the board receives copies of the resolutions and names and addresses of members appointed to the local committee, or within 72 days after all affected municipalities have received written request for local approvals. This notice will identify the participating municipalities, identify the names of the members of the local committee, and inform the parties that negotiations may begin.

If, for error or change in plans, the applicant must add any other affected municipality following the board's notification of participation, that affected municipality shall have the same rights and obligations as outlined above. The board may issue an order delaying negotiations until that affected municipality has time to act. This procedure is outlined in s. 289.33(6)(c), Stats.

Either the applicant or the local committee may initiate negotiations. The time and place of negotiating sessions are determined by agreement between the applicant and the local committee. Negotiating sessions must be open to the public.

What issues can be negotiated?

Any subject may be negotiated except the need for the facility and any proposal that would make the applicant's responsibilities less stringent than required by the Department of Natural Resources. Either party may petition the board in writing for a determination as to whether a proposal is negotiable. The board will conduct a hearing and issue a binding decision in 14 days.

If a negotiated settlement is reached, what is required?

There are two requirements.

First, the agreement must be approved by all appropriate bodies.

An appropriate body is the governing body of each town, city, or village where all or a portion of the waste facility is to be located. If the agreement is approved by all of the appropriate bodies, the agreement is binding on all participating municipalities.

Second, if the agreement is approved, the applicant shall send a copy or notice of any negotiated agreement to the Waste Facility Siting Board and to the Department of Natural Resources within 10 days after the agreement is approved by all appropriate bodies. If the agreement is not approved by all of the appropriate bodies, the agreement is void. The parties may resume negotiations, begin mediation, or initiate arbitration.

Who initiates mediation?

Either party may request a mediator at any time during the negotiation.

Who is the mediator?

The board maintains a list of competent, impartial, disinterested persons consisting of lawyers, retired judges, and professional mediators who serve as mediators.

Who chooses the mediator?

Upon receipt of a request for a mediator, the board will immediately send the parties a list of 5 mediators. The parties shall alternately strike names until one name is left who will be appointed by the board.

What is the role of the mediator?

The role of the mediator is to encourage a voluntary settlement. The mediator may not impose a settlement on either party.

Who pays for the mediator?

Unless specified in the negotiated agreement or the arbitration award, the costs of the mediator will be shared equally by the applicant and the local committee.

What happens if the mediator fails to bring settlement?

The parties may resume negotiations or initiate arbitration.

Who initiates arbitration?

The applicant or the local committee may petition the board jointly or separately to initiate arbitration.

Arbitration may not be initiated until at least 120 days after the appointment of the local committee.

A statement in response to a unilateral arbitration petition must be filed within 14 days.

What issues can be arbitrated?

Only eight issues can be arbitrated. These issues are:

1. Compensation to any person for substantial economic impacts which are a direct result of the facility including insurance and damages not covered by the waste management fund.
- 1m. Reimbursement of reasonable costs, but not to exceed \$20,0000, incurred by the local committee relating to negotiations, mediation and arbitration activities under this section.
2. Screening and fencing related to the appearance of the facility. This item may not affect the design capacity of the facility.
3. Operational concerns including, but not limited to, noise, dust, debris, odors and hours of operation but excluding design capacity.
4. Traffic flows and patterns resulting from the facility.
5. Uses of the site where the facility is located after closing the facility.
6. Economically feasible methods to recycle or reduce the quantities of waste to the facility. At facilities for which the applicant will not provide or contract for collection and transportation services, this item is limited to methods provided at the facility.
7. The applicability or non-applicability of any pre-existing local approvals.

If requested by either party, the board will rule on the arbitrability of a specific issue.

Once initiated, how does the arbitration process work?

Within 15 days of receipt of a petition to initiate arbitration, the board will issue a decision either to have the parties continue negotiation for at least 30 days, delay arbitration until a feasibility report is submitted, or order the parties to submit their final offers within 90 days. If, when ordered by the board, the applicant fails to submit a final offer within 90 days, the applicant may not construct or operate the facility. If the local committee fails to submit a final offer in 90 days the local committee loses all rights to further negotiation and the facility is not subject to any local approval.

Within 30 days after the last day for submitting final offers, the board shall conduct a public meeting for the parties to explain their final offers.

Within 90 days after the last day for submitting final offers, the board will issue an arbitration award. If the board fails to issue an award because it lacks the necessary five votes, the governor will issue an arbitration award within 120 days after the last day for submitting final offers.

The board's arbitration award is binding on the applicant and the participating municipalities.

The information presented here serves as a guide to help affected and additional municipalities comply with the negotiation-arbitration laws concerning siting of solid and hazardous waste facilities under s. 289.33, Stats. For specific legal advice, or changes in the statute or administrative rules, an applicant or affected municipality should consult its attorney or contact the Waste Facility Siting Board, 4822 Madison Yards Way, 5th Floor North, Madison, Wisconsin 53705-5400, (608) 266-7709, FAX: (608) 264-9885.

Revised: 01/25/2018

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GERMANTOWN, WI 53022

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<input type="checkbox"/> Return Receipt (electronic)	\$ 0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ 0.00
<input type="checkbox"/> Adult Signature Required	\$ 0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ 0.00

Postage
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Total Postage and Fees
\$ 7.45



Send To
Germantown Village Clerk
Street and Apt. No., or PO Box No.
1112 WI 7001 Mequon Road
City, State, ZIP+4®
Germantown, WI 53022

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

7015 1730 0001 8281 7740

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Germantown Village Clerk
N112W17001 Meguon Road
Germantown, WI 53022



2. Article Number
(Transfer from service label)

7015 1730 0001 8281 7740

COMPLETE THIS SECTION ON DELIVERY

A. Signature
x Colleen Wirth Agent Addressee

B. Received by (Printed Name) C. Date of Delivery
Colleen Wirth 6-21-19

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

RECEIVED

JUN 24 2019

3. Service Type
 Certified Mail® Priority Mail Express™
 Registered Return Receipt for Merchandise
 Insured Mail Collect on Delivery

4. Restricted Delivery? (Extra Fee) Yes

Dawn Zellmer

From: Jeff Retzlaff <jretzlaff@village.germantown.wi.us>
Sent: Tuesday, July 2, 2019 11:50 AM
To: Dawn Zellmer; douglas.coenen@wisconsin.gov
Cc: 'Brian Sajdak'; Deanna Braunschweig
Subject: RE: Response to June 20 2019 Letter; DNR Treatment, Storage & Disposal License Application
Attachments: CUP 6-15 JDV Real Estate Holdings Enviro Safe.pdf

Doug/Dawn:

Based on our discussion today concerning the Enviro-Safe facility already approved under Conditional Use Permit #06-15 (which amended the original CUP #03-11), I have concluded that the Village will NOT need to revise CUP #06-15 (or issue any other local approvals) because the uses and activities that will be authorized under the additional DNR license being applied for are already covered/listed as permitted uses and activities in CUP #06-15 (copy attached).

Please feel free to contact me if you have questions or concerns.

Thanks.

Jeff

*Jeffrey W. Retzlaff, AICP
Community Development Director
Zoning Administrator
Village of Germantown
N112 W17001 Mequon Road
Germantown, WI 53022
262-250-4735
jretzlaff@village.germantown.wi.us*

From: Jeff Retzlaff
Sent: Thursday, June 27, 2019 12:29 PM
To: Dawn Zellmer <DZellmer@enviro-safe.com>; 'douglas.coenen@wisconsin.gov' <douglas.coenen@wisconsin.gov>
Cc: 'Brian Sajdak' <brian@wrslegal.net>; Deanna Braunschweig <dbraunschweig@village.germantown.wi.us>
Subject: Response to June 20 2019 Letter; DNR Treatment, Storage & Disposal License Application

Dawn:

Please consider this email as the Village of Germantown's response to your June 20, 2019 letter regarding the above cited.

As you are aware, the Village issued a conditional use permit (CUP #03-11 as amended in 2015) to Enviro-Safe for the purpose of operating a facility located at W130 N10500 Washington Drive, Germantown, WI that involves the transportation, collection, bulk repackaging and overall recycling of flammable, combustible, hazardous and non-hazardous liquids, solvents and solid wastes for re-use. CUP #03-11 was amended in 2015 as part of Enviro-Safe's intent to replace the previous transfer station operation license with a solid waste processing operation license. Additional conditions were added to address the change in facility operations.

Because it is unclear to me if the license application referred to in your June 20 letter is different than the license application discussed with the Village and subject of the CUP amendment approved in 2015, I would have to say that the existing CUP #03-11 as amended will have to be reviewed further in light of this current license application and amended as necessary. Consequently, the Village's response required under Wis. Stats. 289.22 is "yes, there is a local approval requirement" that applies to the Enviro-Safe facility subject of the current license application. The process for reviewing

and amending Enviro-Safe's current CUP is the same as what was followed in 2015. Please contact me for further details regarding the process, application forms, meeting dates and deadlines, etc.

With that said, knowing how much time it can take to get various approvals and permits related to hazardous and other solid waste operations, it's possible that the license you were seeking back in 2015 is the same license you are seeking now, or, is such that no further amendment(s) to the Enviro-Safe CUP is required (or was already made back in 2015). If you feel this is the case, please let us know so we can discuss further.

Thanks.

Jeffrey W. Retzlaff, AICP
Community Development Director
Zoning Administrator
Village of Germantown
N112 W17001 Mequon Road
Germantown, WI 53022
262-250-4735
jretzlaff@village.germantown.wi.us

Village of



Germantown

July 23, 2015

JDV Real Estate Holdings LLC
Enviro-Safe Consulting LLC
W130 N10500 Washington Dr.
Germantown, WI 53022

CONDITIONAL USE PERMIT

The Village Board of the Village of Germantown at its meeting on July 6, 2015 granted your request for a Conditional Use Permit to allow the development and operation of facility used for the bulk storage and processing of flammable hazardous and non-flammable non-hazardous liquid and solid waste materials pursuant to Section 17.33(3)(a) and (b) of the Village's Zoning Code.

Enclosed is the original copy of the conditional use permit as approved by the Village Board. Please have the copy executed by **all** the appropriate officials (noting that each signature must be notarized) and return it to this office **within 30 days**. Upon receipt of the conditional use permit, I will have the document executed by the appropriate Village officials and recorded with the Register of Deeds in Washington County. I will then forward a recorded copy to you for your files. *The Conditional Use Permit **is not valid** until it has been signed and recorded. Please use **BLACK INK** when completing and signing the document.*

Please note that Section 17.42 (6) of the Municipal Code states that a conditional use permit shall lapse and be void unless the use granted is operational, or substantial construction required to implement such use has been commenced, within one year of the issuance of such permit unless a different time period is established by the Village Board.

If you have any other questions please feel free to call Planner Retzlaff at (262) 250-4735 or this office at (262) 250-4740.

Sincerely,

Timmerly Tamborino
Deputy Clerk

Enclosures

CUP #06-15
Document No.

CONDITIONAL USE PERMIT
Document Title

1387997



VILLAGE OF GERMANTOWN, WASHINGTON COUNTY, WISCONSIN
CONDITIONAL USE ZONING PERMIT

RECORDED
August 10, 2015 10:40 AM
SHARON A MARTIN
REGISTER OF DEEDS
WASHINGTON COUNTY, WI
Recording Fee Paid: \$30.00

4

Whereas the Applicants:

JDV Real Estate Holdings LLC, Property Owner, Enviro-Safe Consulting LLC, and Enviro-Safe Resource Recovery, Operator

agree to comply with applicable Codes and Ordinances of the Village of Germantown, Wisconsin, and further agrees that all work done pursuant to the permission granted herewith will conform with the applications and drawings filed with and approvals granted by officials of the Village for the purpose of obtaining this permit.

Now, therefore, this permit is issued to the Applicants to permit the development and operation of facility used for the bulk storage and processing of flammable hazardous and non-flammable non-hazardous liquid and solid waste materials pursuant to Section 17.33(3)(a) and (b) of the Village's Zoning Code.

Name & Return Address:

**Village of Germantown
P.O. Box 337
Germantown, WI 53022**

Parcel Identification No:

GTNV 254-280

On the following described property located in the Village of Germantown, Washington County, Wisconsin:

Lot 33 of Certified Survey Map No. 6396, recorded February 22, 2011, in Volume 48 of Certified Survey Maps on Pages 195 to 199, as Document No. 1273968, being a re-division of Lot 25 of Certified Survey Map No. 6275, located in that part of the Southwest 1/4 and the Northwest 1/4 of the Southeast 1/4 of Section 25, Town 9 North, Range 20 East, in the Village of Germantown, County of Washington, State of Wisconsin.

Tax Key No: 254-280

Address: W130 N10500 Washington Drive

Pursuant to the following condition(s):

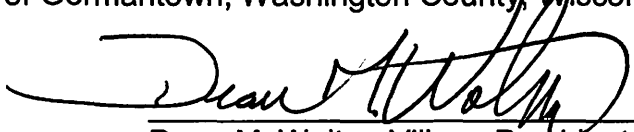
1. Subject to the additional allowances under Condition No. 8 herein, this permit authorizes the uses, activities and facilities set forth in the conditional use permit application dated March 14, 2011 and the supporting documents and plans made part of the application including: Responses to the requirements of Section 11.071 (dated 3-14-2011); MSI letter and attached Plan of Operation (dated March 14, 2011); the draft SPCC (dated March 2011); Enviro-Safe Consulting LLC "CUP Application Review" letter (dated March 30, 2010); Letter of Intent (dated March 11, 2011); and the site development and building plan set (dated 3-14-2011, unless otherwise revised by a subsequent plan set approved by the Village Planner pursuant to revisions required herein). All of the commitments made by the Applicant in the application and supporting documents cited herein are deemed conditions of approval. This approval includes the same uses and activities conducted in/as part of the proposed 12,573 sqft building expansion shown in the site development and building plans.

2. If the use, activities and/or operation subject of this permit falls out of conformity with the conditions herein, or where there is a change in the nature, character, intensity or extent of the permitted conditional use which causes special problems or harmful effects otherwise associated with the use to be no longer ameliorated or eliminated, or where conditions imposed were anticipated to ameliorate or eliminate harmful effects associated with the use but are insufficient to do so, or for similar cause based upon consideration for the public comfort, safety, and welfare, the conditional use permit may be terminated or modified by the Village Board by the amendment to or addition of conditions after public hearing thereon.
3. All business operations and activities conducted on the property and by Enviro-Safe while in the Village shall meet and continuously comply with the performance standards set forth in Zoning Code section 17.47, including, but not limited to odor, fire and explosive hazards, and water quality protection. In the event of a complaint substantiated by Village staff to the extent that a potential violation of or determination of non-compliance with one or more of the performance standards in Section 17.47 may have occurred or is occurring, the applicant shall be responsible for all costs for and resulting from the Village retaining a third party environmental expert capable of investigating and/or monitoring the site and operation. Said expert shall report its findings to the Village for subsequent use in investigating and enforcing said complaint or potential violation of the "performance standards" found in Section 17.47 of the Zoning Code.
4. The type and amount of material to be stored shall be limited to that which is proposed in the application materials including the documents referenced in Condition #1 herein. Any changes to the type, amount, location, and containers from that presented in the application materials and/or site development and building plans, or, any changes to the methods of storage, dispensing, mixing, or transportation activities shall be reported to the Village Planning Department. Modifications to the approved CUP and/or site and building plans or conditions of said approvals may be required by the Village at that time.
5. Enviro-Safe shall develop a closure plan the same as that which required for solid waste storage facilities under WDNR NR 502.04 and submit said plan to the Village Engineer for review and approval prior to issuance of an occupancy permit, including the submittal of a letter of credit or other financial guarantee acceptable to the Village that ensures removal and/or clean-up of remaining inventory can be accomplished by a third party environmental firm (if necessary) in the unanticipated event the business relocates from or ceases to exist in the Village.
6. The applicant is responsible for obtaining all applicable state, federal or other agency permits and approvals and continuously operating within the requirements and restrictions of said permits and approvals. Copies of all state and federal agency permits issued shall be provided to the Village Fire and Planning Department.
7. The overnight storage of hazardous and non-hazardous materials that are not in a protected controlled environment is prohibited.
8. All General, Operations and Reporting conditions of approval and requirements set forth in DNR approval letter dated April 20, 2015 are hereby adopted as conditions of approval for this conditional use permit.

Conditional Use Permit (CUP) #06-15

JDV Real Estate Holdings LLC/Enviro-Safe Consulting LLC/Enviro-Safe Resource Recovery
Village of Germantown, Germantown, Wisconsin
Page 3 of 4

Granted by the Village Board of the Village of Germantown, Washington County, Wisconsin
on the 6th day of July, 2015.



Dean M. Wolter, Village President

ATTEST:




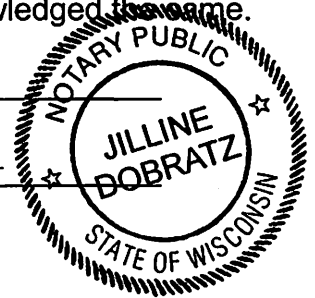
Barbara K. D. Goeckner, Village Clerk

STATE OF WISCONSIN) SS
WASHINGTON COUNTY)

Personally came before me this 9th day of July, 2015, the above
named Dean M. Wolter, Village President, and Barbara K. D. Goeckner, Village Clerk, to me
known to be the persons who executed the foregoing instrument and acknowledged the same.

Jilline Dobratz
(type or print name of Notary on this line)


(signature of Notary on this line)



Notary Public, State of Wisconsin
My Commission Expires: 5-21-19

ACCEPTANCE OF TERMS AND CONDITIONS BY APPLICANT

I, Jeff Vilione, authorized representative for Enviro-Safe Consulting LLC, Enviro-Safe Resource Recovery and JDV Real Estate Holdings LLC, hereby accept the terms and conditions set forth in this Permit, and realize that non-adherence to the terms and conditions as stated hereon may result in the revocation of this Permit by the Village of Germantown under Section 17.42 Germantown Municipal Code.

Dated this 30 day of JULY, 2015

JEFFREY D. VILIONE
(type or print name above)

J.D. VR
Signature

STATE OF WISCONSIN) SS
Washington COUNTY)

Personally came before me this 30th day of July, 2015, being the above named Jeffrey D. Vilione, to me known to be the person who executed the foregoing instrument and acknowledged the same.



Debra J. Zellmer
(type or print name of Notary on this line)
[Signature]
(signature of Notary on this line)

Notary Public, State of Wisconsin
My Commission Expires: 8/28/16

This instrument was drafted by:
Jeffrey W. Retzlaff, AICP
Community Development Director/Zoning
Administrator
Village of Germantown, Wisconsin



State of Wisconsin
Waste Facility Siting Board
4822 Madison Yards Way, 5th Floor,
Madison, WI 53707-7875
Phone: (608) 266-7709
Fax: (608) 264-9885
e-mail: dhamail@wisconsin.gov

Dale Shaver
Chairman

Brian Hayes
Executive Director

June 27, 2019

CERTIFIED MAIL

Washington County Clerk
Ms. Brenda Jazewski
432 East Washington Street, Suite 2027
West Bend, WI 53095

Germantown Village Clerk
Ms. Barbara Goeckner
N112 W17001 Mequon Road
Germantown, WI 53022

Re: Enviro-Safe Consulting, LLC (dba Enviro-Safe Resource Recovery)
Germantown, Wisconsin
WFSB # 231

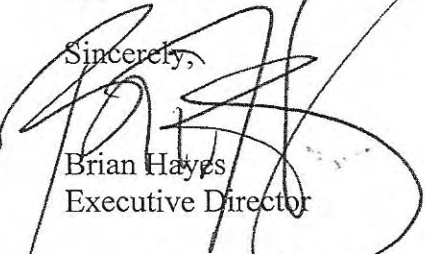
Dear Clerks:

On June 24, 2019 the Waste Facility Siting Board received a copy of a written request for a local approval, along with copies of certified return receipts, sent by Enviro-Safe Resource Recovery to Washington County Clerk and Germantown Village Clerk, regarding the expansion of its current solid waste landfill facility located within the municipalities. The requests were received by the Washington County Clerk on June 20, 2019 and Germantown Village Clerk on June 20, 2019.

If a municipality wishes to participate in the negotiation-arbitration process, it must adopt a siting resolution and appoint members to the local committee within **sixty days of receiving the written request from the applicant**. Wis. Stats. § 289.33(6)(a). A copy of the siting resolution and the names of the members who are appointed to the committee must be sent to the Waste Facility Siting Board within **seven days of the adoption of the siting resolution**. Each member

appointed to a local committee must file a statement of economic interest with the board within **fifteen days of appointment**. A Statement of Economic Interest form can be found on our website at <http://dha.state.wi.us>.

Sincerely,



Brian Hayes
Executive Director

cc: Dawn Zellmer



**Leaders in Resource Recovery Services
and Waste Management Sustainability Programs**

www.enviro-safe.com

June 20, 2019

Washington County Clerk
Ms. Brenda Jazewski
432 East Washington Street, Suite 2027
West Bend, WI 53095

Certified Mail w/Return Receipt
7013 1090 0001 6922 0922

Subject: Enviro-Safe Consulting, LLC. (dba Enviro-Safe Resource Recovery)
Germantown, Wisconsin
EPA ID No. WIR000142877

Dear Ms. Jazewski,

Enviro-Safe Resource Recovery (Enviro-Safe) operates a licensed solid waste processing facility located in Germantown, Wisconsin and plans to apply for a treatment, storage and disposal license from the Wisconsin Department of Natural Resources (WDNR) to allow for the management of hazardous waste generated by businesses and institutions in Wisconsin, as well as, from other states. Enviro-Safe Transportation, LLC., also operates a hazardous and solid waste transportation license. Enviro-Safe plans to submit the license application and a feasibility plan of operation report to the WDNR 135-days after receipt by the municipality of the written request or 120-days after receipt of the response from the municipality indicating that there are no local approval requirements, whichever occurs first.

The purpose of this letter is to comply with provisions of Wisconsin Statute 289.22, addressing the approval process for an operating license, as well as, to inquire if any applicable local approval requirements that shall apply to the facility. Please note that the statute requires that each affected municipality respond within fifteen (15) days upon receipt of this letter. As part of the regulatory obligation under Section 289.22(2), enclosed is a copy of the printed notice prepared by the Wisconsin Waste Facility Sitting Board.

If you have any questions regarding this information, please contact me at any time. Additionally, Douglas Coenen (WDNR Hazardous Waste Specialist) can be contacted at (608) 264-9258 or Douglas.Coenen@wisconsin.gov.

If you have any questions regarding this submittal, please contact me at (262) 790-2500.

Sincerely,
Enviro-Safe Resource Recovery

A handwritten signature in blue ink that reads "D Zellmer".

Dawn Zellmer
V.P. of Operations and Compliance

c: WDNR - Douglas Coenen
File



State of Wisconsin
Waste Facility Siting Board
4822 Madison Yards Way, 5th Floor North
Madison WI 53705-5400
Phone: (608) 266-7709
Fax: (608) 264-9885
e-mail: dhamail@wisconsin.gov

Dale Shaver
Chairman

Brian Hayes
Executive Director

STANDARD NOTICE

TIME LIMITS AND REQUIREMENTS FOR MUNICIPALITIES TO PARTICIPATE IN THE NEGOTIATION AND ARBITRATION PROCESS FOR THE SITING OF A SOLID OR HAZARDOUS WASTE FACILITY UNDER SEC. 289.33, WISCONSIN STATUTES.

PLEASE READ ALL PAGES CAREFULLY.

This notice informs a municipality of the actions and deadlines required to qualify for participation in negotiations and arbitration concerning the proposed siting of all new or expanded solid or hazardous waste facilities in the state of Wisconsin.

This standard notice shall be submitted with any written requests for local approvals by the applicant to the clerk of each affected municipality and to the main public library in each affected municipality. s. 289.22(1m)(2) and s. 289.32, Wis. Stats.

Who is the Waste Facility Siting Board?

The Waste Facility Siting Board is an impartial body composed of six members. These members include the secretaries, or their formally appointed designees, of the Departments of Agriculture, Trade and Consumer Protection, Transportation, Safety and Professional Services and two town elected officials and one county elected official appointed by the governor for three year terms.

What does the Waste Facility Siting Board do?

The Waste Facility Siting Board administers the negotiation and arbitration process for the siting of every solid and hazardous waste facility in the state of Wisconsin.

The board's authority is created by law in Chapter 289, Subchapter III, Wis. Stats. The intent of the law is to create and maintain a comprehensive and effective policy of negotiation and

arbitration between an applicant for a waste facility license and a local committee representing the affected municipalities.

Who is an Applicant?

An “applicant” is any person applying for a license or the owner or operator of a facility.

What is an Affected Municipality?

An affected municipality is any town, village, city, or county:

- (a) where any or all of the proposed waste site will be located, or
- (b) whose boundary is within 1500 feet of the facility designated in the feasibility report for the disposal of solid waste or the treatment, storage or disposal of hazardous waste.

An applicant that is a municipality or is under contract with a municipality for development of the site, is not considered an affected municipality for purposes of negotiation.

What is an Additional Municipality?

An additional municipality is any town, city, village, or county which does not qualify as an affected municipality but is included in the negotiation and arbitration process by written agreement of the applicant and the participating affected municipalities.

How does the negotiation-arbitration process begin?

The process is initiated by the applicant. Before submitting a feasibility report to the Department of Natural Resources (DNR), the applicant must submit by certified mail to the clerk of each affected municipality a written request for specification of all applicable local approvals. The municipality has 15 days to respond.

What is a “local approval”?

The term “local approval” is defined in s. 289.33(3)(d), Stats. It essentially means any requirement, restriction, condition, or prohibition imposed by a municipality on a waste facility site by ordinance, resolution, or regulation.

The law gives special weight to “pre-existing local approvals.” Pre-existing local approvals are those that have been in effect at least 15 months before the applicant submits to DNR an initial site report or a feasibility report, whichever happens first. A new or expanded waste facility is subject to pre-existing local approvals unless specified as inapplicable in a negotiated agreement or an arbitration award. A new or expanded waste facility is not subject to other local approvals unless specified as applicable in a negotiated agreement.

If an Affected Municipality wants to negotiate with the applicant concerning the site what is required?

There are three requirements.

First, an affected municipality must pass a siting resolution within 60 days of receipt of the applicant's initial written request for local approvals. If this deadline is missed, a municipality may not participate in negotiations. A copy of the siting resolution must be sent to the board within 7 days of passage.

Each affected municipality that wishes to negotiate with the applicant about the proposed facility must pass a siting resolution which shall state the following:

- (1) the name and location of the municipality,
- (2) the name and location of the applicant,
- (3) the specific location of the proposed facility, and
- (4) the municipality's intent to negotiate and, if necessary, arbitrate with the applicant concerning the proposed facility.

Second, an affected municipality must appoint members to the local committee within 60 days of receipt of the applicant's request for local approvals. Names and addresses of local committee members must be sent to the Waste Facility Siting Board within 7 days of appointment.

Each affected municipality that wishes to negotiate with the applicant must appoint members to the local negotiating committee. Each town, village, or city where all or part of the proposed waste facility is to be located may appoint 4 members, or 2 more than the total number of all other members, whichever number is greater; no more than 2, however, may be elected officials or municipal employees. Each county where all or any part of the proposed waste facility will be located may appoint 2 members. Every other town, village, city, or county within 1500 feet of the proposed waste facility may appoint 1 member. Appointment of members may be included in the siting resolution or in a separate resolution.

Third, each member appointed to the local committee must file with the Waste Facility Siting Board a Statement of Economic Interests within 15 days of appointment. A member who fails to file a Statement of Economic Interests may not serve on the local committee.

These forms are available at no cost from the Waste Facility Siting Board.

What is required if an Additional Municipality wants to negotiate with the applicant concerning the site?

There are four requirements.

First, an additional municipality must receive written agreement of all parties to be added to the process.

Second, an additional municipality must pass a siting resolution within 30 days of the agreement between the parties to allow participation by the additional municipality. A copy of the siting resolution must be sent to the board within 7 days of passage.

The siting resolution must state the following:

- (1) the name and location of the municipality,

- (2) the name and location of the applicant,
- (3) the specific location of the proposed facility, and
- (4) the municipality's intent to negotiate and, if necessary, arbitrate with the applicant concerning the proposed facility.

Third, an additional municipality must appoint one member to the local committee within 60 days. The name and address of the local committee member must be sent to the Waste Facility Siting Board within 7 days of appointment.

Fourth, the appointed member to the local committee must file with the Waste Facility Siting Board a Statement of Economic Interests within 15 days of appointment. A member who fails to file a Statement of Economic Interests may not serve on the local committee.

These forms are available at no cost from the Waste Facility Siting Board.

When may negotiations begin?

Negotiations may begin at any time after notification by the Waste Facility Siting Board. The board will send a notification of participation to the applicant and the clerk of each participating municipality within 5 days after the board receives copies of the resolutions and names and addresses of members appointed to the local committee, or within 72 days after all affected municipalities have received written request for local approvals. This notice will identify the participating municipalities, identify the names of the members of the local committee, and inform the parties that negotiations may begin.

If, for error or change in plans, the applicant must add any other affected municipality following the board's notification of participation, that affected municipality shall have the same rights and obligations as outlined above. The board may issue an order delaying negotiations until that affected municipality has time to act. This procedure is outlined in s. 289.33(6)(c), Stats.

Either the applicant or the local committee may initiate negotiations. The time and place of negotiating sessions are determined by agreement between the applicant and the local committee. Negotiating sessions must be open to the public.

What issues can be negotiated?

Any subject may be negotiated except the need for the facility and any proposal that would make the applicant's responsibilities less stringent than required by the Department of Natural Resources. Either party may petition the board in writing for a determination as to whether a proposal is negotiable. The board will conduct a hearing and issue a binding decision in 14 days.

If a negotiated settlement is reached, what is required?

There are two requirements.

First, the agreement must be approved by all appropriate bodies.

An appropriate body is the governing body of each town, city, or village where all or a portion of the waste facility is to be located. If the agreement is approved by all of the appropriate bodies, the agreement is binding on all participating municipalities.

Second, if the agreement is approved, the applicant shall send a copy or notice of any negotiated agreement to the Waste Facility Siting Board and to the Department of Natural Resources within 10 days after the agreement is approved by all appropriate bodies. If the agreement is not approved by all of the appropriate bodies, the agreement is void. The parties may resume negotiations, begin mediation, or initiate arbitration.

Who initiates mediation?

Either party may request a mediator at any time during the negotiation.

Who is the mediator?

The board maintains a list of competent, impartial, disinterested persons consisting of lawyers, retired judges, and professional mediators who serve as mediators.

Who chooses the mediator?

Upon receipt of a request for a mediator, the board will immediately send the parties a list of 5 mediators. The parties shall alternately strike names until one name is left who will be appointed by the board.

What is the role of the mediator?

The role of the mediator is to encourage a voluntary settlement. The mediator may not impose a settlement on either party.

Who pays for the mediator?

Unless specified in the negotiated agreement or the arbitration award, the costs of the mediator will be shared equally by the applicant and the local committee.

What happens if the mediator fails to bring settlement?

The parties may resume negotiations or initiate arbitration.

Who initiates arbitration?

The applicant or the local committee may petition the board jointly or separately to initiate arbitration.

Arbitration may not be initiated until at least 120 days after the appointment of the local committee.

A statement in response to a unilateral arbitration petition must be filed within 14 days.

What issues can be arbitrated?

Only eight issues can be arbitrated. These issues are:

1. Compensation to any person for substantial economic impacts which are a direct result of the facility including insurance and damages not covered by the waste management fund.
- 1m. Reimbursement of reasonable costs, but not to exceed \$20,0000, incurred by the local committee relating to negotiations, mediation and arbitration activities under this section.
2. Screening and fencing related to the appearance of the facility. This item may not affect the design capacity of the facility.
3. Operational concerns including, but not limited to, noise, dust, debris, odors and hours of operation but excluding design capacity.
4. Traffic flows and patterns resulting from the facility.
5. Uses of the site where the facility is located after closing the facility.
6. Economically feasible methods to recycle or reduce the quantities of waste to the facility. At facilities for which the applicant will not provide or contract for collection and transportation services, this item is limited to methods provided at the facility.
7. The applicability or non-applicability of any pre-existing local approvals.

If requested by either party, the board will rule on the arbitrability of a specific issue.

Once initiated, how does the arbitration process work?

Within 15 days of receipt of a petition to initiate arbitration, the board will issue a decision either to have the parties continue negotiation for at least 30 days, delay arbitration until a feasibility report is submitted, or order the parties to submit their final offers within 90 days. If, when ordered by the board, the applicant fails to submit a final offer within 90 days, the applicant may not construct or operate the facility. If the local committee fails to submit a final offer in 90 days the local committee loses all rights to further negotiation and the facility is not subject to any local approval.

Within 30 days after the last day for submitting final offers, the board shall conduct a public meeting for the parties to explain their final offers.

Within 90 days after the last day for submitting final offers, the board will issue an arbitration award. If the board fails to issue an award because it lacks the necessary five votes, the governor will issue an arbitration award within 120 days after the last day for submitting final offers.

The board's arbitration award is binding on the applicant and the participating municipalities.

The information presented here serves as a guide to help affected and additional municipalities comply with the negotiation-arbitration laws concerning siting of solid and hazardous waste facilities under s. 289.33, Stats. For specific legal advice, or changes in the statute or administrative rules, an applicant or affected municipality should consult its attorney or contact the Waste Facility Siting Board, 4822 Madison Yards Way, 5th Floor North, Madison, Wisconsin 53705-5400, (608) 266-7709, FAX: (608) 264-9885.

Revised: 01/25/2018

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U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

WEST BEND, WI 53095

Postage	\$2.50
Certified Fee	\$2.80
Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$1.15
	\$7.45



Sent to
 Washington County Clerk
 Street, Apt. No.
 432 East Washington Street
 City, State, ZIP+4
 West Bend, WI 53095

SENDER: COMPLETE THIS SECTION

■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.



1. Article Addressed to:

Washington County Clerk
432 East Washington St.
Suite 2027
West Bend, WI 53095

2. Article Number
(Transfer from service label)

7013 1090 0001 6922 0922

PS Form 3811, July 2013

COMPLETE THIS SECTION ON DELIVERY

A. Signature

x Julie Johnson

Agent
 Addressee

B. Received by (Printed Name)

Julie Johnson

C. Date of Delivery

6-21-19

D. Is delivery addressed here from item 1? Yes
If YES, enter delivery address below: No

JUL 05 2019

3. Service Type

Certified Mail® Priority Mail Express™
 Registered Return Receipt for Merchandise
 Insured Mail Collect on Delivery

4. Restricted Delivery? (Extra Fee)

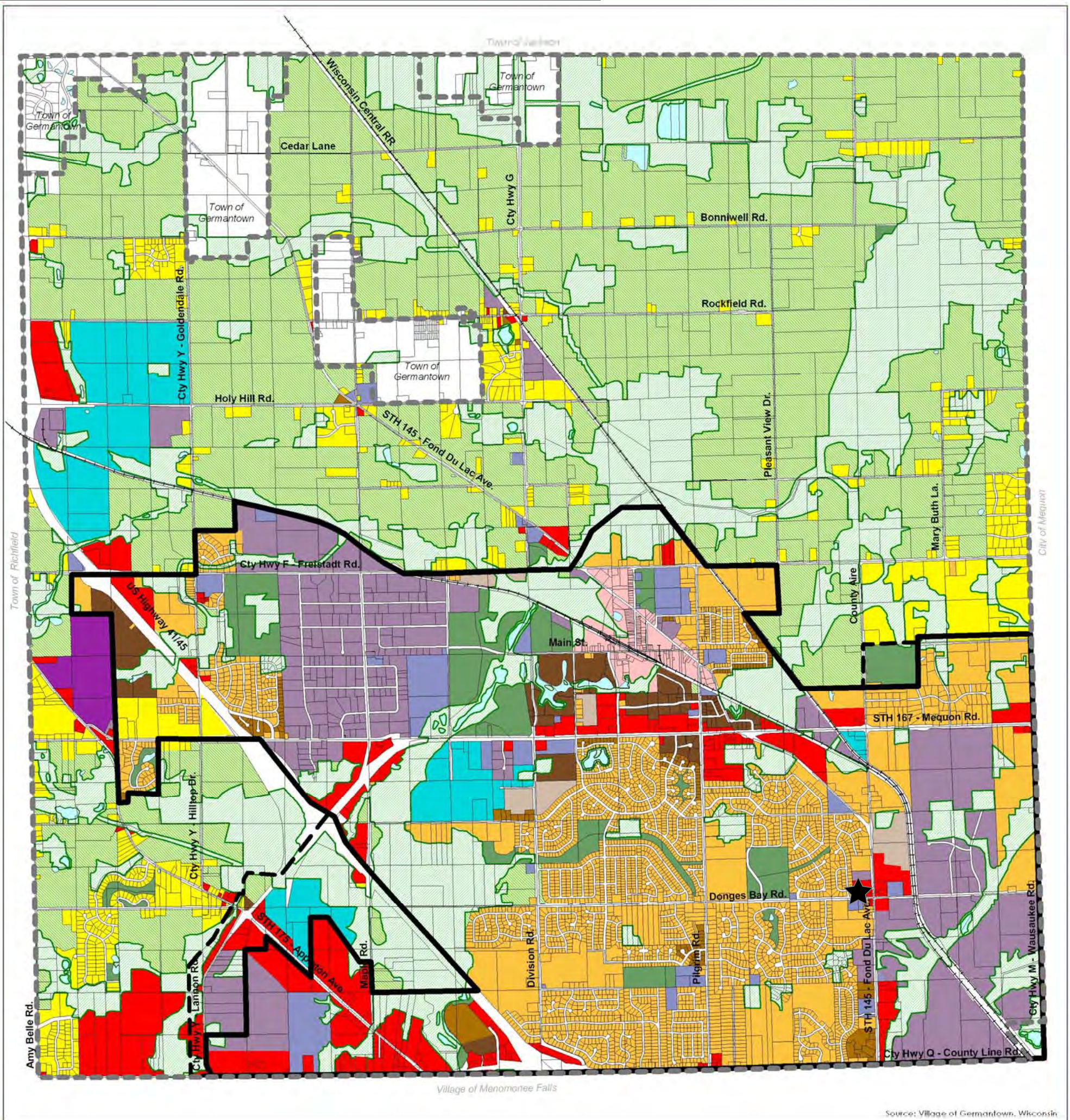
Yes

Domestic Return Receipt

APPENDIX G: DRAWING AND MAPS

G-01 Village of Germantown Zoning Surround Land Use Map [NR 670.014(s)(4)]
G-02 Certified Site Survey
G-03 Topographical Map [NR 670.13(12) and NR 670.0.014(s)]
G-04 Facility Map [NR 670.13(8) and NR 670.014(s)(10)]
G-05 Secondary Containment Map
G-06 100-Year Flood Plain Map [NR 670.014(k) and NR 670.014(s)(2)]
G-07 Local Street and Traffic Pattern Map [NR 670.014(s)(3)]
G-08 Container Storage Map
G-09 Surface Waters and Streams Map [NR 670.014(s)(3)]
G-10 Wind Rose Data Maps [NR 670.014(s)(5)]
G-11 WDNR Injection and Withdrawal Well Map

Enviro-Safe Resource Recovery
Appendix G-01 - Surrounding Land Use



Source: Village of Germantown, Wisconsin

Future Land Use Categories

- | | | |
|--|--|---|
|  Agricultural/Conservation Residential (5 Acre lots) |  Commercial |  Environmental Corridors/ Isolated Natural Areas |
|  Rural Residential (1 Ac. Min. Lot Size) |  Village Mixed Use |  2010 Sanitary Sewer Service Area |
|  Low Density Residential (2 d.u./Acre) |  Mixed Use |  2020 Sanitary Sewer Service Area Extension |
|  Medium Density Residential (4 d.u./Acre) |  Industrial/Office |  Municipal Boundary |
|  High Density Residential (8 d.u./Acre) |  Mineral Extraction | |
|  Elderly Residential |  Institutional/Governmental | |
| |  Park/Recreation Area | |
| |  Rivers, Lakes and Streams | |

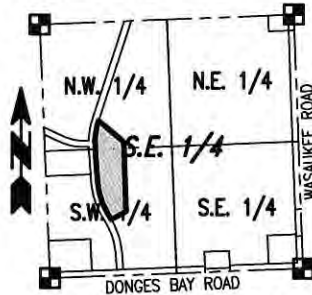
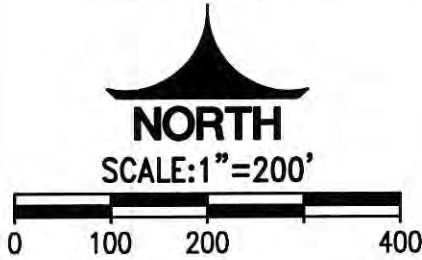
**Enviro-Safe Resource Recovery
Appendix G-02 - Certified Survey Map**

Appendix G-02: Certified Site Survey

Date: October 10, 2018

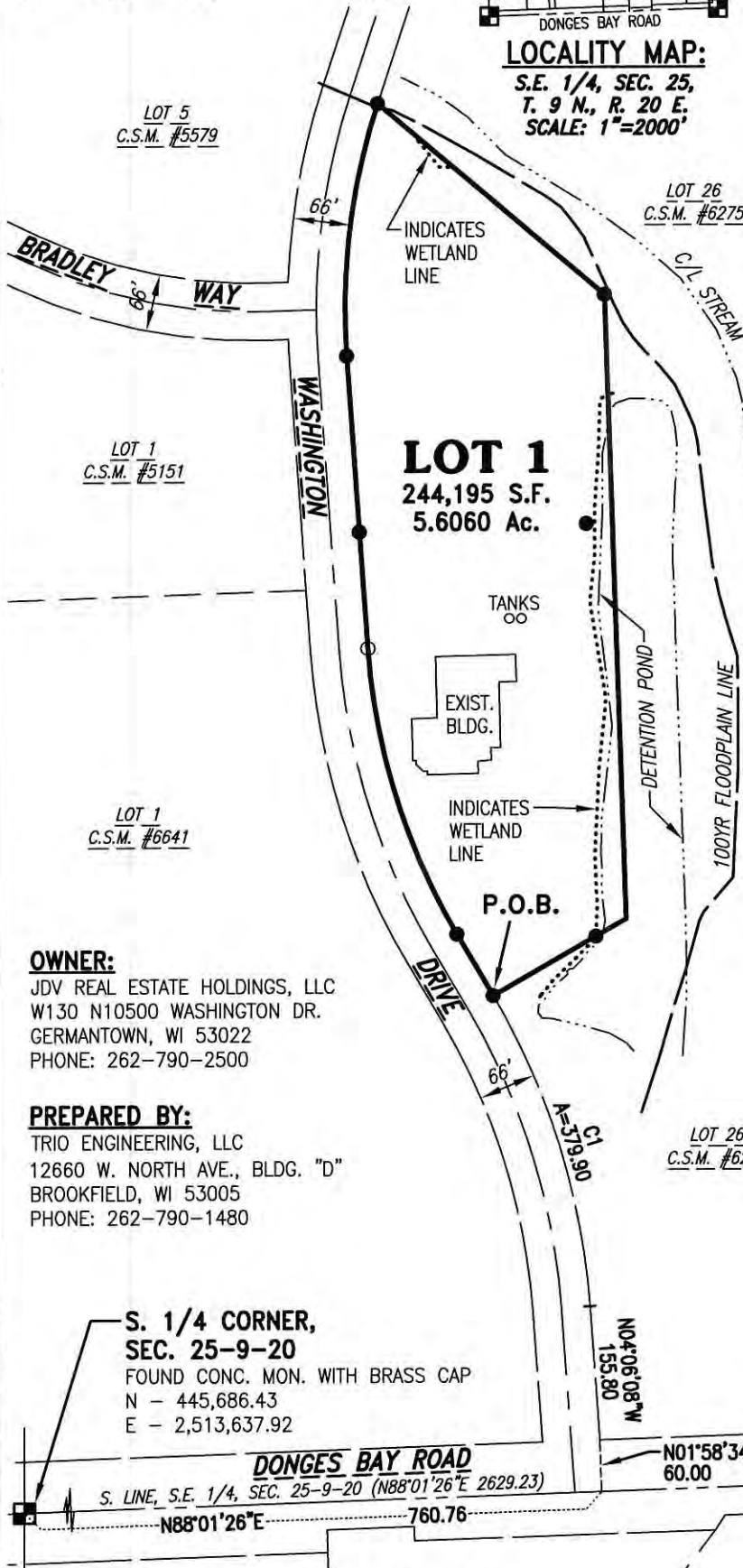
CERTIFIED SURVEY MAP NO.

BEING A CONSOLIDATION OF LOTS 33 AND 34 OF CERTIFIED SURVEY MAP NO. 6396, BEING LOCATED IN A PART OF THE NORTHWEST 1/4 AND SOUTHWEST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 25, TOWN 9 NORTH, RANGE 20 EAST, IN THE VILLAGE OF GERMANTOWN, WASHINGTON COUNTY, WISCONSIN.



LOCALITY MAP:

S.E. 1/4, SEC. 25,
T. 9 N., R. 20 E.
SCALE: 1"=2000'



LEGEND:

- - INDICATES Section Corner (See Sheet 1 for Details)
- - INDICATES "Set" 3/4" X 18" long Iron Rod weighing 1.13 lbs. per lineal foot
- - INDICATES "Found" Monumentation (See Sheet 2 for details)
- IPF - Iron Pipe Found
- IRF - Iron Rod Found
- IRS - Iron Rod Set

NOTES:

- ALL BEARINGS ARE REFERENCED TO GRID NORTH OF THE WISCONSIN STATE PLANE COORDINATE SYSTEM, SOUTH ZONE (NAD-27), IN WHICH THE SOUTH LINE OF THE S.E. 1/4 OF SECTION 25, TOWN 9 NORTH, RANGE 20 EAST, BEARS N88°01'26"E.
- TELEPHONE LINES, ELECTRIC LINES, CABLE TELEVISION LINES, TELECOMMUNICATIONS LINES, AND OTHER SIMILAR UTILITY SERVICES SHALL BE PLACED UNDERGROUND UNLESS THE APPLICANT OR UTILITY CAN DEMONSTRATE THAT UNDERGROUNDING IS NOT FEASIBLE.
- WETLAND LINE SHOWN HEREON WAS FIELD DELINEATED BY STANTEC CONSULTING, INC. (BRIAN LENNIE) ON SEPTEMBER 11, 2018 AND WAS FIELD LOCATED BY TRIO ENGINEERING, LLC ON SEPTEMBER 12, 2018.

OWNER:

JDV REAL ESTATE HOLDINGS, LLC
W130 N10500 WASHINGTON DR.
GERMANTOWN, WI 53022
PHONE: 262-790-2500

PREPARED BY:

TRIO ENGINEERING, LLC
12660 W. NORTH AVE., BLDG. "D"
BROOKFIELD, WI 53005
PHONE: 262-790-1480



S. 1/4 CORNER,
SEC. 25-9-20
FOUND CONC. MON. WITH BRASS CAP
N - 445,686.43
E - 2,513,637.92

S.E. CORNER,
SEC. 25-9-20
FOUND CONC. MON. WITH ALUMINUM CAP
N - 445,777.09
E - 2,516,265.32

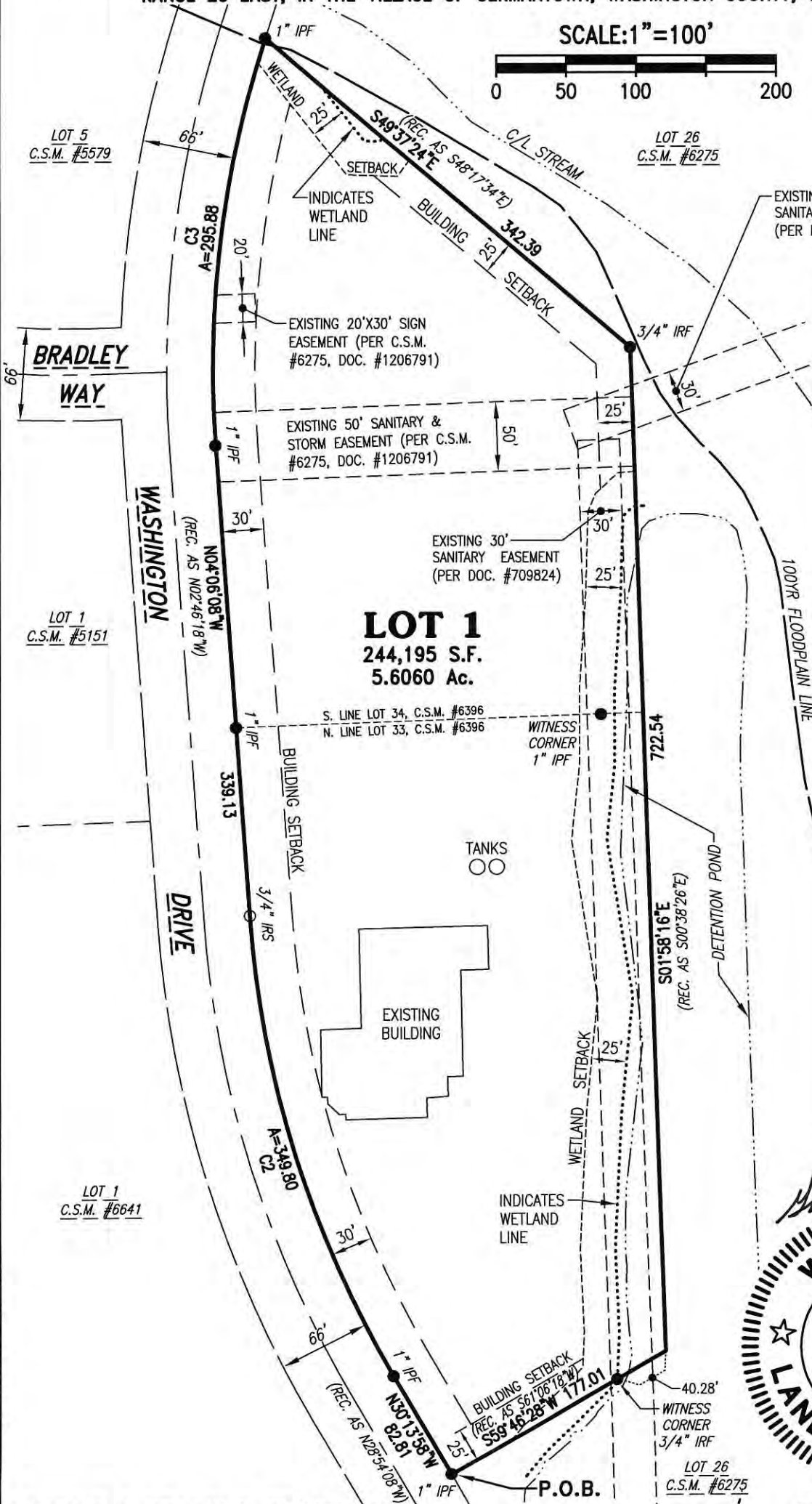
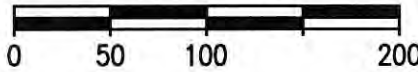
DRAFTED THIS 10TH DAY OF OCTOBER, 2018
THIS INSTRUMENT WAS DRAFTED BY GRADY L. GOSSER, S-2972

JOB NO. 18-023-1050-01
SHEET 1 OF 5

CERTIFIED SURVEY MAP NO. _____

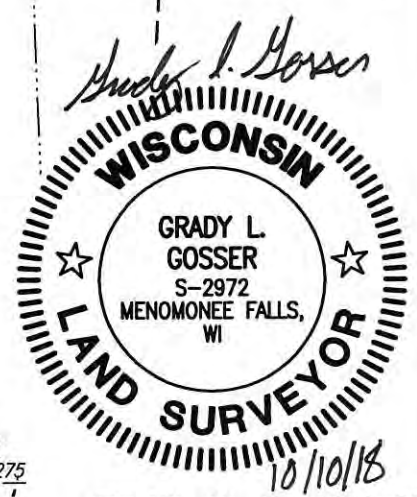
BEING A CONSOLIDATION OF LOTS 33 AND 34 OF CERTIFIED SURVEY MAP NO. 6396, BEING LOCATED IN A PART OF THE NORTHWEST 1/4 AND SOUTHWEST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 25, TOWN 9 NORTH, RANGE 20 EAST, IN THE VILLAGE OF GERMANTOWN, WASHINGTON COUNTY, WISCONSIN.

SCALE: 1" = 100'



CURVE TABLE:

NO.	RADIUS	CENTRAL ANGLE	ARC	CHORD	CHORD BEARING	TANGENT IN	TANGENT OUT
C1	833.00	26°07'50"	379.90	376.62	N17°10'03"W (REC. AS N15°50'13"W)	N04°06'08"W	N30°13'58"W
C2	767.00	26°07'50"	349.80	346.78	N17°10'03"W (REC. AS N15°50'13"W)	N30°13'58"W	N04°06'08"W
C3	767.00	22°06'08"	295.88	294.04	N06°56'56"E (REC. AS N08°16'46"E)	N04°06'08"W	N18°00'00"E



DRAFTED THIS 10TH DAY OF OCTOBER, 2018
THIS INSTRUMENT WAS DRAFTED BY GRADY L. GOSSER, S-2972

JOB NO. 18-023-1050-01
SHEET 2 OF 5

H:\C:\1000\1050\18023-01\Survey\CSM\530CSM01.dwg

CERTIFIED SURVEY MAP NO.

BEING A CONSOLIDATION OF LOTS 33 AND 34 OF CERTIFIED SURVEY MAP NO. 6396, BEING LOCATED IN A PART OF THE NORTHWEST 1/4 AND SOUTHWEST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 25, TOWN 9 NORTH, RANGE 20 EAST, IN THE VILLAGE OF GERMANTOWN, WASHINGTON COUNTY, WISCONSIN.

SURVEYOR'S CERTIFICATE:

STATE OF WISCONSIN)
)ss
COUNTY OF WAUKESHA)

I, Grady L. Gosser, Professional Land Surveyor, do hereby certify:

That I have surveyed, divided and mapped a consolidation of Lots 33 and 34 of Certified Survey Map No. 6396, recorded in the Office of the Register of Deeds for Washington County on February 22, 2011, in Volume 48 of Certified Survey Maps, at Pages 195 through 199 inclusive, as Document No. 1273968, being located in a part of the Northwest 1/4 and Southwest 1/4 of the Southeast 1/4 of Section 25, Town 9 North, Range 20 East, in the Village of Germantown, Washington County, Wisconsin.

Said Parcel contains 244,195 Square Feet (or 5.6060 Acres) of land, more or less.

That I have made such survey, land division and map by the direction of **JDV REAL ESTATE HOLDINGS, LLC**, owner of said lands.

That such map is a correct representation of all the exterior boundaries of the land surveyed and the land division thereof made.

That I have fully complied with the provisions of Chapter 236 of the Wisconsin Statutes and the subdivision regulations of the Village of Germantown in surveying, dividing and mapping the same.

Dated this 10th day of OCTOBER, 2018.



Grady L. Gosser

Grady L. Gosser, P.L.S.
Professional Land Surveyor, S-2972
TRIO ENGINEERING, LLC
12660 W. North Avenue, Building "D"
Brookfield, WI 53005
Phone: (262)790-1480 Fax: (262)790-1481

CERTIFIED SURVEY MAP NO. _____

BEING A CONSOLIDATION OF LOTS 33 AND 34 OF CERTIFIED SURVEY MAP NO. 6396, BEING LOCATED IN A PART OF THE NORTHWEST 1/4 AND SOUTHWEST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 25, TOWN 9 NORTH, RANGE 20 EAST, IN THE VILLAGE OF GERMANTOWN, WASHINGTON COUNTY, WISCONSIN.

CORPORATE OWNER'S CERTIFICATE:

JDV REAL ESTATE HOLDINGS, LLC, a Wisconsin Limited Liability Company duly organized and existing under and by virtue of the laws of the State of Wisconsin, as owner, does hereby certify that said Corporation caused the land described on this map to be surveyed, divided and mapped as represented on this map in accordance with the provisions of Chapter 236 of the Wisconsin Statutes and the ordinances of the Village of Germantown, this _____ day of _____, 20_____.

JDV REAL ESTATE HOLDINGS, LLC

Jeffrey D. Vilione, Member

STATE OF WISCONSIN)
) ss
COUNTY OF)

Personally came before me this _____ day of _____, 20_____, Jeffrey D. Vilione, Member of the above named Corporation, to me known to be the person who executed the foregoing instrument, and to me known to be a Member of said Corporation, and acknowledged that he executed the foregoing instrument as such officer as the deed of said Corporation, by its authority.

Print Name: _____
Notary Public, _____ County, WI
My commission expires: _____

CONSENT OF CORPORATE MORTGAGEE:

SPRING BANK OF WISCONSIN, a corporation duly organized and existing under and by virtue of the laws of the State of Wisconsin, mortgagee of the above described land, does hereby consent to the surveying, dividing and mapping of the land described on this Certified Survey Map, and does hereby consent to the above certificate of **JDV REAL ESTATE HOLDINGS, LLC**, owner, this _____ day of _____, 20_____.

SPRING BANK OF WISCONSIN

Glenn A. Michaelsen, Senior Vice President

STATE OF WISCONSIN)
) ss
COUNTY OF)

Personally came before me this _____ day of _____, 20_____, Glenn A. Michaelsen, Senior Vice President of the above named corporation, to me known to be the person who executed the foregoing instrument, and to me known to be the Senior Vice President of said Corporation, and acknowledged that he executed the foregoing instrument as such officer as the deed of said corporation, by its authority.

Print Name: _____
Notary Public, _____ County, WI
My commission expires: _____



Drafted this 10th Day of October, 2018

THIS INSTRUMENT WAS DRAFTED BY GRADY L. GOSSER, S-2972

Job. No. 18-023-1050-01

SHEET 4 OF 5

CERTIFIED SURVEY MAP NO. _____

BEING A CONSOLIDATION OF LOTS 33 AND 34 OF CERTIFIED SURVEY MAP NO. 6396, BEING LOCATED IN A PART OF THE NORTHWEST 1/4 AND SOUTHWEST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 25, TOWN 9 NORTH, RANGE 20 EAST, IN THE VILLAGE OF GERMANTOWN, WASHINGTON COUNTY, WISCONSIN.

VILLAGE OF GERMANTOWN PLANNING COMMISSION APPROVAL:

This Certified Survey Map is hereby approved by the Planning Commission of the Village of Germantown on this _____ day of _____, 20 _____.

Dean Wolter, Chairman

Date:

Laura A. Johnson, Secretary

Date:

VILLAGE BOARD APPROVAL:

This Certified Survey Map, being a part of the Northwest 1/4 and Southwest 1/4 of the Southeast 1/4 of Section 25, Town 9 North, Range 20 East, in the Village of Germantown, Washington County, Wisconsin, having been approved by the Planning Commission being the same, is hereby approved and accepted by the Village Board of Trustees of the Village of Germantown on this _____ day of _____, 20 _____.

Dean Wolter, Village President

Date:

Deanna Boldrey, Village Clerk

Date:



Drafted this 10th Day of October, 2018

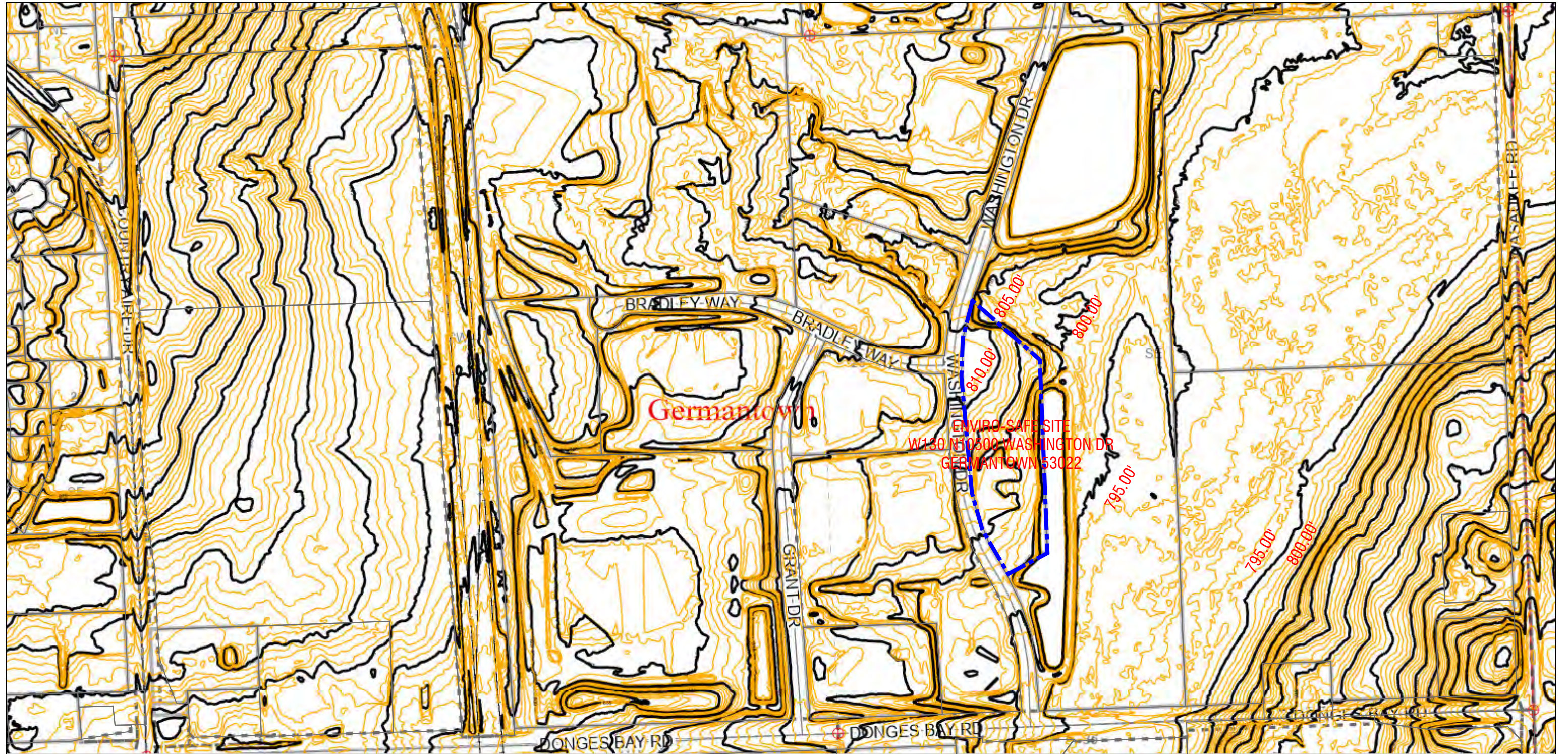
THIS INSTRUMENT WAS DRAFTED BY GRADY L. GOSSER, S-2972

Job. No. 18-023-1050-01

SHEET 5 OF 5

**Enviro-Safe Resource Recovery
Appendix G-03 - Topographical Map**

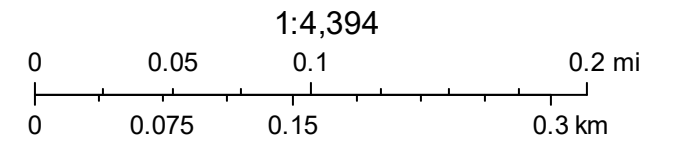
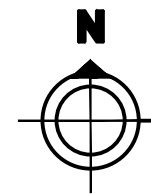
Washington County, Wisconsin



3/17/2021, 10:57:12 PM

- Current Parcel
- City/Village Street
- Private Street
- 1' Contours
- <all other values>
- Index
- Meander Line
- Intermediate
- Lot
- Right-of-Way
- Building
- RoadCenterline TWN, CVS, PVT
- Township Road

ENVIRO-SAFE SITE
W130 N10500 WASHINGTON DR
GERMANTOWN 53022



Washington County GIS
Washington County

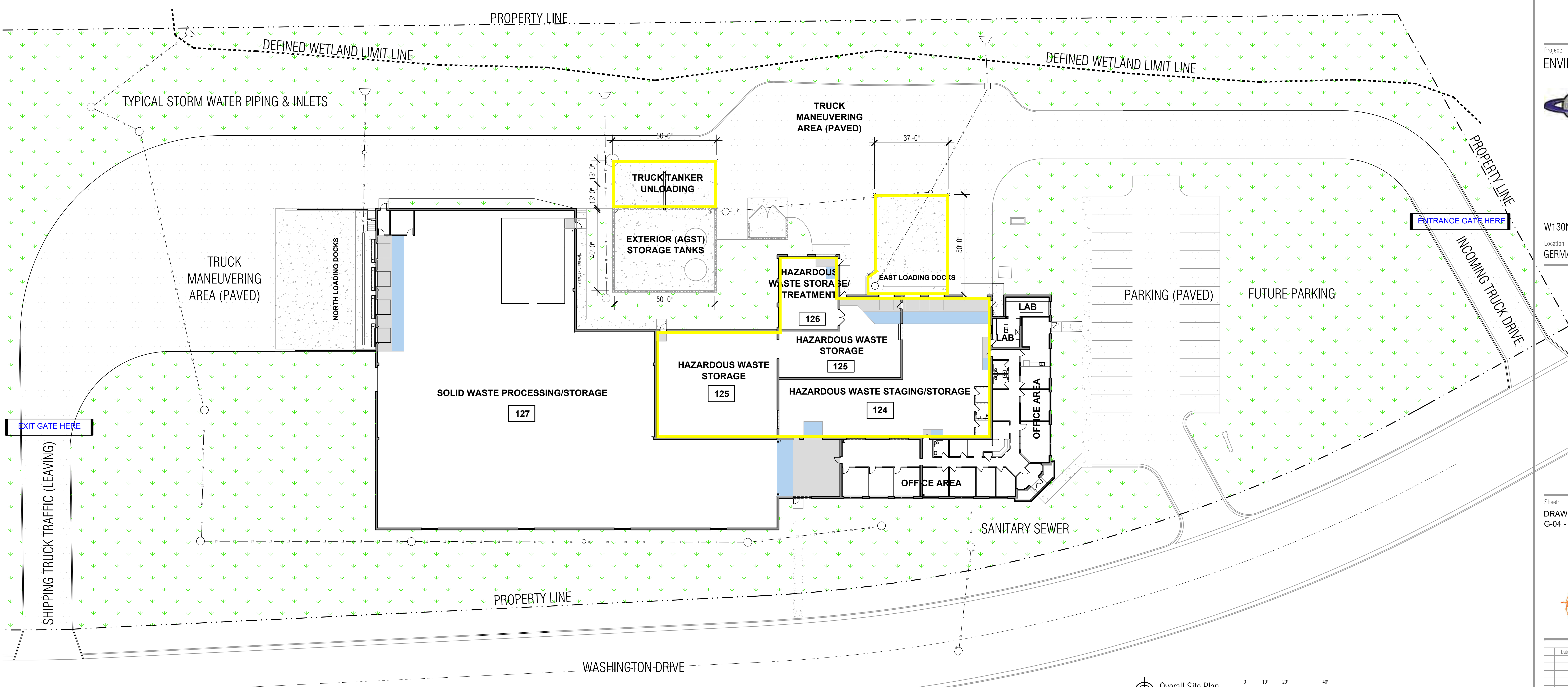
**Enviro-Safe Resource Recovery
Appendix G-04 - Facility Map**



Date:	Issue Set:
Date:	2022-08-08
Project No.:	0019-42
Sheet No.:	

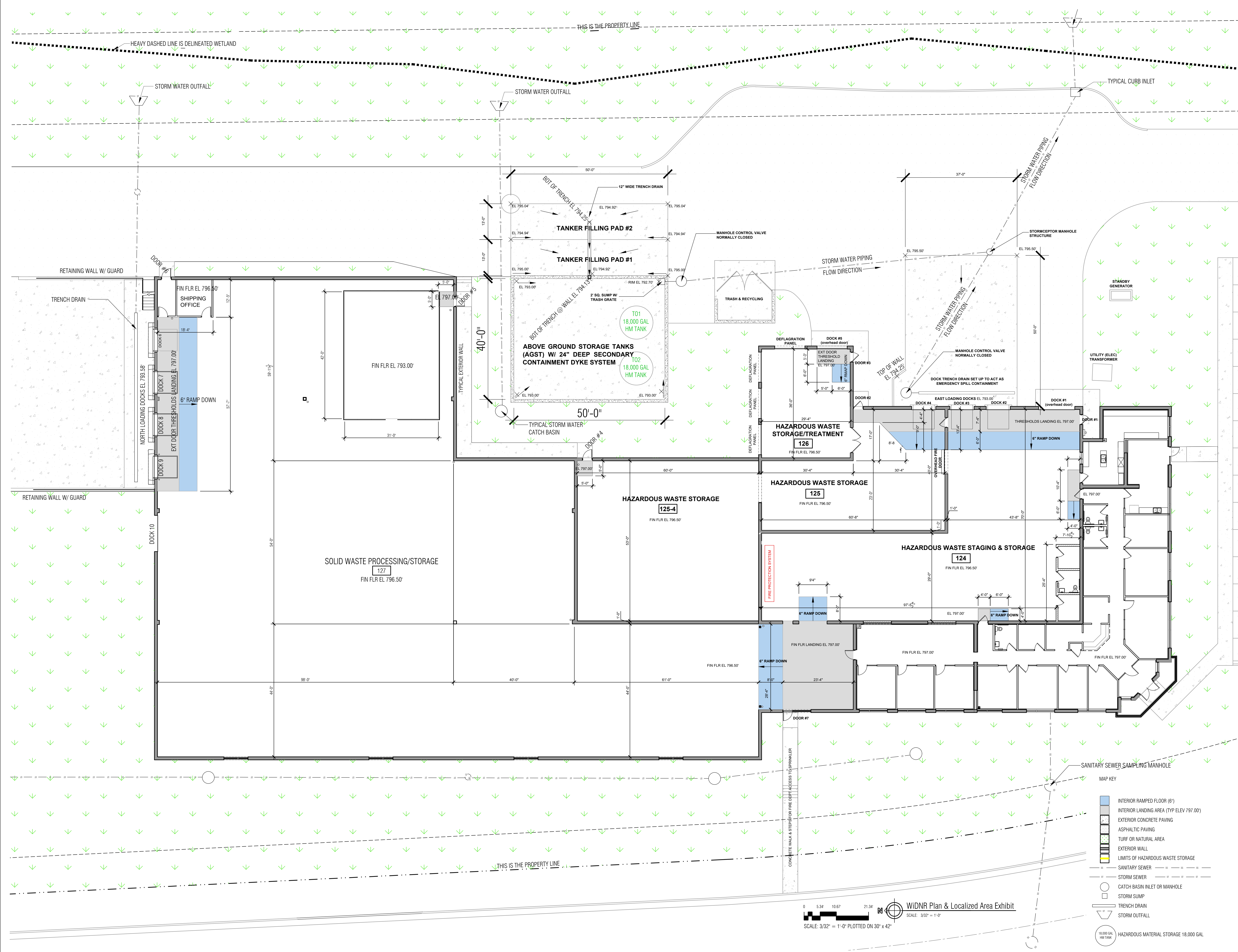
MAP KEY

- INTERIOR RAMPED FLOOR (6")
- INTERIOR LANDING AREA (TYP ELEV 797.00')
- EXTERIOR CONCRETE PAVING
- ASPHALTIC PAVING
- TURF OR NATURAL AREA
- EXTERIOR WALL
- LIMITS OF HAZARDOUS WASTE STORAGE
- SANITARY SEWER
- STORM SEWER
- CATCH BASIN INLET OR MANHOLE
- STORM SUMP
- TRENCH DRAIN
- STORM OUTFALL
- 18,000 GAL 18M TANK
- HAZARDOUS MATERIAL STORAGE 18,000 GAL



Overall Site Plan
 SCALE: 1" = 20'-0"
 SCALE: 1" = 20' PLOTTED ON 30" x 42"

Enviro-Safe Resource Recovery
Appendix G-05 - Secondary Containment Map



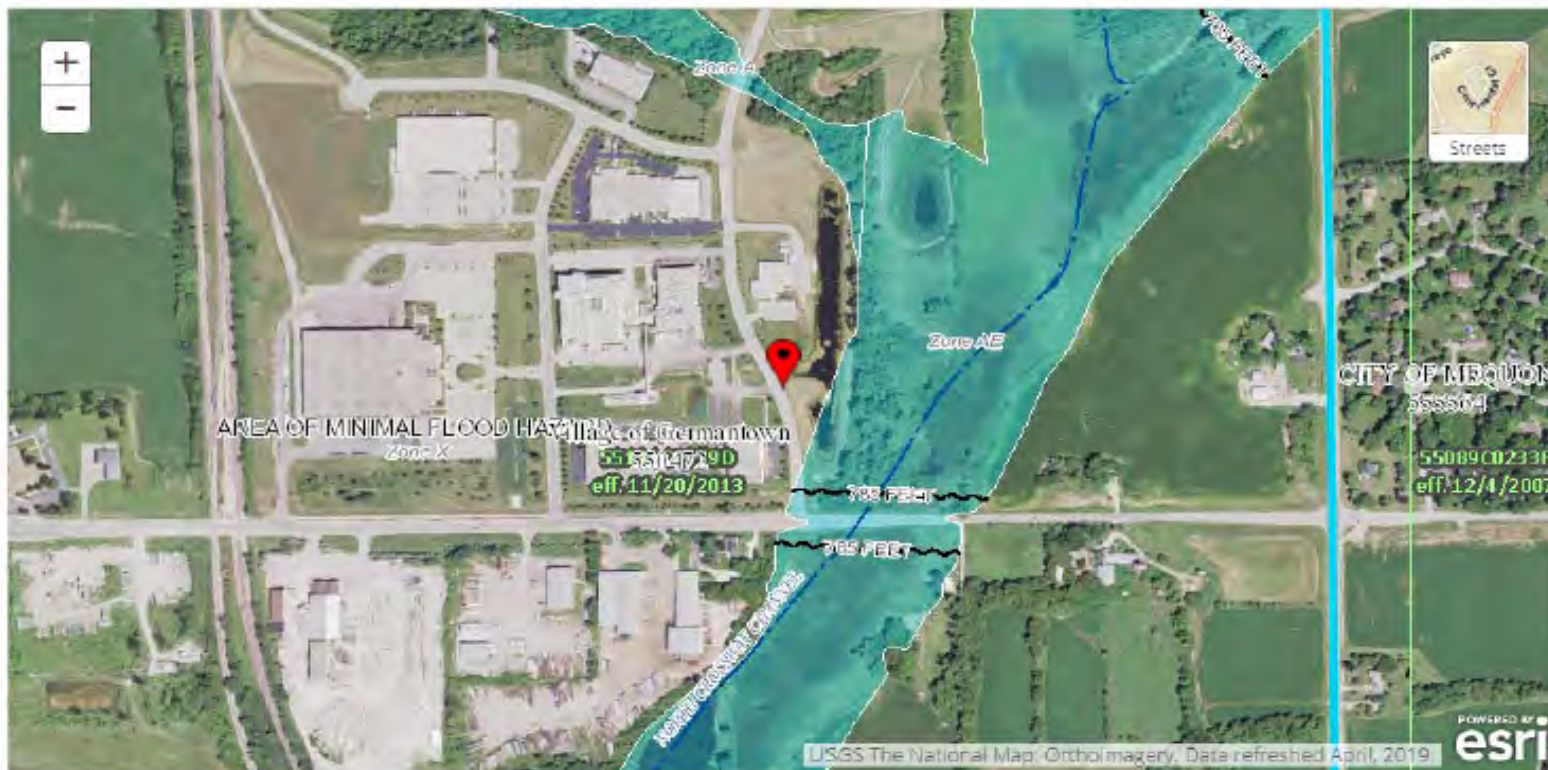
Enviro-Safe Resource Recovery
Appendix G-06 - 100-Year Flood Plain Map

Appendix G-06: 100-Year Flood Plain Map

Date: February 12, 2020

JDV Real Estate Holding, LLC.
 Parcel Number: GTNV_254271 Zoning: M-1 Limited Industrial
 100-Year Floodplain
 February 12, 2020

North



<p>PIN</p> <ul style="list-style-type: none"> Approximate location based on user input and does not represent an authoritative property location <p>MAP PANELS</p> <ul style="list-style-type: none"> Selected FloodMap Boundary Digital data available No Digital Data Available Unmapped <p>OTHER AREAS</p> <ul style="list-style-type: none"> Area of Minimal Flood Hazard Zone X Effective LOMRs Area of Undetermined Flood Hazard Zone D Otherwise Protected Area Coastal barrier resource system Area 	<p>SPECIAL FLOOD HAZARD AREAS</p> <ul style="list-style-type: none"> Without Base Flood Elevation (BFE) Zone A, V, AE With BFE or Depth Regulatory Floodway Zone AE, AO, AH, VE, AV <p>OTHER AREAS OF FLOOD HAZARD</p> <ul style="list-style-type: none"> 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X Future Conditions 1% Annual Chance Flood Hazard Zone X Area with Reduced Flood Risk due to Levee. See Notes. Zone X Area with Flood Risk due to Levee Zone D 	<p>OTHER FEATURES</p> <ul style="list-style-type: none"> Cross Sections with 1% Annual Chance Water Surface Elevation Coastal Transsect Base Flood Elevation Line (BFE) Limit of Study Jurisdiction Boundary Coastal Transsect Baseline Profile Baseline Hydrographic Feature <p>GENERAL STRUCTURES</p> <ul style="list-style-type: none"> Channel, Culvert, or Storm Sewer Levee, Dike, or Floodwall
--	--	---

Appendix G-06: 100-Year Flood Plain Map

Date: February 12, 2020

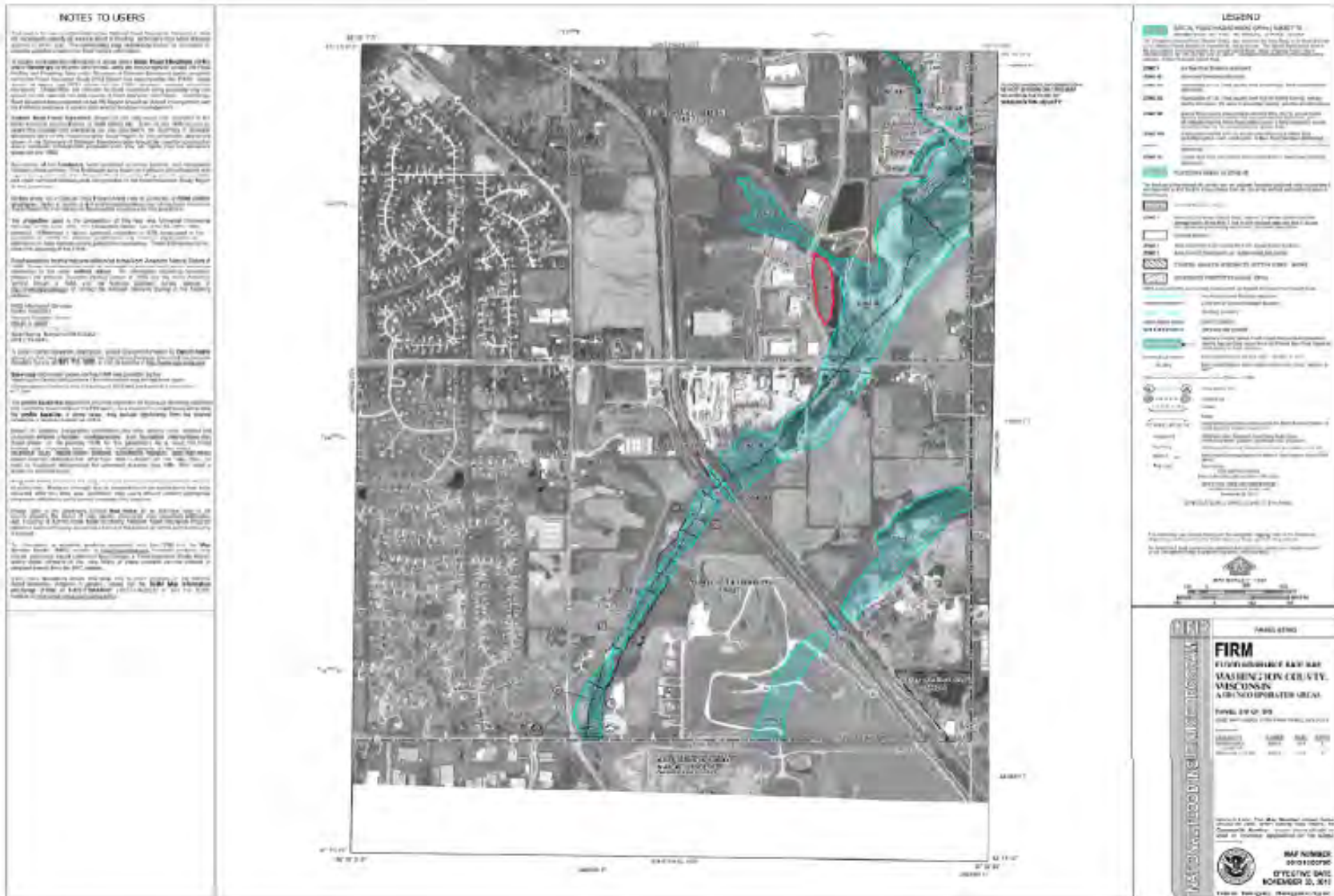
JDV Real Estate Holding, LLC.

Parcel Number: GTNV_254271 Zoning: M-1 Limited Industrial

100-Year Floodplain

February 12, 2020

North



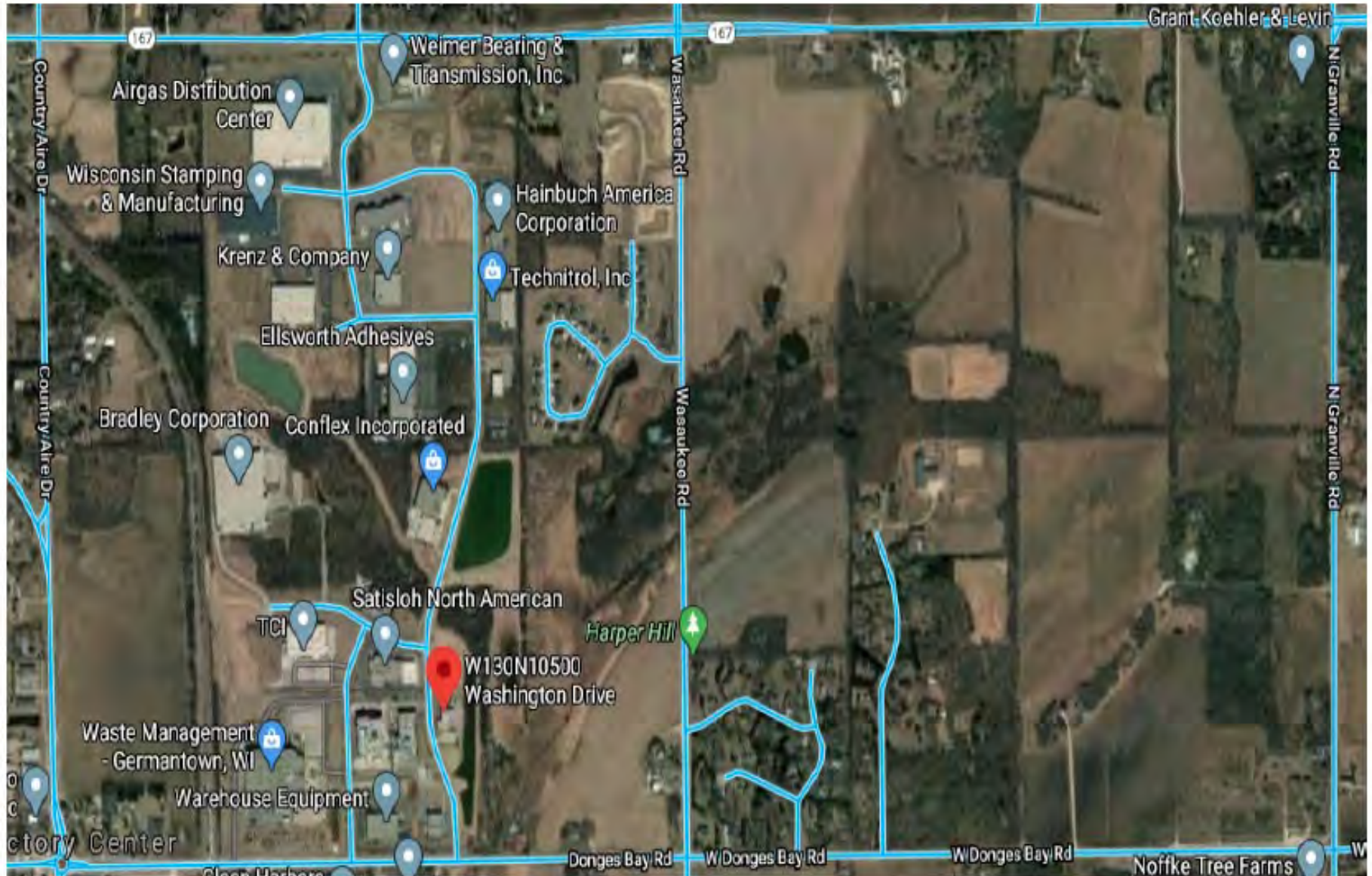
Enviro-Safe Resource Recovery
Appendix G-07 - Local Street and Traffic
Pattern Map

Appendix G-07: Local Street and Traffic Pattern Map

Date: February 10, 2022

ENVIRO-SAFE RESOURCE RECOVERY
LOCAL STREET MAP AND TRAFFIC PATTERN
Goggle Maps (2/10/2020)

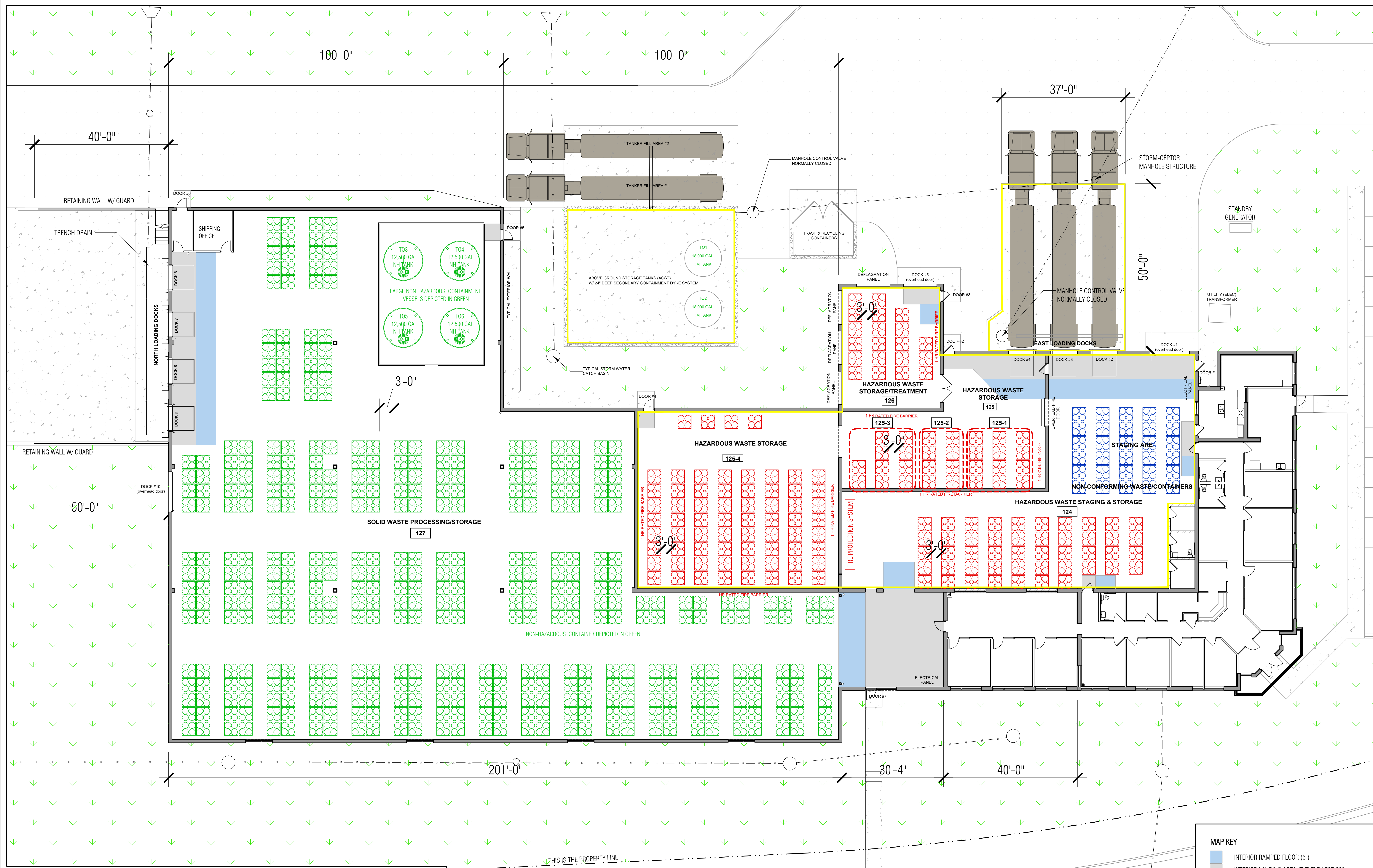
North



**Enviro-Safe Resource Recovery
Appendix G-08 - Container Map**



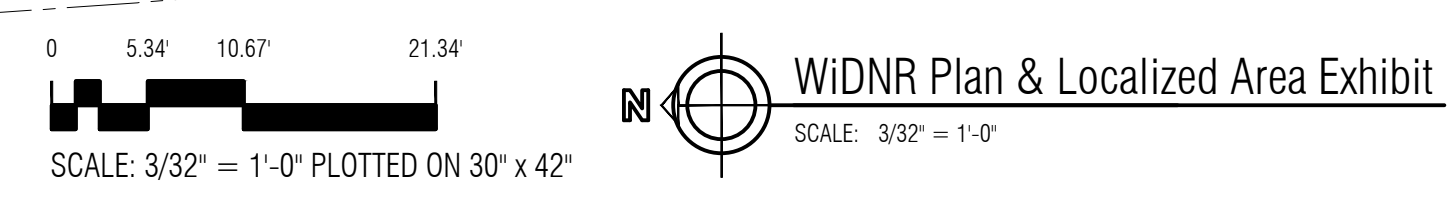
Date:	Issue Set:
Date:	2022-08-08
Project No.:	0019-42
Sheet No.:	



FLOOR AREA AND MAXIMUM STORAGE				
AREA	USE	FLOOR AREA (Square Feet)	Maximum HW Storage Capacity	
			55-Gallon Equiv.	Gallons
RM 124	HW Staging and Storage	4,646	616	33,880
RM 125	HW Storage	5,091	784	43,120
RM 126	HW Storage/Treatment	1,056	160	8,800
East Loading Docks	HW Storage	1,850	N/A	18,000
Tanker Filling Area #1	HW Storage	616	N/A	6,000
Tanker Filling Area #2	HW Storage	616	N/A	6,000
TOTALS		13,810	1,560	115,800

CONTAINER LEGEND	
PICTOGRAM	DESCRIPTION
	HW Storage 48x48 Wood Pallet with 4 Drums or Equivalent Stacked Two High
	Solid Waste Storage 48x48 Wood Pallet with 4 Drums or Equivalent Stacked Two High
	HW Staging 48x48 Wood Pallet with 4 Drums or Equivalent Stacked Two High

(1) All of RM 124 can be used for temporary staging of up to 616 drums (double stacked). The west part of RM 124 can instead be used for licensed storage of up to 376 drums (double stacked) when not needed for staging.
 (2) Room 124 area with red colored pallets and drums can also be used for staging when blue-colored staging area is full.
 (3) Incompatible waste storage to be limited to RMs 125-1 thru 125-4 and RM 126.



MAP KEY

- INTERIOR RAMPED FLOOR (6")
- INTERIOR LANDING AREA (TYP ELEV 797.00')
- EXTERIOR CONCRETE PAVING
- ASPHALTIC PAVING
- TURF OR NATURAL AREA
- EXTERIOR WALL
- LIMITS OF HAZARDOUS WASTE STORAGE
- SANITARY SEWER
- STORM SEWER
- CATCH BASIN INLET OR MANHOLE
- STORM SUMP
- TRENCH DRAIN
- STORM OUTFALL
- 18,000 GAL HM TANK

Enviro-Safe Resource Recovery
Appendix G-09 - Surface Water Data Viewer
Map



Surface Water Data Viewer Map



Legend

- 24K Hydrography Flow Direction
- Stream Order**
 - 1st Order
 - 2nd Order
 - 3rd Order
 - 4th Order
 - 5th Order
 - 6th Order
 - 7th Order
 - 8th Order
 - 9th Order
- Municipality
- State Boundaries
- County Boundaries
- Major Roads**
 - Interstate Highway
 - State Highway
 - US Highway
- County and Local Roads**
 - County HWY
 - Local Road
- Railroads
- Tribal Lands
- Railroads
- Rivers and Streams
- Intermittent Streams
- Lakes and Open water
- Index to EN_Image_Basemap_Leaf_Off

0.1 0 0.06 0.1 Miles

NAD_1983_HARN_Wisconsin_TM

1: 3,960

DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: <http://dnr.wi.gov/legal/>

Notes

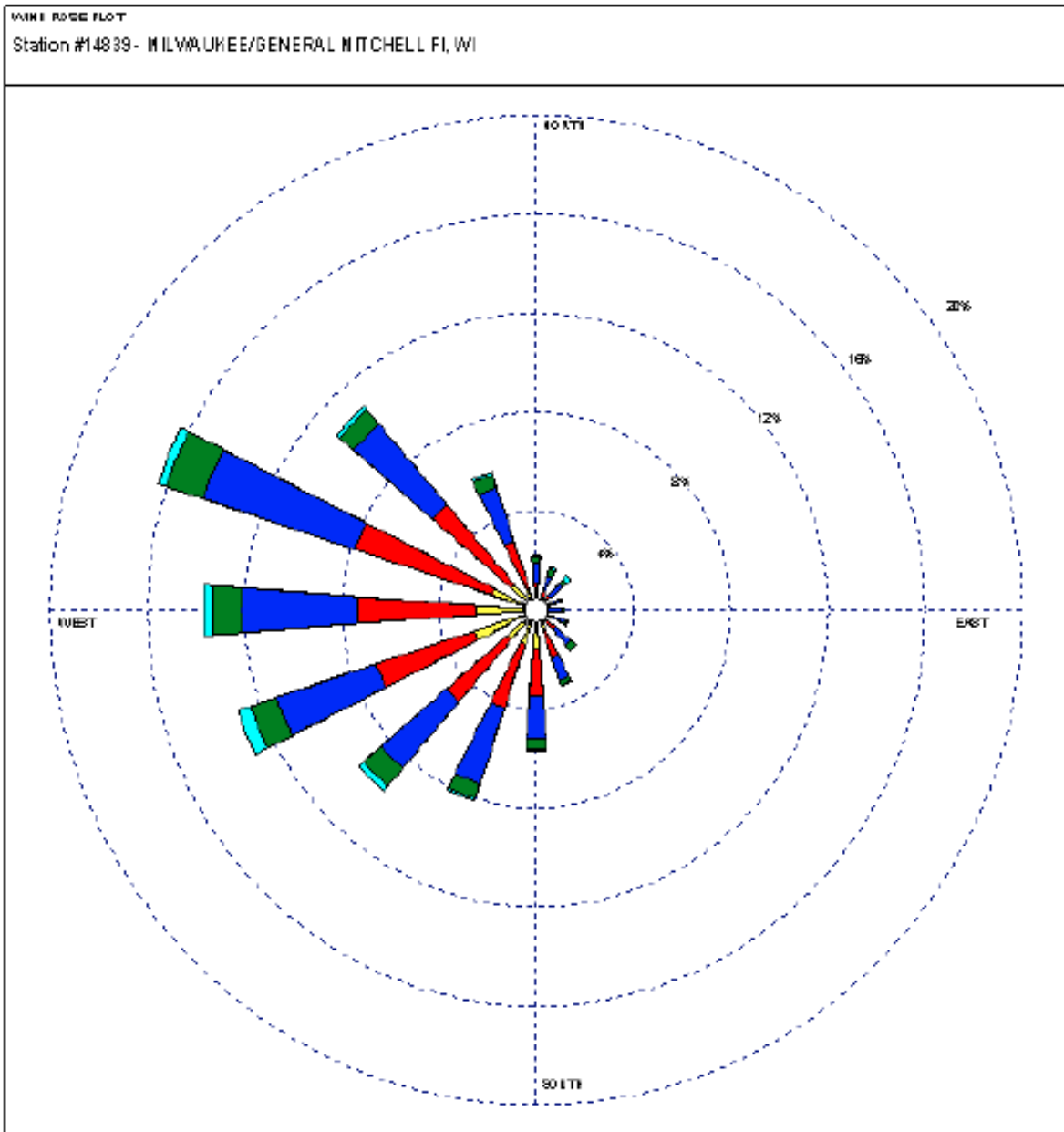
Enviro-Safe Resource Recovery
W130 N10500 Washington Drive
Germantown, WI 53022

**Enviro-Safe Resource Recovery
Appendix G-10 - Wind Rose Map**

Appendix G-10: Wind Rose Data Map

Date: February 12, 2022

**ENVIRO-SAFE RESOURCE RECOVERY
WIND ROSE MAPS
FEBRUARY 12, 2020**

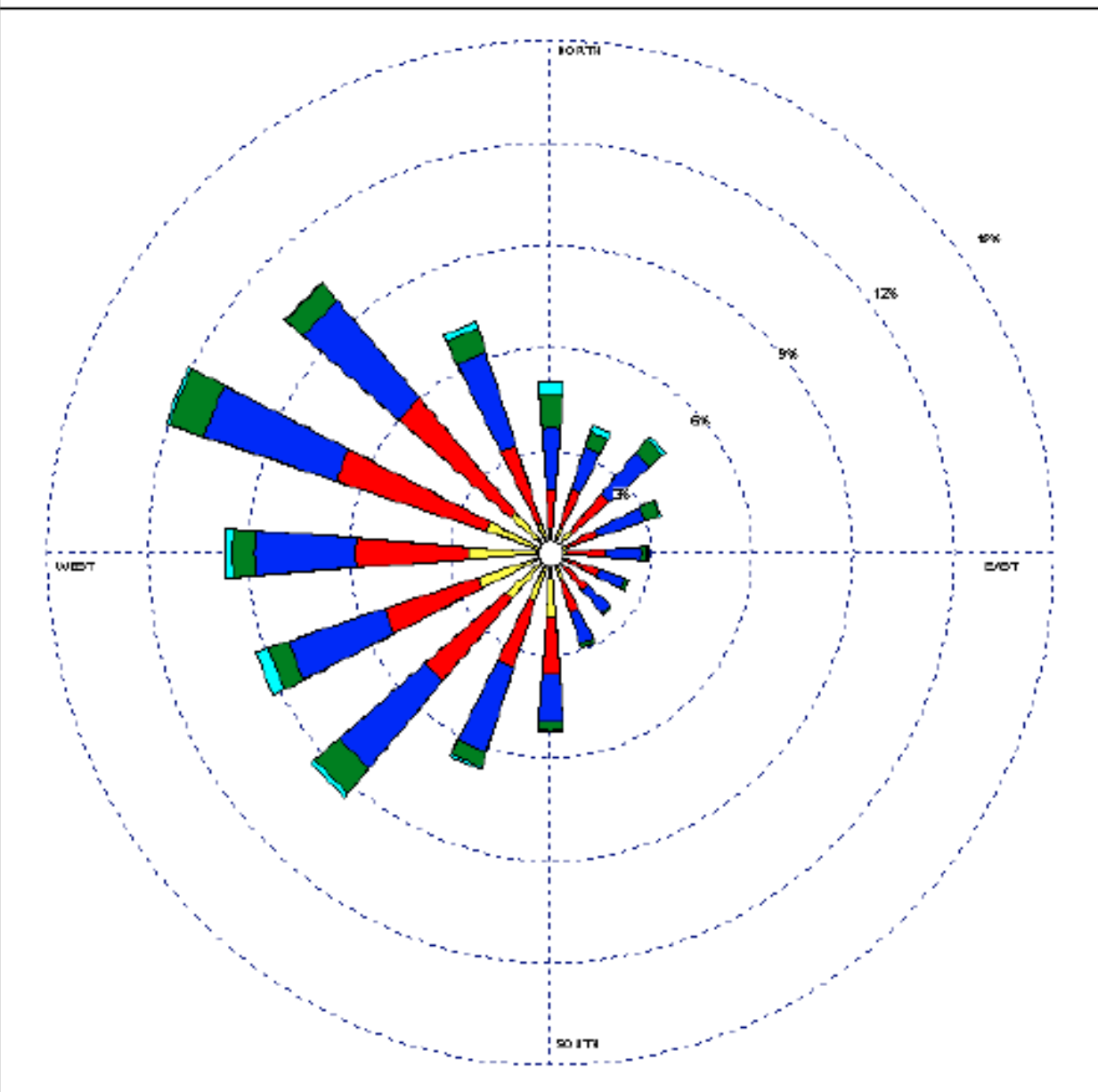


Wind Speed (m/s) 	MODEL	DATE	COMPANY NAME
	WINDREPLY	11/02/2002	
	WIND SPEED	UNIT	COMMENTS
	5.65 m/s	m/s	
	AVG. WIND SPEED	CALM WINDS	
5.65 m/s	1.58%		
DIRECTION	PLOT YEAR-DATE-TIME	PROJECT PLOT NO.	
Direction (blowing from)	1961 Jan 1 - Jan 31 Midnight - 11 PM		

WINDREPLY Ver 2.0 by Edco. Generated at: Milwaukee, Wisconsin

ENVIRO-SAFE RESOURCE RECOVERY
 WIND ROSE MAPS
 FEBRUARY 12, 2020

WIND ROSE PLOT
 Station #14839 - MILWAUKEE/GENERAL MITCHELL FL. WI

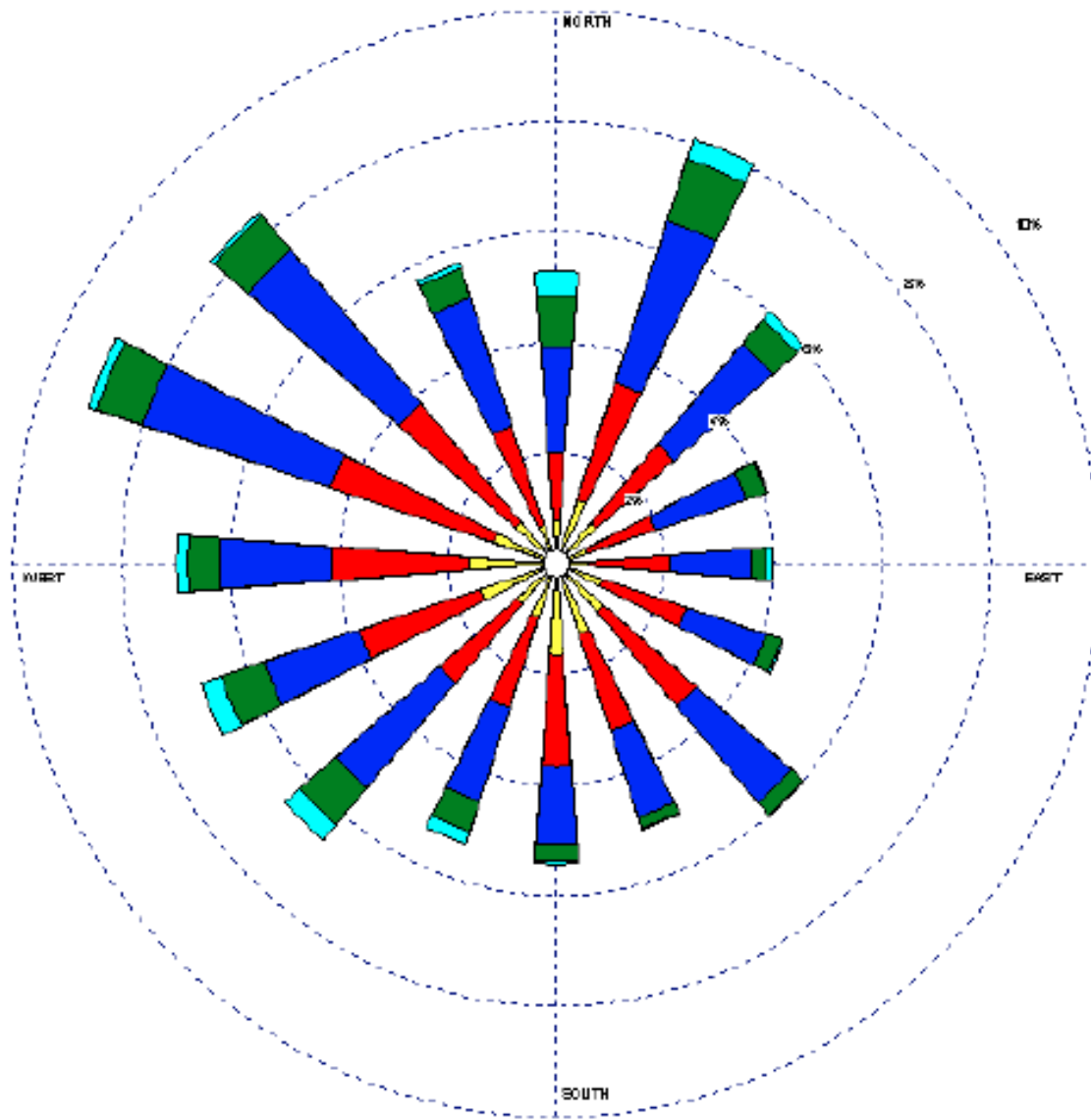


Wind Speed (m/s) 	MODELER	DATE	COMPANY NAME
	INPUT	UNIT	COMMENTS
	AVG. WIND SPEED	CALC WINDS	
	ORIENTATION	PLOT YEAR-DATETIME	PROJECT PLOT NO.
	Wind Speed	m/s	
	3.44 m/s	2.41%	
	Direction (blowing from)	1961 Feb 1 - Feb 29 Midnight - 11 PM	

ENVIRO-SAFE RESOURCE RECOVERY
WIND ROSE MAPS
FEBRUARY 12, 2020

WIND ROSE PLOT

Station #14839 - MILWAUKEE/GENERAL MITCHELL FI, WI



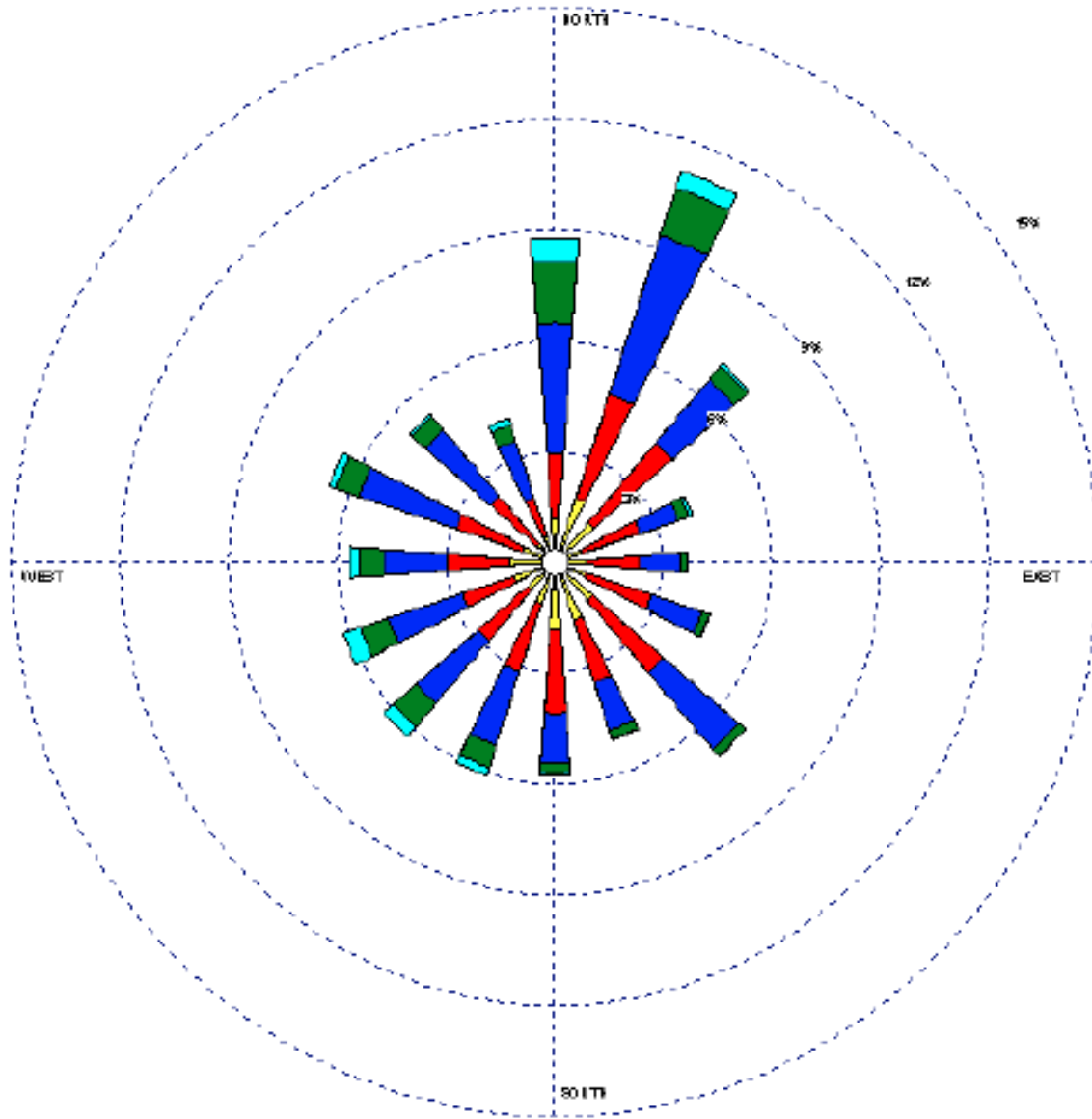
Wind Speed (m/s) 	MODELER	DATE 11/8/2012	COMPANY NAME
	DISPLAY Wind Speed	UNIT m/s	COMMENTS
	Avg. WIND SPEED 5.68 m/s	CALC WINDS 2.61%	
	DIRECTION Direction (blowing from)	PLOT YEAR: DATE/TIME 1961 Mar 1 - Mar 31 Midnight - 11 PM	PROJECT/LOT NO.

WIND ROSE PLOT by Clark Environmental Services - www.clarkenv.com/boston

ENVIRO-SAFE RESOURCE RECOVERY
WIND ROSE MAPS
FEBRUARY 12, 2020

WIND ROSE PLOT

Station #14833 - MILWAUKEE/GENERAL MITCHELL FLD WI

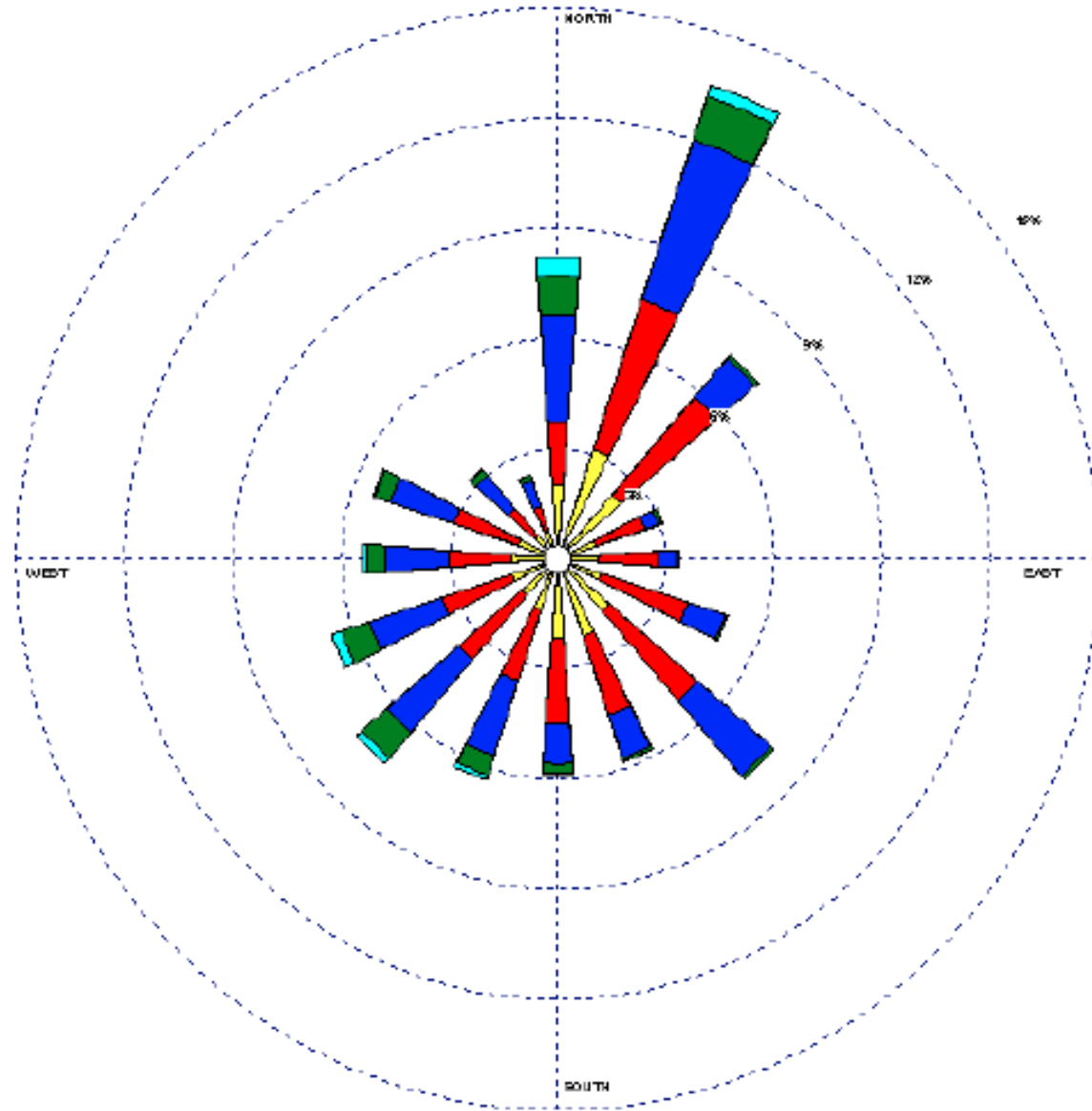



Wind Speed (m/s) 	MODELER	DATE	COMPANY NAME
	DISPLAY	UNIT	COMMENTS
	AVG. WIND SPEED	CALM WINDS	
	ORIENTATION	PLOT YEAR-DATE-TIME	PROJECT/PLOT NO.
	Wind Speed	m/s	
	5.67 m/s	2.95%	
	Direction (blowing from)	1961 Apr 1 - Apr 30 Midnight - 11 PM	

ENVIRO-SAFE RESOURCE RECOVERY
 WIND ROSE MAPS
 FEBRUARY 12, 2020

WIND ROSE PLOT

Station #14833 - MILWAUKEE/GENERAL MITCHELL FI, WI

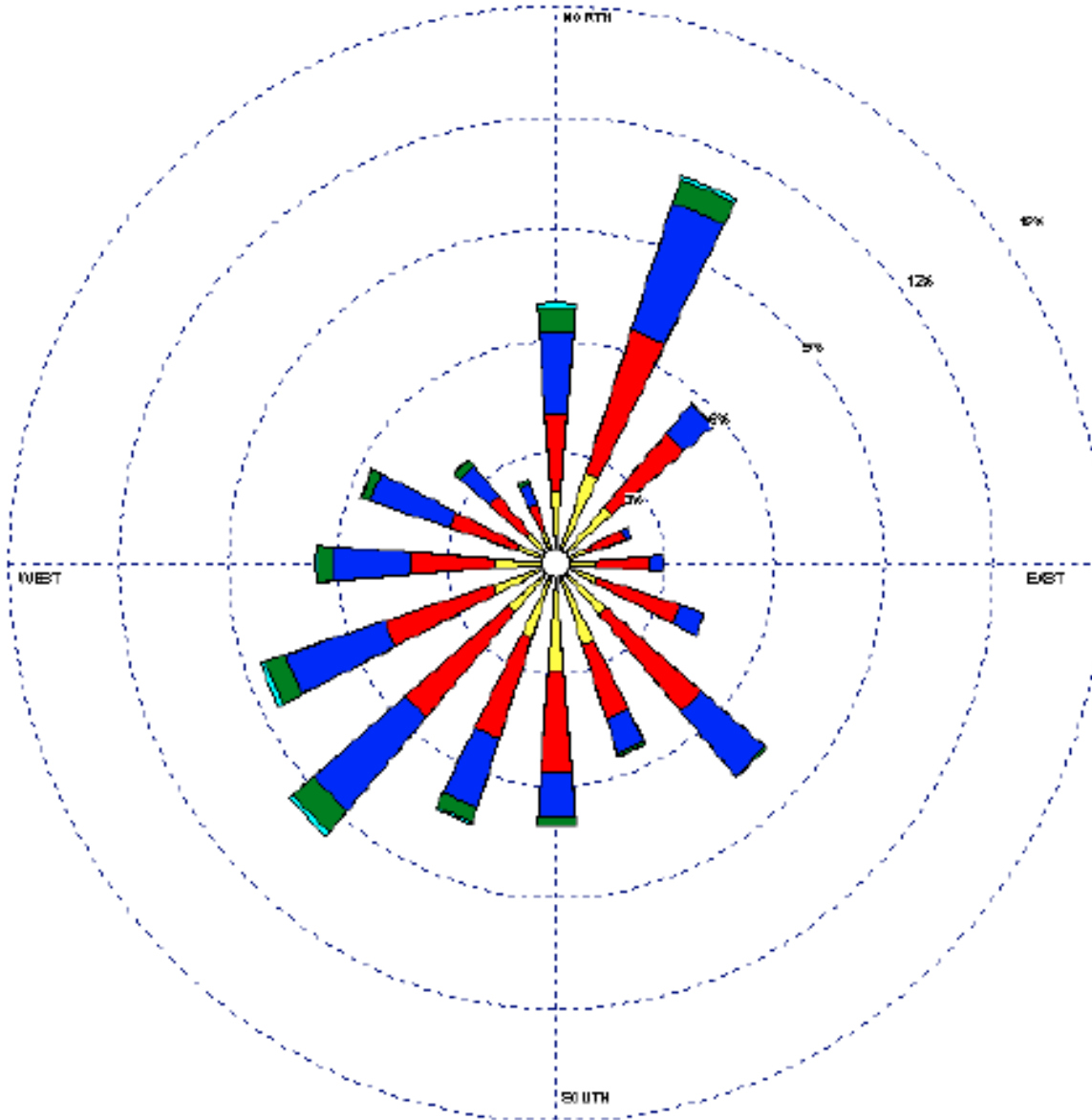


Wind Speed (m/s) 	MODELER	DATE 11/4/2002	COMPANY NAME
	DISPLAY Wind Speed	UNIT m/s	COMMENTS
	Avg. Wind Speed 5.07 m/s	% ALLOWED 3.06%	
	ORIENTATION Direction (blowing from)	PLT YEAR-DATE-TIME 1991 May 1 - May 31 Midnight - 11 PM	PROJECT/PLT NO.

ENVIRO-SAFE RESOURCE RECOVERY
 WIND ROSE MAPS
 FEBRUARY 12, 2020

WIND ROSE PLOT

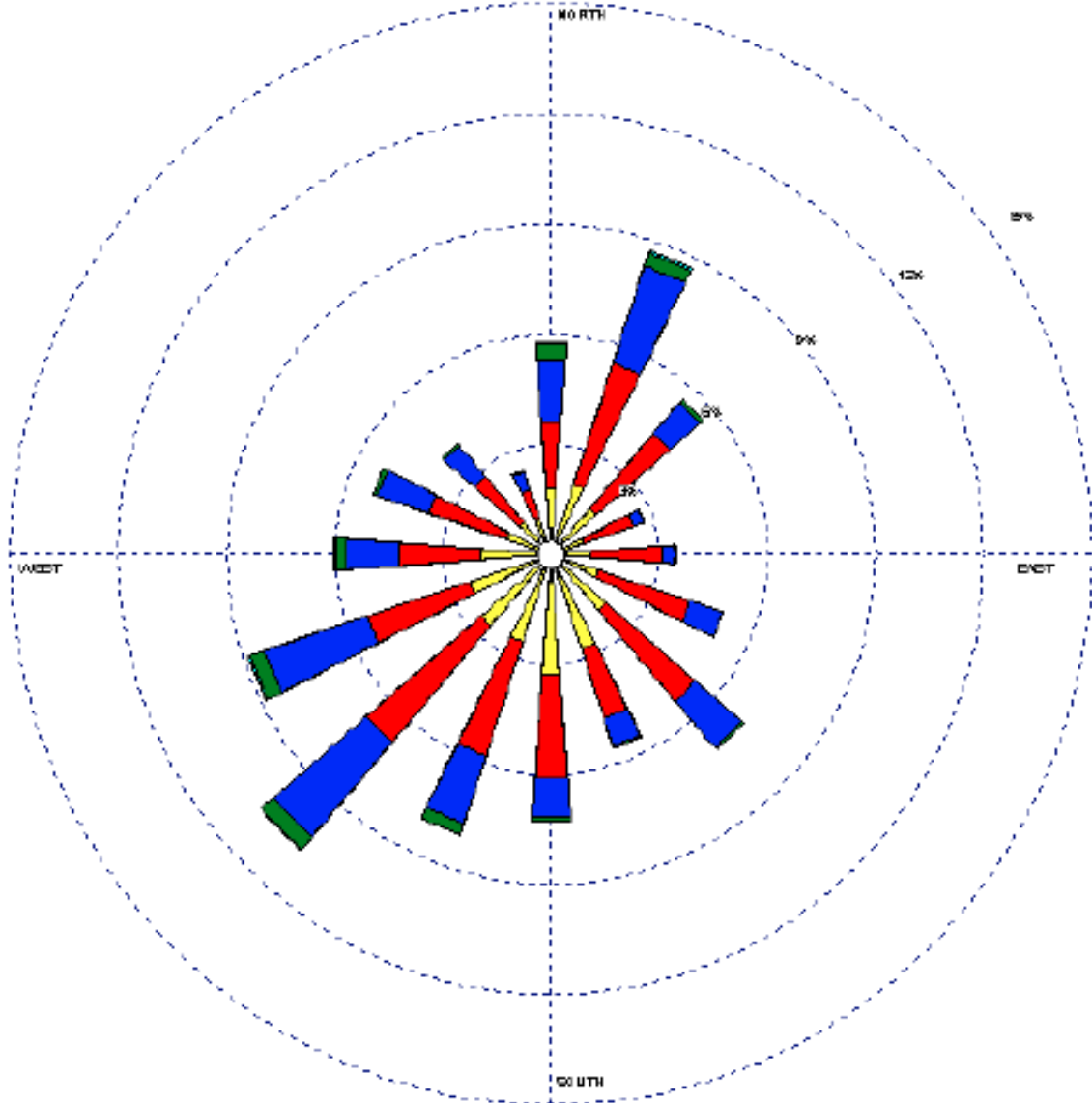
Station #14939 - MILWAUKEE/GENERAL MITCHELL FLD WI



Wind Speed (m/s) 	MODELER	DATE 11/4/2002	COMPANY NAME
	DISPLAY Wind Speed	UNIT m/s	COMMENTS
	Avg. WIND SPEED 4.75 m/s	CALC WIND 2.72%	
	CURTAIN # Direction (blowing from)	PLOT YEAR-DATETIME 1961 Jun 1 - Jun 30 Midnight - 11 PM	PROJECT/PLOT NO.

ENVIRO-SAFE RESOURCE RECOVERY
WIND ROSE MAPS
FEBRUARY 12, 2020

WIND ROSE PLOT
 Station #14839 - MILWAUKEE/GENERAL MITCHELL FI, WI

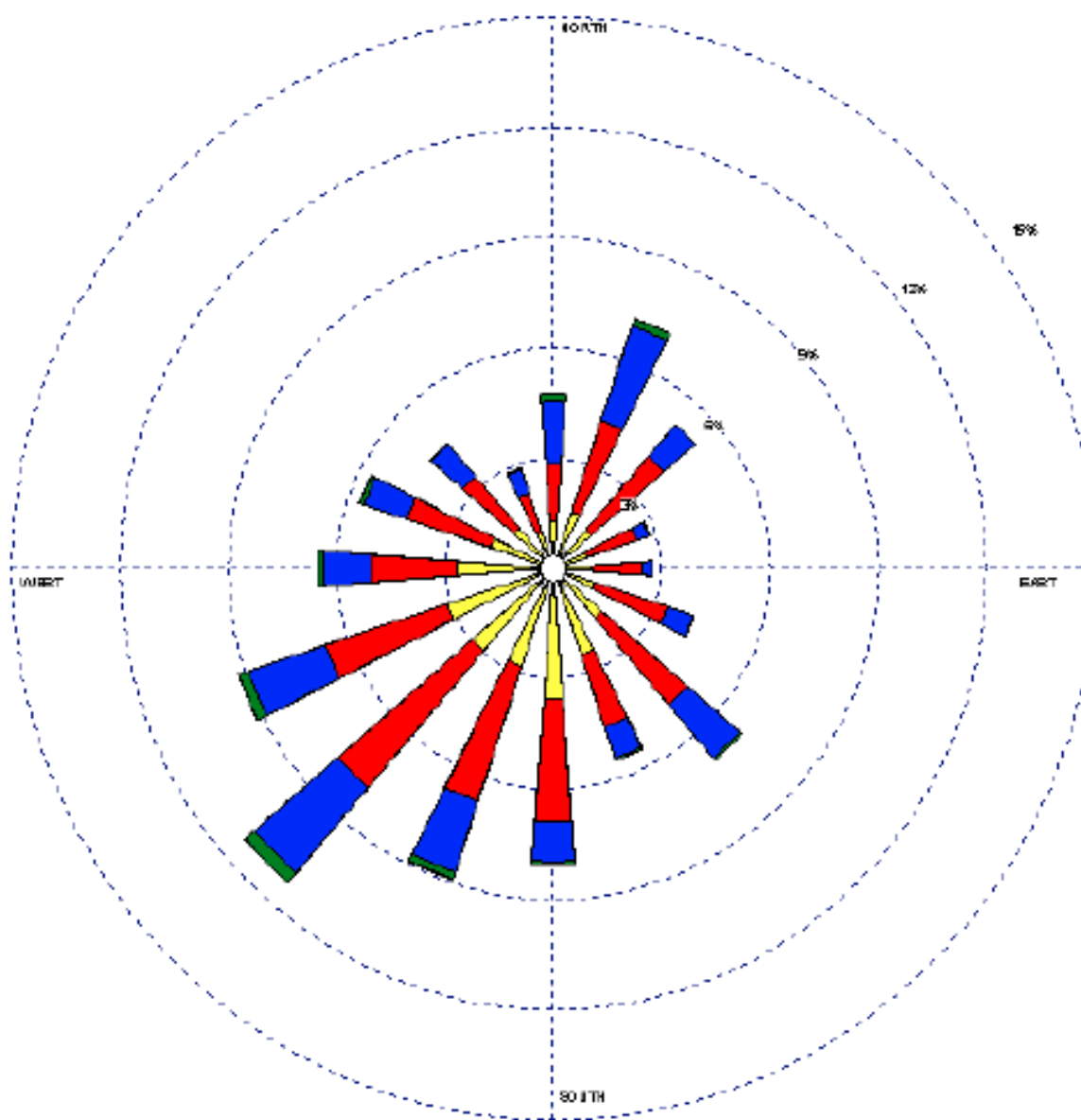


Wind Speed (m/s) 	MOFELER	DATE	COMPANY NAME
	DISPLAY	UNIT	COMMENTS
	AVG. WIND SPEED	DAILY WINDS	
	ORIENTATIO	PLOT YEAR-EXTENT	PROJECT/PLOT NO.
	Wind Speed	m/s	
	4.48 m/s	3.57%	
	Direction (blowing from)	1961 Jul 1 - Jul 31 Midnight - 11 PM	

ENVIRO-SAFE RESOURCE RECOVERY
 WIND ROSE MAPS
 FEBRUARY 12, 2020

WIND ROSE PLOT

Station #148 99 - MILWAUKEE/GENERAL MITCHELL FI, WI

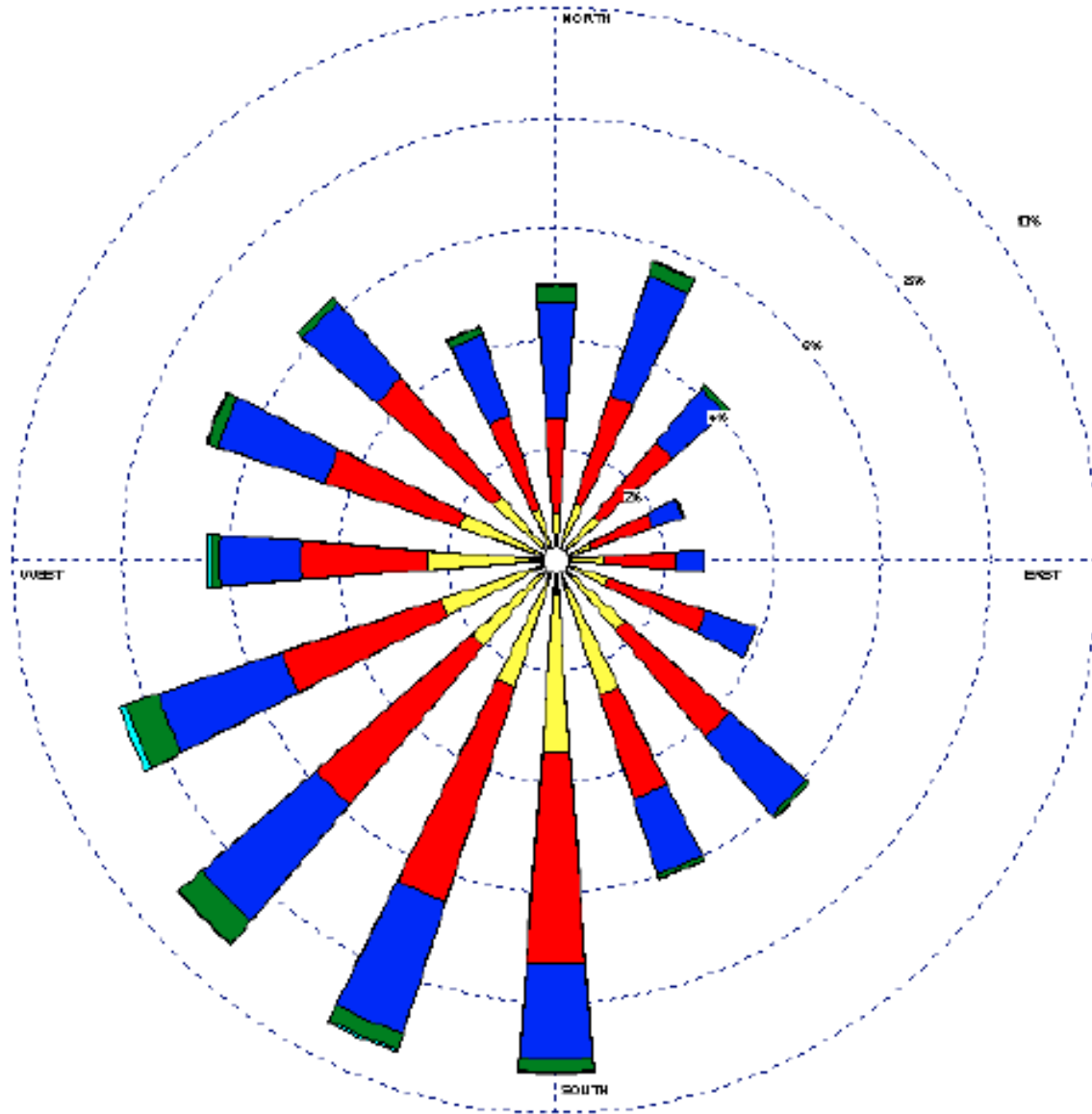


Wind Speed (m/s) 	MODELER	DATE	COMPANY NAME
	INSPIRY	11/4/2002	
	Wind Speed	UNIT	COMMENTS
	AVG. WIND SPEED	m/s	
DIRECTION	AVG. WIND SPEED	CALM WINDS	
Direction (blowing from)	4.35 m/s	3.73%	
	PLOT YEAR-DATE-TIME	PROJECT/PLT NO.	
	1961 Aug 1 - Aug 31 Midnight - 11 PM		

WPC 2.0 rev 2.0 by Gates Environmental Services - environmental.com

ENVIRO-SAFE RESOURCE RECOVERY
 WIND ROSE MAPS
 FEBRUARY 12, 2020

WIND ROSE PLOT
 Station #14039 - MILWAUKEE/GENERAL MITCHELL FLD, WI

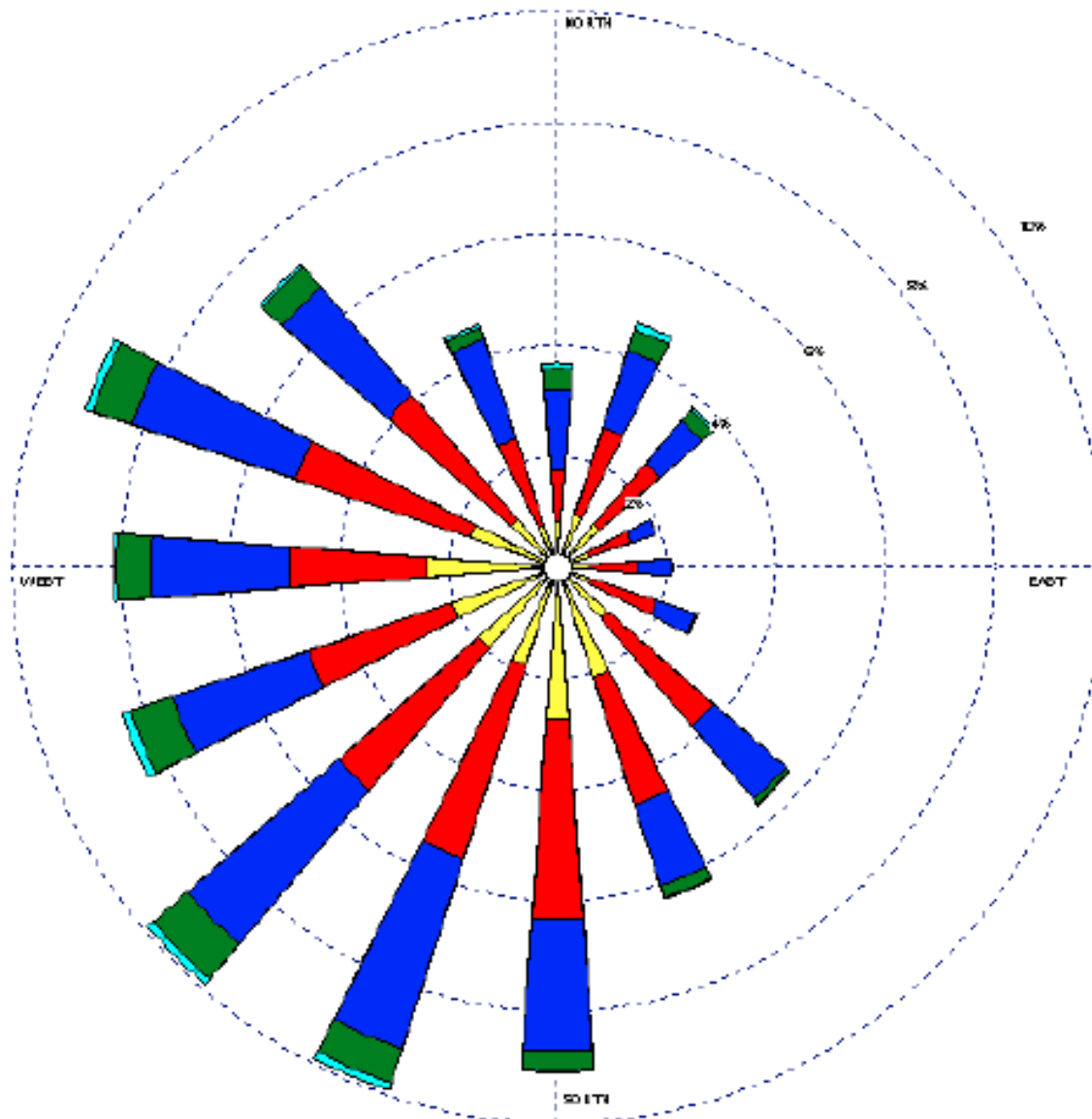


Wind Speed (m/s) 	MODELER	DATE 11/4/2002	COMPANY NAME
	DISPLAY Wind Speed	UNIT m/s	COMMENT
	AVERAGE WIND SPEED 4.68 m/s	CALC NUMBER 3.50%	
	DIRECTION Direction (blowing from)	PLOT YEAR-DATE-TIME 1961 Sep 1 - Sep 30 Midnight - 11 PM	PROJECT/PLT NO.

ENVIRO-SAFE RESOURCE RECOVERY
 WIND ROSE MAPS
 FEBRUARY 12, 2020

WIND ROSE PLOT

Station #14833 - MILWAUKEE/GENERAL MITCHELL FI, WI

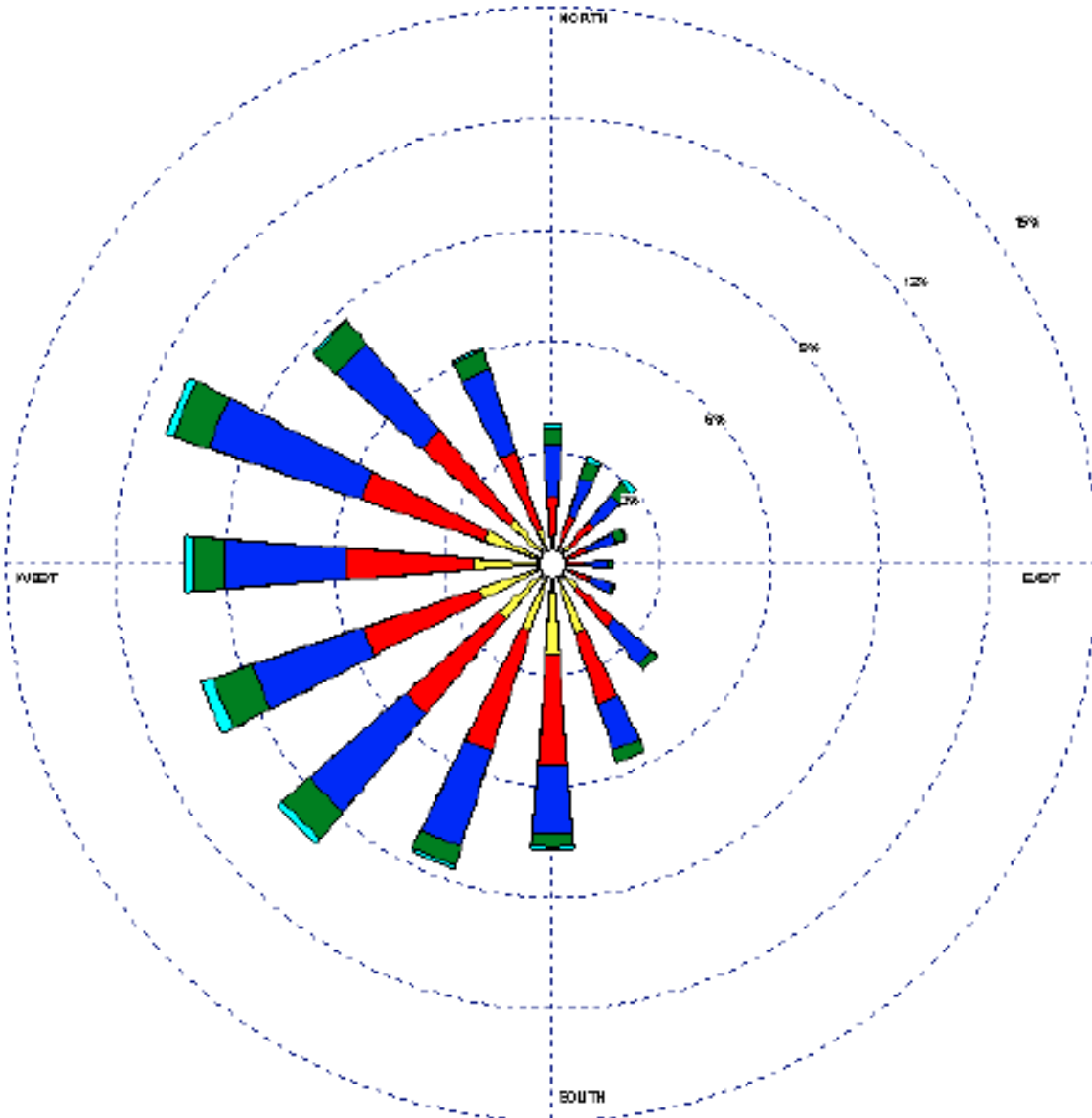


Wind Speed (m/s) 	MODELER 	DATE 11/4/2002	COMPANY NAME
	DISPLAY Wind Speed	UNIT m/s	COMMENTS
	AVG. WIND SPEED 5.11 m/s	CALM PERCENT 2.88%	
	RESTRICTION Direction (blowing from)	PLOT TIME PERIOD 1961 Oct 1 - Oct 31 Midnight - 11 PM	PROJECT/PLOT NO.

ENVIRO-SAFE RESOURCE RECOVERY
 WIND ROSE MAPS
 FEBRUARY 12, 2020

WIND ROSE PLOT

Station #14839 - MILWAUKEE/GENERAL MITCHELL FI, WI

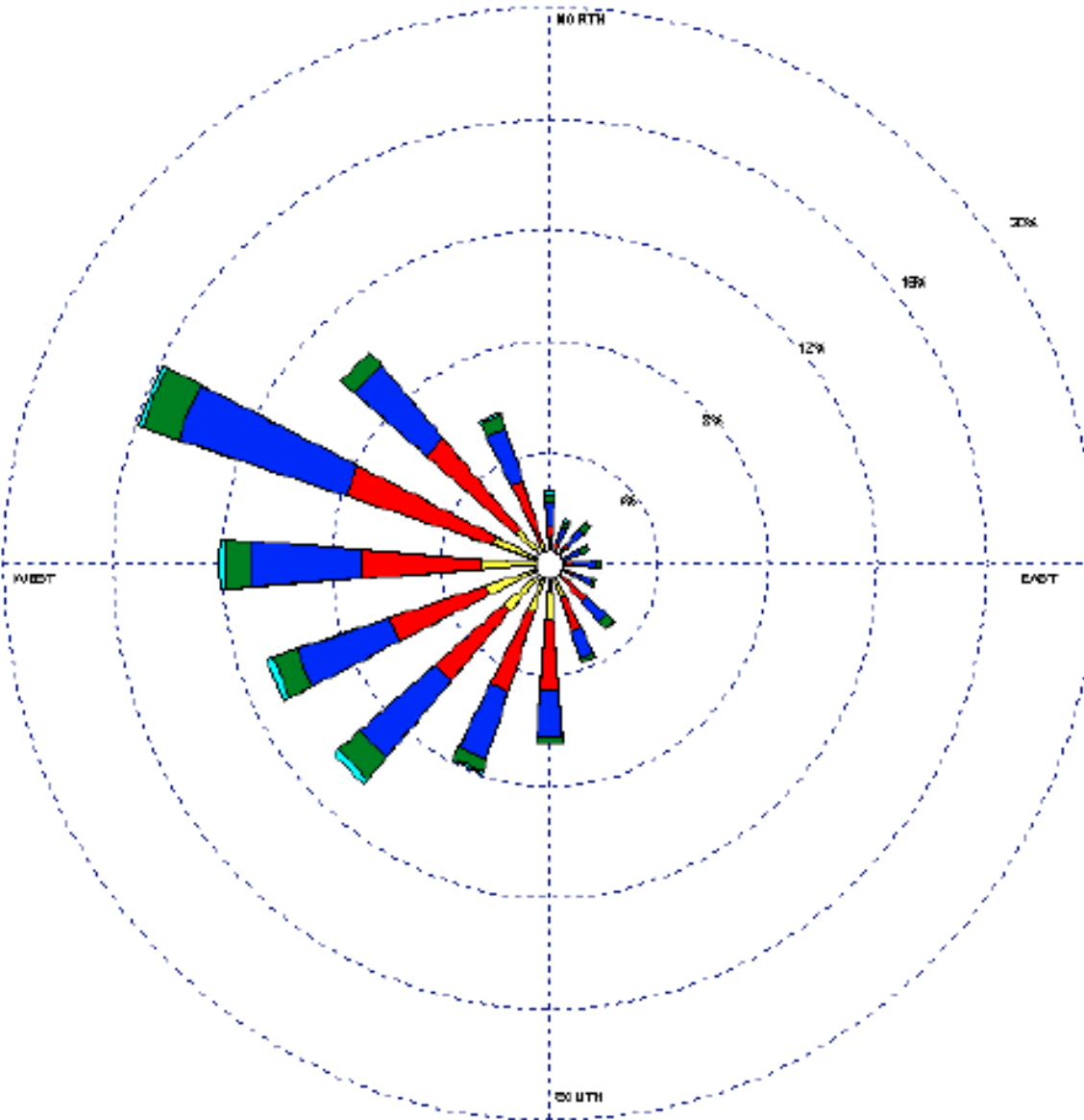


Wind Speed (m/s) 	MODELER	DATE 11/01/2002	COMPANY NAME
	DISPLAY Wind Speed	UNIT m/s	COMMENTS
	AVG. WIND SPEED 5.83 m/s	CALC WINDS 2.35%	
	ORIENTATION Direction (blowing from)	PLT YEAR-DATE-TIME 1961 Nov 1 - Nov 30 Midnight - 11 PM	PROJECT/PLT NO.

ENVIRO-SAFE RESOURCE RECOVERY
WIND ROSE MAPS
FEBRUARY 12, 2020

WIND ROSE PLOT

Station #14839 - M L YW UKEE/GENERAL MITCHELL FI, WI



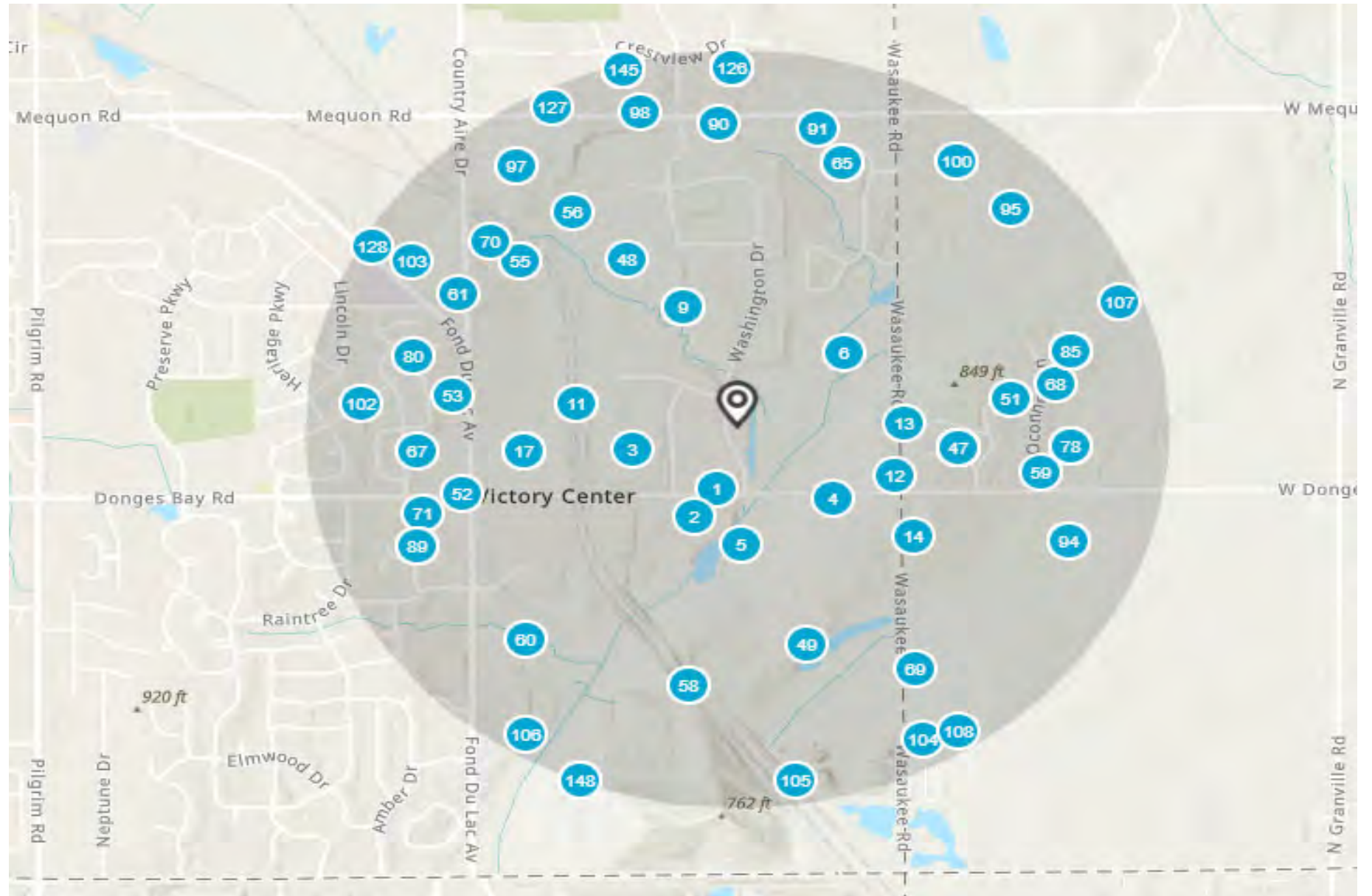
<p>Wind Speed (m/s)</p> <ul style="list-style-type: none"> > 11.05 8.49 - 11.05 5.40 - 8.49 3.24 - 5.40 1.80 - 3.24 0.21 - 1.80 	MODELER	DATE	COMPANY NAME
	DISPLAY	UNIT	COMMENTS
	AVG. WIND SPEED	CALM WINDS	
	DIRECTION	PLOT YEAR-DATE-TIME	PROJECT/PLT NO.
Direction (blowing from)	1361 Dec 1 - Dec 31 Midnight - 11 PM		

**Enviro-Safe Resource Recovery
Appendix G-11 - WDNR Injection and
Withdrawal Well Map**

Appendix G-11: WDNR Injection and Withdrawal Well Map

Date: March 25, 2022

Information derived from the online WDNR Well Construction Report Information System.



APPENDIX H: WASTE ANALYSIS PLAN

Enviro-Safe Resource Recovery Waste Analysis Plan (WAP)

LAST REVISED: OCTOBER 21, 2022

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1.0 General Overview

Pursuant to s. NR 670.014(2)(c) Wis. Adm. Code, Enviro-Safe Resource Recovery (facility) must develop and follow a Waste Analysis Plan (WAP) that meets the requirements of s. NR 664.0013, Wis. Adm. Code. This WAP establishes procedures for the following:

1. Store, treat, and dispose of each waste container properly and safely.
2. Identify the procedures used for obtaining a waste analysis of each waste container prior to its acceptance at the facility.
3. The frequency at which analysis of waste occurs to ensure that waste is characterized accurately.
4. Upon waste container receipt, procedures to confirm that:
 - a. The contents conform to the approved waste characterization.
 - b. The wastes and containers match the shipping documents (e.g., manifest) and Land Disposal Restriction (LDR) paperwork.
 - c. Containers are in proper condition and properly labelled.
5. Procedures for handling discrepancies and rejected shipments.
6. When the facility needs to conduct an analysis of the waste.
7. The methods used to obtain a representative sampled
8. The parameters for which each waste is analyzed and the rationale for selecting these parameters.
9. The test methods used to test for each parameter.
10. A quality assurance/quality control (QA/QC) program for waste sampling and analysis, along with a corrective action program.
11. Procedures to perform the waste determination and characterization for wastes shipped to other facilities.
12. Procedures to comply with the manifesting requirements for inbound and outbound shipments.
13. Procedures to comply with LDR requirements for inbound and outbound shipments.
14. Recordkeeping and reporting procedures associated with these activities.

The facility uses competent individuals as defined in section 1.1 Definitions of this WAP in all aspects in the implementation this WAP. Required qualifications and training for these individuals are established in the training program required by s. NR 664.0016, Wis. Adm. Code.

Section NR 662.011, Wis. Adm. Code, requires Wisconsin generators to make an accurate waste determination. This WAP helps the facility use this information to safely handle the wastes it receives and assists the facility's customers in achieving compliance.

Emphasis is placed upon obtaining accurate information about the chemical and physical makeup of each waste received by the facility. This information, which is to be detailed in a Waste Information Profile (WIP) is maintained as part of the facility record and is based on analytical testing of a representative sample of the waste using a laboratory certified or registered under ch. NR 149, and/or is a knowledge-based determination that meets the "acceptable knowledge" criteria as defined in section 1.1 Definitions of this WAP.

The facility accepts waste in a variety of container configurations such as "containerized waste", "bulk container waste", "bulk or consolidation packs", and "lab packs". These terms are defined in section 1.1 Definitions. The facility also accepts wastes in a variety of physical forms, including for example liquids, sludges, solids, layered (or multi-phased), and compressed gases. In addition

to hazardous wastes regulated under Resource Conservation and Recovery Act (RCRA) and similarly under chs. NR 660-673, Wis. Adm. Code, the facility also accepts nonhazardous waste. These wastes may also be subject to additional regulatory requirements such as the Toxic Substances Control Act (TSCA) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) also known as Superfund, as well as Chs. NR 500-544, Wis. Adm. Code.

1.1 Definitions

For the purposes of this WAP the facility uses the following definitions.

“Accept” or “Acceptance” means the time when waste screening is complete and the facility signs line 20 of the manifest.

“Acceptable Knowledge” means knowledge-based determinations that are based on relevant and reliable (i.e., verifiable) information from any source that indicates that the waste is either a hazardous waste or non-hazardous waste under subchapter C and D of chapter NR 661 Wis. Adm. Code; which hazardous waste codes(s) apply; and which exclusions or restrictions pertain to management of the waste. Acceptable knowledge may include any of the following: process knowledge, which describes information about chemical feedstocks and other inputs to the production process; knowledge of products, by-products, and intermediates produced by the manufacturing process; chemical or physical characterization of wastes; information on the chemical and physical properties of the chemicals used or produced by the process or otherwise contained in the waste; testing that illustrates the properties of the waste; or other reliable and relevant information about the properties of the waste or its constituents. Such information must be organized or presented in a logical way that illustrates how it supports the generator’s conclusions. The information and documentation comprising acceptable knowledge needs to be accurate and complete in order to correctly identify the waste. The facility objectively reviews the information provided by the generator. Therefore, the facility explains in its WAP how the facility determines that generator’s knowledge-based determination is valid; This includes but is not limited to finding proper support for numbers that are used in knowledge-based determinations (e.g., pH 3 to 5, flashpoint greater than 140, lead concentration less than 5 mg/l), and whether the information provided by the generator demonstrates the generator’s competence in complying with the determination requirements of s. NR 661.011(4) and (5) Wis. Adm. Code, and the information requirements of s. NR 661.011(6) Wis. Adm. Code.

“Bulk Container Waste” or “Bulk Waste” or “Bulk Load” means waste that is received and shipped in large containers, such as Intermediate Bulk Container (IBC (also known as totes)) as defined at 49 CFR 171.8, tanker trucks, roll-off containers, and lugger boxes.

“Bulk Container” means a container that holds Bulk Container Waste.

“Bulk or Consolidation Packs” means containers that hold smaller containers of one type of material (e.g., paints, lamps). Each bulk or consolidation pack container is prepackaged in accordance with applicable U.S. DOT regulations. Examples of wastes delivered in this way include spent batteries, palletized boxes of ODM/OEM chemicals that have been shipped in the original manufactures approved outer containers.

“Consolidation” or **“Commingling”** or **“Bulking”** means the act of combining the contents of one container or tank with the contents of another container or tank, such that they are in contact with each other. Lab-packing/repacking does not constitute consolidation.

“Competent Individual” means a person by way of training and/or experience, is knowledgeable of applicable standards, is of sound mind and body, and is capable of identifying workplace hazards and environmental risks relating to the specific operations and has the authority to correct them.

“Container” per s. NR 660.10(14) Wis. Adm. Code means any portable device in which a material is stored, transported, treated, disposed of or otherwise handled (e.g., sacks, flasks, pails, bags, boxes, gas cylinders, drums, IBCs, cubic-yard boxes and bags, and tanker trucks).

“Discrepancy” For Level I, II, and III analyses, “discrepancy” means a difference between the waste received at the facility when compared to its WIP, the manifest or bill of lading, and the LDR document (if applicable). Examples of discrepancies include all of the following:

- The container differs from the information provided on the manifest or shipping paper.
- The waste is a different waste stream than the waste described in the WIP.
- The waste codes in the WIP, manifest, and LDR document do not align.

“Facility” means Enviro-Safe Resource Recovery (Enviro-Safe), W130N10500 Washington Drive, WI 53022, WIR000142877

“Fingerprint Analysis” means the sampling and analysis of several key chemical and physical parameters of a waste to substantiate or verify the composition of a waste as determined previously during a full-scale waste characterization/determination. Fingerprint analysis is typically used by the facility to expedite screening of received wastes. Parameters for analysis may be a subset of the parameters used during full-scale characterization, or they may be parameters that are not normally present in the waste to verify the absence of certain constituents.

“Fuel Blending” means combining compatible hazardous wastes with other compatible materials that also possess substantial heat value (e.g., used oil, spent solvent) to create a waste that is amendable to burning for energy recovery. Fuel blending is hazardous waste treatment that requires a license.

“Lab Pack” means an over-packed container, usually a steel, fiber, or polyethylene drum, containing a variety of small containers of chemicals of the same DOT hazard class packed in nonbiodegradable absorbent materials. Each lab pack container is prepackaged in accordance with applicable U.S. DOT regulations that are based on compatibility, content, and size of individual samples. An inventory-packing list accompanies each lab pack container and identifies, among other things, the content, quantity, and size of each container within the lab pack, and applicable hazardous waste code(s).

“Lab-packing/Repacking” means when small containers of hazardous waste are placed into a larger container while remaining in the original smaller container, with the intention to not allow the waste contents to mix.

“Licensed RCRA Unit” or **“Licensed Unit”** means a unit that has a hazardous waste license number assigned to it and meets the definition of “hazardous waste management unit” in s. NR 66110(54) Wis. Adm. Code. Examples include:

- Container storage areas. Note: A container alone does not constitute a unit; the unit includes containers and the land or pad upon which they are placed (see s. NR 660.10(54), Wis. Adm. Code).
- Tanks and associated piping and underlying containment systems.
- Landfills.
- Miscellaneous units.

“Manufactured Article” means a device this is designed for a purpose other than to access the chemicals that are present within the device. As examples, one uses these articles for electrical energy (batteries), light (lamps) or to measure temperature (thermometers). One does not use these articles to access the mercury, lead, or other chemicals contained in these articles.

“Processing” or **“Process”** means when the contents of a container or tank are added to a different container or tank or combined with other wastes or materials or are otherwise treated in a manner not requiring a hazardous waste license. The following are examples of license-exempt processing activities:

- Consolidation or commingling or bulking
- Lab-packing, depacking, and re-packing
- Elementary neutralization
- Wastewater Treatment Unit treatment
- Qualifying treatability studies

Proper processing requires that wastes are only combined or comingled when compatible with the container and the other wastes or materials.

“Receive” or **“Receipt”** means the time when a waste delivery enters the facility property.

“Repackaging” or **“Recontainerization”** occurs when the contents one a container are moved to another container without mixing with another waste. This includes placement of a container into an overpack container.

“Shipment” means a container or containers of a single waste stream that is delivered in the same transportation vehicle.

“Trans-ship” means a waste that have been accepted into the facility and is then shipped to an off-site facility; the waste remains in its original container and the waste does not undergo any type of treatment or processing.

“Waste Information Profile (WIP)” means written documentation for a specific waste stream that is intended to contain all the information which must be known by the facility to properly process, treat, store, and/or transship the waste according to this chs. NR 664 and NR 668, Wis. Adm. Code.

“**Waste Analysis**” means waste information gathered from analytical testing of representative samples and from knowledge-based determinations.

“**Waste Stream**” means a single type of solid waste or hazardous waste from a single generator.

1.2 Facility Activities

Storage:

The following is a list of licensed container storage areas:

- RM 124
- RM 125
- RM 126
- East Loading Docks
- Tanker Fill Area #1
- Tanker Fill Area #2

Processing:

The following is a list of hazardous waste processing activities and areas:

- RM 124:
 - Lab Packing/Depacking
 - Decanting/bulking
 - Consolidation into containers
- RM 125:
 - Lab Packing/Depacking,
 - Decanting/bulking,
 - Consolidation into containers,
 - Elementary Neutralization,
 - Aerosol can puncturing,
 - Drum/container cleaning
- RM 126:
 - Lab Packing/Depacking,
 - Decanting/bulking,
 - Consolidation into containers,
 - Elementary Neutralization,
 - Aerosol can puncturing,
 - Drum/container cleaning
- East Loading Docks
 - Consolidation into containers
- Tanker Fill Area #1
 - Consolidation into containers
- Tanker Fill Area #2
 - Consolidation into containers.
- **Licensed Treatment:** Fuel Blending: Mixing hazardous waste with compatible hazardous wastes and other compatible materials to meet the spec defined by cement kilns. Fuel blending will be performed in room 126. Fuels blended materials are only blended into other containers in RM 126 and containers (tankers) held in the east loading docks, and the tanker fill areas.

2.0 Waste Prequalification

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 [Waste Analysis](#) of this 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 facility. Wastes which do not meet the prequalification requirements of having a WIP approved by the facility and/or have hazardous waste codes that the facility is not authorized to accept (section 4.0 [Acceptable Waste Codes](#) of this WAP) are not accepted by the facility.

All shipments of waste to the facility must be scheduled. The facility will not approve the schedule of any shipment of wastes that have not been prequalified through the WIP process described herein. Unscheduled shipments of wastes will not be accepted until the Facility confirms with the generator that the shipment is intentional and is properly represented by the accompanying manifest and shipping papers,

The facility does not accept “unknown” wastes. If an unknown waste is delivered to the facility without the facility’s knowledge or consent (e.g., waste left at a gate during the night, or an unidentified waste accompanies a waste delivery and is off-loaded by the facility), then the facility sends an email to their Wisconsin Department of Natural Resources (WDNR) TSD inspector within 24 hours. Following this consultation, the facility makes a waste determination in accordance with s. NR 662.011 Wis. Adm. Code for the purpose of placing the waste into the facility’s storage area and/or preparing the waste for proper shipment to an appropriate off-site facility.

For authorized agents that represent the generator (such as consultants or brokers), the facility will obtain written evidence that demonstrates that they have authority to act on behalf of the generator for the purpose of arranging for the management of the generator’s waste stream.

3.0 Waste Analysis

Section 664.0013(1) Wis. Adm. Code requires that facility obtain a detailed chemical and physical analysis of a representative sample of a waste. This analysis must contain all the information which must be known to treat, store, or dispose of the waste according to chapters NR 664, 668 Wis. Adm. Code and the conditions of the facility’s license. The Facility uses the following methods to meet this requirement:

Representative Sample and Analysis

When available generator knowledge is inadequate to determine whether the waste exhibits one or more hazardous characteristics, the waste analysis must contain results from analytical testing of a representative sample in the manner consistent with the generator requirements of s. NR 662.011(4)(b) Wis. Adm. Code.

The waste analysis requirements for analytical testing are met when a representative sample of the waste identifies the chemical and physical characteristics and composition of a waste. Section 664.0013(1)(a)1. Wis. Adm. Code requires that chemical and physical samples to be analyzed (except

for field analyses for pH, specific conductance and temperature) by a laboratory certified or registered under ch. NR 149; this includes waste received by the facility from in-state and out-of-state generators.

The waste analysis must include, as supporting information, a description of how the samples used were representative samples, and the laboratory's report(s) showing the analytical methods, detection limits, results, and quality control checks.

Knowledge-Based Information

In lieu of analytical testing on a representative sample, the waste analysis requirements for knowledge-based determination are met when the knowledge base determination meets "acceptable knowledge". In this case the waste analysis must contain information consistent with the generator requirements of s. NR 662. 011(4)(a) Wis. Adm. Code. Acceptable knowledge may include any of the following:

- Process knowledge, which describes information about chemical feedstocks and other inputs to the production process.
- Knowledge of products, by-products, and intermediates produced by the manufacturing process.
- Chemical or physical characterization of wastes.
- Information on the chemical and physical properties of the chemicals used or produced by the process or otherwise contained in the waste
- Testing that illustrates the properties of the waste. A test other than a test method set forth in subchapter C chapter NR 661 Wis. Adm. Code, or an equivalent test method approved by the department under s. NR 660.21 Wis. Adm. Code, may be used as part of a person's knowledge to determine whether a solid waste exhibits a characteristic of hazardous waste. However, such tests do not, by themselves, provide definitive results.
- Relevant information about the properties of the waste or its constituents.
- Analytical results (i.e., numbers) used in knowledge-based determination must be supported.

If a non-NR 149 laboratory data is used by the generator to show if a waste is or is not a characteristic waste and/or to describe other waste properties, then the Facility requires the generator to submit, the laboratory's audit results and any laboratory certifications. The facility must review these audit results and any laboratory certifications and conclude that they are equivalent to that which a laboratory certified or registered under ch. NR 149 must achieve, prior to approving the waste stream.

3.1 Waste Information Profile (WIP)

Each waste stream accepted by the facility is described in an approved WIP. For the WIP and associated documentation to be complete, it must contain all the following:

3.1.1 WIP Content

Documentation from the generator or their authorized agent:

1. A detailed description on the process that generated the waste.
2. If sampling was used to determine if the waste is or is not a characteristic hazardous waste, then a description on how the samples collected are a representative sample.
3. If generator knowledge was used by the generator, a complete set of the information described in NR 662.011(4)(a) Wis. Adm. Code such as process knowledge, which

describes information about chemical feedstocks and other inputs to the production process; knowledge of products, by-products, and intermediates produced by the manufacturing process; chemical or physical characterization of wastes; information on the chemical and physical properties of the chemicals used or produced by the process or otherwise contained in the waste; testing that illustrates the properties of the waste; or other reliable and relevant information about the properties of the waste or its constituents.

4. The generator's hazardous waste determination that shows compliance with s. NR 662.011 Wis. Adm. Code.
5. Laboratory analytical reports.
6. The waste's waste analysis meets section [3.0 Waste Analysis](#) of this WAP.
7. All of the information which must be known by the facility to treat, store, or dispose of the waste according to chapters NR 664, 668 Wis. Adm. Code and the conditions of the facility's license.
8. Determination if the hazardous waste has a Volatile Organic Compounds (VOCs) concentration of at least 500 Part per Million by Weight (ppmw). If so, then container is subject to subchapter CC of chapter NR 553, Wis. Adm. Code.
9. An LDR document in compliance with s. NR 668.07(1) Wis. Adm. Code.
10. If applicable, a SDS for waste that is a commercial chemical product (excluding household-generate wastes and lab packs).

The WIP form used by the facility to capture this information is included in [Appendix A](#). The WIP form must be accompanied by supportive documents as necessary to address all of the required information summarized above and listed in more detail in [Appendix H](#). Each approved WIP is identified by a unique number in the upper right corner of each page. The manifest or shipping paper accompanying each delivery of waste clearly must identify the WIP number for each different waste stream in the delivery.

3.1.2 WIP Review and Approval

A WIP must be completed, signed, and submitted by the generator or the generator's authorized agent for each waste stream (including nonhazardous waste) that is proposed to be placed into the facility's licensed unit. The facility then reviews each WIP to determine if the facility can properly store and/or treat the waste. Based on the information provided in the WIP, the facility must do one of the following:

1. Approve the WIP.
2. Determine that the WIP requires additional information before making an approval determination.
3. Deny the WIP.

After one of these decisions is made, the Facility notifies the generator of the decision, and maintains documentation of this notification with the WIP in the operating record.

The following are examples of when the facility requires additional information before the facility makes a determination of accepting the waste into the facility:

- Required information is omitted from the WIP. For example, the generator did not provide sufficient information about the process generating the waste or how the samples were collected.

- The information in the WIP is inconsistent. For example, the generator classifies that waste as an acidic solution, but the waste has a pH value of 14.
- The generator does not provide sufficient information which must be known to safely store and treat the waste. For example, the generator classifies the waste as a D003, but fails to identify why the waste carries the D003 waste code. Is it due to the waste being an explosive, generating toxic gases, or reacts violently with water?

An incomplete or inconsistent WIP cannot be approved and therefore the waste cannot be accepted into the facility. In all cases, if the facility is not confident that a waste has been sampled or characterized accurately, or if knowledge-based information is not adequately supported, then the facility cannot approve the waste for acceptance into the facility.

The facility documents the approval of each WIP. This approval is retained with that WIP and supporting documentation along with any conditions of approval that must be followed by the generator or transporter. The WIP, all supporting documentation package, and the approval is retained as part of the facility's operating record and made available as may be needed to persons performing Level I, II, or III analyses. This documentation will also include any subsequent corrections or supplementary information to the WIP along with its approval. Each part of the documentation will be clearly identified as part of the WIP, such as by marking it with the unique WIP number. These operating record requirements can be achieved with electronic documents provided they are properly organized, secured from unauthorized editing, and readily available.

3.1.3 WIP Updates

In accordance with s. NR 664.0013(1)(c), Wis. Adm. Code, the WIP process must be repeated as necessary to ensure that it is accurate and up to date. At a minimum, this must occur when:

1. The facility is notified by the generator or authorized agent, or the facility has reason to believe, that the process or operation generating the waste has changed.
2. The results of the inspection of wastes indicate that the waste received at the facility:
 - a. Does not match the waste described in the WIP.
 - b. The waste differs from waste previously received from the generator that has the same WIP.
 - c. The WIP was approved more than 3 years prior to receipt, or 5 years for sampling-exempt materials.

In accordance with s. NR 664.0013(1)(a)1, Wis. Adm. Code, chemical and physical samples used to support the WIP must be analyzed by a laboratory certified or registered under ch. NR 149, Wis. Adm. Code, except for certain field analyses. In accordance with s. NR 664.0013(1)(a), only representative samples are used to obtain the detailed chemical and physical analysis.

If non-NR 149 lab data is provided as part of the WIP and the non-NR 149 lab data is used in the acceptance of the waste into the facility, then the facility obtains the laboratory audits and/or other laboratory certifications that show the data from the non-NR 149 lab is equivalent to the standards listed in ch. NR 149, Wis. Adm. Code.

As evidence to support a generator's knowledge-based determination, a generator may use a test method other than the test methods set forth in subch. C of ch. NR 661 Wis. Adm. Code or an equivalent test method approved by the department under s. NR 660.21 Wis. Adm. Code. However, these tests methods cannot be used, by themselves, to make a determination if a solid waste exhibits a characteristic of a hazardous waste (s. NR 661.011(40)(a) Wis. Adm. Code).

Each WIP's approval last for one year from the date that the WIP was last approved by the facility.

A WIP will be auto renewed for an additional year upon shipment and receipt of waste belonging to that WIP. After one year without shipment, a WIP will be expired. A WIP that has been expired for less than one year may be renewed with written instruction from a generator stating no change in the WIP. A WIP expired for greater than one year will require a newly signed WIP before acceptance into the facility. After 5 years from the date of original WIP certification, the WIP will require a recertification or new signed WIP prior to acceptance. Automatic renewal will be paused and require manual review should a waste:

- Be the subject of a discrepancy by triggering a level 2 analysis.
- Fail to conform during a level 3 analysis.

3.2 Determination of Outbound Designated Facility

As part of the prequalification process during WIP approval, the facility also identifies the designated outbound facility(s) to which the facility is intends to ship the waste after the waste has been received by the facility. Selection of the designated outbound facility is based on the WIP, assigned RCRA hazardous waste codes, any applicable land-disposal restriction regulations, generator request/requirement, and any requirements or restrictions of the designated facility's license. The WIP cannot be approved unless the waste meets the acceptance criteria of the outbound designated facility(s) and the outbound facility(s) is reasonably anticipated to be available.

4.0 Acceptable Waste Codes

This facility is licensed to accept certain hazardous waste codes. See the current Part A application of the license for a full list of the hazardous waste codes that the facility is allowed to accept. As a matter of convenience, the waste codes listed in part A have been included in [Appendix J](#). Additional waste codes may be accepted only after a license modification is approved. In addition, the facility does not accept the wastes identified in section [8.0 Restricted Wastes](#) of this WAP.

5.0 Shipment Screening, Analysis, and Acceptance

When the facility receives a shipment of waste, the facility must successfully complete and document the following procedures to accept the waste into a licensed hazardous waste unit:

1. Review the manifest or shipping paper for accuracy and completeness and resolve any inaccuracies and/or items of incompleteness (see [9.0 Manifest and Bill of Lading Discrepancies](#) of this WAP).
2. Confirm receipt of and review the LDR document for accuracy and completeness; resolve any inaccuracies and/or items of incompleteness.
3. Review the WIP, manifest or shipping paper, and LDR document for discrepancies between them and resolve any discrepancies. Record these discrepancies into the facility operating record and how these discrepancies were resolved.
4. Check container labels for accuracy and consistency with the WIP and resolve any inaccuracies and/or items of incompleteness.

5. Check the condition of each container and the type of container used for that waste and verify that the container is U.S. DOT approved. If not in a U.S. DOT approved container then the facility must repackage the waste into an approved U.S. DOT container. The facility checks to confirm that the container is not leaking and properly closed.
6. Verify that each container type, and size is consistent with the information in the WIP and manifest or shipping paper., LDR document, and waste stored in the container.
7. Assign a unique container number to each container using the facility's tracking system and affix a durable label marked with that unique number to the container
8. The facility utilizes a tiered approach for analyzing incoming shipments at the facility.
 - a. Perform a Level I analysis on each shipment received as described in section [5.1 Level I Analysis](#) of this WAP.
 - b. Perform a Level II analysis when the Level I analysis indicates unresolved discrepancies between the waste and its WIP as described in sections [5.2 Level II Analysis](#) of this WAP.
 - c. Perform a Level III analysis to containers received on a periodic basis (to evaluate the accuracy of the WIPs maintained by the facility) as described in sections [5.3 Level III Analysis](#) of this WAP.
9. Complete the form(s) in [Appendices F](#) and [Appendices G](#).
10. In addition to the prequalification requirements described in section [2.0 Waste Prequalification](#) and the waste analysis requirements in section [3.0 Waste Analysis](#) the facility reviews each lab pack' packing list using the Lab Pack Contents Form (see [Appendix B](#)). If any incompatible or unacceptable material is listed on the Lab Pack Contents Form, the generator or generator's agent is given the option of either arranging for the facility to properly repack that material or having the lab pack container rejected by the facility.

Table 1 gives an overview of these analyses and **Table 3** summarizes the analytical parameters and rationales used to determine the general and specific characteristics of a waste stream.

Table 1: Required Analyses to be Performed by the Facility for Incoming Waste Shipments

Incoming Shipments			
Analysis Level	Level I	Level II	Level III
Frequency	Each container and bulk load	Unresolved discrepancy from Level 1	One out of every 500 non-bulk containers or one out of every 50 bulk containers
Parameter	Review Required	Review Required	Review Required
(M-1) Physical Evaluation	Yes		Yes
(M-2) pH (if applicable)*	Yes		Yes
(M-3) Ignitability or Flash Point	Yes		Yes
(M-4) Water Reactivity		Yes	Yes
(M-5) Reactive Sulfides Screen		Yes	Yes
(M-6) Reactive Cyanides Screen (Spot Test)		Yes	Yes
(M-7) Oxidizer Screen (Spot Test)		Yes	Yes
(M-8) Specific Gravity		Yes	Yes
(M-9) % Suspended Solids (If Applicable, Liquid Solutions Only)		Yes	Yes
(M-10) Chlorine (Spot Test)		Yes	Yes
(M-11) Polychlorinated Biphenyl (PCB) Screen		Yes	Yes
(M-12) TCLP RCRA Metals		Yes	Yes
Any other parameter necessary to confirm that the waste matched the WIP and that the waste can be properly managed	When necessary	When necessary	When necessary

* "If applicable" means that the test is only required on samples where a pH test is possible so only liquid aqueous samples will be pH tested but not solids.

Sampling-exempt Materials:

The following wastes do not require sampling and/or analytical testing for level I and level III analysis unless the analytical testing is needed maintain compliance with chs. NR 660 to 679 Wis Adm. Code.

Note that a physical evaluation (method M-1) is still required for all wastes, including but not limited to the following:

1. Household hazardous waste as defined by s. NR 661.0004(2)(a) Wis. Adm. Code.
2. Empty hazardous waste containers as defined in s. NR 661.0007 Wis. Adm. Code.
3. The listed commercial chemical products as defined under s. NR 661.0033(1) to (4) Wis. Adm. Code that are in their original container. The WIP must include a SDS. Examples:
 - a. Any unused commercial chemical products that appear on the U listing.
 - b. Any unused commercial chemical products that appear on the P listing.
4. Non-listed commercial chemical products that are not defined under s. NR 661.0033(1) to (4) Wis. Adm. Code, are unused, and are in their original container. The WIP must include a SDS. Examples:
 - a. Aerosol Cans, gas cylinders, and propane cylinders.
 - b. Paints.
 - c. Pharmaceuticals as defined by s. NR 666.500(9) Wis. Adm. Code.
5. Manufactured articles as defined in section 1.1 Definitions. Examples:
 - a. Video Monitors.
 - b. Universal waste lamps, batteries, and mercury containing equipment.

- c. Cathode ray tubes (CRTs).
 - d. Hydraulic equipment.
 - e. Computers.
 - f. Cell phones.
6. Lab packs as defined in section 1.1 Definitions.
 7. Contaminated environmental media (e.g., soil, groundwater) when the contamination is due to a release of a known chemical substance, commercial product, or waste, as established in the approved WIP.
 8. Contaminated personal protective equipment (PPE).
 9. Debris as defined by s. NR 668.02(7) Wis. Adm. Code generated only from construction or demolition activities involving a known chemical substance, commercial product, or waste, as established in the approved WIP. Examples:
 - a. Construction of a healthcare facility's x-ray room that resulted in the generation of scrap wallboard covered with lead sheeting.
 - b. Removal of asbestos insulation from a pipe run that contains lead paint.
 - c. Demolition of a wall covered in lead paint.

5.1 Level I Analysis

Prior to acceptance, the facility opens and inspects each container and bulk load in the waste receiving area, including:

- Containers that are trans-shipped or planned to be trans-shipped.
- Containers of sampling-exempt materials identified in section 5.0 [Shipment Screening, Analysis, and Acceptance](#) of this WAP - except that the following containers are not required to be opened:
 - manufactured articles
 - small containers within a lab pack container

Upon opening each container and bulk load, the facility performs an examination of the waste and compares the waste to the information on the label(s), manifest/shipping paper, and WIP.

Physical Evaluation:

The physical examination includes, at a minimum, appearance, color, layering, viscosity, and odor if detected.

- Waste Liquids: The facility uses a composite liquid waste sampler (COLIWASA) or sample thief to check for layering. Layering can include, for example, different phases of liquids, or a alter of solid or semi-solid material at the bottom of the container.
- Waste other than liquids: The facility uses an auger, sludge sediment probe, or similar devise to check for layering.
- Lab packs: The facility only needs to open the lab pack to confirm that is meets the definition of a lab pack.

If the evaluation of the waste or WIP indicates that the waste is potentially ignitable or corrosive, then the facility screens the waste for flash point and/or corrosivity. Waste streams that are potentially subject to flash point and/or corrosivity screening include:

- Waste containing liquids.
- Waste having a petroleum- or solvent-like odor.
- Wastes that are not already characterized as exhibiting the characteristic of ignitability (D001) or corrosivity (D002).

Representative Sampling:

The facility collects a representative sample for analytical testing from each container and bulk load in accordance with the facility's Sampling SOP (see [Appendix C](#) of the WAP). The following are exceptions to the collection of a representative sample for analytical testing from each container:

- Shipments of multiple containers from a single generator with the same WIP in which the physical evaluation showed the waste in the containers are consistent. In this case collect at least one representative sample from every ten containers received; the container to be sampled will be selected in a randomized manner.
 - If a discrepancy is found in a container that was selected as one to be sampled from a batch of 10 or fewer other containers of the same waste stream from the same shipment, then a Level I sample and analysis is performed on all containers.
- Sampling and analytical testing is not required for the sample-exempt wastes listed in section [5.0 Shipment Screening, Analysis, and Acceptance](#) of this WAP.

The facility ensures that a representative sample is collected when a container contains waste with multiple layers or phases. When appropriate, individual (un-composited) samples of individual phases layers can be used for analysis to evaluate conformance with WIP information.

Analytical Testing:

The analytical testing required for a Level I analysis is identified in **Table 1** of this WAP.

Evaluating the Physical and Analytical Results:

The facility compares the Level I physical examination and analytical results to the waste's WIP, using the tolerance limits in Table 3. If the Level I analysis identifies a discrepancy, the facility takes the following actions.

1. Follow section [10.0 WIP Discrepancies](#) of this WAP.
2. Clearly mark or label the waste with the word "Quarantined".
3. Place the waste in a quarantine area within a licensed storage area until the discrepancy is resolved. The container must remain in quarantine until it is accepted or removed from the facility.
4. Promptly contact the generator or the generator's agent and attempt to resolve the discrepancy.
 - a. If the discrepancy is resolved by contacting the generator and the WIP remains accurate, then the waste is moved to the appropriate licensed unit by the end of the day.
 - b. If the discrepancy cannot be resolved by the generator, then the facility chooses one of the following options:
 - i. Reject the waste back to the generator in accordance with NR 664.0072(6) Wis. Adm. Code and section [8.0 Restricted Wastes](#) of this WAP.
 - ii. Ship the waste, with the generator's consent, to another TSD facility in accordance with NR 664.0072(4) and (5) Wis. Adm. Code. In addition to these requirements, the facility provides the new receiving TSD facility with the original WIP and Level I (and as applicable II and III) analysis results.
 - iii. Accept the waste and perform a level II analysis. Note that the container

must remain labelled as “quarantined” until it is accepted or removed from the facility.

- c. Accept the waste under a new WIP completed by the generator and approved under section 3.1.2 of this WAP .
5. The facility requires a new WIP to be submitted by the generator or generator’s agent when the discrepancy involves the waste’s physical and/or analytical results not matching the waste’s WIP.
6. Document the cause and resolution of the discrepancy in the operating record and enter required discrepancy information onto the manifest.
7. The facility reviews the generator’s other WIPs for similar issues.

Records:

The Level I analysis is documented using the Level I QA/QC report (see [Appendix F](#) of this WAP). A record of all Level I analysis (and how discrepancies were resolved) is maintained by the facility in accordance with section [17.0 Recordkeeping and Reporting](#) for each container delivery as part of the facility operating record.

5.2 Level II Analysis

The facility conducts a Level II analysis when there is an unresolved Level I discrepancy and the facility retains and quarantines the waste as in section 5.1 Level I Analysis. Waste subject to Level II analysis remains quarantined until the discrepancy is resolved.

Representative Sampling:

The “Representative Sampling” for a Level II analysis is performed as described in section [5.1 Level I Analysis](#) of this WAP.

Analytical Testing:

The analytical testing required for a Level II analysis are identified in **Table 1** of this WAP. Methods M-11 and M-12 require testing by a laboratory certified under NR 149.

Evaluating the Physical and Analytical Results:

If the Level II analysis identifies a discrepancy with the WIP, the facility takes the following actions:

1. Follow section [10.0 WIP Discrepancies](#) of this WAP.
2. Clearly mark or label the waste with the word “Quarantined”.
3. Place the waste in a quarantine area within a licensed storage area until the discrepancy is resolved. The container must remain in quarantine until it is accepted or removed from the facility.
4. Promptly contact the generator or the generator’s agent and attempt to resolve the discrepancy.
 - a. If the discrepancy is resolved by contacting the generator and the WIP remains accurate, then the waste is moved to the appropriate licensed unit by the end of the day.
 - b. If the discrepancy cannot be resolved by the generator, then the facility chooses one of the following options:
 - i. Reject the waste back to the generator in accordance with NR

664.0072(6) Wis. Adm. Code and section [8.0 Restricted Wastes](#) of this WAP.

- ii. Ship the waste, with the generator's consent, to another TSD facility in accordance with NR 664.0072(4) and (5) Wis. Adm. Code. In addition to these requirements, the facility provides the new receiving TSD facility with the original WIP and Level I (and as applicable II and III) analysis results.
5. The facility requires a new WIP to be submitted by the generator or generator's agent when the discrepancy involves the waste's physical and/or analytical results not matching the waste's WIP.
6. Documents the cause and resolution of the discrepancy in the operating record together with a copy of the manifest.
7. The facility reviews the generator's other WIPs for similar issues.

Records:

The Level II analysis is documented using the Level II QA/QC report (see [Appendix G](#) of this WAP). A record of all Level II analysis (and how discrepancies were resolved) is maintained by the facility in accordance with section [17.0 Recordkeeping and Reporting](#) for each container or bulk load subject to a level II analysis.

5.3 Level III Analysis

The facility conducts a Level III analysis for the contents of one out of every 500 containers and the contents of one out of every 50 bulk loads (including non-hazardous wastes) received by the facility.

- The facility uses an inventory tracking system to identify every 500th non-bulk container and every 50th bulk load received by the facility in sequential order.
- If the 500th non-bulk container or 50th bulk load is a sample-exempt wastes or a P or U-listed waste, then the facility selects the next sequential container that is not one of these types of waste.
- If the 500th non-bulk container is one of several containers within a single delivery, the container to undergo Class III analysis will be selected randomly from the delivery.

The facility uses the following system to track the number and sequence of containers received by the facility, in order to identify Class III container candidates:

- Containers are given individual drum numbers upon receiving. Using the sequential numbers, every 500th drum will be automatically flagged by our ERP software for sampling and analysis.

Physical Evaluation:

The "Physical Evaluation" is performed as described in section [5.1 Level I Analysis](#) of this WAP.

Representative Sampling:

The "Representative Sampling" for a Level III analysis is performed as described in section [5.1 Level I Analysis](#) of this WAP.

Analytical Testing:

The analytical testing for a Level III analysis are identified in **Table 1** of this WAP. Required testing is to be completed by a laboratory certified under NR 149.

Evaluating the Physical and Analytical Results:

On an annual basis, the facility reviews the Level III analysis and the previous year's Level III analysis results to ensure that a variety of waste types and customers have been, and will continue to be, represented.

If the Level III analysis identifies a discrepancy with the WIP, the facility takes the following actions:

1. Follow section [10.0 WIP Discrepancies](#) of this WAP.
2. Clearly mark or label the waste with the word "Quarantined".
3. Place the waste in a quarantine area within a licensed storage area until the discrepancy is resolved. The container must remain in quarantine until it is accepted or removed from the facility.
4. Promptly contact the generator or the generator's agent and attempt to resolve the discrepancy.
 - a. If the discrepancy is resolved by contacting the generator and the WIP remains accurate, then the waste is moved to the appropriate licensed unit by the end of the day.
 - b. If the discrepancy cannot be resolved by the generator, then the facility chooses one of the following options:
 - i. Reject the waste back to the generator in accordance with NR 664.0072(6) Wis. Adm. Code and section [8.0 Restricted Wastes](#) of this WAP.
 - ii. Ship the waste, with the generator's consent, to another TSD facility in accordance with NR 664.0072(4) and (5) Wis. Adm. Code. In addition to these requirements, the facility provides the new receiving TSD facility with the original WIP and Level I (and as applicable II and III) analysis results.
5. The facility requires a new WIP to be submitted by the generator or generator's agent when the discrepancy involves the waste's physical and/or analytical results not matching the waste's WIP.
6. Document the cause and resolution of the discrepancy in the operating record together with a copy of the manifest.
7. The facility reviews the generator's other WIPs for similar issues.

Records:

The Level III analysis is documented using the Level II QA/QC report (see [Appendix G](#) of this WAP). A record of all Level III analysis (and how discrepancies were resolved) is maintained by the facility in accordance with section [17.0 Recordkeeping and Reporting](#) for each container or bulk load subject to a level III analysis.

5.4 Annual Analysis and Discrepancy Report

By March 30 of each year, the facility prepares an annual analysis and discrepancy report based on the previous calendar year's activities containing the following minimum information; this report is

maintained in the facility operating record for ten years¹.

1. The total number of Class I analyses, and the identification and description of discrepancies, including causes, found during Class II analyses, and any apparent trends or commonalities
2. The total number of Class II analyses, and the identification and description of discrepancies, including causes, found during Class I analyses, and any apparent trends or commonalities.
3. An analysis of the causes for the discrepancies, including identification of any apparent trends or commonalities.
4. A description of the following actions and results: If any WIP was found to be inaccurate through a Level II or Level III analysis, the facility will review all other WIPs for wastes from that generator (including WIPs submitted by an authorized representative of that generator) for completeness and confirm with the generator the accuracy of the WIP.
5. An analysis of the success of process improvements from the previous year's annual analysis and discrepancy report.
6. If determined to be appropriate or needed based on these analyses and evaluations, process improvements to be taken by or taken by the facility (and the implementation schedule) to reduce the number of discrepancies and improve the quality of the information provided by generators (such as manifests and WIP)
7. If such process improvements are not needed, and explanation of why this was concluded.

5.5 Final Acceptance and Placement of Waste in Storage

Upon verification that the container is acceptable and its waste contents through the waste screening process, the container is then moved from the receiving area to an appropriate licensed storage unit or removed and placed into transportation. Such movement or removal occurs within 24 hours after the waste arrived at the facility unless the container is quarantined.

Any waste that does not conform to the corresponding WIP and other applicable records is quarantined until the discrepancy is resolved with the generator. Upon resolution of the discrepancy, quarantine labels are removed, and the waste is moved to an appropriate licensed storage unit by the end of the day or removed and placed into transportation by the end of the day.

A waste may be accepted but still rejected, if the facility determines after signing the manifest that the waste does not conform to the corresponding WIP; in this case the container is labelled for (and placed into) quarantine.

6.0 Consolidating Wastes

Certain processing activities such as bulking, containerizing, consolidating, lab packing, and elementary neutralization do not require a hazardous waste treatment license when hazardous waste treatment is not occurring. For example, repackaging waste from larger to smaller container or from a smaller to larger container is not treatment provided the intent is to make the waste more cost-effective for shipment to a TSD facility, and provided that any reduction in the hazards due to this activity is incidental (i.e., not the intent of the activity)².

¹ The Annual Analysis and Discrepancy Report will be used by WDNR when the facility seeks any license modification regarding this WAP and in developing the 10-year license renewal application/FPOR required in NR 670 Wis Adm Code.

² RO 11497: <https://rcrapublic.epa.gov/files/11497.pdf>

Consolidation that involves hazardous waste treatment, such as blending of different types of hazardous waste to meet a fuel specification, will also conform to the procedures of this section (see section 7.0 Treatment). Processes that involve impermissible dilution do not occur at the facility (see section 7.1.6 Impermissible Dilution of this WAP).

All required waste codes and LDR restrictions are followed when wastes are consolidated.

6.1 Compatibility Testing for Consolidated Waste

Before the wastes are consolidated with other wastes the waste mixture is tested for compatibility. Compatibility is evaluated to ensure that wastes do not adversely react with one another when they are comingled in containers or tanks.

To prevent undesirable chemical reactions from occurring when wastes are consolidated or bulked, the facility tests for compatibility using the M-13: Compatibility Testing as outlined in section 15.0 Test Methods using representative samples from all wastes and residues that will contact each other.

Prior to the compatibility test, the facility reviews the WIP and other relevant information to conclude that described waste and constituents to be consolidated are compatible. When a container or tank contains waste with multiple layers or phases, the facility ensures that each phase/layer is properly represented within the sample.

6.2 Lab Packs

Wastes to undergo lab packing/lab repacking are reviewed to ensure they are compatible with other wastes to be placed in the same container and with the container. Additional compatibility testing is not required since the waste is not being mixed.

Lab packing only occurs using a clean container that is free of any potentially incompatible materials, structurally sound, made of materials compatible with the wastes, and when closed are leak proof.

6.3 Containers and Tanks

Wastes are only consolidated into unused containers that are clean, free of any potentially incompatible materials, structurally sound, made of materials compatible with the wastes, and when closed are leak proof. If the container was previously used or is not free of contamination, it is cleaned to eliminate any previous residues or contamination. If the tank or container is not cleaned of all residues, then the compatibility testing will include the residues that remain in the tank or container before consolidation.

6.4 Documentation

The facility uses the Bulk Consolidation Tracking Sheet (see [Appendix D](#)) for hazardous waste that are consolidated on-site in advance of outbound shipments. Each Bulk Consolidation Tracking Sheet is maintained with the facility copy of the outbound manifest as part of the facility operating record.

RO 12458: <https://rcrapublic.epa.gov/files/12458.pdf>

RO 13764: <https://rcrapublic.epa.gov/files/13764.pdf>

This form also includes documentation of compatibility testing.

The facility uses the Lab Pack Contents form (see [Appendix B](#)) when lab packing smaller containers.

7.0 Treatment

The facility conducts hazardous waste treatment that requires a hazardous waste license. Section 291.01(21) Wis. Statute defines treatment as: *“Any method, technique or process, including neutralization, which follows generation and which is designed to change the physical, chemical or biological character or composition of any hazardous waste so as to neutralize the hazardous waste or so as to render the waste nonhazardous, safer for transport, amenable for recovery, amenable for storage or reduced in volume.”* The first part focus on whether a given activity changes the properties of a hazardous waste. *“Any method, technique or process, including neutralization, which follows generation and which is designed to change the physical, chemical or biological character or composition of any hazardous waste ...”* The second part looks at the intent of the waste management activity. *“... so as to neutralize the hazardous waste or so as to render the waste nonhazardous, safer for transport, amenable for recovery, amenable for storage or reduced in volume.”*

Treatment residues are typically generated when wastes are treated. Treatment residues generated by the facility are subject to the generator requirements of ch. NR 662 Wis. Adm. Code and not the TSD requirements of ch. NR 664 Wis. Adm. Code. There is usually more than one type of treatment residue generated when treating hazardous waste (May 26, 1998, federal register; 63 FR 28610). One of these treatment residues is the waste that is being treated (i.e., the primary treatment residue) and the other is the waste generated from the treatment of that waste (i.e., the secondary treatment residue). Examples of treatment residues generated from hazardous waste treatment:

1. **Solvent recovery:**
 - a. Primary treatment residue: None. The waste solvent reclaimed is a commodity and not a waste and therefore not subject to the NR 600 series hazardous waste requirements.
 - b. Secondary treatment residue: Still bottoms generated from the still are subject to ch. NR 662 Wis. Adm. Code.
2. **Solidification:**
 - a. Primary treatment residue: The waste stabilized by solidification are subject to ch. NR 662 Wis. Adm. Code.
 - b. Secondary treatment residue: Bag house dust are subject to ch. NR 662 Wis. Adm. Code.
3. **Fuel Blending:**
 - a. Primary treatment residue: Final fuel "Blend".
 - b. Secondary treatment residue: None.
4. **Elementary neutralization or wastewater treatment:**
 - a. Primary treatment residue: The supernatant (i.e., the liquid above the precipitate) are subject to ch. NR 662 Wis. Adm. Code and possibly the Clean Water Act (CWA).
 - b. Secondary treatment residue: The precipitate (i.e., sludge) generated from wastewater treatment are subject to ch. NR 662 Wis. Adm. Code.

7.1 Fuel Blending for Energy Recovery for Boilers and Industrial Furnaces

Since there is no federal or state RCRA regulatory definition for “fuel blending”, fuel blending is defined in section 1.1 Definitions of this WAP. Fuel blending is a form of hazardous waste treatment. The types of hazardous wastes and nonhazardous wastes fuel blended for boilers and industrial

furnaces (BIFs) are typically organic liquids (e.g., spent solvents, coatings, resins, used oil, and other high-BTU wastes) generated from parts cleaning, painting, printing, and lubrication.

With EPA's adoption of the BIF rules in 1991, the as-generated 5,000 British thermal units per pound (Btu/lb.) heating value requirement no longer determines the regulatory status of the BIF (56 FR 7183, February 21, 1991). Therefore, a fuel blender can blend hazardous wastes of any Btu value for burning in a BIF; however, there are consequences for the BIF that chooses to burn fuel blended hazardous waste with a Btu value of less than 5,000 Btu/lb. EPA uses the 5,000 Btu/lb. value to distinguish between hazardous waste that are burned for legitimate energy recovery versus those hazardous waste that are burned for destruction or for use only as an ingredient. When a BIF fuel blends its hazardous wastes to meet the minimum 5,000 Btu/lb. limit or to meet the maximum inorganic metal concentration limit of 500 ppm the fuel blending must be legitimate and not constitute impermissible dilution (40 CFR ss. 266.103(a)(5)(ii) and 268.3, and facility specific conditions). BIFs may become subject to the incinerator standards of 40 CFR Part 264 (NR 664), subpart O when burning hazardous waste for destruction.

For example, cement kilns use an industrial furnace to produce cement, which is a product that is used in a manner constituting disposal since it is nearly always applied to the land. Cement kilns typically burn fuel blended hazardous wastes, which almost always contains listed hazardous wastes due to toxicity. If a portion of this fuel blended hazardous waste has a heating value of less than 5,000 Btu/lb., then EPA will generally assume that the hazardous waste is being burned for destruction. As such, under s. 261.2(c)(1)(i)(B) the cement is a solid waste since the cement is a waste-derived product that is applied to or placed on the land. Under the derived-from rule of s. 261.3(c)(2)(i) the cement is also a listed hazardous waste because the fuel blended hazardous waste is a listed hazardous waste due to toxicity.

The cement remains a waste-derived product unless the BIF can certify under s. 266.103(c)(1) that the low heating value waste is being burned for legitimate energy recovery. When hazardous waste is used as an ingredient to produce the waste-derived product that is applied to the land, then the waste-derived products is subject to s. 266.20(b). Even though the cement is produced from the burning of hazardous waste, the hazardous waste has not been used as an ingredient in the cement and therefore s. 266.20(b) does not apply (53 FR 31198, August 17, 1988). However, if the BIF uses the hazardous waste as an ingredient to produce the product that is applied to the land, then s. 266.20(b) applies. This may occur when hazardous waste is used (or mixed) as slurry water or using soils that contain hazardous waste to make the cement.

7.1.1 Waste Qualification and Acceptance Process

The facility uses the information in the WIP when making a preliminary determination as to whether the waste may be suitable for fuel blending. The facility evaluates the information in the WIP to ensure the hazardous waste codes are permitted and that the waste meets the acceptance criteria listed above in section [7.1.2 Criteria](#) of this WAP

7.1.2 Fuel Blending Criteria

Hazardous waste that are used for fuel blending must meet all the following:

1. Not create an incompatibility issue when mixed.

2. Is not a D001 oxidizer as defined in 49 CFR 173.127 (a) and as determined by the test methods described in that regulation or equivalent test methods approved by the WDNR under ss. NR 660.20 and 660.21 Wis Adm. Code.
3. Is not a D002.
4. Not prevent combustion but contain >0 BTU per pound for each waste stream prior to mixing.
5. Not prohibited by NR 668.03: As per s. NR 668.03 Wis. Adm. Code the combustion of the hazardous waste codes listed in Appendix XI³ of ch. NR 668 Wis. Adm. Code is prohibited, unless the waste, at the point of generation or after any legitimate treatment, complies with one or more of the following and is not otherwise specifically prohibited from combustion:
 - The waste contains hazardous organic constituents or cyanide at levels exceeding the constituent-specific treatment standard found in s. NR 668.48 Wis. Adm. Code.
 - The waste consists of organic, debris-like materials (e.g., wood, paper, plastic, cloth) contaminated with an inorganic metal-bearing hazardous waste.
 - The waste has heating value of greater than or equal to 5,000 BTU per pound.
 - The waste is co-generated with wastes for which combustion is a required method of treatment. For example, a waste stream at its POG is a D001 and a D008.
 - The waste is subject to federal or Wisconsin requirements necessitating reduction of organics, including biological agents.
 - The waste contains greater than one percent total organic carbon (TOC).
6. Treatment technology requirements: Waste having a specified LDR treatment technology other than CMBST or DEACT must also meet that specified LDR treatment technology.
7. Be legitimately amenable to the same type of treatment (see section [7.1.6 Impermissible Dilution](#) of this WAP).
8. Not involve impermissible dilution under the LDR requirements of ch. NR 668 Wis. Adm. Code when mixed (see section [7.1.6 Impermissible Dilution](#) of this WAP).
9. Not be a PCB wastes, as defined under the Toxic Substance Control Act, or contain PCBs greater than or equal to 50 parts per million.
10. Not be any waste with the recognized Dioxin/Furan waste codes. These hazardous waste codes are F020, F021, F022, F023, F026, F027, and F028.

Hazardous wastes that have been fuel blended must meet the specifications required by the destination BIF.

7.1.3 BIF Specifications

The facility's operating record identifies all the criteria and specifications that must be met for fuel blended waste to be accepted at each BIF used by the facility.

7.1.4 Meeting the BIF Specifications

After the wastes are fuel blended and before the fuel blended hazardous waste is shipped off-site to the BIF, the facility conducts analytical testing on each outbound container or bulk load to determine if the fuel blended hazardous waste meets the specifications discussed in section [7.1.3](#)

³ D004 – D011, F006 – F012, K002 - K008, K061, K069, K071, K100, K106, P010 – P013, P015, P029, P074, P087, P099, P104, P113 - P115, P119 – P121, U032, U145, U151, U204, U205, U216, and U217.

BIF Specifications of this WAP. The analytical testing consists of testing a representative sample for heat content (i.e., BTUs per pound) and all the analytical-based criteria and specifications established by the BIF. Documentation of this representative sampling and the analytical results is maintained in the operating record.

7.1.5 Analytical Testing

The analytical testing required for fuel blending are identified in the column titled “Analytical Method to use” in **Table 2** of this WAP. Representative samples of each container of waste will be analyzed. Analytical results for wastes that are to be blended will be used for calculating the final blend. Individual wastes to be blended do not need to meet the minimum BIF acceptance criteria however they must still be legitimately amenable to fuel blending as a treatment. The final blend must meet the minimum BIF acceptance criteria based on a representative sample from the outbound container.

Table 2: Fuel Blending Analytical Requirements

Parameter	Hazardous waste that are used for fuel blending	Hazardous wastes that have been fuel blended
	Review Required	Review Required
(M-13) Compatibility	Yes	Yes
(M-14) Heat Content	Yes	Yes
(M-15) % Water	Yes	Yes
(M-16) Total Halogens	Yes	Yes
(M-11) PCBs (If Applicable*)	Yes	Yes
Any other parameter necessary to confirm that the waste meets the specifications required by the cement kiln	When necessary	When necessary

* PCB analysis is required unless the approved WIP indicates that PCBs are not present and, based on the WIP’s waste generation process description, PCBs are not reasonably expected to be present.

7.1.6 Impermissible Dilution

For waste that will be land disposed, the facility will not perform impermissible dilution when performing fuel blending or other consolidation or processing activities. The mixing (i.e., aggregation) of hazardous wastes for treatment on an economic scale only occurs when the waste-constituents are legitimately amenable to the same type of treatment. Therefore, when hazardous wastes are mixed to be legitimately fuel blended and it results in the characteristic hazardous waste code and/or the underlying hazardous constituents (UHCs) being removed due to dilution as a result of that mixing, then the mixing is not considered to be impermissibly diluted under LDR requirements of s. NR 668.03 Wis. Adm. Code. EPA states in the June 1, 1990, federal register (55 FR 22666/22667⁴) the following regarding mixing of hazardous waste:

“The Agency is able to provide limited additional guidance today on the issue of when treatment methods involving dilution are permissible. The issue frequently arises when prohibited wastes are aggregated for purposes of treatment. First if the wastes

⁴ <https://tile.loc.gov/storage-services/service/ll/fedreg/fr055/fr055106/fr055106.pdf>

are all legitimately amenable to the same type of treatment, and this method of treatment is utilized for the aggregated wastes, the aggregation step is not impermissible dilution. Thus, it is permissible (and normally desirable) for prohibited organic-containing wastes that are suitable for combustion to be aggregated before combustion even though the concentration of organics in some of the wastes decreases”

An example of impermissible dilution in fuel blending operation would be mixing in inorganic metal-bearing wastes (e.g., a D008 wastewater). Since the inorganic metal-bearing wastes contains no organics components it is not legitimately amenable to the same type of treatment as the fuel blended wastes. This is because the inorganic metal-bearing wastes are not destroyed by incineration, whereas the fuel blended wastes - which have organics components - are destroyed by incineration.

7.1.7 Applicability of LDR Notification when Burning in a Bevill-exempt Device⁵

The “Bevill exclusion” exempts certain mining and fuel-related wastes from RCRA hazardous waste regulation.

The LDR notification provisions ordinarily apply to fuel blending operations because the combustion residues from the burning of these fuel blended hazardous waste are ultimately land disposed and these combustion residues ordinarily remains subject to LDR treatment standards⁶.

However, there are circumstances where fuel blended hazardous waste that are destined for combustion at a BIF may not be subject to LDR requirements because neither the hazardous waste nor the residue from treating the hazardous waste is subject to a treatment standard when land disposed. This occurs when hazardous wastes are going to be burned for energy recovery in a Bevill device, such as a cement kiln (s. NR 661.0004(2)(h) Wis. Adm. Code). To show that the LDR requirements do not apply the fuel blended waste, the facility obtains the following from the industrial furnace or boiler:

1. The name and contact information of the industrial furnace or boiler.
2. Documentation showing that the hazardous waste is burned for energy recovery.
3. Documentation showing the industrial furnace or boiler processes normal Bevill raw materials (e.g., cement or light-weight aggregate).
4. Documentation showing that the residues are not significantly affected by the hazardous waste-burning activities. The "significantly affected" test is found in s. NR 666.112 Wis. Adm. Code.

The LDR off-site notification requirements would not apply to the generator or the facility’s hazardous waste if it is burned for energy recovery in a Bevill device that produces Bevill raw materials and the Bevill device’s residues are not significantly affected by its hazardous waste burning activities.

Generator LDR Notification

⁵ <https://rcrapublic.epa.gov/files/11881.pdf>

⁶ According to s. NR 668.40(5) Wis. Adm. Code, the LDR treatment standards continue to apply to characteristic wastes that no longer exhibit a characteristic when land disposed.

If the generator can assure that the conditions discussed above are all true regarding the disposition of its otherwise prohibited waste, then the generator is only required to prepare a one-time on-site LDR notification form per s. NR 668.07(1)(g) Wis. Adm. Code. If a generator cannot assure, then the full notification and certification requirements under s. NR 668.07(1) Wis. Adm. Code would apply.

Facility LDR Notification

The facility must comply with s. NR 668.07(2)(e) Wis. Adm. Code, which requires the facility to prepare the same LDR notification and certification that is required for generators, which in some cases will be the one-time LDR notification form.

7.1.8 Recordkeeping

As part of the facility's operating record, the facility documents all the waste streams that are used to make a fuel blended load (such as WIP number, manifest/line number, quantity) and all screening and analysis performed on waste performed prior to and after blending (see [Appendix D](#))

8.0 Restricted Wastes

The facility does not accept the following waste:

1. Waste codes not identified in the Part A Application (see Appendix C)
2. Radioactive Waste.
3. Conventional or chemical ordnance.

9.0 Manifest and Bill of Lading Discrepancies

The facility reviews each manifest and bill of lading to verify that all required information has been entered. If the required information is missing or incorrect, then the facility contacts the generator for the missing information or for the correct information. The facility documents these changes in the facility operating record. The manifest or bill of lading identifies the approved WIP number for each waste stream.

Manifest and bill of lading discrepancies are to any of the following:

1. Significant discrepancies in quantity, including but not limited to any of the following:
 - a. For bulk waste, variations greater than 10% in weight or volume.
 - i. Bulk containers able to be forklifted such as cubic yard boxes and totes will be weighed on the scale.
 - ii. Bulk material in tanker trucks will be evaluated utilizing the tank volume gauge on tanker trucks.
 - b. For batch waste, any variation in piece count, such as a discrepancy of one drum in a truckload.
2. Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as:
 - a. Waste solvent substituted for waste acid.
 - b. Solid material substituted for a liquid.
 - c. Orange waste substituted for gray waste
3. Rejected wastes based on the Level I, II, and III evaluation and analyses, which may be a full

or partial shipment of hazardous waste that the facility cannot accept.

4. Container residues, which are residues that exceed the limits for empty containers set forth in s. NR 661.0007(2) Wis. Adm. Code.

The facility follows the procedures in section s. NR 664.0072(3) Wis. Adm. Code to address manifest discrepancies – including those VSQGs who use a manifest. The facility also resolves discrepancies related to waste on bill of ladings. In addition to following s. NR 664.0072(3) Wis. Adm. Code the facility also does all the following:

1. Decide if the waste can be accepted by the facility despite the discrepancy. This may require obtaining addition information from the generator, and involves a determination whether the facility, and the destination facility, can manage the waste in a manner that is safe, effective, and in accordance with the conditions of the facility’s license
2. If the waste cannot be accepted, reject it in accordance with section and section [8.0 Restricted Wastes](#) of this WAP.
3. Perform a WIP re-evaluation to determine if a new or revised WIP is necessary. This could involve acquiring a new or modified WIP from the generator for re-evaluation and re-certification. The new or revised WIP is then subject to the Pre-Qualification process described in section [2.0 Waste Prequalification](#) of this WAP.
4. Maintains records that document proper completion of the above actions. Refer to section [17.0 Recordkeeping and Reporting](#) of this WAP for recordkeeping.
5. Prior to accepting additional waste from the generator having a discrepancy as described in this section of the WAP, the facility requires the generator to submit documentation (e.g., e-mail) describing what caused the discrepancy and what action(s) will be taken to prevent that discrepancy from occurring in the future.

Additional information and requirements regarding discrepancies is provided in sections [5.0 Shipment Screening, Analysis, and Acceptance](#) to [5.5 Final Acceptance and Placement of Waste in Storage](#) and section [10.0 WIP Discrepancies](#) of this WAP.

10.0 WIP Discrepancies

Section NR 664.0013(1)(a) Wis. Adm. Code requires the facility to know how to treat, store, and dispose of the waste it receives from off-site in accordance with chs. NR 664 and 668 Wis. Adm. Code and the facility’s conditions of its RCRA license. Therefore the facility must ensure that the information in the WIP including the LDR document is correct.

If there is a discrepancy (e.g., discrepancy in pH, flammability, etc.) between the waste received at the facility and the waste’s WIP, then the facility performs one of the following to resolve the discrepancy:

1. Attempt to resolve the discrepancy by contacting the generator and requesting additional information in order to do one of the following:
 - a. Decide if the waste can be accepted by the facility under the existing WIP despite the discrepancy. This involves a determination whether the facility can manage the waste on-site in a manner that is safe, effective, and in accordance with the conditions of the facility’s RCRA license.
 - b. If the generator is unable to provide an explanation, perform the necessary analysis to fully characterize the waste. Refer to section [5.2 Level II Analysis](#) of

this WAP for the procedures associated with a Level II analysis.

- c. Perform a new WIP evaluation. This will involve acquiring a new WIP from the generator for evaluation and certification. The new WIP is then subject to the Pre-Qualification process described in section [2.0 Waste Prequalification](#) of this WAP.
2. Decide to reject the waste by following the procedures in the Rejection Policy in section and section [11.0 Rejection of Inbound Hazardous Waste](#) of this WAP.

Once the discrepancy is resolved, have the generator provide a written corrective action plan to the facility that describes the reason for the discrepancy and actions to be taken to prevent re-occurrence. Records must be maintained that document proper completion of the above actions. Refer to section [17.0 Recordkeeping and Reporting](#) of this WAP for recordkeeping.

Additional information and requirements regarding discrepancies is provided in sections [5.0 Shipment Screening, Analysis, and Acceptance](#) to [5.5 Final Acceptance and Placement of Waste in Storage](#).

11.0 Rejection of Inbound Hazardous Waste

The facility follows the procedures set forth at s. NR 664.0072(4) to (7) Wis. Adm. Code when rejecting hazardous waste containers. In addition to following s. NR 664.0072(4) to (7) Wis. Adm. Code the facility also does all of the following:

1. Place the rejected hazardous waste in the facility's quarantine area.
2. Clearly label each rejected hazardous waste container with the words "Rejected"
3. Ensure that the rejected hazardous waste is safely and properly containerized
4. Maintains records that document proper completion of the above actions. Refer to section [17.0 Recordkeeping and Reporting](#) of this WAP for recordkeeping.

When a rejected waste is sent back to the generator, the facility will promptly notify the WDNR's TSD inspector via email and provide written notification to WDNR of this rejected waste occurrence within 3 days of the date the waste was shipped.

Additional information and requirements regarding discrepancies is provided in sections [5.0 Shipment Screening, Analysis, and Acceptance](#) to [5.5 Final Acceptance and Placement of Waste in Storage](#) and section [10.0 WIP Discrepancies](#) of this WAP.

12.0 Outbound Hazardous Wastes Shipments

Whenever a shipment of hazardous waste is initiated from the facility, the facility complies with the waste determination and recordkeeping requirements in s. NR 662.011, Wis. Adm. Code, the generator's manifesting requirements under subchapter B of ch. NR 662 Wis. Adm. Code and s. NR 664.071(3) Wis. Adm. Code, the LDR requirements of s. NR 668.07 Wis. Adm. Code, and the exception reporting requirements in s. NR 662.042(1) Wis. Adm. Code when a signed copy of the manifest is not received within 35 days of the date the waste was accepted by the initial transporter.

For wastes generated from the operation of licensed units and to comply with generator waste determination requirements, the facility may rely on, as acceptable knowledge, information from the applicable WIP(s) provided by the original waste generator(s), but only if this information demonstrates compliance by the original generator with waste determination requirements in s. NR 662.011, Wis. Adm. Code. Examples of these sorts of wastes are:

- Trans-shipped wastes
- Consolidated or bulked wastes
- Lab-packed wastes
- Blended fuels
- Spill cleanup residues
- Contaminated PPE
- Used containers

13.0 Waste Sampling

Samples used for waste determinations and Level I, II and II analyses must be representative and the procedures for collecting these representative samples are identified below. Sampling equipment is typically constructed of non-reactive materials such as glass, PVC plastic, aluminum, or stainless steel. Care is taken in the selection of the sampling device to prevent contamination of the sample and to ensure compatibility of materials. For example, glass bottles are not used to collect hydrofluoric acid wastes.

Collected samples are to either be returned to their original container or combined with compatible materials prior to shipment off-site for proper disposal. Any “waste” material generated by sampling activities is either returned to the original waste container or the facility utilizes a new container.

13.1 Sampling Methods

The methods and equipment used for sampling waste vary with the form and consistency of the waste to be sampled. The facility selects the most appropriate representative sampling methods, techniques, devices, and containers from those included/described in either the EPA document “Test Methods for Evaluating Solid Wastes” (SW-846) or the “American Society for Testing and Materials” (ASTM) standards. A representative sample is defined as a sample exhibiting average properties of the whole waste (NR 660.10(101) Wis. Adm. Code).

The facility’s sampling procedures are included in [Appendix C](#) of this section.

13.2 Sampling Personnel

All sampling is performed by facility personnel who have been trained in proper sample collection. This training is documented in the operating record, including at a minimum the description of the training contents, the name of the trainer(s), the name of the individual trained, and the date.

13.3 Sample Documentation

Samples collected for on-site Level I analysis are documented utilizing the Level I QA/QC checklist (see [Appendix F](#)).

All Level II and III sampling are documented utilizing the Level II/Level III QA/QC Checklist included in [Appendix G](#) of this section. Chain-of-custody forms are used for tracking Level II and Level III samples sent for off-site laboratory analyses and testing. The specific chain of custody form will be based on the 3rd party lab utilized.

13.4 Sample Labels

Labels are affixed to each sample container prior to, or at the time of, sampling. At a minimum, the labels include the following information:

1. Name of sample collector
2. Date of collection
3. Unique container number, which can be used to quickly identify the generator name, waste name, WIP number, and WIP information.
4. A unique sample container number sticker, that matches (or references) the unique container number
5. Instructions (e.g., Level I, II or III analysis)

Samples sent to outside labs must be accompanied by instructions and chain of custody documentation. The specific chain of custody form will be based on the 3rd party lab utilized.

Labels are affixed after the sample has been inserted and the sample container is sealed such that the sample container cannot be opened without disfiguring the label, thereby flagging those instances that other wastes or materials may have been introduced into the sample.

14.0 Parameters and Rationale

Table 3 summarizes the analytical parameters and rationales used to determine the general and specific characteristics of a waste stream, and tolerance limits for use in identifying discrepancies. ASTM and SW-846 are used as guidelines in developing the following analytical methods:

Table 3: Analytical Parameters and Rationales

Parameter	Method Number	Reference Method(s)	Rational for Selection
Physical Description	M-1	Not applicable	Used to determine the general characteristics of the waste stream. This facilitates subjective comparison with WIP information regarding physical characteristics of the waste. Facility personnel check for appearance, color, layering, and viscosity. If an odor is detected, then note if the odor is applicable to the waste. Tolerance limits: Must match description in WIP
pH	M-2	SW-846 test methods 9040C or 9041	Required of all water-bearing liquid, solid, and semi-solid waste streams to determine the corrosivity of the waste. The apparent pH of non-aqueous waste is also performed. Tolerance limits: D002 waste that are acids should have an acidic pH (<3) while wastes that are bases should have a caustic pH (>12). Wastes without a D002 should be within their expected range listed on the WIP
Ignitability	M-3	ASTM D93-79, D	Indicates the fire-producing potential of the waste and determines whether the waste is a D001 ignitable waste. This

		93–80, or D 3278–78	<p>test is applied to all wastes (including liquids, solids, and sludges).</p> <p>Tolerance limits: D001 wastes such as a flammable liquid waste must flash at <140F and flammable solids should maintain combustion. Wastes without a D001 should not flash at <140F and not maintain combustion when exposed to open flame. These results must align with the ranges provided in the material's WIP.</p>
Water Reactivity	M-4		<p>Used to determine whether the waste has a potential to react with water to generate heat, flammable gases, or other products. The test does not apply to wastes already in contact with excess water.</p> <p>Tolerance limits: Must match description in the WIP. D003 reactive waste material should have an adverse reaction when exposed to water while wastes not bearing a D003 for reactive should have no reaction when exposed to water.</p>
Reactive Sulfides Screen (Spot Test)	M-5	ASTM D4978	<p>Used to indicate whether the waste produces hydrogen sulfide upon acidification below pH 2. It is not required if the pH of the waste is <6 or if the waste is not water-soluble.</p> <p>Tolerance limits: Must match description in the WIP.</p>
Reactive Cyanides Screen (Spot Test)	M-6		<p>Indicates whether the waste produces hydrogen cyanide upon acidification below a pH of 2. It is not required for wastes with pH <6 or if the waste is not water-soluble.</p> <p>Tolerance limits: Must match description in the WIP.</p>
Oxidizer Screen	M-7		<p>A general qualitative test used to determine if a waste is an oxidizer. Oxidizers have the potential to react with a wide range of wastes and therefore often need to be segregated.</p> <p>Tolerance limits: Must match description in the WIP.</p>
Specific Gravity	M-8		<p>Used in conjunction with other test data to determine probable characteristics of materials and their conformance to the WIP.</p> <p>Tolerance limits: +/- 10% of value reported in the WIP</p>
Percent Suspended Solids	M-9	EPA method 160.2	<p>Used in conjunction with other test data to determine probable characteristics of materials and their conformance to the WIP.</p> <p>Tolerance limits: +/- 10% of value reported in the WIP</p>
Chlorine (Spot Test)	M-10		<p>Indicates if the material is chlorinated. Information is used to check conformance to the WIP.</p> <p>Tolerance limits: Must match description in the WIP</p>
Polychlorinated	M-11	SW-846 8082	Determines PCB content in order to verify WIP information and

Biphenyls Screen			<p>assess applicability under TSCA.</p> <p>Tolerance limits: Must match description in the WIP. If a WIP states no PCBs then an analysis should show the concentration as not detected. A WIP stating PCBs are present should be within the respective range, either 1-49ppm, 50-499ppm, or >500ppm</p>
TCLP	M-12	SW 846 test method 1311 for digestion	<p>Used to determine the leachable concentration of the 40 constituents listed in s. NR 661.0024 Wis. Adm. Code.</p> <p>Tolerance limits: +/- 20% of value reported in WIP</p>
Compatibility Testing	M-13	ASTM D5058 ASTM D4981	<p>Prior to a waste being commingled with other wastes, the waste is tested to verify compatibility. Liquid or sludge wastes are combined in a manner to simulate the commingling in order to assess their compatibility.</p> <p>Tolerance limits: NA</p>
Heat Content	M-14	ASTM D240 ASTM D5468	Indicates if the waste meets the minimum BTU value required for fuel blending. The fuel blended waste must have adequate heating value to ensure its use for energy recovery.
% Water	M-15	SW-846 Method 9000	Indicates if the waste meets the criteria for fuel blending.
Total Halogens	M-16	SW-846 Method 9056A	Indicates if the waste meets the criteria for fuel blending.

15.0 Test Methods

The test methods used to confirm that the waste received by the facility conforms to the corresponding WIP are described below. Each layer or phase in a container is subject to these test methods.

M-1: Physical Description

The physical examination includes, at a minimum, appearance, color, layering, viscosity, and odor if detected. The physical description includes:

1. Color.
2. Physical state (% solid, % sludge, % liquid).
3. Layers/phases (single, bi-layered, multi-layered).
4. Viscosity.
5. If an odor is detected, then note if the odor is applicable to the waste.

If necessary, a COLIWASA or sample thief is used to check for layering and to determine the approximate percentage of each different layer (e.g., solid, sludge, aqueous liquid, oily liquid, light liquids). Containers of solids and semi-solid should be examined with augers or shovel-like devices to identify the presence of differing materials. These same sorts of devices can also assist in gathering a representative sample. Representative samples must properly represent all phases, layers, and other varying components of the waste.

M-2: pH Screen

The pH of liquids and sludges is measured using SW-846 test methods 9040C or 9041.

The pH of a solid is measured by placing 20 grams of the sample into a cup and adding 20 milliliters (ml) of deionized water to the mixture and then stirring for 30 seconds. The pH of the slurry is then taken and recorded using SW-846 test methods 9040C or 9041.

M-3: Ignitability

The ignitability screen is determined by using a Pensky–Martens Closed Cup Tester (using the test method specified in ASTM Standard D 93–79 or D 93–80) or a Setaflash Closed Cup Tester (using the test method specified in ASTM Standard D 3278–78).

M-4: Water Reactivity

The water reactivity of a liquid or solid is determined by adding approximately 3 mL of water to 0.1 mL of liquid or 0.1 gram of solid. The mixture is observed to detect heating (more than 15° C temperature rise) or turbulent gas evolution (more than 10% of the mixture volume). If the mixture reacts as described above, the test is considered positive. If the addition of water causes the material to be considered reactive under any definition of s. NR 661.0023 Wis. Adm. Code, then the material is considered water reactive.

M-4: Reactive Sulfides Screen (Spot Test)

2 to 4 drops of the material are placed on a spot plate. Then, a strip of lead-acetate paper moistened with 1 drop of water is placed over the spot plate cavity containing the waste. Next, 2 to 3 drops of 3M HCl are added. Black PbS forms in the paper after 0.5 to 1 minute if sulfide is present.

M-5: Reactive Cyanides Screen (Spot Test)

Cyanide is determined by placing 2 to 4 drops or a small spatula tip of the sample on a spot plate. Two drops of water are then added to the waste. Next, one drop of chloramine-T solution followed by one drop of pyridine-barbituric acid solution is added to the waste. If the solution turns dark red or carmine after 10 to 30 seconds, this is a positive response.

The presence of cyanide can be detected above 60 ppb in aqueous samples (3 drop size) and 10 ppm in solid samples (1-gram size).

Reagents:

1. Chloramine-T solution: 1 gram of Chloramine-T is dissolved in 100 ml of distilled water.
2. Pyridine-barbituric acid: 1.5 g of barbituric acid is mixed with 5 mL of water and 7.5 mL of pyridine. The mixture is treated with 1.5 mL of concentrated HCl and diluted to 25 mL.

M-7: Oxidizer Screen

The method used is a qualitative examination for the presence of oxidizing materials in liquid, sludge, and solid samples.

Liquids and Sludges: The procedure for liquid and sludge waste consists of wetting a strip of KI-

Starch paper in HCl. The wetted strip is then dipped into the sample. The color change is then noted. If the color turns light brown to dark purple or black, then the result is interpreted as positive, and the waste is managed as an oxidizer. The color is indicative of the type of oxidizer present.

Solids: The procedure requires that 2 mL of deionized water be added to 11 grams of sample. The mixture is then stirred for 30 seconds. A strip of KI-starch paper is wetted in HCl and then dipped into the slurry. The color change of the KI paper is then noted. If the color turns light brown to dark purple or black, then the result is interpreted as positive, and the waste is managed as an oxidizer. The light brown color is indicative of nitric acid while the purple/black color results from the presence of peroxides.

M-8: Specific Gravity

The Specific Gravity of a liquid is determined by weighing 10 mL of the sample (at room temperature) and dividing this value by 10. The alternate method of using a hydrometer may be used if sufficient sample is present.

M-9: Percent Suspended Solids

EPA method 160.2 is used to determine total suspended solids

M-10: Chlorine (Spot Test)

A small amount of the sample is placed in a test tube. Litmus paper is placed over the sample as heat is applied. A red coloration of the paper indicates the presence of chlorine. An additional test is done by placing a small amount of the material in a flame on a wire loop. A green color indicates the presence of chlorine.

M-11: Polychlorinated Biphenyls Screen

EPA method 8082 is used to determine PCB content.

M-12: Toxicity Characteristic Leaching Procedure (TCLP)

TCLP test using SW 846 test method 1311 for digestion and one or more of the following analytical methods to analysis the leachate (see Figure 1: TCLP Analytical Requirements). For waste that are 100% physical solid (i.e., contains no filterable liquids) the total concentration can be used in lieu of TCLP test when the total concentration for that analyte is less than 20 times the TCLP value for that TCLP analyte.

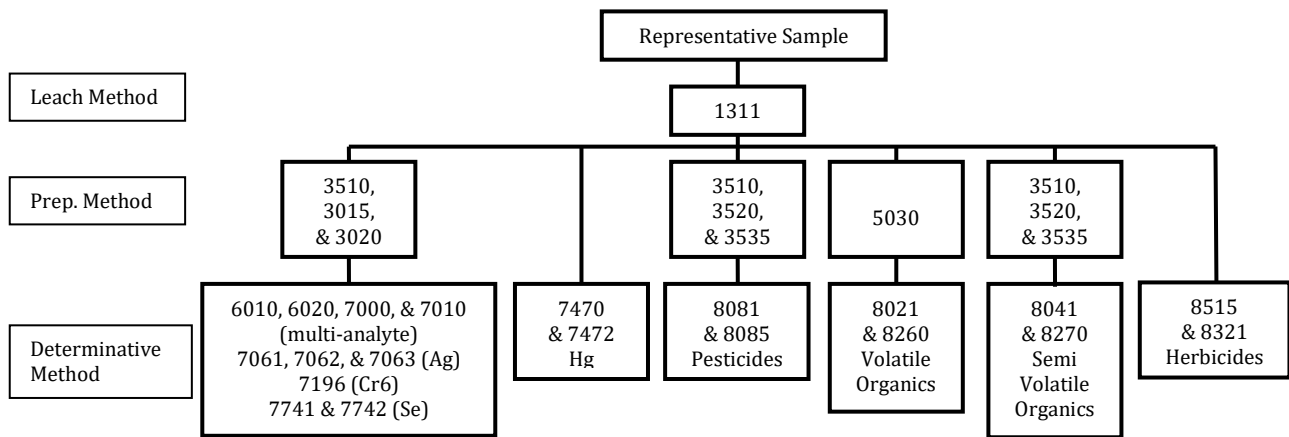


Figure 1: TCLP Analytical Requirements

M-13: Compatibility Testing

To determine if the wastes are compatibility prior to commingling, the facility performs a bench-test to simulate the bulk mixture process. The bench test involves mixing representative samples of the waste to be blended (each must be at the same temperature) and then observing the mixture for undesirable chemical reactions such as bubbling, splattering or frothing, heat rise, and/or hazardous polymerization. This is done under controlled conditions by personnel trained to assess and manage chemical reactions.

More specifically, I mixture is observed for the following:

1. Evolution of gas characterized by bubbling or foaming.
2. Heat release evidenced by a temperature increase of more than 15 degrees over the measured temperature.
3. Polymerization of the mixture to an un-pumpable viscosity within 30 minutes.
4. Miscibility or the formation of layers.
5. Precipitate formation.
6. Emulsification.
7. Any other indication of heat or pressure, fire or explosion, violent reaction, toxic dusts, mists, fumes, or gases, or flammable fumes or gases.

If the facility observes any of these conditions, then the wastes are considered incompatible and cannot be mixed.

M-14: Heat Content

The heating content (i.e., BTU value) is determined using an oxygen bomb calorimeter.

M-15: % Water

The % Water present in a sample is determined using a Karl Fischer Titrator. ASTM D6304-20 or SW-846 method 9000

M-16: Total Halogens

The Total Halogens (Chlorine, Fluorine) is determined using the cup wash from an oxygen bomb calorimeter analyzed by Ion-Chromatography. ASTM D4327-17

16.0 Quality Assurance and Quality Control

The following quality assurance/quality control (QA/QC or “quality”) information for this facility is being provided as required by s. NR 670.030(5) Wis. Adm. Code and in accordance with the following EPA guidance documents:

1. Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, Third Edition, Final Update I, U.S. EPA, Office of Solid Waste, Washington, DC, July 1992, Chapter One, updated editions.
2. Handbook for analytical Quality Control in Water and Wastewater laboratories, EPA 600/4-79-019, March 1979, US Environmental Protection Agency (USEPA), Environmental Monitoring and Support Laboratory (EMSL), Cincinnati, OH.

These quality protocols are applicable to waste sampling, evaluation techniques (e.g., physical appearance) and analytical methods.

16.1 Sampling Program

Individual container samples that are related may be composited prior to analysis only when appropriate to form a representative sample.

Sampling procedures are described in section [14.0 Parameters and Rationale](#) of this WAP. The selection of the sample collection device depends on the type of sample, the sample container, the sampling location and the nature and distribution of the waste components. In general, the methodologies used for specific materials correspond to those referenced in Chapter NR 661, Appendix I. The selection and use of the sampling device is supervised or performed by a person thoroughly familiar with the sampling requirements.

16.2 Analytical Program

The facility performs Level I and III physical waste evaluations and Level I analytical testing on-site. The QA/QC Plan for these analyses to be performed by the facility on-site is included in [Appendix I](#).

The facility subcontracts with an independent laboratory certified or registered under ch. NR 149 for Level II and III analyses. The facility and these laboratories have developed programs of analytical quality control practices and procedures to ensure that precision and accuracy are maintained. These programs – which include use of control standards, duplicates, spikes, and blanks – are required. Chapter NR 149 Wis. Adm. Code requires the establishment, implementation and documentation of analytical quality control protocols that are followed.

Good laboratory practices which encompass sampling, sample handling, housekeeping and safety are required and implemented by all laboratories used by the facility.

16.4 Training

All personnel that implement the procedures of this WAP will be competent and properly trained. The facility maintains and implements a training plan that describes personnel training requirements, procedures, and protocols. In addition, the facility must meet the requirements of the training requirements of NR 664.0016 and the approved training plan required by NR 670.014(2)(L) and included in the facility’s approved FPOR.

16.5 Conclusion

These sampling and analysis quality practices help ensure the data obtained are precise and accurate for the waste stream being evaluated, sampled and tested. The analytical results are used by facility management to decide whether or not to accept a particular waste and, upon acceptance, to determine the appropriate method of treatment, storage, and disposal. Results are also important to ensure that wastes are managed properly by the facility and that incompatible wastes are not inadvertently combined or improperly containerized. The quality of these results are as important as the results themselves. Thus, the quality of the analytical data, along with the thoroughness and care with which the sampling and analyses are performed and reported, provides an important basis for day-to-day operational decisions, compliance, and safety.

17.0 Recordkeeping and Reporting

Recordkeeping: The following WAP records are maintained in the facility's operating record and are made available to WDNR and EPA when requested. Unless specified otherwise, records will be retained for at least three years.

1. Documentation on how the facility obtained representative samples.
2. Documentation of any discrepancies identified by the Level I, II, and III analysis and how the facility resolved those discrepancies.
3. Results of all Level I, II, and III analysis for each waste sampled/analyzed:
 - a. If applicable, a copy of the chain of custody document. The specific chain of custody form will be based on the 3rd party lab utilized.
 - b. Copies of all applicable analytical test results and lab reports.
 - c. A copy of the generator's manifest(s).
 - d. A copy of the generator's original WIP and, if applicable, a copy of the generator's revised WIP.
 - e. Level I QA/QC checklist (see [Appendix F](#)).
 - f. Level II/Level III QA/QC checklist (see [Appendix G](#) of this WAP)
4. Records of all compatibility testing and necessary sampling and testing prior to commingling any wastes (see [Appendix D](#) of this WAP).
5. Records of analyses, corrective action plans and other actions taken under the Rejection Policy and Discrepancy Policy in this WAP.
6. The annual report that documents the frequency at which incoming shipments do or do not conform to their WIPs, based on the results of Level II and III analyses, as addressed in sections [5.0 Shipment Screening, Analysis, and Acceptance](#) of this WAP. The report must indicate the steps taken by the facility to evaluate and resolve the discrepancies, including but not limited to the development of new or revised WIPs, and measures taken to improve the facility's WAP and its implementation.
7. Other specific documentation and records as specified in this WAP.

Reporting: The following reports related to WAP activities will be provided to WDNR. All reports will be provided to the WDNR Region contact person (field inspector) assigned to the facility and to the WDNR TDSF inspector. If these individuals are not known, the Facility will contact the Hazardous Waste Section Chief for instructions.

8. Unknown waste reports discussed in section 2.0
9. Rejected waste report addressed in Section 9.1
10. Amended manifest report required in NR 664.0072(7)
11. Unmanifested waste reports required in NR 664.0076
12. All reports applicable to WAP topics required by NR 600 – 670 and by the facility license.

18.0 Corrective Action

The facility subcontracts with an independent laboratory certified or registered under ch. NR 149 for all Level II and III analyses. The facility and subcontracted laboratories have processes in place to ensure quality assurance and quality control (see Section 16.0 Quality Assurance and Quality Control of this WAP). In addition, the facility and subcontracted laboratories have methods for correcting problems when they are identified. If problems/discrepancies are found, the facility must take corrective actions, such as performing an audit of the laboratory, reviewing and revising applicable SOPs, evaluating subcontracted laboratories and entering into new subcontracts if the facility has a concern about the quality of work.

19.0 Appendices

1. [Appendix A: Waste Information Profile \(WIP\) Form.](#)
2. [Appendix B: Lab Pack Contents Form.](#)
3. [Appendix C: Standard Operating Procedures for Opening and Sampling Container.](#)
4. [Appendix D: Bulk Consolidation Tracking Sheet.](#)
5. [Appendix E: \(Reserved\)](#)
6. [Appendix F: Level I QA/QC Checklist.](#)
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8. [Appendix H: Minimum WIP Contents.](#)
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Appendix A: Waste Information Profile (WIP) Form



ENVIRO-SAFE RESOURCE RECOVERY
GENERATOR PROFILE FORM

Profile: _____

Status: _____

Process Code: _____

SECTION 1. GENERAL COMPANY INFORMATION

Generator Company Information	Billing Company Information
Generator Name: _____	Company Name: _____
Address: _____	Address: _____
City, State, Zip Code: _____	City, State, Zip Code: _____
Contact Name: _____	Contact Name: _____
Title: _____	Phone: _____
Phone: _____	Email: _____
Email: _____	Will a PO Number be Required? <input type="checkbox"/> Yes <input type="checkbox"/> No
Generator Status: <input type="checkbox"/> LQG <input type="checkbox"/> SQG <input type="checkbox"/> VSQG/CESQG (If yes, complete VSQG/CESQG Supplemental Form) <input type="checkbox"/> Not Applicable	
EPA ID Number: _____	NAICS Code: _____ Emergency Number: (800) 424-9300 (CNN677208)

SECTION 2. PROFILE INFORMATION

Common Name: _____

Generating Process: _____

Does the Generator have a Sustainability Policy? Yes No Does the Generator have a No Landfill Policy? Yes No

SECTION 3. CHEMICAL CONSTITUENTS

List all components in the material by percentage (%) or ppm. Provide a range of typical concentration. The concentration maximum total should be equal to or greater than 100%.

The constituent information is based upon: Generator Knowledge Safety Data Sheets (attach) Analytical/Sample (attach)

Constituent	CAS Number	Range (%)	Regulatory Applicability



ENVIRO-SAFE RESOURCE RECOVERY
GENERATOR PROFILE FORM

Profile: _____

Status: _____

Process Code: _____

If an above listed chemical constituent is applicable to one of the below regulatory requirements, please indicate applicable letter under the Regulatory Applicability field above.

- A. SARA Title III EPCRA Section 302 Extremely Hazardous Substance (EHS) (40 CFR 355, Appendix A) - Listed Chemical
B. SARA Title III EPCRA Section 311/312 Tier II Reportable (40 CFR 370) - OSHA Safety Data Sheet Required (not applicable to waste)
C. SARA Title III EPCRA Section 313 Toxic Release Inventory (40 CFR 372.65) - Listed or Categorical Chemical
D. Clean Air Act (CAA) Section 112 Hazardous Air Pollutant (HAP) (40 CFR 61) - Listed Chemical
E. Clean Air Act (CAA) Section 112(r) for Accidental Release Prevention (40 CFR 68.130, Subpart F) - Listed Chemical
F. Clean Air Act (CAA) Listed CERCLA Hazardous Substance (40 CFR Part 61 Subpart FF) - Listed
G. Department of Homeland Security Chemicals of Interest (6 CFR Part 27 Appendix A) - Listed Chemical
H. EPA Ozone Depleting Substance - Listed Class I or Listed Class II
I. Benzene NESHAP (40 CFR Part 61, Subpart FF)

SECTION 4. PHYSICAL PROPERTIES

Color: _____ Odor: _____ VOC (%): _____
Water (%): _____ Halogens (%): _____ Chlorine (%): _____
Physical State: [] Liquid [] Solid [] Gas (at 70°F)
Liquid Phase: [] Single [] Double-Layer [] Multi-Layer [] N/A
Solid Phase: [] Slurry [] Dust/Powder [] Debris [] Other
pH: [] <=2 (acid) [] 2.1 - 4.0 [] 4.1 - 10.0 [] 10.1 - 12.4 [] >=12.5 (base) [] N/A
Flash Point: [] <=73°F [] 73° - 140°F [] 141° - 200°F [] >=200°F [] N/A
Heat Content: [] <=3,000 btu [] 3,000-5,000 btu [] 5,000-10,000 btu [] >=10,000 btu
Viscosity: [] Low [] Medium [] High

SECTION 5. ADDITIONAL PROPERTIES

Physical Hazards (check all that apply)

- [] Air Reactive [] Flammable Solid [] Reactive Sulfides
[] Combustible Liquid [] Organic Peroxide [] Shock Sensitive
[] Compressed Gas [] Oxidizer [] Temperature Sensitive
[] Flammable Aerosol [] Polymerization [] Unstable Reactive
[] Flammable Gas [] Pyrophoric [] Water Reactive
[] Flammable Liquid [] Reactive Cyanides [] Other _____

Health Hazards (check all that apply)

- [] Carcinogen [] Inhalation - Poison [] Skin Irritant
[] Corrosive [] Irritant [] Target Organ
[] Eye Irritant [] Respirator Toxin [] Toxic Agent
[] Highly Toxic Agent [] Sensitizer [] Other _____

Constituents of Concern (check all that apply)

Please indicate if the below are contained within the waste. If so, ensure it is listed and the amount indicated under Section 3.

- [] Asbestos [] Benzene [] Dioxins [] Isocyanates [] Mercury
[] Nitrocellulose [] PCBs (1) [] TCLP Metals [] TCLP Volatiles [] TCLP Semi-Volatiles
[] Other: _____

(1) If marked, complete and attach PCB Supplemental Form.



ENVIRO-SAFE RESOURCE RECOVERY GENERATOR PROFILE FORM

Profile: _____

Status: _____

Process Code: _____

SECTION 6. RCRA CHARACTERIZATION AND LAND DISPOSAL RESTRICTION

RCRA Exemption or Exclusion (check all that apply)

- | | | |
|---|--|--|
| <input type="checkbox"/> Electronic Waste | <input type="checkbox"/> Infection Waste (Bio-Hazardous/Sharps) | <input type="checkbox"/> Universal Waste |
| <input type="checkbox"/> Fuel Exemption Waste | <input type="checkbox"/> RCRA Empty Container | <input type="checkbox"/> Used Oil ⁽²⁾ |
| <input type="checkbox"/> Hazardous Secondary Material | <input type="checkbox"/> Solvent Exempt Wipes Waste ⁽¹⁾ | <input type="checkbox"/> Other _____ |

(1) If marked, complete and attach Solvent Exempt Wipes Supplemental Form.

(2) If marked, complete and attach Used Oil Supplemental Form.

RCRA Waste Codes: _____ State Waste Codes: _____

RCRA Source Code: _____ RCRA Form Code: _____

LDR Subcategory: _____ VOC Subpart CC: <500 ppmw ≥500 ppmw

This waste is a: Wastewater (<1% TSS & TOC) Non-Wastewater

Are UHCs present in excess of the UTS standard (40 CFR 268.40)? Yes (List) No

Are Applicable Constituents Requiring Treatment in F001-F005, F039, Debris and Alternative Soils (40 CFR 268.48)? Yes (List) No

Is this waste being managed under one of the following alternative LDR treatment standard.

- Lab Packs (subject to 40 CFR 268.42(c)) Debris (subject to 40 CFR 268.45) Soil (subject to 40 CFR 268.49)

SECTION 7. SHIPPING AND CONTAINER INFORMATION

DOT Proper Shipping Name: _____

Hazard Class: _____ UN/NA: _____ PG: _____ RQ: _____

ERG Number: _____ DOT Special Permit: _____ Inhalation Hazardous Zone: _____

- Container Type:
- | | | | | |
|--------------------------------------|--|--------------------------------------|--------------------------------------|---|
| <input type="checkbox"/> Steel Drums | <input type="checkbox"/> Plastic Drums | <input type="checkbox"/> Fiber Drums | <input type="checkbox"/> Supersac | <input type="checkbox"/> Cubic Yard Boxes |
| <input type="checkbox"/> Totes (IBC) | <input type="checkbox"/> Pails | <input type="checkbox"/> Bulk | <input type="checkbox"/> Pallet | <input type="checkbox"/> Overpack |
| <input type="checkbox"/> Bulb Box | <input type="checkbox"/> Roll-Off | <input type="checkbox"/> Cylinder | <input type="checkbox"/> Other _____ | |

- Container Size:
- | | | | | |
|-------------------------------------|------------------------------------|--------------------------------------|------------------------------------|-------------------------------------|
| <input type="checkbox"/> 5-Gallon | <input type="checkbox"/> 16-Gallon | <input type="checkbox"/> 30-Gallon | <input type="checkbox"/> 55-Gallon | <input type="checkbox"/> 275-Gallon |
| <input type="checkbox"/> 330-Gallon | <input type="checkbox"/> Bulk | <input type="checkbox"/> Other _____ | | |

- Container Contents:
- | | | | | |
|-----------------------------------|-------------------------------------|--------------------------------|-----------------------------------|---------------------------------|
| <input type="checkbox"/> Liquid | <input type="checkbox"/> Sludge | <input type="checkbox"/> Solid | <input type="checkbox"/> Debris | <input type="checkbox"/> Powder |
| <input type="checkbox"/> Lab Pack | <input type="checkbox"/> Loose Pack | <input type="checkbox"/> Vials | <input type="checkbox"/> Aerosols | <input type="checkbox"/> Gas |

Quantity: _____ One-Time Weekly Monthly Yearly

SECTION 8. GENERATOR CERTIFICATION

I hereby certify that I am familiar with the waste/material and all information (including attachments) is complete, true and is an accurate representation of the known and suspected hazards pertaining to waste/material described herein and no available information has been omitted or falsified. I certify If there are any changes to the character or regulatory status of the profile, the generator shall promptly notify Enviro-Safe. I authorized Enviro-Safe personnel to be an authorized agent of the generator to act on their behalf to conduct complete or conduct corrections to the profile, supplemental forms and/or shipping documents provided such changes are documented.

Name: _____ Title: _____

Signature: _____ Date: _____

Appendix B: Lab Pack Contents Form



ENVIRO-SAFE RESOURCE RECOVERY CONTAINER INVENTORY SHEET

DATE: 09-01-2022 PAGE: 1 of 1
EPA ID #: WID000000000 PROFILE #: 8411-3
CUSTOMER NAME: ABC Company REC FACILITY: ABC Facility
CUSTOMER ADDRESS: 1234 North Street APPROVAL #: 1234567
Milwaukee, WI 53233 CONTAINER: SIZE: 5 TYPE: DF
SHIPPING DESCRIPTION: UN3265, Waste Corrosive liquid, acidic, organic, n.o.s. (Trichloroacetic Acid, Sulfuric Acid), 8 , II

Waste Description	Physical Form	Qty	Size	UOM	Container Type	EPA Waste Codes
Hydrochloric Acid	Liquid	1	1	L	Glass	D002
Sulfuric Acid 2.5N	Liquid	1	1	L	Glass	D002
Trichloroacetic Acid	Liquid	2	120	ML	Glass	D002

Appendix C: Standard Operating Procedures for Opening and Sampling Containers

Sampling of Containers

Coliwesas, tubes, drum thieves, and corers are examples of the devices used to sample containers. Samples are taken from locations displaced both vertically and horizontally throughout the waste. For liquids (or liquids with precipitated solids), the sample collector uses a Coliwasa or equivalent. The sampling device is inserted into the container from the top and is pushed down slowly until the bottom of the container is reached. The device is sealed to retain the contents. The contents of the sampling device are then transferred to a polyethylene or glass bottle that is labeled with waste identification information.

A corer or equivalent device is used to sample containers that are solid in nature. These containers are generally filled with dirt and sludges. Several areas from the container are sampled and composited into a sample jar in order to ensure a representative sample. The sample collector removes a sample that uniformly represents the waste composition of the container (i.e., all layers and phases are represented in the sample).

When a container contains waste with multiple layers or phases, particular care must be taken to ensure that a representative sample (or samples) is obtained to ensure that each phase/layer is represented.

Sampling of Bulk Material

Bulk solids are sampled using a simple random sampling strategy. The bulk solids container, usually a roll-off box or a dump trailer, is divided into sections. A corer or other similar device is used in each section to draw a sample from varying depths as needed for a representative sample. On occasion, a shovel is used to access lower levels of a bulk container. The samples are composited together so that there is one sample that represents that particular bulk solids shipment.

Bulk liquids are sampled using a Coliwasa or similar device that can sample vertical anomalies. Each compartment of tanker truck is sampled. Compartment samples from the same generator and waste stream are not composited prior to analysis.

Tank trucks without manways are sampled through a valve. The valve is flushed prior to the sample being drawn.

Debris

Not all wastes are amenable to sampling (e.g., universal waste batteries, CRTs, lamps or ballasts, lab packs, etc.). A container of debris often contains a wide variety of materials. For example, it may contain spill absorbent, Tyvek suits, rubber booties, gloves, and paper towels. It may be difficult to obtain a representative sample.

Frozen Waste

The facility does not sample waste that is frozen. The container is labelled as quarantined and remains in the receiving area or placed in a licensed storage area until the waste can be sampled and be stored on pallets.

Appendix D: Bulk Consolidation Tracking Sheet

Repack Drum Details

Outbound Container #:	Outbound Profile #:	Common Name:							
Container Type/Size:	Weight:	Volume:			Storage Location:				
Generator	Inbound Drum	Inbound Profile	Common Name	Process Code	Process Date	Type/Size	Weight	Volume	Location

Appendix E: (Reserved)

Appendix F: Level I QA/QC Form



LEVEL I QA/QC INSPECTION FORM

Company Name: Address: City, State, Zip: Company Notes:	Sales Order #: Load #: Document #: Uniform Manifest #:	Pickup Date: Received Date: Transporter: Sampler:
--	---	--

Profile No.:	Description:	Approval No.:	Process Code:	Line:	Sample Required:						
Profile Notes:											
Sampler Notes:											
Container No.	Type Size	Weight	Color (M-1)	Odor (M-1)	Viscosity (M-1)	pH (M-2)	Ignitability (M-3)	Compatibility (M-13)	Heat Cont (M-14)	Water % (M-15)	Halogens (M-16)

Appendix G: Level II/III QA/QC Form

Lab Analysis Report

Analysis Number:

Generator Number:

Analysis Type:

Generator Name and Location:

Basis / Line:

Profile Number:

Analyzed Date:

Sample Date:

Analyst ID:

Sample Type: Single or Composite

Analysis	Low	Hi	UM	Indicate	Method	Alternate Value	Recommendation

Appendix H: Minimum WIP Contents

Generator Information:

- Name
- Address
- County
- Contact name and his/her contact information
- EPA ID number
- If no ID number whether the Generator is a Very Small Quantity Generator
- Generator NAICS code(s) related to the activity generating the material

Basic Waste or Material Information:

- Common name
- Generating process description (including details such as flowcharts as needed)
- Material composition and contaminants (percent by weight or ppm); total must be \geq 100%
- State waste code(s) (if generated outside of Wisconsin)
- Whether the waste is a universal waste
- Color(s)
- Odor(s)
- Physical State(s) at 70F, e.g., solid, sediment, liquid, semi-solid, multi-phased); if multi-phased, each phase should be identified and distinctly described
- Free liquid %
- Viscosity (e.g., low, medium, high)
- Flash point (ranges are acceptable, such as <140F, 140F-199F, \geq 200F)
- pH
- Whether the material has any of the following attributes or constituents:
 - Oxidizer
 - Shock sensitivity
 - Water or air reactive
 - Reactive cyanides
 - Reactive sulfides
 - Organic peroxide
 - Hexavalent chromium
 - Explosive
 - Dioxin
 - PCBs
 - PFAS
 - Benzene
 - Infectious
 - Radioactive
 - Chelating agent
 - Lachrymator (tear-inducing)
 - Polymerizer
 - Pyrophoric
 - Presents an inhalation hazard (packing group and hazard zone)
 - Asbestos
 - Halogens
 - Contaminants for the toxicity characteristic per NR 261.024 (Table 1)
 - Hazardous Air Pollutants
 - Class I or Class II ozone-depleting substances
 - EPCRA 313 chemicals identified in 40 CFR 372.65
 - Chemicals of Interest listed in 6 CFR Part 27 Appendix A (Department of Homeland Security)

Analytical and Other Information:

- Whether the waste determination is based on testing, generator knowledge, and/or SDS or

product specifications

- Description of sampling method and date associated with analytical information
- Verification that the sample(s) was a representative sample in accordance with NR 661
- Analytical information (WIP should identify any attached reports) to describe detailed material composition and contaminants
- Other generator information (e.g., SDSs and how SDS applies; any generator knowledge contributing to the waste determination under NR 662.011)

Regulatory Information:

- All EPA Waste code(s)
- All State waste codes (if generated outside of Wisconsin)
- Whether the material is a used oil (if so, identify the halogen content and any chlorinated constituents)
- Whether the material not a solid waste because of an exclusion (if so, identify the exclusion, e.g., HSM)
- Whether the material not a hazardous waste (or from certain regulations) because of an exclusion (if so, identify the exclusion, e.g., cement kiln dust)
- Whether the material not a hazardous waste due to treatment or delisting; if so, identify the reason, such as treated hazardous waste debris, treated hazardous characteristic waste, documentation of delisting)
- Whether the waste is a wastewater stream (contains <1% Total Organic Carbon & <1% Total Suspended Solids) or a non-wastewater
- Identification of all Underlying Hazardous Constituents
- Applicability of other applicable regulatory provisions, such as
 - The generator's industry is regulated under benzene NESHAP (if so, include detailed information to address off-site TSD requirements)
 - The material is generated by a remediation subject to 40 CFR 63 GGGG
 - The material is generated by a CERCLA or NR 140 remediation
 - NRC radioactive or NORM material (if regulated, provide relevant analytical information)
- Whether the material contains PCBs. If so:
 - Is it regulated under 40 CFR 761?
 - Is it exempted under 40 CFR 761.61(a) for remediation?
- Is it regulated as untreated medical waste, or does it present a risk of infection?
- Does the material contain asbestos (if so, is it non-friable, friable, or regulated non-friable)?
- If a waste, was it imported into the U.S.
- Whether the material is subject to the Alternate Debris Standards of NR 268.045
- Whether the material is subject to the Alternate Soil Standards of NR 268.049
- Whether the material is exempt from NR 664 Subchapter CC controls, If so:
 - Whether the waste meets LDR or treatment exemptions for organics per NR 664.1082(3)(a) or (3)(d)
 - Whether the waste contains VOCs averaging less than 500 ppmw per NR 664.1082(3)(a)
- Does the material contain any Hazardous Air Pollutants?
- Does the material contain any Class I or Class II ozone-depleting substances?
- Is the material and oxidizer as defined in 49 CFR 173.127 (a)?

Shipping Information:

- Whether it is from a one-time event or ongoing activity
- Estimated quantity (per one-time event, year or month)
- Container type and size
- USDOT proper shipping name(s), technical name(s) and hazard class(es)/division(s)

Generator Certification:

- That the WIP and all attached information is true, accurate and complete
- That the WIP includes all information that generator relied on to comply with NR 662.011
- That any changes to the character or regulatory status of the material is promptly reported to the TSDf

Authorized Agent Certification (if applicable):

- Certification that the agent/broker has confirmed with the generator that all WIP and attached information is true, accurate and complete
- Certification that the authorized agent is legally authorized by the generator to act on his/her behalf

Examples of Attachments or Supporting Documents to the WIP

- Laboratory analytical reports used to support the WIP information
- Representative sampling description
- Information that cannot fit within the space provided in the WIP form but is needed to support the WIP entry
- WIP Approval and conditions
- Notification to the generator of WIP approval (and conditions)
- For waste to be processed or treated at the facility, the type of treatment or processing.
- For waste to be transshipped, a destination facility(s) and management method(s)

Attachments or Supporting Documents to the WIP


- Must identify the WIP (or unique WIP number).
- Must be dated.

Appendix I: Laboratory QA/QC Plan

Appendix J: Part A Waste Codes

Referenced in Appendix C – Part A Application Package

APPENDIX I: TOTAL PREVENTATIVE MAINTENANCE AND INSPECTION PLAN

Document No.: TPM-SOP-001	Revision Date: 7/6/2022	Revision No.: 003	
Document Title: TOTAL PREVENTATIVE MAINTENANCE AND INSPECTION PLAN			
Certified By: CEO/OPERATION MANAGER		Certified Date: 7/6/2022	

1.0 PURPOSE

1.1 The purpose of managed maintenance and inspection is to inspect the facility for malfunctions and deterioration, operator errors and discharges which may cause, or may lead to, release of hazardous waste constituents to the environment or a threat to human health.

2.0 SCOPE

2.1 The program covers waste storage areas and containers, monitoring equipment, safety and emergency equipment, security devices and operation, and structural equipment that are important to preventing, detecting or responding to environmental or human health hazards.

3.0 LEGAL COMPLIANCE

3.1 The organization has developed this plan based upon the regulatory requirements under the Occupational Safety and Health Administration (OSHA) 29 CFR 1910, Environmental Protection Agency (EPA), Wisconsin Department of Natural Resources (WDNR) NR 600-series and the Department of Transportation (DOT) 49 CFR 172.704, local requirements and general industry standards.

4.0 DEFINITIONS

4.1 Inspection. An organized examination or formal evaluation which may involve the measurement and/or testing.

5.0 ORGANIZATION AND PERSONNEL RESPONSIBILITIES

5.1 Operations Manager. The Operations Manager shall be responsible to ensure all inspections are conducted for all facility and operational equipment by competent personnel. The Operations Manager is responsible for training the internal inspectors and ensuring that inspections are only conducted by trained and qualified personnel. In addition, the Operations Manager will facilitate any corrective action, maintenance or repair to ensure the remedy is conducted in a timely manner.

5.2 Technical Service Manager. The Technical Service Manager shall be responsible to ensure all inspections are conducted for laboratory equipment by competent personnel. The Technical Service Manager is responsible for training the internal inspectors and ensuring that inspections are only conducted by trained and qualified personnel. In addition, the Technical Service Manager will facilitate any corrective action, maintenance or repair to ensure the remedy is conducted in a timely manner.


5.3 Operators. Operators (as identified in the Training and Competence Plan) may perform inspections as assigned by the Operations Manager or Technical Service Managers.

6.0 TYPES AND FREQUENCY OF INSPECTIONS


6.1 Inspections are required to be conducted for waste storage areas and containers, monitoring equipment, safety and emergency equipment, security devices and operation, and structural equipment (such as secondary containment) which is based upon the rate of possible deterioration of a particulate area or the probability that an environmental or human health incident would occur if there were deterioration, malfunction or operator error, which could possibly go undetected between inspection.

6.2 The Waste Analysis Plan should be referred to regarding required inspections related to waste and containers received from off-site.

7.0 INSPECTION SCHEDULE [NR 664.0015(2) and NR 670.014(2)(e)]

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Certified By: CEO/OPERATION MANAGER		Certified Date: 7/6/2022	

- 7.1 A written annual inspection schedule is developed and followed for each calendar year which depicts which inspections are required to be conducted at specific intervals based upon regulatory requirements, manufacturer requirements, best management or industry standards and on the rate of deterioration of the equipment and the probability of an environmental or human health incident if the deterioration, malfunction or any operator error goes undetected between inspections. The current calendar year inspection schedule can be found in Appendix A. However, it should be noted that this schedule is fluid and is updated on an annual basis and only changes to hazardous waste treatment, storage and disposal inspection items that are less stringent can only be made after a license modification. When an inspection is required daily, it means the days for which the facility is operational and does not include non-operational days such as weekends or holidays. The facility will also follow the inspection plan for alarms and emergency equipment that is outlined in the Emergency Management Plan - Appendix C.
- 7.2 In addition to the scheduled inspections, informal operator inspections are performed on a daily basis to ensure the safety of employees and the environment. Prior to starting their respective tasks at the start of each shift, each operator is required to visually inspect their respective work areas and tools to check for repair, service, maintenance, or clean-up needs. These types of items include, but are not limited to, forklifts, truck hoses, exhaust fans, communication equipment, spill clean-up equipment, and personnel protective equipment for signs of deterioration or accumulation of materials in the containment areas.
- 8.0 INSPECTION FORMS [NR 664.0015(4)]**
- 8.1 For each inspection to be conducted, an inspection protocol is established which describes the type of inspection to be performed, references, prerequisite, procedure and intervals, handling deficiencies, associated documentation and associated contractor. The actual inspection itself is either an internal inspection form or on various documentation provided by external vendors conducting the inspection on the behalf of the company (Appendix B). The inspection form identifies the types of problems (e.g. malfunctions or deterioration) which are to be observed during the inspection and indicate whether its condition is acceptable or unacceptable.
- 8.2 If the status of a particulate item is found unacceptable during the inspection, it is noted on the inspection form and appropriate and immediate action is taken to resolve the discrepancy. The corrective action is documented. If the corrective action can not be immediately addressed or requires additional resources, the deficiency should be noted on the inspection form for additional review and follow-up by the respective area manager. All inspection results are documented and reviewed by the respective area manager.
- 9.0 SCHEDULE TO REMEDY [NR 664.0015(3)]**
- 9.1 If the status of a particular item on an inspection form is found unacceptable and has not been corrected, it is the responsibility of the Operation Manager or Technical Service Manager to ensure the items is addressed in a timely manner.
- 9.1 The corrective action process (schedule to remedy) includes clear identification of a problem through documentation of the resources and steps required to mitigate the immediate symptoms and remedy the problem, with the additional goal to find and solve the root cause of the problem.
- 9.2 Inspections records are documented on the respective internal inspection form or as part of the service report provided by the outside vendor. The forms and reports are routed to the Operation Manager or Technical Service Manager upon completion for review and approval. If an inspection reveals a situation that presents an immediate environmental or human health hazards, all operations will be immediately ceased until the situation can be brought to a safety condition.

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9.3 If an inspection record reveals an item in need of repair, equipment malfunction or deterioration, or some other abnormal condition, the item is included on the Deficiency and Corrective Action Log (Appendix C) where a priority level is assigned.

Priority Level	
High	Must be completed within 24-hours of discovery.
Medium	Must be completed within 7-days of discovery.
Low	Must be completed within 30-days of discovery.

9.4 The corrective action necessary is evaluated and based upon the on-site resources and the level of expertise necessary to resolve the issue, the respective manager will assign the responsible internal resource or contact the appropriate contractor to schedule necessary work with a planned completion date.

9.5 Upon remedy of the deficiency, the Operation Manager or Technical Service Manager will verify that the appropriate action has been taken and the deficiency resolved, and document the remedy (see Appendix C). Any supplemental documentation associated with the corrective action will be retained and become part of the completed inspection records.

10.0 INSPECTION RECORDS [NR 664.0015(4) and NR 664.1088

10.1 The company maintains records (historical data) pertinent to equipment and facilities covered by the program, including but not limited to, building blueprints, equipment nameplate data, purchasing information, age, design and installation information, acceptable test data and applicable data from the manufacturer's technical manuals.

10.2 Inspection and test completed (and their results), corrective actions, scheduled and unscheduled maintenance and cost, repair parts and materials used and cost, modifications and capital improvements completed, and applicable change records are maintained by the company.

10.3 Inspection and remedy records are maintained electronically (scanned copied) for a minimum of three-years.

11.0 INSPECTOR TRAINING


11.1 Employees designated to conducted inspections shall receive hands-on training from their manager to obtain an acceptable level of competence and to familiarize personnel with the criteria against which the inspection is being conducted, being able to identify unacceptable conditions and to document the inspection properly. In addition, to the hands-on training, designated employees will have training in RCRA hazardous waste awareness and DOT and OSHA Hazwoper.

12.0 CONTRACTORS

12.1 Contractors are used to conduct inspections on the behalf of the company due to their area and/or level of expertise. Contractors that come on-site must provide the company with a Contractor Information Form (Appendix D) which acknowledges the Contractor Health, Safety and Environmental Manual (Appendix D). In addition, a Certificate of Insurance (COI) with Enviro-Safe listed as an Additional Insurer is required.

13.0 RELATED DOCUMENTS

13.1 Appendix A: Inspection Schedule

Document No.: TPM-SOP-001	Revision Date: 7/6/2022	Revision No.: 003	
Document Title: TOTAL PREVENTATIVE MAINTENACE AND INSPECTION PLAN			
Certified By: CEO/OPERATION MANAGER		Certified Date: 7/6/2022	


- 13.2 Appendix B: Inspection Protocols and Forms
- 13.3 Appendix C: Deficiency and Corrective Action Log
- 13.4 Appendix D: Contractor Information

14.0 REFERENCE DOCUMENTS

- 14.1 Emergency Management Plan (EHS-WI-005)
- 14.2 Waste Analysis Plan
- 14.3 Training and Competence Plan

15.0 REVISION SUMMARY

Revision	Date	Description of changes	Requested By
000	3/19/2020	Initial Release	D. Zellmer
001	2/18/2022	Included comments from WDNR.	D. Zellmer
002	6/23/2022	Included comments from WDNR.	D. Zellmer
003	7/6/2022	Included comments from WDNR.	D. Zellmer

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**APPENDIX A
INSPECTION SCHEDULE**

The purpose of the Inspection Schedule is to provide a complete listing of items to be included in the loss prevention maintenance and inspection programs for facilities, systems and equipment. This listing is not limited only to those items required under the site's hazardous waste generator and Treatment, Storage and Disposal Facility (TSDf) regulations. Therefore, an asterisk is used to identify those items applicable to the facility's hazardous waste generator and Treatment, Storage and Disposal Facility (TSDf) requirements.



Enviro-Safe - 2022
TMP Schedule and F

Sandpiper Pump and Auxiliary Components	RM 126	Manufacturer	Monthly	TPM-INSP-008	Operation Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
T07 - Plastic Above Ground Storage Tank	RM 127	Manufacturer	Monthly	TPM-INSP-033	Operation Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
T08 - Plastic Above Ground Storage Tank	RM 127	Manufacturer	Monthly	TPM-INSP-033	Operation Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
T09 - Plastic Above Ground Storage Tank	RM 127	Manufacturer	Monthly	TPM-INSP-033	Operation Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
T10 - Plastic Above Ground Storage Tank	RM 127	Manufacturer	Monthly	TPM-INSP-033	Operation Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
Yamada Pumps and Auxiliary Components (PUMP #1)	RM 127	Manufacturer	Monthly	TPM-INSP-033	Operation Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
Yamada Pumps and Auxiliary Components (PUMP #2)	RM 127	Manufacturer	Monthly	TPM-INSP-033	Operation Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
Yamada Pumps and Auxiliary Components (PUMP #3)	RM 127	Manufacturer	Monthly	TPM-INSP-033	Operation Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
Yamada Pumps and Auxiliary Components (PUMP #4)	RM 127	Manufacturer	Monthly	TPM-INSP-033	Operation Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
Yamada Pumps and Auxiliary Components (PUMP #5)	RM 127	Manufacturer	Monthly	TPM-INSP-033	Operation Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
Yamada Pumps and Auxiliary Components (PUMP #6)	RM 127	Manufacturer	Monthly	TPM-INSP-033	Operation Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly

Laboratory

Bomb Calorimeter*	Laboratory	WDNR NR 664.0013	Monthly / Annually	TPM-INSP-023	Technical Service Manager	Monthly	Annually	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
Ion Chromatography*	Laboratory	WDNR NR 664.0013	Monthly / Annually	TPM-INSP-024	Technical Service Manager	Annually	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
DI Water System*	Laboratory	WDNR NR 664.0013	Monthly	TPM-INSP-025	Technical Service Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
DI Water System*	Laboratory	WDNR NR 664.0013	Bi-Annually / Annually	TPM-INSP-025	Technical Service Manager	Bi-Annually	N/A	N/A	N/A	N/A	Bi-Annually	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Karl Fischer Titrator*	Laboratory	WDNR NR 664.0013	Monthly / Annually	TPM-INSP-026	Technical Service Manager	Annually	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
Flashpoint Tester*	Laboratory	WDNR NR 664.0013	Monthly	TPM-INSP-029	Technical Service Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
pH/ORP Meter*	Laboratory	WDNR NR 664.0013	Weekly	TPM-INSP-030	Technical Service Manager	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly












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Certified By: CEO/OPERATION MANAGER		Certified Date: 7/6/2022



APPENDIX B INSPECTION PROTOCOLS AND FORMS

Below is a list of the inspection protocols and forms that have been established to describe the inspections that are conducted and how they are documented.

Inspection Number	Description [Requirement]	Document
TPM-INSP-001	Forklifts, Attachments and Accessories [N/A]	 TPM-INSP-001 - Forklifts Attachment
TPM-INSP-002	Security Systems [NR 664.0015]	 TPM-INSP-002 - Security Systems.doc
TPM-INSP-003	Fire Alarm System [NR 664.0033]	 TPM-INSP-003 - Fire Alarm System.doc
TPM-INSP-004	Fire Extinguishers and Hoses [NR 664.0033]	 TPM-INSP-004 - Fire Extinguishers and H
TPM-INSP-005	Safety Shower and Eyewash [NR 664.0033]	 TPM-INSP-005 - Safety Shower and E
TPM-INSP-006	Emergency Signs and Exit Lights [NR 664.0033]	 TPM-INSP-006 - Emergency Signs an
TPM-INSP-007	Floor Scrubber [N/A]	 TPM-INSP-007 - Floor Scrubber.doc
TPM-INSP-008	Outside Storage Tanks and Associated Equipment [N/A]	 TPM-INSP-008 - Outside Storage Tar
TPM-INSP-009	Pressure Washer [N/A]	 TPM-INSP-009 - Pressure Washer.do


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TPM-INSP-010	Air Compressor System [N/A]	 TPM-INSP-010 - Air Compressor System.
TPM-INSP-011	Generator [NR 664.0033]	 TPM-INSP-011 - Generator.doc
TPM-INSP-012	Gas Monitoring and Detection System [NR 664.0033]	 TPM-INSP-012 - Gas Monitoring and Det
TPM-INSP-013	Loading Dock Levelers [N/A]	 TPM-INSP-013 - Loading Dock Leveler
TPM-INSP-014	Overhead Fire Door [NR 664.0033]	 TPM-INSP-014 - Overhead Fire Door.
TPM-INSP-015	Floor Scale [N/A]	 TPM-INSP-015 - Floor Scale.doc
TPM-INSP-016	HVAC System [N/A]	 TPM-INSP-016 - HVAC System.doc
TPM-INSP-017	Portable Container Storage [N/A]	 TPM-INSP-017 - Portable Container
TPM-INSP-018	Sprinkler System [NR 664.0033]	 TPM-INSP-018 - Sprinkler System.doc
TPM-INSP-019	Outside Secondary Containment and Stormsepter System [NR 664.0015 and NR 664.0174]	 TPM-INSP-019 - Secondary Containm
TPM-INSP-020	Facility Inspection [NR 664.0015, NR 664.0174 and NR 664.1088]	 TPM-INSP-020 - Facility Inspection.d

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TPM-INSP-021	Water Heater [N/A]	 TPM-INSP-021 - Water Heater.doc
TPM-INSP-023	Bomb Calorimeter [NR 664.0013]	 TPM-INSP-023 - Bomb Calorimeter.d
TPM-INSP-024	Ion Chromatography [NR 664.0013]	 TPM-INSP-024 - Ion Chromatography.dc
TPM-INSP-025	DI Water System [NR 664.0013]	 TPM-INSP-025 - DI Water System.doc
TPM-INSP-026	Karl Fischer Titrator [NR 664.0013]	 TPM-INSP-026 - Karl Fischer Titrator.doc
TPM-INSP-028	Grounding System [NR 664.0033]	 TPM-INSP-028 - Grounding System.c
TPM-INSP-029	Flashpoint Tester [NR 664.0033]	 TPM-INSP-029 - Flashpoint Tester.dc
TPM-INSP-030	pH ORP Meter	 TPM-INSP-030 - pH ORP Meter.doc
TPM-INSP-031	Concrete Floor Coating and Joint Filler [NR 664.0015 and NR 664.0174]	 TPM-INSP-031 - Concrete Floor Coat
TPM-INSP032	Blowout Doors [NR 664.0033]	 TPM-INSP-032 - Blowout Doors.doc
TPM-INSP-033	Inside Storage Tanks and Associated Equipment [N/A]	 TPM-INSP-033 - Inside Storage Tank

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TPM-INSP-034	Smoke Detectors [NR 664.0033]	 TPM-INSP-034 - Smoke Detectors.do
TPM-INSP-035	Radios [NR 664.0033]	 TPM-INSP-035 - Radios.doc
TPM-INSP-036	Aerosol Puncturing Unit [NR 664.1088]	 TPM-INSP-036 - Aerosol Puncturing

Document No.: TPM-INSP-001	Revision Date: 1/7/2022	Revision No.: 003
Document Title: FORKLIFTS, ATTACHMENTS AND ACCESSORIES		
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



FORKLIFTS, ATTACHMENTS AND ACCESSORIES TOTAL PREVENTATIVE MAINTENANCE PROGRAM

PURPOSE This procedure describes the steps required to maintain the integrity of the material handling and associated equipment present.

- REFERENCES**
- Doosan B20T-5 Forklift Manual (on the forklift)
 - Doosan B20T-7 Forklift Manual (on the forklift)
 - Morspeed 1500 Forklift Attachment
 - Heavy Duty Forklift Karrier Attachment
 - Battery-Mate 80 Charger
 - Hand Pallet Jack Unit #1
 - Hand Pallet Jack Unit #2

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.

PROCEDURE

Daily

The forklifts are required to be inspected prior to the start of each shift by the forklift operator. See the [Forklift Operator's Daily Checklist \(SOP-EHS-002\)](#) for specific inspection details.

Every 3-Months

The forklift attachments are required to be inspected every three months to ensure the integrity and general condition of the structural and mechanical components are maintained. See the [Morspeed 1500 Forklift Attachment](#) and [the Heavy-Duty Forklift Karrier Attachment Manual](#) for specific inspection details. General cleaning of the equipment should also be conducted at this time if required.

The battery charger is required to be cleaned and inspected every three months to ensure the integrity and general condition of the unit are being maintained. See the [Battery-Mate 80 Manual](#) for specific inspection details.

The hand pallet jacks are required to be inspected every three months to ensure the integrity and general condition of the unit are being maintained. See the [Hand Pallet Jack Manual](#) for specific inspection details.

Annually

The forklift is required to be inspected for specific items after specific hours of use by the designated contractor per the manufacturer. See the [Doosan B20T-5 or B20T-7 Manuals](#) for specific inspection details. This inspection will be conducted by a qualified outside contractor on the behalf of the organization. *Special Note. At the present time, due to the low hours metered on the forklift, all Other Inspection elements are addressed during the annual inspection.

DEFICIENCIES

Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration

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where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged “Out of Service” until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The daily inspections shall be documented on the [Forklift Operator’s Daily Checklist \(SOP-EHS-002\)](#). The other inspections shall be documented on the attached forms. The annual inspections shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR Wolter Power Systems
3125 Intertech Drive, Brookfield, WI 53045
Phone: (262) 790-6230

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**Total Preventative Maintenance Inspection Form
Forklift Attachment Form - Every 3-Months**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Morspeed 1500 Forklift Attachment

Manufacturer: Morse Manufacturing Company	Make and Model: 288-2	Serial Number: 0912
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Preventative Maintenance Item	Observation	Identified Deficiencies
Visually inspect the unit for any damage or compromise to its integrity.		
Ensure the unit is clean.		
Lubricate all moving joints and spring-anchor points.		
Clean and oil ratchet, pawl and other moving parts.		
Inspect all moving parts, framework, drum holder and contact areas for signs of wear, fatigue or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		

Preventative Maintenance Item – Unit #2	Observation	Identified Deficiencies
Visually inspect the unit for any damage or compromise to its integrity.		
Ensure the unit is clean.		
Lubricate all moving joints and spring-anchor points.		
Clean and oil ratchet, pawl and other moving parts.		
Inspect all moving parts, framework, drum holder and contact areas for signs of wear, fatigue or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		

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Heavy-Duty Forklift Karrier Attachment

Manufacturer: Morse Manufacturing Company	Make and Model: 285A-HD	Serial Number: 1112
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Preventative Maintenance Item	Observation	Identified Deficiencies
Visually inspect the unit for any damage or compromise to its integrity.		
Ensure the unit is clean.		
Inspect all moving parts for proper operation.		
Lubricate moving parts generously with 90W Oil.		
Clean and oil ratchet, pawl and other moving parts.		
Inspect all moving parts, framework, drum holder and contact areas for signs of wear, fatigue or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		

**Total Preventative Maintenance Inspection Form
Battery Charger Form - Every 3-Months**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Battery-Mate 80 Battery Charging Unit

Manufacturer: Ametek Prestolite Power	Make and Model: 750H3-18C	Serial Number: 113CS06382
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Preventative Maintenance Item	Observation	Identified Deficiencies
Visually inspect the unit for any damage or compromise to its integrity.		
Ensure the unit is clean. Wipe and blow out all dirt from the unit's interior components with clean dry air not over 25 psi.		
Check and tighten all electrical connections as necessary to eliminate unnecessary losses and to avoid subsequent trouble from overheating or open circuits.		
Check for broken wiring or damaged insulation wiring.		

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**Total Preventative Maintenance Inspection Form
Hand Pallet Jack Form - Every 3-Months**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Hand Pallet Jack - Unit #1

Manufacturer: Global Industries	Make and Model: T97334475	Serial Number: N/A
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Preventative Maintenance Item	Observation	Identified Deficiencies
Visually inspect the unit for any damage or compromise to its integrity. Pay special attention to wheels, axles, handles, forks and lift controls.		
Ensure the unit is clean.		
Inspect all moving parts for proper operation.		
Lubricate all moveable parts.		
Check oil level. Restore the fluid level in the rubber reservoir to 5mm below the top with the forks in the lower position. Use L-HV46 hydraulic oil.		
Check for broken wiring or damaged insulation wiring.		

Hand Pallet Jack - Unit #2

Manufacturer: Global Industries	Make and Model: T97334475	Serial Number: N/A
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Preventative Maintenance Item	Observation	Identified Deficiencies
Visually inspect the unit for any damage or compromise to its integrity. Pay special attention to wheels, axles, handles, forks and lift controls.		
Ensure the unit is clean.		
Inspect all moving parts for proper operation.		
Lubricate all moveable parts.		
Check oil level. Restore the fluid level in the rubber reservoir to 5mm below the top with the forks in the lower position. Use L-HV46 hydraulic oil.		
Check for broken wiring or damaged insulation wiring.		

Document No.: TPM-INSP-002	Revision Date: 1/7/2022	Revision No.: 002
Document Title: SECURITY SYSTEMS		
Certified By: OPERATIONS MANAGER		Certified Date: 1/7/2022



SECURITY SYSTEMS TOTAL PREVENTATIVE MAINTENANCE PROGRAM

PURPOSE This procedure describes the steps required to maintain the integrity of the security systems present.

REFERENCES

- Keri Card Access System
- Gemini Security Alarm System
- Security Camera System

PREREQUISITE Inspections only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

PROCEDURE


Daily Inspections
The security alarm system is monitored on a 24-hour basis by a third-party UL certified monitoring station. In addition, daily time tests are conducted as part of the monitoring service. The daily timer tests are signals generated daily from the alarm panel to the monitoring station to verify proper operation. If the monitoring stations does not receive the signal at the expected time on a daily basis, a notification will be received and appropriate follow-up performed.

No specific inspection criteria are required for the other security systems identified above. However, general operations of these systems are inspected daily as part of the Facility Total Preventative Maintenance Inspection Report.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The contract for the security alarm system monitoring shall be documented with a copy of the contract on file at the organization. Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR Keri Card Access System, Security Alarm System and CCTV Camera System
First Security, LLC.
N88 W17270 Main Street, Menomonee Falls, WI 53051
Phone: (262) 345-5850
Email: Mike Fay (MFay@FIRSTSecurityllc.net)

Document No.: TPM-INSP-003	Revision Date: 1/7/2022	Revision No.: 003	
Document Title: FIRE ALARM SYSTEM			
Certified By: OPERATION MANAGER	Certified Date: 1/7/2022		

**FIRE ALARM SYSTEM
TOTAL PREVENTATIVE MAINTENANCE PROGRAM**

PURPOSE This procedure describes the steps required to maintain the integrity of the fire alarm system present.

REFERENCES

- Silent Knight IFP-50 Fire Alarm System and Associated Equipment Specifications

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

PROCEDURE

Daily Inspections
The fire alarm system is monitored on a 24-hour basis by a third-party UL certified monitoring station. In addition, daily time tests are conducted as part of the monitoring service. The daily timer tests are signals generated daily from the alarm panel to the monitoring station to verify proper operation. If the monitoring stations does not receive the signal at the expected time on a daily basis, a notification will be received and appropriate follow-up performed.

Annual Inspections
The fire alarm is required to be inspection on an annual basis. The inspection will be conducted by a qualified outside contractor on the behalf of the organization.


DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The contract for the fire alarm system monitoring shall be documented with a copy of the contract on file at the organization. Documentation to be retained in the electronic Operations - TPM file.

The annual inspections shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR Fire Alarm Monitoring Service
Central 1 Security
18110 West Bluemound Road, Brookfield, WI 53045
Phone: (262) 783-7500
Email: Maria Bernal (mbernal@central1security.com)

Alarm Testing Service
Blair Fire Protection
13111 W. Silver Spring Drive, Butler, WI 53007
Phone: (414) 460-4006
Email: Kevin Gall (k.gall@blairfireprotection.com)

Document No.: TPM-INSP-004	Revision Date: 1/7/2022	Revision No.: 002	
Document Title: FIRE EXTINGUISHERS AND HOSES			
Certified By: OPERATIONS MANAGER		Certified Date: 1/7/2022	

**FIRE EXTINGUISHERS AND HOSES
TOTAL PREVENTATIVE MAINTENANCE PROGRAM**

PURPOSE This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.

- REFERENCES**
- Fire Extinguisher Specifications
 - Fire Hose Specifications

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.


PROCEDURE **Monthly Inspection**
The fire extinguishers and hoses are required to be inspected on a monthly basis by internal designated personnel. See the [Fire Extinguisher and Hose Inspection Form](#) for specific inspection details.

Annual Inspections
The fire extinguishers and hoses are required to be inspection on an annual basis. The inspection will be conducted by a qualified outside contractor on the behalf of the organization.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Corrective Action Log (ESRR-SOP-030 - Appendix B) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The monthly inspections shall be documented on the attached form. The annual inspections shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic Operations - TPM file.

CONTRACTOR Blair Fire Protection
13111 W. Silver Spring Drive, Butler, WI 53007
Phone: (414) 460-4006
Email: Kevin Gall (k.gall@blairfireprotection.com)

Document No.: TPM-INSP-004	Revision Date: 1/7/2022	Revision No.: 002	
Document Title: FIRE EXTINGUISHERS AND HOSES			
Certified By: OPERATIONS MANAGER		Certified Date: 1/7/2022	

**Total Preventative Maintenance Inspection Form
Fire Extinguisher and Hose Inspection - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Fire Extinguisher Inspection Criteria. All fire extinguishers should be visually inspected to ensure (1) the unit is in its designated place, (2) no obstructions to accessibility or visibility, (3) safety seals are not broken or missing, (4) no evidence of physical damage, corrosion, leaking or clogged nozzle, (5) pressure gauge reading in the proper range, and (6) operating instructions legible. **Fire Hose Inspection Criteria.** All fire hoses should be visually inspected to insure (1) no obstructions to accessibility or visibility, (2) no evidence of physical damage, and (3) no hose cuts or evidence of mildew or deterioration.

In addition to completing this form, the tag on the fire extinguisher must be signed and dated (DD/MM/YY). Completed inspection forms should be routed to the Operation Manager for review and recordkeeping purposes.

FACILITY FIRE EXTINGUISHERS					
Extinguisher No.	S/N	Location	Size/Type	Mfg. Date	Acceptable
1	BA-727546	Office Hall Exit	10 ABC	2012	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
2	AY-79754	Office Lobby	10 ABC	2012	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
3	AS-141025	Lunch Room	10 ABC	2012	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
4	YE-539621	Laboratory	5 ABC	2012	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
5	AY-613924	Room 124 - South Door	10 ABC	2012	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
6	AY-77778	Room 124 - West Door	10 ABC	2012	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
7	V-622056	Room 125 - East Door	10 ABC	2012	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
8	G29264067	RM 125 - North Door	10 ABC	2021	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
9	A-23919815	Room 126 - South Door	10 ABC	2012	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
10	G29264075	Room 127 - West Door	10 ABC	2021	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
11	G29293715	Room 127 - South Wall	10 ABC	2021	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
12	G29258049	Room 127 - Column	10 ABC	2021	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
13	G29293708	Room 127 - South Wall	10 ABC	2021	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
14	G29264064	Room 127 - South Door	10 ABC	2021	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
15	G29293720	Room 127 - Column	10 ABC	2021	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
16	G08668518	Room 127 - Shipping Office	10 ABC	2021	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
17	XW-332869	Outside Flammable Fence	20 ABC	2012	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable

Document No.: TPM-INSP-004	Revision Date: 1/7/2022	Revision No.: 002
Document Title: FIRE EXTINGUISHERS AND HOSES		
Certified By: OPERATIONS MANAGER		Certified Date: 1/7/2022



FIRE HOSES

Hose No.	S/N	Location	Size/Type	Mfg. Date	Acceptable
HOSE-01	N/A	Room 124 - West Door	FIRE HOSE	2017	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
HOSE-02	N/A	Room 125 - East Door	FIRE HOSE	2007	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable

TRANSPORTATION FIRE EXTINGUISHERS

Extinguisher No.	S/N	Location	Size/Type	Mfg. Date	Acceptable
18	E62639362	Straight Truck (#1002)	5 ABC	2018	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
19	NM-389862	Straight Truck (#1004)	5 ABC	1996	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
20	CF-271773	Tractor Truck (#1001)	5 ABC	2014	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
21	E62639345	Tractor Truck (#1003)	5 ABC	2019	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
22	F66320173	Tractor Truck (#1005)	5 ABC	2019	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
23	E95578523	Tractor Truck (#1006)	5 ABC	2018	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
24	E95454790	Tanker Trailer (#2001)	20 ABC	2019	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
25	B-05025209	Tanker Trailer (#2002)	20 ABC	2019	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
26	F82147792	Van Trailer (#2003)	20 ABC	2021	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
27	F68218434	Tanker Trailer (#2004)	20 ABC	2020	<input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable

Document No.: TPM-INSP-005	Revision Date: 7/6/2022	Revision No.: 004
Document Title: SAFETY SHOWER AND EYEWASH UNIT		
Certified By: OPERATION MANAGER		Certified Date: 7/6/2022



**SAFETY SHOWER AND EYEWASH UNIT
TOTAL PREVENTATIVE MAINTENANCE PROGRAM**

PURPOSE This procedure describes the steps required to maintain the integrity of the safety showers and eyewash units present.

- REFERENCES**
- Bradley Halo Combination Drench Shower and Eyewash Unit Specifications
 - Honeywell Eyesaline Eyewash Unit

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.

PROCEDURE **Weekly Inspections**
The safety shower and eyewash unit is required to be inspected on a weekly basis by internal designated personnel. See the [Safety Shower and Eyewash Unit Inspection Form \(attached\)](#) for specific inspection details.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The weekly inspections shall be documented on the Safety Shower and Eyewash Unit (attached). Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR None

Document No.: TPM-INSP-005	Revision Date: 7/6/2022	Revision No.: 004
Document Title: SAFETY SHOWER AND EYEWASH UNIT		
Certified By: OPERATION MANAGER		Certified Date: 7/6/2022



**Total Preventative Maintenance Inspection Form
Emergency Safety Shower and Eyewash Unit - Weekly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition and operation of the pump units is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

THE TAG ON THE EMERGENCY SAFETY SHOWER AND EYEWASH UNIT MUST BE SIGNED AND DATA (DD/MM/YYYY) IN ADDITION TO THE COMPLETION OF THIS FORM.

Emergency Safety Shower and Eyewash Unit - RM 124

Manufacturer: Bradley Emergency Safety Shower and Eyewash Unit	Make and Model: S19314	Serial Number: N/A
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Preventative Maintenance Item (RM 124)	Observation	Identified Deficiencies
Ensure the unit is operating properly and there is no malfunction.		
Visually inspect the unit for any damage or compromise to its integrity. Ensure no broken or missing parts.		
Insure there are no obstructions to accessibility or visibility.		
Ensure the unit is clean.		
Activate the unit to ensure proper operation and to clear any sediment present.		

Emergency Safety Shower and Eyewash Unit - Laboratory

Manufacturer: Honeywell Eyesaline Eyewash Station	Make and Model: N/A	Serial Number: N/A
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Preventative Maintenance Item (RM 124)	Observation	Identified Deficiencies
Visually inspect the unit for any damage or compromise to its integrity. Ensure no broken or missing parts.		
Insure there are no obstructions to accessibility or visibility.		
Ensure the unit is clean.		
The saline solution shelf life is 36-months from the date of manufacturer. Check to ensure within allowable shelf life.		

Document No.: TPM-INSP-006	Revision Date: 1/7/2022	Revision No.: 001
Document Title: EMERGENCY SIGNS AND EXIT LIGHTS		
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



**EMERGENCY SIGNS AND EXIT LIGHTS
TOTAL PREVENTATIVE MAINTENANCE PROGRAM**

PURPOSE This procedure describes the steps required to maintain the integrity of the exit lights present.

- REFERENCES**
- Emergency Sign Specifications
 - Exit Light Specifications

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.

PROCEDURE **Monthly Inspection**
The emergency signs and exit lights for the facility are all electrically hardwired with an emergency generator backup and therefore, do not contain battery back-up. As a result, a monthly test is not required to be performed.

Annual Inspections
The exit lights are required to be inspection on an annual basis. The inspection will be conducted by a qualified outside contractor on the behalf of the organization.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The annual inspections shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR Blair Fire Protection
13111 W. Silver Spring Drive, Butler, WI 53007
Phone: (414) 460-4006
Email: Kevin Gall (k.gall@blairfireprotection.com)

Document No.: TPM-INSP-007	Revision Date: 1/7/2022	Revision No.: 004
Document Title: FLOOR SCRUBBER		
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



FLOOR SCRUBBER TOTAL PREVENTATIVE MAINTENACE PROGRAM

PURPOSE This procedure describes the steps required to maintain the integrity of the cleaning equipment present.

REFERENCES

- Floor Scrubber PowerBoss Phoenix 20 Super Sport Specifications

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.

PROCEDURE

Monthly Inspection
The floor scrubber is required to be inspected on a monthly basis by internal designated personnel. See the [PowerBoss Phoenix 20 Super Sport Manual](#) for specific inspection details.


Annual Inspection
The floor scrubber is required to be inspected for specific items after specific hours of use by the designated contractor per the manufacturer. See the [PowerBoss Phoenix 20 Super Sport Manual](#) for specific inspection details. This inspection will be conducted by a qualified outside contractor on the behalf of the organization.

*Special Note. At the present time, due to the low hours metered on the floor scrubber, all Other Inspection elements are addressed during the annual inspection.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The monthly inspections shall be documented on the attached form. The annual inspections shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR Wolter Power Systems
3125 Intertech Drive, Brookfield, WI 53045
Phone: (262) 790-6230

Document No.: TPM-INSP-007	Revision Date: 1/7/2022	Revision No.: 004	
Document Title: FLOOR SCRUBBER			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

**Total Preventative Maintenance Inspection Form
Floor Scrubber Form - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Floor Scrubber

Manufacturer: PowerBoss, Inc.	Make and Model: DPHOENIX280070	Serial Number: 13110050
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Preventative Maintenance Item	Observation	Identified Deficiencies
Visually inspect the unit for any damage or compromise to its integrity.		
Ensure the unit is clean.		
Check and clean tanks and hoses.		
Check and clean brush and pads.		
Check and clean the squeegee.		
Check and clean vacuum shut-off float in recovery tank.		
Check the battery operation (lead acid battery).		
Inspect and clean scrub deck skirt for debris.		
Inspect and clean inline solution filter.		
Lubricate the fittings and rear caster swivel as needed until grease seeps out around the bearings.		
Lubricate the pivot mounting point of the rear squeegee to the chassis and the rear squeegee caster wheel axle.		
Inspect all moving parts, framework, and contact areas for signs of wear, fatigue or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		

Document No.: TPM-INSP-008	Revision Date: 1/7/2022	Revision No.: 004	
Document Title: OUTSIDE STORAGE TANKS and ASSOCIATED EQUIPMENT			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

**OUTSIDE STORAGE TANKS AND ASSOICATED EQUIPMENT
TOTAL PROVENTATIVE MAINTENANCE PROGRAM**

PURPOSE This procedure describes the steps required to maintain the integrity of the above ground storage tanks and associated equipment present.

- REFERENCES**
- Above Ground Storage Tank Units
 - Above Ground Storage Piping System
 - Blackmer Positive Displacement Rotary Vane Pump (Outside)
 - Sandpiper Air-Diaphragm Pump (RM 126)
 - Piping, Valves, Strainers and Other Auxiliary Components

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.

PROCEDURE

Daily
The tank levels are monitored on a 24-hours basis by an ultra-sonic level sensor through a software system. Tank levels can be remotely displayed at the IP address: <http://192.168.0.49/bpage.html>.

Monthly
The above ground storage tanks and associated systems are required to be inspected every month to verify integrity of the overall system in accordance with STI SP001 requirements.


The associated pumps and auxiliary components (piping, valves, strainers, etc.) are required to be inspected every month to ensure the integrity and general condition of the structural and mechanical components are maintained. See the [Blackmer Positive Displacement Rotary Vane Pump](#) (outside tank farm) and the [Sandpiper Air-Diaphragm Pump](#) (RM 126) manuals for specific inspection details.

Annual
The above ground storage tanks and associated systems are required to be inspected annually to verify integrity of the overall system in accordance with STI SP001 requirements.

Every 5-Years
Every 5-Years ultrasonic thickness testing is required by a certified inspector to determine the corrosion rate of the equipment per API 653 (Tanks) and API 570 (Piping).

Every 10-Years
Every 10-years an external inspection is required by a certified inspector to assess the internal and external condition of the tank to determine its suitability for continued use per STI SP0001 Tank Inspection Standard.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on

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Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The above ground storage tanks and associated systems monthly inspection shall be documented on the [Outside Above Ground Storage Tank \(T01\)](#) and [Outside Above Ground Storage Tank \(T02\)](#) forms which complies with STI SP001 Monthly Tank Inspection Checklist. Documentation to be retained in the electronic Operations - TPM file.

The associated pumps and auxiliary components (piping, valves, strainers, etc.) monthly inspections shall be documented on the [Blackmer Pump and Auxiliary Component](#) (outside tank farm) and the [Sandpiper Pump and Auxiliary Component](#) (RM 126) forms which complies with STI SP001 Inspection Checklist.

The 5-year ultrasonic thickness testing and 10-year external inspection records shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR Compliance Testing and Technology
W67 N250 Evergreen Blvd., Suite B, Cedarburg, WI 53012
Phone: (262) 292-2200

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Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



**Total Preventative Maintenance Inspection Form
Outside Above Ground Storage Tank (T01) - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Inspection Guidance. This inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a certified inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. The checklist items below are the minimum inspection requirements. The asterisk (*) designates an item in a non-conformance status and indicates that action is required to address the problem at the time of the inspection. This inspection is based upon STI SP001 requirements.

T01 - Outside Above Ground Storage Tank

Indication of reduce system flow or other system operational deficiency?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Stainer clean and in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Filter in good condition and within the manufacturers expected service life?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Visible signs of leakage or damage around tank, valves, piping, concrete pad, containment, transfer area, ring-wall or ground?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Water in primary tank, secondary containment interstice, dike, transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Product in secondary containment interstice, dike transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Tank liquid level gauge readable and functional?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Ladder and platform structure secure with no sign of server corrosion or damage?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Visible portions of containment liner or expansion joint seam sealer in good condition with no signs of blistering, tearing, or delamination.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Containment egress pathways clear and gates/doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Debris or fire hazard in containment, transfer area, or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Drain valves operable and in a closed position?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
All tank openings properly sealed? Caps and covers have functional fittings, hardware and gaskets?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Leak detection for underground piping operable and not in an alarm condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
If equipped with an audible and/or visual over-fill alarm, does it operate when "test button" depressed?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
For the item above, is the battery charged if applicable?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Identification labels and tags secure, intact and readable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Are there other conditions that should be addressed for continued safe operation or that may affect the site's SPCC Plan?	<input type="checkbox"/> Yes* <input type="checkbox"/> No

Comments:

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Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

**Total Preventative Maintenance Inspection Form
Outside Above Ground Storage Tank (T02) - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Inspection Guidance. This inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a certified inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. The checklist items below are the minimum inspection requirements. The asterisk (*) designates an item in a non-conformance status and indicates that action is required to address the problem at the time of the inspection. This inspection is based upon STI SP001 requirements.

T02 - Outside Above Ground Storage Tank

Indication of reduce system flow or other system operational deficiency?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Stainer clean and in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Filter in good condition and within the manufacturers expected service life?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Visible signs of leakage or damage around tank, valves, piping, concrete pad, containment, transfer area, ring-wall or ground?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Water in primary tank, secondary containment interstice, dike, transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Product in secondary containment interstice, dike transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Tank liquid level gauge readable and functional?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Ladder and platform structure secure with no sign of server corrosion or damage?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Visible portions of containment liner or expansion joint seam sealer in good condition with no signs of blistering, tearing, or delamination.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Containment egress pathways clear and gates/doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Debris or fire hazard in containment, transfer area, or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Drain valves operable and in a closed position?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
All tank openings properly sealed? Caps and covers have functional fittings, hardware and gaskets?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Leak detection for underground piping operable and not in an alarm condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
If equipped with an audible and/or visual over-fill alarm, does it operate when "test button" depressed?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
For the item above, is the battery charged if applicable?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Identification labels and tags secure, intact and readable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Are there other conditions that should be addressed for continued safe operation or that may affect the site's SPCC Plan?	<input type="checkbox"/> Yes* <input type="checkbox"/> No

Comments:

Document No.: TPM-INSP-008	Revision Date: 1/7/2022	Revision No.: 004
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Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



**Total Preventative Maintenance Inspection Form
Blackmer Pump and Auxiliary Components (Outside Tank Farm) Form - Monthly**


Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Inspection Guidance. Periodic inspection for the general condition and operation of the pump units is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Manufacturer: Blackmer Positive Displacement Rotary Vane Pump	Make and Model: GX3E	Serial Number: 933043
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Preventative Maintenance Item	Observation	Identified Deficiencies
Pump. Visually inspect the unit for any damage or compromise to its integrity.		
Pump. Ensure the unit is clean.		
Pump. Lubricate the two grease fittings as needed. Remove the grease relief fittings from the bearing cover. Slowly apply grease with a hand gun until grease begins to escape from the grease relief fitting port. Replace the grease relief fittings. DO NOT over grease pump bearings.		
Pump. Clean the strainer.		
Pump. Ensure the unit is properly grounded. Verify with conductivity meter.		
Pump. Operate the pump by recirculating material through the system. Turn on the main power at the electrical box in Room 124. Open the four valves in the tank farm. Turn on the switch at the tank farm. Recirculate material for 10-15 minutes or the period for which it takes to get the pump motor up to operating temperature. Once completed shut-down system.		
Pump. Inspect all moving parts, framework, drum holder and contact areas for signs of wear, fatigue or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		
Piping. Visually inspect the piping for any damage, corrosion or compromise to its integrity.		
Swing Check Valves. Visually inspection for condition and proper operation. (Morrison 246ADI-0500AV)		
Internal Emergency Valves. Visually inspection for condition and proper operation. (Morrison 272HDI-0100AV)		

Document No.: TPM-INSP-008	Revision Date: 1/7/2022	Revision No.: 004	
Document Title: OUTSIDE STORAGE TANKS and ASSOCIATED EQUIPMENT			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

**Total Preventative Maintenance Inspection Form
Sandpiper Pump and Auxiliary Components (RM126) Form - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Inspection Guidance. Periodic inspection for the general condition and operation of the pump units is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Manufacturer: Sandpiper Air Diaphragm Metallic Pump	Make and Model: S20	Serial Number: 2025576
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Preventative Maintenance Item	Observation	Identified Deficiencies
Pump. Visually inspect the unit for any damage or compromise to its integrity.		
Pump. Ensure the unit is clean.		
Pump. Ensure unit is properly grounded. Verify with conductivity meter.		
Pump. Inspect all parts and framework areas for signs of wear, fatigue deformities, rust or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		
Piping. Visually inspect the piping for any damage, corrosion or compromise to its integrity.		
Strainer. Visually inspect the basket strainer for any damage or compromise to its integrity and if the unit is clean.		
Ball Valves. Visually adjust the steam packaging as needed and cycle the valve from open to close to ensure proper operation. (ProMax PM01)		
Emergency (Fire) Valves. Cycle the valve from open to close to ensure proper operation. (Morrison 346DI-0500 AV)		

Document No.: TPM-INSP-009	Revision Date: 1/7/2022	Revision No.: 002
Document Title: PRESSURE WASHER		
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



PRESSURE WASHER TOTAL PREVENTATIVE MAINTENANCE PROGRAM

- PURPOSE** This procedure describes the steps required to maintain the integrity of the cleaning equipment present.
- REFERENCES**
- Hosty 1075SSE Specifications
- PREREQUISITE** Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.
- Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.
- PROCEDURE**
- Annual**
The pressure washer is required to be inspected annually to ensure the integrity and general condition of the overall system is operating and functioning properly. See the [Hosty 1075SSE](#) manuals for specific inspection details
- *Special Note. At the present time, due to the low hours metered on the pressure washer, it may be determined that the annual inspection is not required. However, this will be documented.
- DEFICIENCIES** Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
- DOCUMENTATION** The annual inspection records shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.
- CONTRACTOR** Hosty Cleaning Systems, Inc.
3558 Hillside Drive, Delafield, WI 53018
Phone: (262) 646-4677

Document No.: TPM-INSP-010	Revision Date: 1/7/2022	Revision No.: 003	
Document Title: AIR COMPRESSOR SYSTEM			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

AIR COMPRESSOR SYSTEM AND ASSOCIATED EQUIPMENT TOTAL PREVENTATIVE MAINTENANCE PROGRAM

PURPOSE This procedure describes the steps required to maintain the integrity of the air compressor system present.

- REFERENCES**
- CompAir Air Compressor Unit (Model L07 10HP)
 - Silvan Air Receiver Tank
 - Great Lakes Coalescing Filter (Model GC-100-SA)
 - Great Lakes Refrigerated Air Dryer (Model GRF-100A-116)
 - All-Weather Hydraulic Oil ISO Grade 46

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.

PROCEDURE **Annual**
The air compressor system and associated equipment are required to be inspected annually to ensure the integrity and general condition of the overall system is operating and functioning properly. See the [CompAir Compressor Unit](#) and [Great Lakes Refrigerated Air Dryer](#) manuals for specific inspection details.

Every 5-Years
Every 5-Years an internal inspection of the pressure vessel by a qualified person must be conducted per API 510 (Pressure Vessels) and API 570 (Piping).

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The annual inspection records shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic Operations - TPM file.

The 5-year ultrasonic thickness testing and 10-year external inspection records shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR ABC Flow Services - Wisconsin, Inc.
Formerly Wisconsin Compressed Air Corporation
12855 W. Silver Spring Drive, Butler, WI 53007
Phone: (800) 236-1616

Document No.: TPM-INSP-011	Revision Date: 6/23/2022	Revision No.: 004
Document Title: GENERATOR		
Certified By: OPERATION MANAGER		Certified Date: 6/23/2022



GENERATOR TOTAL PREVENTATIVE MAINTENANCE PROGRAM

PURPOSE This procedure describes the steps required to maintain the integrity of the backup generator system present.

REFERENCES

- Generac Generator Model H-100

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.

PROCEDURE **Annual**
The generator is required to be inspected annually to ensure the integrity and crucial emergency components (ex. emergency lighting, exit signs) is operational by the unit, as well as, to ensure the overall all system is operational and functioning properly. See the [Generac Generator Model H-100](#) manuals for specific inspection details.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The annual inspection records shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR Wolter Power Systems
3125 Intertech Drive, Brookfield, WI 53045
Phone: (262) 790-6230

Document No.: TPM-INSP-012	Revision Date: 1/7/2022	Revision No.: 002
Document Title: GAS DETECTION SYSTEM		
Certified By: OPERATION MANAGER	Certified Date: 1/7/2022	



GAS MONITORING AND DETECTION SYSTEM MECHANICAL INTEGRITY PROCEDURE

- PURPOSE** This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.
- REFERENCES**
- Honeywell Manning Air Alert 96d Multi-Channel Gas Monitoring System
 - Honeywell Optima Plus IR Sensors (Model 2108)
 - Honeywell XNX Universal Transmitter
- PREREQUISITE** Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.
- Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.
- PROCEDURE**
- Daily Monitoring**
The gas monitoring system is monitors the gas levels in RM 125 and RM 126 on a 24-hour basis. If vapor levels exceed 20% of the lower explosive limit (LEL), an advisory alarm is activated to notify the facility that vapor are present and above acceptable levels. If vapor levels exceed 40% of the lower explosive limit (LEL), the fire alarm is activated indicating evacuation of the facility is required.
- Annual**
The gas detection system is required to be calibrated and inspected annual to ensure the integrity and general condition of the overall system is operating and functioning properly. See the [Honeywell Gas Monitoring System, Sensors and Transmitter](#) manuals for specific inspection details.
- SPECIAL NOTES** All sensors are on one group within the gas monitoring system. At 20% of the LEL a supervisory alarm is initiated at the fire panel located in the Front Lobby and green light will flash. At 40% of the LEL the evacuation alarm is initiated and the fire department is notified via the 24-hour monitoring system. The green light will turn a solid amber color. The password for the gas monitoring system panel in the IT room is 2967.
- DEFICIENCIES** Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged “Out of Service” until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
- DOCUMENTATION** The annual inspection records shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.
- CONTRACTOR** Lesman Instrument Company (Previously Raeco)
5160 N. 125th Street, Butler, WI 53007
Phone: (262) 923-1797

Document No.: TPM-INSP-012	Revision Date: 1/7/2022	Revision No.: 002
Document Title: GAS DETECTION SYSTEM		
Certified By: OPERATION MANAGER	Certified Date: 1/7/2022	




kari@lesman.com

Document No.: TPM-INSP-013	Revision Date: 1/7/2022	Revision No.: 001
Document Title: LOADING DOCK LEVELERS		
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



**LOADING DOCK LEVELERS
TOTAL PREVENTATIVE MAINTENANCE PLAN**

- PURPOSE** This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.
- REFERENCES**
- Airdock Series Air-Powered Dock Leveler Model AD
 - Mechanical Dock Leveler Model CM
- PREREQUISITE** Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.
- Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.
- PROCEDURE** Every 3-Months
The dock levelers are required to be inspected every three months to ensure the integrity and general condition of the units are maintained. See the [Nordock Airdock Series Air Powered Dock Leveler Model AD](#) and [Nordock Mechanical Dock Leveler Model CM](#) for specific inspection details.
- DEFICIENCIES** Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged “Out of Service” until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
- DOCUMENTATION** The inspections shall be documented on the attached form. Documentation to be retained in the electronic recordkeeping file.
- CONTRACTOR** Flatly Dock Systems, Inc.
2220 C. Stonebridge Road, West Bend, WI 53095
Phone: (262) 335-3625

Document No.: TPM-INSP-013	Revision Date: 1/7/2022	Revision No.: 001	
Document Title: LOADING DOCK LEVELERS			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

**Total Preventative Maintenance Inspection Form
Airdock Series Dock Leveler Model AD - Every 3-Months**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Dock Leveler

Manufacturer: Nordock, Inc.	Make and Model: Model AD-68-30	Serial Number: 21512	Location: RM 124 - Dock #2 (East Docks)
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Preventative Maintenance Item	Check Upon Completion	Comments
Visually inspect the unit for any damage or compromise to its integrity.		
Lip Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Chain. Use chain lube to lubricate. Remove debris as required. Lube used for chain should be a lithium-based spray lube.		
Rear Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Lip Extended Mechanism. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Bearings. Use grease to lubricate. Remove debris as required. Grease used should be a minimum EP-2 grade.		
Pit Area. Remove debris as required.		

Document No.: TPM-INSP-013	Revision Date: 1/7/2022	Revision No.: 001	
Document Title: LOADING DOCK LEVELERS			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

**Total Preventative Maintenance Inspection Form
Airdock Series Dock Leveler Model AD - Every 3-Months**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Dock Leveler

Manufacturer: Nordock, Inc.	Make and Model: Model AD-68-30	Serial Number: 21511	Location: RM 124 - Dock #3 (East Docks)
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Preventative Maintenance Item	Check Upon Completion	Comments
Visually inspect the unit for any damage or compromise to its integrity.		
Lip Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Chain. Use chain lube to lubricate. Remove debris as required. Lube used for chain should be a lithium-based spray lube.		
Rear Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Lip Extended Mechanism. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Bearings. Use grease to lubricate. Remove debris as required. Grease used should be a minimum EP-2 grade.		
Pit Area. Remove debris as required.		

Document No.: TPM-INSP-013	Revision Date: 1/7/2022	Revision No.: 001	
Document Title: LOADING DOCK LEVELERS			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

**Maintenance Inspection Form
Mechanical Dock Leveler Model CM - Every 3-Months**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Dock Leveler (Room 125 or North Dock)

Manufacturer: Nordock, Inc.	Make and Model: Model AD-68-30	Serial Number: 21511	Location: RM 125 - Dock #4 (East Docks)
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Preventative Maintenance Item	Check Upon Completion	Comments
Visually inspect the unit for any damage or compromise to its integrity.		
Dock Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Lip Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Deck Float Assembly. Use grease to lubricate. Remove debris as required. Grease used should be a minimum EP-2 grade.		
Lift Arm Assembly. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Pit Area. Remove debris as required.		

Document No.: TPM-INSP-013	Revision Date: 1/7/2022	Revision No.: 001	
Document Title: LOADING DOCK LEVELERS			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

**Total Preventative Maintenance Inspection Form
Airdock Series Dock Leveler Model AD - Every 3-Months**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Dock Leveler

Manufacturer: Nordock, Inc.	Make and Model: Model AD-68-30	Serial Number:	Location: RM 127 - Dock #6 (North Docks)
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Preventative Maintenance Item	Check Upon Completion	Comments
Visually inspect the unit for any damage or compromise to its integrity.		
Lip Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Chain. Use chain lube to lubricate. Remove debris as required. Lube used for chain should be a lithium-based spray lube.		
Rear Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Lip Extended Mechanism. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Bearings. Use grease to lubricate. Remove debris as required. Grease used should be a minimum EP-2 grade.		
Pit Area. Remove debris as required.		

Document No.: TPM-INSP-013	Revision Date: 1/7/2022	Revision No.: 001	
Document Title: LOADING DOCK LEVELERS			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

**Total Preventative Maintenance Inspection Form
Airdock Series Dock Leveler Model AD - Every 3-Months**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Dock Leveler

Manufacturer: Nordock, Inc.	Make and Model: Model AD-68-30	Serial Number:	Location: RM 127 - Dock #7 (North Docks)
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Preventative Maintenance Item	Check Upon Completion	Comments
Visually inspect the unit for any damage or compromise to its integrity.		
Lip Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Chain. Use chain lube to lubricate. Remove debris as required. Lube used for chain should be a lithium-based spray lube.		
Rear Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Lip Extended Mechanism. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Bearings. Use grease to lubricate. Remove debris as required. Grease used should be a minimum EP-2 grade.		
Pit Area. Remove debris as required.		

Document No.: TPM-INSP-013	Revision Date: 1/7/2022	Revision No.: 001	
Document Title: LOADING DOCK LEVELERS			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

**Total Preventative Maintenance Inspection Form
Airdock Series Dock Leveler Model AD - Every 3-Months**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Dock Leveler

Manufacturer: Nordock, Inc.	Make and Model: Model AD-68-30	Serial Number:	Location: RM 127 - Dock #8 (North Docks)
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Preventative Maintenance Item	Check Upon Completion	Comments
Visually inspect the unit for any damage or compromise to its integrity.		
Lip Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Chain. Use chain lube to lubricate. Remove debris as required. Lube used for chain should be a lithium-based spray lube.		
Rear Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Lip Extended Mechanism. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Bearings. Use grease to lubricate. Remove debris as required. Grease used should be a minimum EP-2 grade.		
Pit Area. Remove debris as required.		

Document No.: TPM-INSP-013	Revision Date: 1/7/2022	Revision No.: 001	
Document Title: LOADING DOCK LEVELERS			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

**Total Preventative Maintenance Inspection Form
Airdock Series Dock Leveler Model AD - Every 3-Months**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Dock Leveler

Manufacturer: Nordock, Inc.	Make and Model: Model AD-68-30	Serial Number:	Location: RM 127 - Dock #9 (North Docks)
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Preventative Maintenance Item	Check Upon Completion	Comments
Visually inspect the unit for any damage or compromise to its integrity.		
Lip Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Chain. Use chain lube to lubricate. Remove debris as required. Lube used for chain should be a lithium-based spray lube.		
Rear Hinge. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Lip Extended Mechanism. Use light oil to lubricate. Remove debris as required. Light oil used should have good penetration and adhesion qualities.		
Bearings. Use grease to lubricate. Remove debris as required. Grease used should be a minimum EP-2 grade.		
Pit Area. Remove debris as required.		

Document No.: TPM-INSP-014	Revision Date: 1/7/2022	Revision No.: 002
Document Title: OVERHEAD FIRE DOOR		
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



OVERHEAD FIRE DOOR TOTAL PREVENTATIVE MAINTENANCE PROGRAM

- PURPOSE** This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.
- REFERENCES**
- Overhead Fire Door
- PREREQUISITE** Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.
- Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.
- PROCEDURE** **Annual Inspections**
The overhead fire door is required to be inspection on an annual basis. The inspection will be conducted by a qualified outside contractor on the behalf of the organization.
- DEFICIENCIES** Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
- DOCUMENTATION** The annual inspections shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.
- CONTRACTOR** Blair Fire Protection
13111 W. Silver Spring Drive, Butler, WI 53007
Phone: (414) 460-4006
Email: Kevin Gall (k.gall@blairfireprotection.com)

Document No.: TPM-INSP-015	Revision Date: 1/7/2022	Revision No.: 001	
Document Title: FLOOR SCALE			
Certified By: OPERATION MANAGER	Certified Date: 1/7/2022		

FLOOR SCALE EQUIPMENT TOTAL PREVENTATIVE MAINTENANCE PROGRAM

PURPOSE	This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.
REFERENCES	<ul style="list-style-type: none"> • CAS 4x4 10,000 lbs. MS Floor Scale • TI 500E MS Indicator
PREREQUISITE	<p>Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.</p> <p>Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.</p>
PROCEDURE	<p>Annual Inspection</p> <p>The floor scale and associated equipment are required to be inspected and calibrated annually to ensure the integrity and general condition of the overall system is operating and functioning properly. See the appropriate manufacturing manual for the specific units indicated above for specific inspection details.</p>
DEFICIENCIES	Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
DOCUMENTATION	The annual inspection and calibration records shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.
CONTRACTOR	<p>A-1 Scale Service, Inc. 3287 Sherman Way, Slinger, WI 53086 Phone: (262) 677-3555</p>

Document No.: TPM-INSP-016	Revision Date: 1/7/2022	Revision No.: 003
Document Title: HVAC SYSTEM		
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022




HVAC AND ASSOCIATED EQUIPMENT TOTAL PREVENTATIVE MAINTENANE PROGRAM

PURPOSE This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.

REFERENCES See table below for specific equipment details:

Number	Description	Manufacturer	Model	Year Installed	Location
CEF-1	Ceiling Exhaust Fan	Broan	AE50	Aug-2012	Shipping Office
EBB-1	Electrical Baseboard Heaters	Q-Mark/Marley	2578W	Aug-2012	Offices (Old)
EBB-2	Electrical Baseboard Heaters	Marley	2578W	Aug-2012	Lunchroom/Conference
EBB-3	Electrical Baseboard Heaters	Marley	2506W	Sep-2012	Offices (New)
EBB-4	Electrical Baseboard Heaters	Marley	2506W	Sep-2012	Offices (New)
EBB-5	Electrical Baseboard Heaters	Marley	2506W	Sep-2012	Offices (New)
EF-1	Exhaust Fan	Broan	684	Sep-2012	Private Bathroom
EF-2	Exhaust Fan	Broan	L-150	Sep-2012	Warehouse Bathroom
EF-3	Exhaust Fan	Broan	684	Sep-2012	Janitor's Closet
EF-4	Exhaust Fan	Broan	684	Sep-2012	Women's Bathroom
EF-5	Exhaust Fan	Broan	684	Sep-2012	Men's Bathroom
EF-6	Exhaust Fan	Carnes	VUBK-08-K4	Sep-2012	Laboratory
EF-7	Exhaust Fan	Carnes	VUBK-21-51	Sep-2012	Warehouse RM 125
EF-8	Exhaust Fan	Carnes	VUBK-15-R1	Sep-2012	Warehouse RM 126
EWH-1	Electrical Wall Heater	Q-Mark	CWH-110-DS	Sep-2012	Entrance Corridor
EWH-2	Electrical Wall Heater	Q-Mark	CWH-110-DS	Sep-2012	Entrance Corridor
EWH-3	Electrical Wall Heater	Q-Mark/Marley	CWH3408F	Aug-2021	Shipping Corridor
MS-1	Electrical Air Conditioner	LG Electronics	LSN122HE	Sep-2012	IT Room
MUA 1	Make-Up Air	Captive Aire	AA3-D.750-G18	Sep-2012	Roof - RM 125
MUA-2	Make-Up Air	Captive Aire	A2-D.500	Aug-2021	Roof - RM 125
PTAC-1	Packaged Terminal Air Conditioner	Fredrich	PDE09K	Aug-2021	Shipping Office
PRV-1	Pressure Relief Valve	Captive Aire	NCA18FA	Aug-2021	Roof - RM 125
RTU 1	Roof Top Unit	Trane	YSC090E3	Sep-2012	Roof - Offices
RTU-2	Roof Top Unit	Comfortmaker	PGD430060K	Aug-2021	Roof - Offices
UH-1	Natural Gas Unit Heater	Sterling	TF-200	Jan-2016	RM 124 Warehouse
UH-2	Natural Gas Unit Heater	Sterling	TF-100	Nov-2019	RM 124 Warehouse
UH-3	Natural Gas Unit Heater	Modine	PCP-350	Aug-2021	RM 127 Warehouse
UH-4	Natural Gas Unit Heater	Modine	PCP-350	Aug-2021	RM 127 Warehouse
UH-5	Natural Gas Unit Heater	Modine	PCP-350	Aug-2021	RM 127 Warehouse
VAV-1	Electronic Thermostat	Nailor	UNI2-VAV	Aug-2021	Inside
VAV-2	Electronic Thermostat	Nailor	UNI2-VAV	Aug-2021	Inside

Document No.: TPM-INSP-016	Revision Date: 1/7/2022	Revision No.: 003	
Document Title: HVAC SYSTEM			
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022	

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.

PROCEDURE Bi-Annual Inspection (Spring and Fall Maintenance)
The air compressor system and associated equipment are required to be inspected bi-annually to ensure the integrity and general condition of the overall system is operating and functioning properly. See the appropriate manufacturing manual for the specific units indicated above for specific inspection details.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The bi-annual inspection records shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR Ideal Mechanical
5477 S. Westridge Court
New Berlin, WI 53151
Phone: (262) 879-8349

John Cass, Project Engineer
Cell Phone: (414) 731-0321
Email: john.cass@pieperpower.com

Document No.: TPM-INSP-017	Revision Date: 1/7/2022	Revision No.: 001
Document Title: PORTABLE CONTAINER STORAGE		
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



**PORTABLE CONTAINER STORAGE
TOTAL PREVENTATIVE MAINTENANCE PROGRAMS**

- PURPOSE** This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.
- REFERENCES** Portable containers being stored within the facility at the time the inspection is conducted. This includes totes, drums, cubic yard boxes, pails and any other container present.
- PREREQUISITE** Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.
- Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.
- PROCEDURE** **Weekly Inspection**
The containers being stored within the facility are required to be inspected on a weekly basis by internal designated personnel.
- DEFICIENCIES** Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
- DOCUMENTATION** The inspections shall be documented on the attached form. Documentation to be retained in the electronic recordkeeping file.
- CONTRACTOR** None

Document No.: TPM-INSP-017	Revision Date: 1/7/2022	Revision No.: 001
Document Title: PORTABLE CONTAINER STORAGE		
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



Total Preventative Maintenance Inspection Form Portable Container Storage Inspection - Weekly

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Inspection Guidance. This inspection is intended for monitoring the external container condition. The visual inspection does not require a certified inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. The checklist items below are the minimum inspection requirements. The asterisk (*) designates an item in a non-conformance status and indicates that action is required to address the problem at the time of the inspection. This inspection is based upon STI SP0001 requirements.

RM 124	
Storage Area/Containment. Container within designated storage area?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Storage Area/Containment. Debris, spills and other fire hazards in storage area and containment?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Storage Area/Containment. Egress pathways clear and doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Storage Area/Containment. Secondary containment is free of signs of spills, cracks or deterioration?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Leak Detection. Visible signs of leakage around the container or storage area?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Container. Noticeable container distortions, buckling, denting or bulging?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Comments:	

RM 125	
Storage Area/Containment. Container within designated storage area?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Storage Area/Containment. Debris, spills and other fire hazards in storage area and containment?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Storage Area/Containment. Egress pathways clear and doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Storage Area/Containment. Secondary containment is free of signs of spills, cracks or deterioration?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Leak Detection. Visible signs of leakage around the container or storage area?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Container. Noticeable container distortions, buckling, denting or bulging?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Comments:	

RM 126	
Storage Area/Containment. Container within designated storage area?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Storage Area/Containment. Debris, spills and other fire hazards in storage area and containment?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Storage Area/Containment. Egress pathways clear and doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Storage Area/Containment. Secondary containment is free of signs of spills, cracks or deterioration?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Leak Detection. Visible signs of leakage around the container or storage area?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Container. Noticeable container distortions, buckling, denting or bulging?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Comments:	

Document No.: TPM-INSP-017	Revision Date: 1/7/2022	Revision No.: 001
Document Title: PORTABLE CONTAINER STORAGE		
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



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RM 127	
Storage Area/Containment. Container within designated storage area?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Storage Area/Containment. Debris, spills and other fire hazards in storage area and containment?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Storage Area/Containment. Egress pathways clear and doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Storage Area/Containment. Secondary containment is free of signs of spills, cracks or deterioration?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Leak Detection. Visible signs of leakage around the container or storage area?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Container. Noticeable container distortions, buckling, denting or bulging?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Comments:	

Document No.: TPM-INSP-018	Revision Date: 1/7/2022	Revision No.: 002
Document Title: SPRINKLER SYSTEM		
Certified By: OPERATION MANAGER		Certified Date: 1/7/2022



**SPRINKLER SYSTEM
TOTAL PREVENTATIVE MAINTENANCE PROGRAM**

PURPOSE This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.

- REFERENCES**
- Sprinkler System - Water (Office Area)
 - Sprinkler System - Foam (Warehouses and Laboratory)
 - Sprinkler System - Deluge System (Tank Farm)
 - Double Check Valves
 - Foam Testing

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.

PROCEDURE


Quarterly Inspection
The sprinkler system is required to be inspection on a quarterly basis. The inspection will be conducted by a qualified outside contractor on the behalf of the organization.

Annual Inspections
The sprinkler system and double check valves are required to be inspection on an annual basis. The inspection will be conducted by a qualified outside contractor on the behalf of the organization. In addition, the foam testing is required.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The inspections shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR Blair Fire Protection
13111 W. Silver Spring Drive, Butler, WI 53007
Phone: (414) 460-4006
Email: Kevin Gall (k.gall@blairfireprotection.com)

Document No.: TPM-INSP-019	Revision Date: 6/23/2022	Revision No.: 003	
Document Title: SECONDARY CONTAINMENT AND STORMCEPTOR			
Certified By: OPERATION MANAGER		Certified Date: 6/23/2022	

SECONDARY CONTAINMENT AND STORMCEPTOR SYSTEM TOTAL PREVENATIVE MAINTENANCE PROGRAM

PURPOSE This procedure describes the steps required to maintain the integrity of the outside secondary containment area (east loading docks, north loading docks, tanker filling loading pads and above ground storage secondary containment structure).

- REFERENCES**
- East Loading Docks and Trench (Dock #2, #3 and #4)
 - North Loading Docks and Trench (Dock #6, #7, #8 and #9)
 - Tanker Filling Pads #1 and #2
 - Outside Secondary Containment Structure
 - Stormceptor System

PREREQUISITE Inspection only authorized to be conducted by personnel familiar with the areas and their intended purpose and/or experienced, trained and/or qualified personnel acceptable to the organization.

PROCEDURE

Daily
A visual review of all areas will be conducted as part of the daily Facility Inspection (TPM-INSP-0020). If during this inspection, integrity issues are identified, they should be addressed immediately.

Bi-Annually
The areas described above will be inspected to ensure continuous integrity and proper maintenance. In addition, to ensure a high level of housekeeping of these areas are maintained. See the [Secondary Containment and Stormceptor Inspection Form \(attached\)](#) for specific inspection details.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The biannual inspections shall be documented on the [Secondary Containment and Stormceptor Inspection Form \(attached\)](#). Documentation to be retained in the electronic recordkeeping files.

CONTRACTOR Grunau
1100 W. Anderson Court, Oak Creek, WI 53154
Phone: (414) 216-6886
Contact: Kyle Germait (kyle.germait@grunau.us)

Document No.: TPM-INSP-019	Revision Date: 6/23/2022	Revision No.: 003
Document Title: SECONDARY CONTAINMENT AND STORMCEPTOR		
Certified By: OPERATION MANAGER		Certified Date: 6/23/2022



Total Preventative Maintenance Inspection Form Secondary Containment and Stormceptor System

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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East Loading Docks and Trench (Dock #2, #3 and #4)

Preventative Maintenance Item	Check Upon Completion	Comments
Remove the trench grates and clean accumulated sediment and debris.		
Inspect grated concrete for integrity and ensure free of cracks and gaps.		
Clear loading dock area of any accumulated sediment and debris. Sweep and/or power wash the area.		
Inspect loading dock pad for integrity and ensure free of cracks and gaps.		
Inspect loading dock pad to ensure expansion joints are sealed.		
Inspect the manual valve for proper operation and for cover seal integrity.		

North Loading Docks and Trench (Dock #6, #7, #8 and #9)

Preventative Maintenance Item	Check Upon Completion	Comments
Remove the trench grates and clean accumulated sediment and debris.		
Inspect grated concrete for integrity and ensure free of cracks and gaps.		
Clear loading dock area of any accumulated sediment and debris. Sweep and/or power wash the area.		
Inspect loading dock pad for integrity and ensure free of cracks and gaps.		
Inspect loading dock pad to ensure expansion joints are sealed.		

TANKER FILLING PADS (Tanker Filling Pad #1 and #2)

Preventative Maintenance Item	Check Upon Completion	Comments
Inspect tanker filling pad for integrity and ensure free of cracks and gaps.		
Inspect loading dock pad to ensure expansion joints are sealed.		
Clear tanker filling pad of any accumulated sediment and debris. Sweep and/or power wash the area.		

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Certified By: OPERATION MANAGER		Certified Date: 6/23/2022



Outside Storage Tank Secondary Containment Structure (Outside)

Preventative Maintenance Item	Check Upon Completion	Comments
Remove and clean accumulated sediment and debris within the structure. Sweep and/or power wash the area.		
Inspect structure for integrity and ensure free of cracks and gaps.		
Inspect structure to ensure expansion joints are sealed.		
Inspect the manual valve for proper operation and for cover seal integrity.		

Stormceptor (Outside)

Manufacturer: Rinker Stormceptor and Loading Dock Trenches	Make and Model: 900	Serial Number: N/A
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Preventative Maintenance Item	Check Upon Completion	Comments
Remove and clean accumulated sediment and debris within the stormceptor.		
Inspect the unit for integrity and ensure free of cracks and gaps.		
Inspect the valve for proper operation and for cover seal integrity.		

Document No.: TPM-INSP-020	Revision Date: 6/23/2022	Revision No.: 004
Document Title: FACILITY INSPECTION		
Certified By: OPERATION MANAGER		Certified Date: 6/23/2022



**FACILITY INSPECTION
TOTAL PREVENTATIVE MAINTENANCE PROGRAM**

PURPOSE This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.

- REFERENCES**
- Property
 - Facility
 - Assets

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.


Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.

PROCEDURE **Daily Inspection**
The entire property, facility and its assets are required to be inspected each day the facility is in operation to ensure it is maintained in good working condition.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The inspections shall be documented on the attached form. Documentation to be retained in the electronic recordkeeping files.

CONTRACTOR None

Document No.: TPM-INSP-020	Revision Date: 6/23/2022	Revision No.: 004	
Document Title: FACILITY INSPECTION			
Certified By: OPERATION MANAGER	Certified Date: 6/23/2022		

**Total Preventative Maintenance Inspection Form
Facility Inspection - Daily**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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This form is required to be completed for each day the facility is in operation by the assigned designee. A copy of this completed report shall be retained on-site and available for review by authorized personnel.

ROOM 124	STATUS	COMMENT
All doors are closed and locked.	Satisfactory Unsatisfactory	
Floors are clean and free of any spills or debris in storage area or containment.	Satisfactory Unsatisfactory	
All marked aisles and exit paths are unobstructed and free of debris.	Satisfactory Unsatisfactory	
No obstruction or storage within unauthorized areas (yellow lined out areas).	Satisfactory Unsatisfactory	
Electrical panels are unobstructed (yellow lined out areas).	Satisfactory Unsatisfactory	
Emergency shower/eyewash unit is unobstructed (yellow lined out areas).	Satisfactory Unsatisfactory	
General lighting is illuminated and in proper working condition.	Satisfactory Unsatisfactory	
Emergency phone numbers updated and posted at the phone station.	Satisfactory Unsatisfactory	
Emergency evacuation routes posted at the exit points.	Satisfactory Unsatisfactory	
Emergency exit signs are fully illuminated (if required) and in proper working condition.	Satisfactory Unsatisfactory	
Fire doors are unobstructed and closed.	Satisfactory Unsatisfactory	
Fire extinguishers are unobstructed.	Satisfactory Unsatisfactory	
Spill kit is present and fully stocked.	Satisfactory Unsatisfactory	
Drain blocker cover present and in good condition.	Satisfactory Unsatisfactory	
Two-way communication radios operational and charged.	Satisfactory Unsatisfactory	
General garbage containers are not overflowing. Empty if needed.	Satisfactory Unsatisfactory	
Desk is clean and organized.	Satisfactory Unsatisfactory	
All equipment and tools are in their designated place for storage.	Satisfactory Unsatisfactory	
Scale is clean and free of spills and debris.	Satisfactory Unsatisfactory	
Containers are stored on pallets, stable and in designated aisles/areas.	Satisfactory Unsatisfactory	
Containers are properly closed with lids, tarps, or covers. The closure device is visually monitor for gaps, holes and cracks (Subpart CC).	Satisfactory Unsatisfactory	
Containers are in good condition, not leaking, free of damage and excessive corrosion, and have no evidence of over-pressurization.	Satisfactory Unsatisfactory	
Container labels are visible and accurate.	Satisfactory Unsatisfactory	
Floor area, pallets and containers are free of evidence of leaks.	Satisfactory Unsatisfactory	

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Secondary containment floor and curbs are in good condition with no damage to coating and no cracks or gaps.	Satisfactory	Unsatisfactory	
Storage quantity is below license limit. (616 55-gallon equivalent containers)	Satisfactory	Unsatisfactory	
Supplies being stored on storage racking is neat, organized and stable.	Satisfactory	Unsatisfactory	
Sprinkler system controls area is clean, neat and organized.	Satisfactory	Unsatisfactory	
Locker room is clean, neat and organized.	Satisfactory	Unsatisfactory	
Bathroom is clean, neat and organized.	Satisfactory	Unsatisfactory	
Janitor's closet is clean, neat and organized.	Satisfactory	Unsatisfactory	
Air compressor oil level checked.	Satisfactory	Unsatisfactory	
Air dryer tank water drained.	Satisfactory	Unsatisfactory	
No miscellaneous items present or being stored – no accumulation.	Satisfactory	Unsatisfactory	

ROOM 125	STATUS	COMMENT
All doors are closed and locked.	Satisfactory	Unsatisfactory
Floors are clean and free of any spills or debris in storage area or containment.	Satisfactory	Unsatisfactory
All marked aisles and exit paths are unobstructed and free of debris.	Satisfactory	Unsatisfactory
No obstruction or storage within unauthorized areas (yellow lined out areas).	Satisfactory	Unsatisfactory
General lighting is illuminated and in proper working condition.	Satisfactory	Unsatisfactory
Emergency evacuation routes posted at the exit points.	Satisfactory	Unsatisfactory
Emergency exit signs are fully illuminated and in proper working condition.	Satisfactory	Unsatisfactory
Fire doors are unobstructed and closed.	Satisfactory	Unsatisfactory
Fire extinguishers are unobstructed.	Satisfactory	Unsatisfactory
Spill kit is present and fully stocked.	Satisfactory	Unsatisfactory
Gas monitors are unobstructed (yellow lined out areas).	Satisfactory	Unsatisfactory
Ventilation ports are unobstructed (yellow lined out areas) and working properly.	Satisfactory	Unsatisfactory
General garbage containers are not overflowing. Empty if needed.	Satisfactory	Unsatisfactory
Desk is clean and organized.	Satisfactory	Unsatisfactory
All equipment and tools are in their designated place for storage.	Satisfactory	Unsatisfactory
Containers are stored on pallets, stable and in designated aisles/areas.	Satisfactory	Unsatisfactory
Containers are properly closed with lids, tarps, or covers. Containers are closed and secure. The closure device is visually monitor for gaps, holes and cracks (Subpart CC).	Satisfactory	Unsatisfactory
Containers are in good condition, not leaking, free of damage and excessive corrosion, and have no evidence of over-pressurization.	Satisfactory	Unsatisfactory
Container labels are visible and accurate.	Satisfactory	Unsatisfactory
Floor area, pallets and containers are free of evidence of leaks.	Satisfactory	Unsatisfactory
Secondary containment floor and curbs are in good condition with no damage to coating and no cracks or gaps.	Satisfactory	Unsatisfactory


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Storage quantity is below license limit. (784 55-gallon equivalent containers)	Satisfactory Unsatisfactory	
No miscellaneous items present or being stored – no accumulation.	Satisfactory Unsatisfactory	


ROOM 126	STATUS	COMMENT
All doors are closed and locked.	Satisfactory Unsatisfactory	
Floors are clean and free of any spills or debris in storage area or containment.	Satisfactory Unsatisfactory	
All marked aisles and exit paths are unobstructed and free of debris.	Satisfactory Unsatisfactory	
No obstruction or storage within unauthorized areas (yellow lined out areas).	Satisfactory Unsatisfactory	
General lighting is illuminated and in proper working condition.	Satisfactory Unsatisfactory	
Emergency evacuation routes posted at the exit points.	Satisfactory Unsatisfactory	
Emergency exit signs are fully illuminated and in proper working condition.	Satisfactory Unsatisfactory	
Fire doors are unobstructed and closed.	Satisfactory Unsatisfactory	
Fire extinguishers are unobstructed.	Satisfactory Unsatisfactory	
Spill kit is present and fully stocked.	Satisfactory Unsatisfactory	
Pump area is clean and organized and no indication of leaks.	Satisfactory Unsatisfactory	
Piping, valves, pressure relief devices, flanges and connections are free of corrosion, leaks and other deterioration.	Satisfactory Unsatisfactory	
Chemical pipelines are properly labeled.	Satisfactory Unsatisfactory	
Gas monitors are unobstructed (yellow lined out areas).	Satisfactory Unsatisfactory	
Ventilation ports are unobstructed (yellow lined out areas).	Satisfactory Unsatisfactory	
All equipment and tools are in their designated place for storage.	Satisfactory Unsatisfactory	
Grounding and bonding cables are clean and in good condition.	Satisfactory Unsatisfactory	
Containers are stored on pallets, stable and in designated aisles/areas.	Satisfactory Unsatisfactory	
Containers are properly closed with lids, tarps, or covers. Containers are closed and secure. The closure device is visually monitor for gaps, holes and cracks (Subpart CC).	Satisfactory Unsatisfactory	
Containers are in good condition, not leaking, free of damage and excessive corrosion, and have no evidence of over-pressurization.	Satisfactory Unsatisfactory	
Container labels are visible and accurate.	Satisfactory Unsatisfactory	
Floor area, pallets and containers are free of evidence of leaks.	Satisfactory Unsatisfactory	
Secondary containment floor and curbs are in good condition with no damage to coating and no cracks or gaps.	Satisfactory Unsatisfactory	
Storage quantity is below license limit. (160 55-gallon equivalent containers)	Satisfactory Unsatisfactory	
No miscellaneous items present or being stored – no accumulation.	Satisfactory Unsatisfactory	

ROOM 127	STATUS	COMMENT
All doors are closed and locked.	Satisfactory Unsatisfactory	
Floors are clean and free of any spills or debris in storage area or containment.	Satisfactory Unsatisfactory	

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All marked aisles and exit paths are unobstructed and free of debris.	Satisfactory	Unsatisfactory	
No obstruction or storage within unauthorized areas (yellow lined out areas).	Satisfactory	Unsatisfactory	
Electrical panels are unobstructed (yellow lined out areas).	Satisfactory	Unsatisfactory	
General lighting is illuminated and in proper working condition.	Satisfactory	Unsatisfactory	
Emergency phone numbers updated and posted at the phone station.	Satisfactory	Unsatisfactory	
Emergency evacuation routes posted at the exit points.	Satisfactory	Unsatisfactory	
Emergency exit signs are fully illuminated (if required) and in proper working condition.	Satisfactory	Unsatisfactory	
Fire doors are unobstructed and closed.	Satisfactory	Unsatisfactory	
Fire extinguishers are unobstructed.	Satisfactory	Unsatisfactory	
Spill kit is present and fully stocked.	Satisfactory	Unsatisfactory	
Storage tank area is clean and organized and no indication of leaks.	Satisfactory	Unsatisfactory	
Storage tank manifold system is clean and no indication of leaks.	Satisfactory	Unsatisfactory	
Piping, valves, pressure relief devices, flanges and connections are free of corrosion, leaks and other deterioration.	Satisfactory	Unsatisfactory	
Chemical pipelines are properly labeled.	Satisfactory	Unsatisfactory	
General garbage containers are not overflowing. Empty if needed.	Satisfactory	Unsatisfactory	
Desk is clean and organized.	Satisfactory	Unsatisfactory	
All equipment and tools are in their designated place for storage.	Satisfactory	Unsatisfactory	
Containers are stored on pallets, stable and in designated aisles/areas.	Satisfactory	Unsatisfactory	
Containers are properly closed with lids, tarps, or covers. Containers are closed and secure. The closure device is visually monitor for gaps, holes and cracks.	Satisfactory	Unsatisfactory	
Containers are in good condition, not leaking, free of damage and excessive corrosion, and have no evidence of over-pressurization.	Satisfactory	Unsatisfactory	
Container labels are visible and accurate.	Satisfactory	Unsatisfactory	
Floor area, pallets and containers are free of evidence of leaks.	Satisfactory	Unsatisfactory	
Secondary containment floor and curbs are in good condition with no damage to coating and no cracks or gaps.	Satisfactory	Unsatisfactory	
Storage quantity is below license limit. (3,304 55-gallon equivalent containers)	Satisfactory	Unsatisfactory	
Supplies being stored on storage racking is neat, organized and stable.	Satisfactory	Unsatisfactory	
Shipping area corridor is clean and neat.	Satisfactory	Unsatisfactory	
No miscellaneous items present or being stored – no accumulation.	Satisfactory	Unsatisfactory	

LABORATORY	STATUS	COMMENT
Floors are clean and free of any spills or debris.	Satisfactory	Unsatisfactory
General lighting is illuminated and in proper working condition.	Satisfactory	Unsatisfactory
Emergency phone numbers updated and posted at the phone station.	Satisfactory	Unsatisfactory
Emergency evacuation routes posted at the exit points.	Satisfactory	Unsatisfactory

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Fire extinguishers are unobstructed.	Satisfactory	Unsatisfactory	
General garbage containers are not overflowing. Empty if needed.	Satisfactory	Unsatisfactory	
Counters are clean and organized.	Satisfactory	Unsatisfactory	
All equipment and tools are in their designated place for storage.	Satisfactory	Unsatisfactory	
Samples are labeled to their identity and sealed.	Satisfactory	Unsatisfactory	
Samples are not accumulating in excessive amounts.	Satisfactory	Unsatisfactory	
Flammable samples are properly stored in the flammable cabinet.	Satisfactory	Unsatisfactory	
Fume hood is clean, neat and organized.	Satisfactory	Unsatisfactory	
No miscellaneous items present or being stored – no accumulation.	Satisfactory	Unsatisfactory	

EAST LOADING DOCKS	STATUS	COMMENT
Secondary containment free of debris and garbage.	Satisfactory	Unsatisfactory
Secondary containment free of standing liquid.*	Satisfactory	Unsatisfactory
The lid on the secondary containment manhole closed and locked.	Satisfactory	Unsatisfactory
The valve that presents flow to the storm water systems is in the closed position.	Satisfactory	Unsatisfactory
The east loading docks secondary containment concrete is not compromised and of adequate integrity. No cracks, gaps, or damage to coating.	Satisfactory	Unsatisfactory
No miscellaneous items present or being stored.	Satisfactory	Unsatisfactory
Storage quantity is below license limit. (18,000-gallons)	Satisfactory	Unsatisfactory
<p>*If free standing liquid is present within the Secondary Containment, it needs to be evaluated and documented using the SPCC Record of Secondary Containment Observation and Drainage (WI-EHS-016 – Appendix G) Form prior to release or removal.</p>		

OUTSIDE TANK FARM	STATUS	COMMENT
Gate is closed and locked.	Satisfactory	Unsatisfactory
Gate and fencing are intact and free from signs of forced entry or tampering.	Satisfactory	Unsatisfactory
Secondary containment free of debris and garbage.	Satisfactory	Unsatisfactory
Secondary containment free of standing liquid.*	Satisfactory	Unsatisfactory
The lid on the secondary containment manhole closed and locked.	Satisfactory	Unsatisfactory
The valve that presents flow to the storm water systems is in the closed position.	Satisfactory	Unsatisfactory
Tanker filling area secondary containment concrete is not compromised and of adequate integrity. No cracks, gaps, or damage to coating.	Satisfactory	Unsatisfactory
No miscellaneous items present or being stored.	Satisfactory	Unsatisfactory
Storage quantity is below license limit for the tanker filling areas. (12,000-gallons)	Satisfactory	Unsatisfactory
<p>*If free standing liquid is present within the Secondary Containment, it needs to be evaluated and documented using the SPCC Record of Secondary Containment Observation and Drainage (WI-EHS-016 - Appendix G) Form prior to release or removal.</p>		

FACILITY GROUNDS	STATUS	COMMENT
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All outside utility doors are closed and locked.	Satisfactory	Unsatisfactory	
The badge access system is properly functioning.	Satisfactory	Unsatisfactory	
Security cameras are properly functioning.	Satisfactory	Unsatisfactory	
Security alarm system properly functioning.	Satisfactory	Unsatisfactory	
Property lighting is illuminated and in proper working condition.	Satisfactory	Unsatisfactory	
North loading docks are free of debris and garage.	Satisfactory	Unsatisfactory	
Stormceptor is closed and in proper working condition.	Satisfactory	Unsatisfactory	
Asphalt and concrete are in good condition.	Satisfactory	Unsatisfactory	
Property landscape maintained in good condition.	Satisfactory	Unsatisfactory	
No miscellaneous items present or being stored on the property – no accumulation.	Satisfactory	Unsatisfactory	
<p>*If free standing liquid is present within the Secondary Containment, it needs to be evaluated and documented using the SPCC Record of Secondary Containment Observation and Drainage (WI-EHS-016 - Appendix G) Form prior to removal or release.</p>			



**ENVIRO-SAFE RESOURCE RECOVERY
RECORD OF SECONDARY CONTAINMENT OBSERVATION AND DRAINAGE**

The outside secondary containment areas shall be visually inspected on a daily basis. When liquid is observed within the secondary containment, it must be evaluated and actions documented.

Name of Person Conducting the Evaluation	Evaluation Date
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Rainfall Reference Chart				
1 in = 2,493 gal	0.95 in = 2,369 gal	0.9 in = 2,244 gal	0.85 in = 2,119 gal	0.8 in = 1,995 gal
0.75 in = 1,870 gal	0.7 in = 1,745 gal	0.65 in = 1,621 gal	0.6 in = 1,496 gal	0.55 in = 1,371 gal
0.5 in = 1,247 gal	0.45 in = 1,122 gal	0.4 in = 997 gal	0.35 in = 873 gal	0.3 in = 748 gal
0.25 in = 623 gal	0.2 in = 499 gal	0.15 in = 374 gal	0.1 in = 249 gal	0.05 in = 125 gal

Location	Source of Liquid Accumulation	Estimated Quantity	Evaluation Results		
East Loading Dock	<input type="checkbox"/> Spill <input type="checkbox"/> Leak <input type="checkbox"/> Rainfall Event		<input type="checkbox"/> Discharged <input type="checkbox"/> Contained		
Color:	<input type="checkbox"/> Clear <input type="checkbox"/> Red	<input type="checkbox"/> Yellow	<input type="checkbox"/> Brown	<input type="checkbox"/> Other	
Odor:	<input type="checkbox"/> None <input type="checkbox"/> Musty	<input type="checkbox"/> Sewage	<input type="checkbox"/> Rotten Egg	<input type="checkbox"/> Other	
Clarity:	<input type="checkbox"/> Clear <input type="checkbox"/> Cloudy	<input type="checkbox"/> Opaque	<input type="checkbox"/> Suspended Solids	<input type="checkbox"/> Other	
Floatables:	<input type="checkbox"/> None <input type="checkbox"/> Foam	<input type="checkbox"/> Garbage	<input type="checkbox"/> Oily Film	<input type="checkbox"/> Other	
Deposits/Stains:	<input type="checkbox"/> None <input type="checkbox"/> Oily	<input type="checkbox"/> Sludge	<input type="checkbox"/> Sediment	<input type="checkbox"/> Other	
Other Observations:					


Location	Source of Liquid Accumulation	Estimated Quantity	Evaluation Results		
Tanker Fill Pad and Tank Farm	<input type="checkbox"/> Spill <input type="checkbox"/> Leak <input type="checkbox"/> Rainfall Event		<input type="checkbox"/> Discharged <input type="checkbox"/> Contained		
Color:	<input type="checkbox"/> Clear <input type="checkbox"/> Red	<input type="checkbox"/> Yellow	<input type="checkbox"/> Brown	<input type="checkbox"/> Other	
Odor:	<input type="checkbox"/> None <input type="checkbox"/> Musty	<input type="checkbox"/> Sewage	<input type="checkbox"/> Rotten Egg	<input type="checkbox"/> Other	
Clarity:	<input type="checkbox"/> Clear <input type="checkbox"/> Cloudy	<input type="checkbox"/> Opaque	<input type="checkbox"/> Suspended Solids	<input type="checkbox"/> Other	
Floatables:	<input type="checkbox"/> None <input type="checkbox"/> Foam	<input type="checkbox"/> Garbage	<input type="checkbox"/> Oily Film	<input type="checkbox"/> Other	
Deposits/Stains:	<input type="checkbox"/> None <input type="checkbox"/> Oily	<input type="checkbox"/> Sludge	<input type="checkbox"/> Sediment	<input type="checkbox"/> Other	
Other Observations:					

Document No.: TPM-INSP-021	Revision Date: 2/14/2022	Revision No.: 000
Document Title: WATER HEATER		
Certified By: OPERATION MANAGER		Certified Date: 2/14/2022



**WATER HEATER
TOTAL PREVENTATIVE MAINTENANCE PROGRAM**

- PURPOSE** This procedure describes the steps required to maintain the integrity of the water heater.
- REFERENCES**
- Bradford Water Heater Model M250T6DS-1NCWW
- PREREQUISITE** Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.
- Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.
- PROCEDURE**
- Annual**
The water heater is required to be inspected annually to ensure the integrity and general condition of the overall system is operating and functioning properly. See the [Bradford Water Heater](#) manuals for specific inspection details
- Monthly**
The water heater is required to be inspected monthly to ensure the seals around the heating elements are no leaking, the thermostat is operating properly and to drain off any residual water to remove silt or sediment.
- DEFICIENCIES** Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
- DOCUMENTATION** The annual inspection records shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping file.
- CONTRACTOR** Joe DeBelak Plumbing and Heating
W143 N9358 Henry Start Road, Menomonee Falls, WI 53051
Phone: (262) 251-2890

Document No.: TPM-INSP-021	Revision Date: 2/14/2022	Revision No.: 000	
Document Title: WATER HEATER			
Certified By: OPERATION MANAGER		Certified Date: 2/14/2022	

**Total Preventative Maintenance Inspection Form
Water Heater Form - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Water Heater


Manufacturer: Bradford	Make and Model: M250T6DS-1NCWW	Serial Number: N/A
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Preventative Maintenance Item	Observation	Identified Deficiencies
Visually inspect the unit for any damage or compromise to its integrity.		
Check the thermostat to ensure it is properly operating.		
Check the seals around the heating element for leaks. If there are any signs of leaks, disconnect the power supply to the water heater. The unit needs to be serviced.		
Drain of approximately one-gallon of water from the water heater to remove silt and sediment.		

Document No.: TPM-INSP-023	Revision Date: 2/18/2022	Revision No.: 000	
Document Title: BOMB CALORIMETER			
Certified By: TECHNICAL SERVICE MANAGER	Certified Date: 2/18/2022		

BOMB CALORIMETER MECHANICAL INTEGRITY PROCEDURE

PURPOSE	This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.
REFERENCES	<ul style="list-style-type: none"> • Parr 6400 Bomb Calorimeter Manual • Rinse Tank Assembly
PREREQUISITE	<p>Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.</p> <p>Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.</p>
PROCEDURE	<p>Monthly Inspection</p> <p>The Bomb Calorimeter is required to be calibrated monthly to ensure the integrity and general condition of the overall system is operating and functioning properly. Calibration should be completed per the user manual. Expiration date of calibration reagents should be checked prior to use. The machine should be wiped clean with a dampened soft cloth to remove dust and residue. The jacket reservoir should be emptied and refilled sufficiently with DI water to keep the vessel partially submerged. The rinse tank should be emptied and refilled with DI water. Gas Connections, hoses, and tanks should all be visually inspected for signs of damage. The bomb vessel and O-ring should be visually inspected for damage. Damage to these may include: pitting, staining, cracking, scratches, discoloration, and many others.</p> <p>Annual Inspection</p> <p>An annual inspection will be performed annually in February of each year by a manufacturer technician or manufacturer certified 3rd party technician.</p>
DEFICIENCIES	Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
DOCUMENTATION	The weekly inspection and calibration records shall be documented laboratory personnel in the equipment's calibration log. Documentation to be retained in the electronic recordkeeping file.
CONTRACTOR	<p>Parr Instruments, Inc. 211 Fifty Third-Street, Moline, IL 61265 Phone: (800) 872-7720 Zach Schony, Technical Sales Representative Email: Zack.Schony@parrinst.com</p>

Document No.: TPM-INSP-023	Revision Date: 2/18/2022	Revision No.: 000	
Document Title: BOMB CALORIMETER			
Certified By: TECHNICAL SERVICE MANAGER	Certified Date: 2/18/2022		

**Total Preventative Maintenance Inspection Form
Bomb Calorimeter - Monthly**


Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Calibration should be completed per the user manual. Expiration date of calibration reagents should be checked prior to use. The machine should be wiped clean with a dampened soft cloth to remove dust and residue. The jacket reservoir should be emptied and refilled sufficiently with DI water to keep the vessel partially submerged. The rinse tank should be emptied and refilled with DI water. Gas Connections, hoses, and tanks should all be visually inspected for signs of damage. The bomb vessel and O-ring should be visually inspected for damage. Damage to these may include: pitting, staining, cracking, scratches, discoloration, and many others.

Manufacturer: Parr Instruments, Inc.	Make and Model: A1435DDEB	Serial Number: M85980
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Bomb Calorimeter Inspection		
Item	Acceptable	Notes
Machine Wiped Soft Dampened Cloth	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Bomb Jacket Water Empty/Refill	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Rinse Tank Water Empty/Refill	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Gas Connections Intact	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Oxygen Tank Regulator/Volume Remaining	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Bomb Vessel Inspection	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Bomb Vessel Lid and O-Ring Inspection	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Bomb Waste Container Drain and Rinse	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Bomb Reagents and Supplies Stocked	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Benzoic Acid Calibration and Bomb Value	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	

Document No.: TPM-INSP-024	Revision Date: 2/18/2022	Revision No.: 000	
Document Title: ION CHROMATOGRAPHY (IC)			
Certified By: TECHNICAL SERVICE MANAGER	Certified Date: 2/18/2022		

ION CHROMATOGRAPHY (IC) EQUIPMENT MECHANICAL INTEGRITY PROCEDURE

PURPOSE This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.

REFERENCES

- Metrohm Eco IC Unit

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.

PROCEDURE

Annual inspection

The full annual inspection is to be conducted by personnel from Metrohm or other lab equipment servicer. Washer, lines, and other pieces will be changed regardless of condition at this point. Record of this service and result of a calibration will be kept in the form of receipt from contractor

Monthly Inspection

Machine and equipment will be inspected for any leaks, wear, tear, and/or breakages. Special attention should be given to hose connection points and to any lines within a peristaltic pump apparatus. The machine should be wiped free of dust and residues using a soft dampened cloth. Empty waste container and clean with dish soap if any residue or grime is visible.

It is of paramount importance that nitrile or other gloves be worn during any maintenance or inspection of the IC unit. The IC unit is highly vulnerable to contamination from human skin or other unsanitary items. Unwanted contact of internals can result in background or false readings that only a thorough teardown and cleaning of the equipment will fix.

As needed, the eluent in the reservoir on the top of the machine should be refilled whenever it is either: Below 250ml -or- below the operating level necessary to run planned number of samples. In order to complete the refill, The bottle should first be emptied and then flushed thoroughly with deionized water. Inspect the line and cap for wear and replace pieces as needed. Drain the bottle of excess liquid, then refill with newly prepared eluent as in the instruction manual. Label the bottle with the date the solution was prepared and filled. Conduct a new standard curve procedure before running samples using a new eluent mixture. Results of standard curve should be saved in standards folder.

DEFICIENCIES

Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

Document No.: TPM-INSP-024	Revision Date: 2/18/2022	Revision No.: 000
Document Title: ION CHROMATOGRAPHY (IC)		
Certified By: TECHNICAL SERVICE MANAGER		Certified Date: 2/18/2022



DOCUMENTATION The annual inspection and calibration records shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping files.

CONTRACTOR Metrohm USA, Inc.
 9250 Camden Field Parkway, Riverview, FL 32578
 Phone: (813) 316-4705
 Amy Furreness, Account Representative
 Phone (224) 283-3261
amy.furreness@metrohmusa.com

Michael Boushley, Field Service Engineer
 Phone: (414) 232-0891
michael.boushley@metrohmusa.com

Document No.: TPM-INSP-024	Revision Date: 2/18/2022	Revision No.: 000
Document Title: ION CHROMATOGRAPHY (IC)		
Certified By: TECHNICAL SERVICE MANAGER		Certified Date: 2/18/2022




**Total Preventative Maintenance Inspection Form
Ion Chromatography - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Manufacturer: Metrohm USA, Inc.	Make and Model: N/A	Serial Number: 186300106619
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Eco IC Inspection		
Item	Acceptable	Notes
Machine Wiped with Soft Dampened Cloth	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Molecular Sieve/Desiccant Functional	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Waste Bottle Emptied and Cleaned	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Hoses and Hose Connections Intact	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Hose Within Peristaltic Pump Inspected	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Eluent Volume and Fill Date	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Reagents and Supplies Stocked; Not Expired	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Regenerant Volume and Fill Date	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	

Document No.: TPM-INSP-025	Revision Date: 2/18/2022	Revision No.: 000	
Document Title: DI WATER (ELGA FLEX) SYSTEM			
Certified By: TECHNICAL SERVICE MANAGER	Certified Date: 2/18/2022		

pH METER MECHANICAL INTEGRITY PROCEDURE

PURPOSE	This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.
REFERENCES	<ul style="list-style-type: none"> • DI Water (Elga Flex) System
PREREQUISITE	<p>Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.</p> <p>Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.</p>
PROCEDURE	<p>Monthly Inspection Record the resistance at the nozzle display after dispensing 100ml of DI water. This should be done on the first of each month. Anything under 18 M-Ohms is deficient.</p> <p>Semi-Annual Maintenance The following filters should be changed out by internal personnel every June: PC1, LW5, LW6, Water Softener. After filter changes, completely dispense the volume of the water reservoir. After the unit refills the reservoir, record the resistance reading after dispensing 100ml of DI water.</p> <p>Annual Maintenance Performed by Culligan personnel in January of each year. Technician will replace all filters (PC1, LW2, LW3, LW4, LW5, LW6, and Softener), clean water lines, and replace washers. Record of this maintenance will be in the form of a receipt from the contractor.</p>
DEFICIENCIES	Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
DOCUMENTATION	The weekly inspection and calibration records shall be documented by laboratory personnel in the equipment's calibration log. Documentation to be retained in the electronic recordkeeping file.
CONTRACTOR	<p>Culligan Water 251 Stockhausen Lane, West Bend, WI 53095 Kyle Weis, Account Specialist Phone: (262) 865-8075 Email: kyle.weis@culliganwater.com</p>

Document No.: TPM-INSP-025	Revision Date: 2/18/2022	Revision No.: 000
Document Title: DI WATER (ELGA FLEX) SYSTEM		
Certified By: TECHNICAL SERVICE MANAGER	Certified Date: 2/18/2022	



**Total Preventative Maintenance Inspection Form
DI Water (Elga Flex) System - Monthly**

Record the resistance at the nozzle display after dispensing 100ml of DI water. This should be done on the first of each month. Anything under 18 M-Ohms is deficient.

Manufacturer: Elga Flex	Make and Model: PF3XXXXM1-US	Serial Number: FLC00014520
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DI Water (Elga Flex) Monthly Resistance Recordkeeping				
Month	Measurement (M-Ohms)	Acceptability	Date	Signature
January		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
February		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
March		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
April		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
May		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
June		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
July		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
August		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
September		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
October		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
November		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
December		<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		

Comments

Document No.: TPM-INSP-025	Revision Date: 2/18/2022	Revision No.: 000
Document Title: DI WATER (ELGA FLEX) SYSTEM		
Certified By: TECHNICAL SERVICE MANAGER	Certified Date: 2/18/2022	




**Total Preventative Maintenance Inspection Form
DI Water (Elga Flex) System - Semi-Annually**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Manufacturer: Elga Flex	Make and Model: PF3XXXXM1-US	Serial Number: FLC00014520
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Semi Annual		
Item	Acceptable	Notes
PC1 Filter	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
LW5 Filter	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
LW6 Filter	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Water Softener Filter	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Resistance Reading	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	

Document No.: TPM-INSP-026	Revision Date: 2/18/2022	Revision No.: 000	
Document Title: KARL FISCHER TITRATOR			
Certified By: TECHNICAL SERVICE MANAGER	Certified Date: 2/18/2022		

KARL FISCHER TITRATOR EQUIPMENT MECHANICAL INTEGRITY PROCEDURE

PURPOSE	This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.
REFERENCES	<ul style="list-style-type: none"> • Karl Fischer Titrator
PREREQUISITE	<p>Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.</p> <p>Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.</p>
PROCEDURE	<p>Annual Inspection The Karl Fischer Titrator unit and associated equipment are required to be inspected and calibrated annually to ensure the integrity and general condition of the overall system in operation and functioning properly. See the appropriate manufacturing manual for the specific units indicated above for specific inspection details.</p> <p>Monthly Inspection All lines should be flushed clean with concentrated ethanol and allowed to dry. Washers and lines should be inspected for weakness. Iodine reagent should not be allowed to sit in any line or piece of the equipment to prevent crystallization and clogging. Any part cleaned should have a final rinse with concentrated ethanol prior to drying.</p>
DEFICIENCIES	Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
DOCUMENTATION	The annual inspection records shall be documented by the contractor with a copy of the inspection report provided to the organization. The monthly inspection records shall be documented on the internal form. Documentation to be retained in the electronic recordkeeping files.
CONTRACTOR	Mettler Toledo, LLC. 1900 Polaris Parkway Columbus, OH 43240 Phone: (800) 638-8537

Document No.: TPM-INSP-026	Revision Date: 2/18/2022	Revision No.: 000	
Document Title: KARL FISCHER TITRATOR			
Certified By: TECHNICAL SERVICE MANAGER	Certified Date: 2/18/2022		

**Total Preventative Maintenance Inspection Form
Karl Fischer Titrator - Monthly**


Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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All lines should be flushed clean with concentrated ethanol and allowed to dry. Washers and lines should be inspected for weakness. Iodine reagent should not be allowed to sit in any line or piece of the equipment to prevent crystallization and clogging. Any part cleaned should have a final rinse with concentrated ethanol prior to drying.

Manufacturer: Mettler Toledo	Make and Model: V20	Serial Number: B348041296
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Karl Fischer Titrator Monthly Inspection		
Item	Acceptable	Notes
Machine Wiped with Soft Dampened Cloth	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Molecular Sieve/Desiccant Functional	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Waste Bottle Emptied and Cleaned	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Hoses and Hose Connections Intact	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Syringe Free of Leaks	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Reagents and Supplies Stocked; Not Expired	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Lines Flushed, Dried, and Reassembled	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Washers and O-Rings Inspected	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Standard Test Performed	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	

Document No.: TPM-INSP-028	Revision Date: 3/1/2022	Revision No.: 001	
Document Title: GROUNDING SYSTEM			
Certified By: OPERATION MANAGER	Certified Date: 3/1/2022		

GROUNDING SYSTEM TOTAL PREVENTATIVE MAINTENANCE PROGRAM

PURPOSE This procedure describes the steps required to maintain the integrity of the grounding system.

- REFERENCES**
- Bond-Rite Remove (RM 126)
 - Earth-Rite II RR (Outside Tank Farm)
 - ER2 C/R Tester (Ohm Testing Meter)

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.

PROCEDURE

Daily Inspection

Informal daily inspections are conducted by the operators at the time of use for the safe operation of the equipment. The LED flashes when the clamp is operation correctly and is monitoring a good bonding connection. If the LED does not flash when the clamp is attached to a conductive item then the condition of all associated cable termination should be checked and adjusted as necessary. If the LED still does not flash, connect the clamp to a clean piece of metal. The LED should now flash. If the LED does not flash, replace the battery in accordance with the manufacturer instructions. Again, connect the clamp onto a clean piece of metal. The LED should now flash. If the LED still fails to show, the ground clamp should not be used.

Components to be incorporated into or used as replacements in equipment have been designed and constructed that they function safely for their intended purpose of explosion protection when they are installed in accordance with the manufacturer's instructions.

Annual Inspection

A complete annual inspection shall be conducted of the grounding system. This includes inspection the ground, indicators, clamps and cable. The inspection shall be documented on the Grounding System form.

DEFICIENCIES

Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR Newson Gale (IEP Technologies, LLC.0
417-1 South Street, Marlborough, MA 01752
Phone: (732) 961-7610

Document No.: TPM-INSP-028	Revision Date: 3/1/2022	Revision No.: 001
Document Title: GROUNDING SYSTEM		
Certified By: OPERATION MANAGER	Certified Date: 3/1/2022	



**Total Preventative Maintenance Inspection Form
Grounding System - Annually**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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A complete annual inspection shall be conducted of the grounding system. This includes inspection the ground, indicators, clamps and cable.

Preventative Maintenance Item	Observation	Identified Deficiencies
Operator Ground Resistant. Using the ohm meter, test the ground resistance. An acceptable result is 10 ohms or less. Results: _____		
Indication Lamp. Ensure the indicate lamp illuminates green when a proper ground is achieved. LED green indicates a proper ground connection.		
Clamp. Ensure the clamp is clean and the tension is appropriate to properly affix to containers.		
Cable. Ensure the cable from the grounding bar to the clamp is not pinched, frayed or otherwise in poor condition.		
Cable. Ensure all cables entering the enclosed power supply box are connected and not lose or otherwise compromised.		
Power Supply Unit. The power supply unit is securely mounted to the wall and is not damaged.		

Document No.: TPM-INSP-029	Revision Date: 6/14/2022	Revision No.: 001
Document Title: FLASHPOINT TESTER		
Certified By: TECHNICAL SERVICE MANAGER		Certified Date: 6/14/2022



FLASHPOINT TESTER MECHANICAL INTEGRITY PROCEDURE

- PURPOSE** This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.
- REFERENCES**
- Flashpoint Tester (Model RT-1)
- PREREQUISITE** Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.
- Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.
- PROCEDURE** **Monthly Calibration**
Wipe the instrument clean with a damp cloth to remove any surface residues. Wipe clean the flash vessel using a damp cloth and a solvent with a high evaporation rate (ethanol, acetone, etc). After cleaning and removing all liquid from the vessel, set the temperature to 100F and verify that the thermometer reaches and holds at 100F. Check the gas canister for remaining reagent make sure that there is a spare gas canister ready to use.
- DEFICIENCIES** Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
- DOCUMENTATION** The monthly inspection and calibration records shall be documented by laboratory personnel in the equipment's calibration log. Documentation to be retained in the electronic recordkeeping file.
- CONTRACTOR** Paul N. Gardner Company
316 NE First Street
Pompano Beach, FL 33060
Phone: (954) 946-9454

Document No.: TPM-INSP-029	Revision Date: 6/14/2022	Revision No.: 001
Document Title: FLASHPOINT TESTER		
Certified By: TECHNICAL SERVICE MANAGER		Certified Date: 6/14/2022




**Total Preventative Maintenance Inspection Form
Flashpoint Tester - Monthly**

Verify instrument reaches and holds temp and check for gas canister stock.

Manufacturer: Flashpoint Tester	Make and Model: RT-1	Serial Number: N/A
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Month	Acceptability	Date	Signature
January	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
February	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
March	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
April	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
May	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
June	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
July	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
August	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
September	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
October	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
November	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		
December	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency		

Comments

Document No.: TPM-INSP-030	Revision Date: 2/18/2022	Revision No.: 000	
Document Title: pH METER			
Certified By: TECHNICAL SERVICE MANAGER		Certified Date: 2/18/2022	

pH METER MECHANICAL INTEGRITY PROCEDURE

- PURPOSE** This procedure describes the steps required to maintain the integrity of the machines, equipment and systems present.
- REFERENCES**
- Metrohm pH Meter
- PREREQUISITE** Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.
- Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes are required.
- PROCEDURE** **Monthly Inspection**
The pH Meter is required to be calibrated monthly to ensure the integrity and general condition of the overall system is operating and functioning properly. Calibration should be completed per the user manual. Expiration date of calibration solutions should be checked prior to use. The machine should be wiped clean with a dampened soft cloth to remove dust and residue. The probe cap should be filled sufficiently with DI water to keep the probe moist.
- DEFICIENCIES** Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
- DOCUMENTATION** The weekly inspection and calibration records shall be documented laboratory personnel in the equipment's calibration log book. Documentation to be retained in the electronic recordkeeping file.
- CONTRACTOR** Metrohm USA, Inc.
9250 Camden Field Parkway, Riverview, FL 32578
Phone: (813) 316-4705
Amy Furreness, Account Representative
Phone: (224) 283-3261
amy.furreness@metrohmusa.com
- Michael Boushley, Field Service Engineer
Phone (414) 232-0891
michael.boushley@metrohmusa.com

Document No.: TPM-INSP-030	Revision Date: 2/18/2022	Revision No.: 000	
Document Title: pH METER			
Certified By: TECHNICAL SERVICE MANAGER	Certified Date: 2/18/2022		

**Total Preventative Maintenance Inspection Form
pH Meter - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Expiration date of calibration solutions should be checked prior to use. The machine should be wiped clean with a dampened soft cloth to remove dust and residue. The probe cap should be filled sufficiently with DI water to keep the probe moist.

Floor Scrubber

Manufacturer: Metrohm USA, Inc.	Make and Model: HI2221	Serial Number: N/A
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pH Meter Monthly Inspection		
Item	Acceptable	Notes
Machine Wiped with Soft Dampened Cloth	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Probe Cap Cleaned and Refilled	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
3 Point Calibration Completed	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	
Calibration Standards Expiration	<input type="checkbox"/> Completed <input type="checkbox"/> Deficiency	

Document No.: TPM-INSP-031	Revision Date: 3/1/2022	Revision No.: 001
Document Title: CONCRETE FLOOR COATING AND JOINT FILLER		
Certified By: OPERATIONS MANAGER		Certified Date: 3/1/2022



**CONCRETE FLOOR COATING AND JOINT FILLER
TOTAL PREVENTATIVE MAINTENANCE PROGRAM**

PURPOSE This procedure describes the steps required to maintain the integrity of the security systems present.

- REFERENCES**
- Concrete Coatings (Warehouses and Outside Tanker Filling Pads)
 - Joint Sealant (Warehouse and Outside Tanker Filling Pads)
 - Urethane Cement Base (Warehouses)

PREREQUISITE Inspections only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

PROCEDURE No specific inspection criteria are required for the concrete floor coatings and joint sealer. However, general conditions are inspected daily as part of the Facility Total Preventative Maintenance Inspection Report.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The annual inspection shall be documented on the attached form. Documentation to be retained in the electronic recordkeeping file.


CONTRACTOR Kevco, Inc.
3000 South 163rd Street, New Berlin, WI 53151
Phone: (262) 788-5556

Document No.: TPM-INSP-032	Revision Date: 1/7/2022	Revision No.: 000
Document Title: BLOWOUT DOORS		
Certified By: OPERATIONS MANAGER		Certified Date: 1/7/2022



**BLOWOUT DOORS
TOTAL PREVENTATIVE MAINTENANCE PROGRAM**

- PURPOSE** This procedure describes the steps required to maintain the integrity of the blowout doors present.
- REFERENCES**
- TKO Panel Doors
- PREREQUISITE** Inspections only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.
- PROCEDURE** No specific inspection criteria are required for the blowout doors identified above. However, general operations of these systems are inspected daily as part of the Facility Total Preventative Maintenance Inspection Report.
- DEFICIENCIES** Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
- DOCUMENTATION** No specific documentation required to retain unless repairs are required. Repair documentation to be retained in the electronic recordkeeping file.
- CONTRACTOR** Wilde's Lake Country Garage Doors, LLC.
W278 N5534 Hanover Hill Road, Sussex, WI 53089
Phone: (262) 538-0137

Document No.: TPM-INSP-033	Revision Date: 8/4/2022	Revision No.: 002	
Document Title: INSIDE STORAGE TANKS and ASSOCIATED EQUIPMENT			
Certified By: OPERATION MANAGER		Certified Date: 8/4/2022	

**INSIDE STORAGE TANKS AND ASSOCIATED EQUIPMENT
TOTAL PROVENTATIVE MAINTENANCE PROGRAM**

PURPOSE This procedure describes the steps required to maintain the integrity of the above ground storage tanks and associated equipment present.

- REFERENCES**
- Above Ground Storage Tank Units
 - 1" Yamada Pump and Auxiliary Components (Inlet)
 - 3" Yamada Pump and Auxiliary Components (Outlet)

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

Review this procedure to ensure all steps and cautions are clear and all hazards have been defined. Ensure proper personal protective equipment is being worn for the activity to be conducted. At a minimum, safety shoes, are required.

PROCEDURE **Monthly**
The above ground storage tanks and associated systems are required to be inspected every month to verify integrity of the overall system in accordance with STI SP001 requirements.

The associated pumps and auxiliary components (piping, valves, strainers, etc.) are required to be inspected every month to ensure the integrity and general condition of the structural and mechanical components are maintained. See the 1" Yamada Pump and Auxiliary Components (inlet) and the 3" Yamada Pump and Auxiliary Component (outlet) manuals for specific inspection details.

Annual
The above ground storage tanks and associated systems are required to be inspected annually to verify integrity of the overall system in accordance with STI SP001 requirements.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The above ground storage tanks and associated systems monthly inspection shall be documented on the [Inside Above Ground Storage Tank \(T07-T10\)](#) forms which complies with STI SP001 Monthly Tank Inspection Checklist. Documentation to be retained in the electronic recordkeeping file.


The associated pumps and auxiliary components (piping, valves, strainers, etc.) monthly inspections shall be documented on the [1" Yamada Pump and Auxiliary Component](#) (inlet) and the [3" Yamada Pump and Auxiliary Component](#) (outlet) forms which complies with STI SP001 Inspection Checklist.

Document No.: TPM-INSP-033	Revision Date: 8/4/2022	Revision No.: 002
Document Title: INSIDE STORAGE TANKS and ASSOCIATED EQUIPMENT		
Certified By: OPERATION MANAGER		Certified Date: 8/4/2022



CONTRACTOR

Grunau
1100 W. Anderson Court, Oak Creek, WI 53154
Phone: (414) 216-6886
Contact: Kyle Germain (kyle.germain@grunau.us)

Document No.: TPM-INSP-033	Revision Date: 8/4/2022	Revision No.: 002	
Document Title: INSIDE STORAGE TANKS and ASSOCIATED EQUIPMENT			
Certified By: OPERATION MANAGER		Certified Date: 8/4/2022	

**Total Preventative Maintenance Inspection Form
Inside Above Ground Storage Tank (T07) - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Inspection Guidance. This inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a certified inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. The checklist items below are the minimum inspection requirements. The asterisk (*) designates an item in a non-conformance status and indicates that action is required to address the problem at the time of the inspection. This inspection is based upon STI SP001 requirements.

T03 - Inside Above Ground Storage Tank

Indication of reduce system flow or other system operational deficiency?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Strainer clean and in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Filter in good condition and within the manufacturers expected service life?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Visible signs of leakage or damage around tank, valves, piping, concrete pad, containment, transfer area, ring-wall or ground?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Water in primary tank, secondary containment interstice, dike, transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Product in secondary containment interstice, dike transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Tank liquid level gauge readable and functional?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Ladder and platform structure secure with no sign of server corrosion or damage?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Visible portions of containment liner or expansion joint seam sealer in good condition with no signs of blistering, tearing, or delamination.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Containment egress pathways clear and gates/doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Debris or fire hazard in containment, transfer area, or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Drain valves operable and in a closed position?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
All tank openings properly sealed? Caps and covers have functional fittings, hardware and gaskets?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Leak detection for underground piping operable and not in an alarm condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
If equipped with an audible and/or visual over-fill alarm, does it operate when "test button" depressed?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
For the item above, is the battery charged if applicable?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Identification labels and tags secure, intact and readable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Are there other conditions that should be addressed for continued safe operation or that may affect the site's SPCC Plan?	<input type="checkbox"/> Yes* <input type="checkbox"/> No

Comments:

Document No.: TPM-INSP-033	Revision Date: 8/4/2022	Revision No.: 002	
Document Title: INSIDE STORAGE TANKS and ASSOCIATED EQUIPMENT			
Certified By: OPERATION MANAGER		Certified Date: 8/4/2022	

**Total Preventative Maintenance Inspection Form
Inside Above Ground Storage Tank (T08) - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Inspection Guidance. This inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a certified inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. The checklist items below are the minimum inspection requirements. The asterisk (*) designates an item in a non-conformance status and indicates that action is required to address the problem at the time of the inspection. This inspection is based upon STI SP001 requirements.

T04 - Inside Above Ground Storage Tank

Indication of reduce system flow or other system operational deficiency?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Strainer clean and in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Filter in good condition and within the manufacturers expected service life?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Visible signs of leakage or damage around tank, valves, piping, concrete pad, containment, transfer area, ring-wall or ground?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Water in primary tank, secondary containment interstice, dike, transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Product in secondary containment interstice, dike transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Tank liquid level gauge readable and functional?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Ladder and platform structure secure with no sign of server corrosion or damage?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Visible portions of containment liner or expansion joint seam sealer in good condition with no signs of blistering, tearing, or delamination.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Containment egress pathways clear and gates/doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Debris or fire hazard in containment, transfer area, or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Drain valves operable and in a closed position?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
All tank openings properly sealed? Caps and covers have functional fittings, hardware and gaskets?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Leak detection for underground piping operable and not in an alarm condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
If equipped with an audible and/or visual over-fill alarm, does it operate when "test button" depressed?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
For the item above, is the battery charged if applicable?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Identification labels and tags secure, intact and readable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Are there other conditions that should be addressed for continued safe operation or that may affect the site's SPCC Plan?	<input type="checkbox"/> Yes* <input type="checkbox"/> No

Comments:

Document No.: TPM-INSP-033	Revision Date: 8/4/2022	Revision No.: 002	
Document Title: INSIDE STORAGE TANKS and ASSOCIATED EQUIPMENT			
Certified By: OPERATION MANAGER		Certified Date: 8/4/2022	

**Total Preventative Maintenance Inspection Form
Inside Above Ground Storage Tank (T09) - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Inspection Guidance. This inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a certified inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. The checklist items below are the minimum inspection requirements. The asterisk (*) designates an item in a non-conformance status and indicates that action is required to address the problem at the time of the inspection. This inspection is based upon STI SP001 requirements.

T05 - Inside Above Ground Storage Tank

Indication of reduce system flow or other system operational deficiency?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Strainer clean and in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Filter in good condition and within the manufacturers expected service life?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Visible signs of leakage or damage around tank, valves, piping, concrete pad, containment, transfer area, ring-wall or ground?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Water in primary tank, secondary containment interstice, dike, transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Product in secondary containment interstice, dike transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Tank liquid level gauge readable and functional?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Ladder and platform structure secure with no sign of server corrosion or damage?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Visible portions of containment liner or expansion joint seam sealer in good condition with no signs of blistering, tearing, or delamination.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Containment egress pathways clear and gates/doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Debris or fire hazard in containment, transfer area, or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Drain valves operable and in a closed position?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
All tank openings properly sealed? Caps and covers have functional fittings, hardware and gaskets?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Leak detection for underground piping operable and not in an alarm condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
If equipped with an audible and/or visual over-fill alarm, does it operate when "test button" depressed?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
For the item above, is the battery charged if applicable?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Identification labels and tags secure, intact and readable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Are there other conditions that should be addressed for continued safe operation or that may affect the site's SPCC Plan?	<input type="checkbox"/> Yes* <input type="checkbox"/> No

Comments:

Document No.: TPM-INSP-033	Revision Date: 8/4/2022	Revision No.: 002	
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Certified By: OPERATION MANAGER		Certified Date: 8/4/2022	

**Total Preventative Maintenance Inspection Form
Inside Above Ground Storage Tank (T10) - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Inspection Guidance. This inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a certified inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. The checklist items below are the minimum inspection requirements. The asterisk (*) designates an item in a non-conformance status and indicates that action is required to address the problem at the time of the inspection. This inspection is based upon STI SP001 requirements.

T06 - Inside Above Ground Storage Tank

Indication of reduce system flow or other system operational deficiency?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Strainer clean and in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Filter in good condition and within the manufacturers expected service life?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Visible signs of leakage or damage around tank, valves, piping, concrete pad, containment, transfer area, ring-wall or ground?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Water in primary tank, secondary containment interstice, dike, transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Product in secondary containment interstice, dike transfer containment or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Tank liquid level gauge readable and functional?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Ladder and platform structure secure with no sign of server corrosion or damage?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Visible portions of containment liner or expansion joint seam sealer in good condition with no signs of blistering, tearing, or delamination.	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> N/A
Containment egress pathways clear and gates/doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Debris or fire hazard in containment, transfer area, or spill container?	<input type="checkbox"/> Yes* <input type="checkbox"/> No
Drain valves operable and in a closed position?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
All tank openings properly sealed? Caps and covers have functional fittings, hardware and gaskets?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Leak detection for underground piping operable and not in an alarm condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
If equipped with an audible and/or visual over-fill alarm, does it operate when "test button" depressed?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
For the item above, is the battery charged if applicable?	<input type="checkbox"/> Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A
Identification labels and tags secure, intact and readable?	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Are there other conditions that should be addressed for continued safe operation or that may affect the site's SPCC Plan?	<input type="checkbox"/> Yes* <input type="checkbox"/> No

Comments:

Document No.: TPM-INSP-033	Revision Date: 8/4/2022	Revision No.: 002	
Document Title: INSIDE STORAGE TANKS and ASSOCIATED EQUIPMENT			
Certified By: OPERATION MANAGER		Certified Date: 8/4/2022	

**Total Preventative Maintenance Inspection Form
1" Yamada Pump (PUMP #1) and Auxiliary Components (Inlet) Form - Monthly**

Inspection Date:	Inspector Name:	Signature:
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Review Date:	Manager's Name:	Signature:
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Inspection Guidance. Periodic inspection for the general condition and operation of the pump units is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Manufacturer: 1" Yamada Pump (PUMP #1)	Make and Model: NDP-25BAT-FLG	Serial Number: C16705
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Preventative Maintenance Item	Observation	Identified Deficiencies
Pump. Visually inspect the unit for any damage or compromise to its integrity.		
Pump. Ensure the unit is clean.		
Pump. Lubricate and grease fittings as needed. Remove the grease relief fittings from the bearing cover. Slowly apply grease with a hand gun until grease begins to escape from the grease relief fitting port. Replace the grease relief fittings. DO NOT over grease pump bearings.		
Pump. Clean the strainer.		
Pump. Operate the pump to ensure it is working properly for 10-15 minutes.		
Pump. Inspect all moving parts, framework, drum holder and contact areas for signs of wear, fatigue or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		
Basket Filter. Visually inspect the unit for any damage or compromise to its integrity. Remove metal basket filter and remove debris and sludge. Remove basket seal and replace, if necessary.		
Piping. Visually inspect the piping for any damage, corrosion or compromise to its integrity.		
Ball Valves. Visually inspection for condition and proper operation.		

Manufacturer: 1" Yamada Pump (PUMP #2)	Make and Model: NDP-25BAT-FLG	Serial Number: C16705
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Preventative Maintenance Item	Observation	Identified Deficiencies
Pump. Visually inspect the unit for any damage or compromise to its integrity.		
Pump. Ensure the unit is clean.		
Pump. Lubricate and grease fittings as needed. Remove the grease relief fittings from the bearing cover. Slowly apply grease with a hand gun until grease begins to escape from the grease relief fitting port. Replace the grease relief fittings. DO NOT over grease pump bearings.		
Pump. Clean the strainer.		

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Certified By: OPERATION MANAGER		Certified Date: 8/4/2022



Pump. Operate the pump to ensure it is working properly for 10-15 minutes.		
Pump. Inspect all moving parts, framework, drum holder and contact areas for signs of wear, fatigue or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		
Basket Filter. Visually inspect the unit for any damage or compromise to its integrity. Remove metal basket filter and remove debris and sludge. Remove basket seal and replace, if necessary.		
Piping. Visually inspect the piping for any damage, corrosion or compromise to its integrity.		
Ball Valves. Visually inspection for condition and proper operation.		

Manufacturer: 1" Yamada Pump (PUMP #3)	Make and Model: NDP-25BAT-FLG	Serial Number: C16702
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Preventative Maintenance Item	Observation	Identified Deficiencies
Pump. Visually inspect the unit for any damage or compromise to its integrity.		
Pump. Ensure the unit is clean.		
Pump. Lubricate and grease fittings as needed. Remove the grease relief fittings from the bearing cover. Slowly apply grease with a hand gun until grease begins to escape from the grease relief fitting port. Replace the grease relief fittings. DO NOT over grease pump bearings.		
Pump. Clean the strainer.		
Pump. Operate the pump to ensure it is working properly for 10-15 minutes.		
Pump. Inspect all moving parts, framework, drum holder and contact areas for signs of wear, fatigue or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		
Basket Filter. Visually inspect the unit for any damage or compromise to its integrity. Remove metal basket filter and remove debris and sludge. Remove basket seal and replace, if necessary.		
Piping. Visually inspect the piping for any damage, corrosion or compromise to its integrity.		
Ball Valves. Visually inspection for condition and proper operation.		

Manufacturer: 1" Yamada Pump (PUMP #4)	Make and Model: NDP-25BAT-FLG	Serial Number: C16697
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Preventative Maintenance Item	Observation	Identified Deficiencies
Pump. Visually inspect the unit for any damage or compromise to its integrity.		
Pump. Ensure the unit is clean.		

Document No.: TPM-INSP-033	Revision Date: 8/4/2022	Revision No.: 002
Document Title: INSIDE STORAGE TANKS and ASSOCIATED EQUIPMENT		
Certified By: OPERATION MANAGER	Certified Date: 8/4/2022	




Pump. Lubricate and grease fittings as needed. Remove the grease relief fittings from the bearing cover. Slowly apply grease with a hand gun until grease begins to escape from the grease relief fitting port. Replace the grease relief fittings. DO NOT over grease pump bearings.		
Pump. Clean the strainer.		
Pump. Operate the pump to ensure it is working properly for 10-15 minutes.		
Pump. Inspect all moving parts, framework, drum holder and contact areas for signs of wear, fatigue or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		
Basket Filter. Visually inspect the unit for any damage or compromise to its integrity. Remove metal basket filter and remove debris and sludge. Remove basket seal and replace, if necessary.		
Piping. Visually inspect the piping for any damage, corrosion or compromise to its integrity.		
Ball Valves. Visually inspection for condition and proper operation.		

Manufacturer: 1" Yamada Pump (PUMP #5)	Make and Model: NDP-80-BAT	Serial Number: B89122
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Preventative Maintenance Item	Observation	Identified Deficiencies
Pump. Visually inspect the unit for any damage or compromise to its integrity.		
Pump. Ensure the unit is clean.		
Pump. Lubricate and grease fittings as needed. Remove the grease relief fittings from the bearing cover. Slowly apply grease with a hand gun until grease begins to escape from the grease relief fitting port. Replace the grease relief fittings. DO NOT over grease pump bearings.		
Pump. Clean the strainer.		
Pump. Operate the pump to ensure it is working properly for 10-15 minutes.		
Pump. Inspect all moving parts, framework, drum holder and contact areas for signs of wear, fatigue or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		
Basket Filter. Visually inspect the unit for any damage or compromise to its integrity. Remove metal basket filter and remove debris and sludge. Remove basket seal and replace, if necessary.		
Piping. Visually inspect the piping for any damage, corrosion or compromise to its integrity.		
Ball Valves. Visually inspection for condition and proper operation.		

Manufacturer: 1" Yamada Pump (PUMP #6)	Make and Model: NDP-80-BAT	Serial Number: B89123
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Preventative Maintenance Item	Observation	Identified Deficiencies
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Document No.: TPM-INSP-033	Revision Date: 8/4/2022	Revision No.: 002	
Document Title: INSIDE STORAGE TANKS and ASSOCIATED EQUIPMENT			
Certified By: OPERATION MANAGER		Certified Date: 8/4/2022	

Pump. Visually inspect the unit for any damage or compromise to its integrity.		
Pump. Ensure the unit is clean.		
Pump. Lubricate and grease fittings as needed. Remove the grease relief fittings from the bearing cover. Slowly apply grease with a hand gun until grease begins to escape from the grease relief fitting port. Replace the grease relief fittings. DO NOT over grease pump bearings.		
Pump. Clean the strainer.		
Pump. Operate the pump to ensure it is working properly for 10-15 minutes.		
Pump. Inspect all moving parts, framework, drum holder and contact areas for signs of wear, fatigue or loosening. Tighten, adjust or replace parts as necessary to prevent failure and maintain proper function.		
Basket Filter. Visually inspect the unit for any damage or compromise to its integrity. Remove metal basket filter and remove debris and sludge. Remove basket seal and replace, if necessary.		
Piping. Visually inspect the piping for any damage, corrosion or compromise to its integrity.		
Ball Valves. Visually inspection for condition and proper operation.		

Document No.: TPM-INSP-034	Revision Date: 3/1/2022	Revision No.: 001	
Document Title: SMOKE DETECTORS			
Certified By: OPERATION MANAGER		Certified Date: 3/1/2022	

SMOKE DETECTORS TOTAL PREVENTATIVE MAINTENANCE PROGRAM

PURPOSE This procedure describes the steps required to maintain the integrity of the smoke detectors present.

REFERENCES

- Silent Knight IDP-Photo-T Smoke Detectors

PREREQUISITE Inspection only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

PROCEDURE

Semi-Annually Inspection
The smoke detectors shall be visually inspected semi-annually by a qualified outside contractor on the behalf of the organization to confirm that the smoke detector looks operational. This includes checking for physical damage to the detector and ensuring the detector is not dirty or obstructed in a way to limit smoke being able to enter the sensing chamber.

Annual Inspection
The smoke detectors are required to be inspected on an annual basis. The inspection will be conducted by a qualified outside contractor on the behalf of the organization. In addition, sensitivity testing shall be performed 1-year after installation and then checked every other year and increased to every 5-years if the device remains within its sensitivity range.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The contract for the fire alarm system monitoring shall be documented with a copy of the contract on file at the organization. Documentation to be retained in the electronic recordkeeping files.

The annual inspections shall be documented by the contractor with a copy of the inspection report provided to the organization. Documentation to be retained in the electronic recordkeeping files.

CONTRACTOR Blair Fire Protection
13111 W. Silver Spring Drive, Butler, WI 53007
Phone: (414) 460-4006
Email: Kevin Gall (k.gall@blairfireprotection.com)

Document No.: TPM-INSP-035	Revision Date: 1/10/2022	Revision No.: 000
Document Title: RADIOS		
Certified By: OPERATION MANAGER		Certified Date: 1/10/2022



**RADIOS
TOTAL PREVENTATIVE MAINTENANCE PROGRAM**

- PURPOSE** This procedure describes the steps required to maintain the integrity of the security systems present.
- REFERENCES**
- Vertex Standard VX-450 Series Radios
- PREREQUISITE** Inspections only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.
- PROCEDURE** No specific inspection criteria are required for the radios. However, general operations of these systems are inspected daily as part of the Facility Total Preventative Maintenance Inspection Report.
- DEFICIENCIES** Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.
- DOCUMENTATION** The contract for the security alarm system monitoring shall be documented with a copy of the contract on file at the organization. Documentation to be retained in the electronic recordkeeping file.
- CONTRACTOR** None

Document No.: TPM-INSP-036	Revision Date: 6/23/2022	Revision No.: 001
Document Title: AEROSOL CAN PUNCTURING UNIT		
Certified By: CEO/OPERATION MANAGER		Certified Date: 6/23/2022



**AEROSOL CAN PUNCTURING UNIT
TOTAL PREVENTATIVE MAINTENANCE PROGRAM**

PURPOSE This procedure describes the steps required to maintain the integrity of the aerosol can puncturing unit.

REFERENCES

- AeroVent 3X Aerosol Can Disposal System
- Safe2Vend Dual Filter Assembly

PREREQUISITE Inspections only authorized to be conducted by experienced, trained and qualified personnel acceptable to the organization.

PROCEDURE **Monthly Inspection**
The aerosol can puncturing unit is required to be inspection on a monthly basis by internal designated personnel. See the AeroVent 3X Aerosol Can Disposal System Manual for specific inspection details.

DEFICIENCIES Deficiencies identified during the inspection shall be immediately repaired, if possible. If the item can not be immediately repaired, the item will be included on the Deficiency and Corrective Action Log (ESRR-SOP-030 - Appendix C) with a priority level. If the deficiency reveals an equipment malfunction or deterioration where a hazard is imminent or that could lead to an environmental or human health hazard, operations will be ceased and the item will be tagged "Out of Service" until deficiency is resolved. All other deficiencies shall be made within a reasonable period of time.

DOCUMENTATION The monthly inspections shall be documented on the attached form. Documentation to be retained in the electronic recordkeeping file.

CONTRACTOR Newstripe, Inc.
1700 Jasper Street, Unit F, Aurora, CO 8011
Phone: (800) 624-6706
Website: www.newstripe.com

Document No.: TPM-INSP-036	Revision Date: 6/23/2022	Revision No.: 001
Document Title: AEROSOL CAN PUNCTURING UNIT		
Certified By: CEO/OPERATION MANAGER		Certified Date: 6/23/2022



Total Preventative Maintenance Inspection Form Aerosol Can Puncturing Unit Form - Monthly

Inspection Date:	Inspector Name:	Signature:
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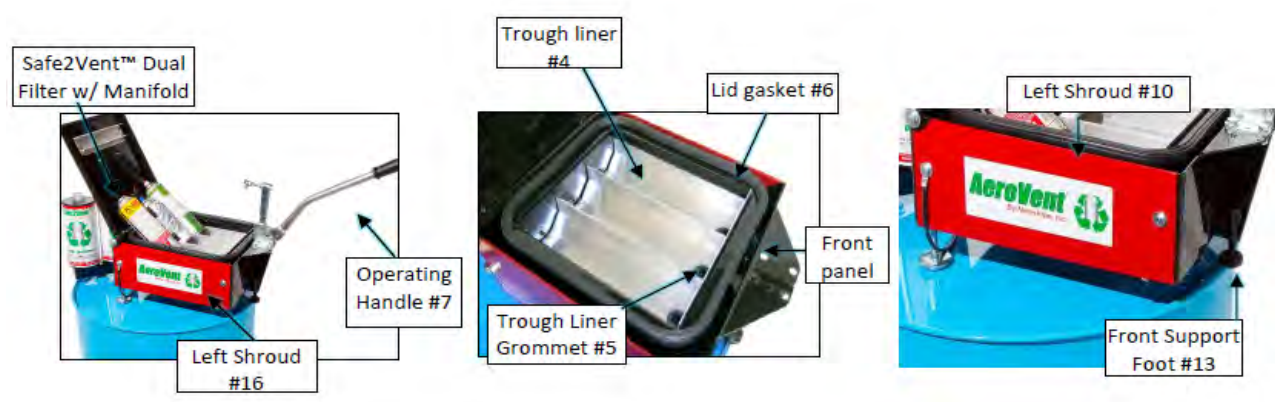
Review Date:	Manager's Name:	Signature:
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Periodic inspection for the general condition of structural and mechanical components is imperative for safe and efficient operation. Any unit found to be compromised shall be immediately repaired or taken out-of-service.

Floor Scrubber

Manufacturer: Newstipe	Make and Model: AeroVent 3X	Serial Number: N/A
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Preventative Maintenance Item	Observation	Identified Deficiencies
Visually inspect the unit for any damage or compromise to its integrity.		
Ensure the unit and the area around the unit is clean.		
Check the lid gasket to ensure it is in tack and clean. Replace as needed.		
Check the cobalt point to ensure sharp and capable to puncturing units. Replace as needed.		
Check to ensure the trough grommets are in place and clean. Replace as necessary.		
Check the operation handle to ensure it is not compromised and is clean. Lubricate with light oil (3-in-1 or WD-40) regularly.		
Check that the bellows are in place and clean. Replace as necessary.		
Check to ensure the can guides are in place and clean.		
Check filters and replace every 90-days or 600 cans. <u>Number of units punctured should be recorded on the work order.</u>		



Document No.: TPM-SOP-001	Revision Date: 7/6/2022	Revision No.: 003	
Document Title: TOTAL PREVENTATIVE MAINTENANCE AND INSPECTION PLAN			
Certified By: CEO/OPERATION MANAGER		Certified Date: 7/6/2022	

**APPENDIX C
DEFICIENCY AND CORRECTIVE ACTION LOG**


The Deficiency and Corrective Action Log is required to be completed for items that an inspection reveals are in need of repair, a malfunction or deterioration present, or some other abnormal condition. It is the responsibility of the Operation Manager or Technical Service Manager ensure the item is followed through on to resolution.



Appendix C -
Deficiency and Corr

The ID Number will be an internal number that will be written on the inspection form and then referenced on the log to correlate the items together. It will be the year followed by the next two-digit number (Ex. 2022-01, 2022-02, 2022-03, etc.)

MOC means Management of Change (MOC) and Pre-Start Up Safety Review and is in regards to the OSHAs Process Safety Management requirements. This is related to our outside above ground storage tanks due to the storage of flammable materials in excess of 10,000 lbs. If changes or repairs are made to the storage tanks, this must be documented through a MOC and PSSR. Instead of creating an entirely different spreadsheet it made sense to add the reference to these documents here.

Document No.: TPM-SOP-001	Revision Date: 7/6/2022	Revision No.: 003	
Document Title: TOTAL PREVENTATIVE MAINTENANCE AND INSPECTION PLAN			
Certified By: CEO/OPERATION MANAGER		Certified Date: 7/6/2022	

APPENDIX D CONTRACTORS

Contractors are used to conduct inspections or address deficiencies on the behalf of the company due to their area and/or level of expertise. As a result, the company requires information to be obtained from all contractors (and their subcontractors) prior to work being conducted (see attached form). In addition, a list of approved contractors is maintained



Appendix D -
Contractor - HS&E A



CONTRACTOR INFORMATION

General Information

Company Name:	
Address:	
City, State, Zip Code:	
NAICS Code:	

Contact:	
Phone Number:	
Email:	

Payable Contact:	
Phone Number:	
Email:	

Service

Services Provided:			
Please indicate if any of the below will be conducted at our site:			
Confined Space Entry	<input type="checkbox"/> Yes <input type="checkbox"/> No	Lockout Tagout	<input type="checkbox"/> Yes <input type="checkbox"/> No
Electrical Work	<input type="checkbox"/> Yes <input type="checkbox"/> No	Powered Industrial Trucks	<input type="checkbox"/> Yes <input type="checkbox"/> No
Elevated Work	<input type="checkbox"/> Yes <input type="checkbox"/> No	Respirator Being Used	<input type="checkbox"/> Yes <input type="checkbox"/> No
Hot Work	<input type="checkbox"/> Yes <input type="checkbox"/> No	Chemicals Brought On-Site	<input type="checkbox"/> Yes <input type="checkbox"/> No

Additional Comments:

Insurance

Certificate of Insurance (COI)	<input type="checkbox"/> Attached <input type="checkbox"/> Provided Under Separate Cover
*The Certificate of Insurance must list Enviro-Safe Resource Recovery as an additional certificate holder.	

Injury and Illness Data

	2021	2020	2019
Recordable Injury / Illness Cases (TCIR) (Columns G-J on OSHA 300 Log)			
Days Away, Restricted, & Transfer Cases (DART) (Columns H & I on OSHA 300 Log)			
Number of Fatalities (Column G on OSHA Log)			
Total Recordable Incident Rate			
DART Incident Rate			
Provide Experience Modification Rate (EMR)			
Total Number of Employees			



Regulatory Citations

Has the company received any citations or violations from a regulatory enforcement agency (OSHA, EPA, WDNR or DOT) in the last three years?	
If yes, please explain.	

Subcontractor List

Name	Address, City, State, Zip	Phone Number

Certification

I certify that to the best of my knowledge, the information provided is correct, true and accurately represents the current state of said company.

In addition, I have been provided and reviewed the contents of the Enviro-Safe Contractor Health, Safety and Environmental Manual for the purpose of briefing employees and subcontractors under my supervision of expectations and requirements while conducting work at the site.

Name:	
Date:	
Signature:	

Enviro-Safe Representative:

Company Name:	Enviro-Safe Resource Recovery
Address:	W130 N10500 Washington Drive Germantown, WI 53022
Phone:	(262) 790-2500
Site Contact:	Bobby Wiedenfeld
Email Address:	bwiedenfeld@enviro-safe.com

FOR INTERNAL PURPOSES ONLY

Industry TRIR Rate:	<input type="checkbox"/> Acceptable	<input type="checkbox"/> Unacceptable
Experience Mod Rate:	<input type="checkbox"/> Acceptable	<input type="checkbox"/> Unacceptable
Work Required on PSM Required Process:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Request for Additional Information:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Information Request:		



CONTRACTOR HEALTH, SAFETY AND ENVIRONMENTAL MANUAL

Germantown, Wisconsin

Leaders in Sustainability Programs
and Waste Management Solutions



Introduction

Enviro-Safe Resource Recovery (Enviro-Safe) is a solid waste processing facility and hazardous waste storage and treatment facility. Therefore, the proper storage and handling of materials and the activities that are conducted around them is very important to the safety of our employees and operations, as well as, the environmental where our facility is located.

Enviro-Safe's safety requirements for contractors are outlined in this document which are derived from WDNR, OSHA, NFPA and other industry standards and best practices. Since the regulation can be general in nature, the contractor must have a good working knowledge of the regulations applicable to their area of expertise and the work to be conducted. Depending on the work to be performed, Enviro-Safe may request additional information from the contractor including, but not limited to, written programs, permits, and training records. Any questions or comments pertaining to the information in this manual or safety in general, should be directed to your Enviro-Safe point of contact.

The actual project supervisor for the contractor will meet with an Enviro-Safe representative, if warranted, prior to any actual work to review all required safety or environmental documents and any specific local requirements that may exist. The following items, as appropriate but not limited to, will be reviewed with the contractor: facility access, food consumption areas, cell phone usage, machinery lockouts, hot work permits, equipment used, medical assistance, security, lavatory facilities, shelters, vehicle parking, prohibition of tobacco products, injury reporting, telephone numbers, operating hazards, fire apparatus, injury investigations, pre-work training, fall prevention, confined space entry, hazardous materials, waste generation, storm water management, and spill prevention.

The contractor is responsible for communicating and enforcing all applicable safety and environmental regulations for their employees and the employees of their subcontractors. The reference to Contractor throughout this document includes subcontractors. Employees not adhering to these guidelines will be removed from the site.

CONTRACTOR'S ACCESS TO THE PREMISES

No contractor is permitted on the site unless previously arranged in advance and scheduled with an Enviro-Safe representative or their designee. Unannounced presence may result in the contractor being denied access due to the activities being conducted at the site. Therefore, scheduling all work in advance is required.

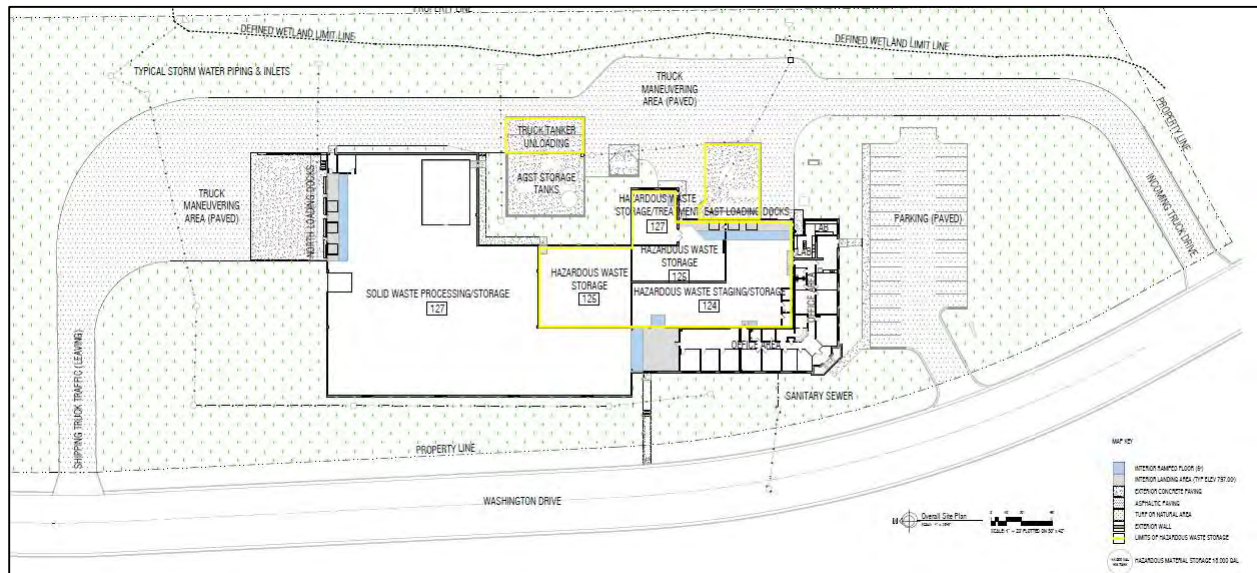
The facility is protected with intrusion detection devices. For this reason, special arrangements must be made with the Enviro-Safe representative for access beyond the normal workday, on weekends, or holidays. Normal business hours are 7:30am to 4:00pm Monday thru Friday.

Upon arrival at the site, all contractors must register with the front receptionist and check-in with the Enviro-Safe representative prior to performing work. The receptionist will provide each contractor with a badge that must be worn and displayed while conducting work at the site. Badges should be returned after work is completed or at the end of each day.

The contractor's employees will be permitted access only to those areas necessary for the performance of contractual work. The contractor's employees shall not be allowed to tour or roam around the facility

or site or to enter areas not necessary to the performance of their work. The Enviro-Safe representative shall designate the best entrance to be utilized by the contractor while conducting their work. This will allow for minimal disruption to the work being conducted at the site while the contractor is on-site.

The Enviro-Safe representative will point out these key locations on premises on the map below.



No personal vehicles are allowed to park on the property unless previously arranged and approved by the Enviro-Safe representative. There is a fair amount of vehicular movement throughout the day on the property and we need to ensure no contractor vehicle compromises this movement. All closed type vans, trucks, car trunks, tool boxes and other contractor vehicles and equipment are subject to inspection by a duly authorized Enviro-Safe representative while on company premises. Roadways and emergency exits will not be blocked.

All equipment and appurtenances supplied by Enviro-Safe or purchases for Enviro-Safe are the property of Enviro-Safe. Excess materials shall not be removed from the facility or site without written permission of the Enviro-Safe representative.

CONTRACTOR EXPECTATIONS

Enviro-Safe takes the conduct of our employees very seriously and expects everyone present at the site to conduct themselves in a professional manner. Therefore, we expect the same of our contractors while on the premise. The contractor is responsible for the conduct of their employees and subcontractors. While at our site, the following must be observed:

It is expected that the contractor is informed of and conforms to all safety, health and environmental regulations of federal, state and local government or other regulatory agencies having jurisdiction. Unacceptable behavior on the pre mises includes fighting, gambling, theft, horseplay or other inappropriate behavior is not allowed.



No eating is permitted on-site except for the lunch room or contractor's vehicles. Due the various types and amounts of chemicals present on-site, eating in undesignated area is prohibited. Drinking is allowed but must be in a container that is capable of being covered with a cap or lid when not in immediate use.

Obscene or abusive language or any form of harassment will not be tolerated. It is expected that mutual respect and interaction be conducted on the behalf of all parties.

Cell phones are not allowed in RM 125 and RM 126 since these are hazardous material and hazardous waste storage and processing areas. In addition, cell phone usage that presents a hazard or becomes disruptive to the activities being performed may also be prohibited by the Enviro-Safe representative.

No pictures are allowed to be taken unless specifically authorized by the Enviro-Safe representative for confidentiality reasons.

No firearms or weapons are allowed on-site.

It is at the discretion of the Enviro-Safe representative to determine if any attire is inappropriate for the facility including, but not limited to sandals, high-heels, tank tops, verbiage on clothing, and other attire that may be offensive or inappropriate for the site.

Smoking or any other tobacco use is prohibited in the facility and on the site at all times - no exception. The use of alcoholic beverages or use or possession of drug paraphernalia or drugs on the controlled substance list are not permitted on Enviro-Safe premises.

All incidents should be reported immediately to the Enviro-Safe representative (accidents, damage to property, security breach, stolen property, etc.).

SAFETY and HEALTH RESPONSIBILITIES

Effective safety and health performance requires following rules and identifying at-risk situations where rules are not defined. Therefore, contractor employees will face at-risk situations (situations which the employee is placed in danger of an injury, illness or other hazard). To assure conformance to the requirement to work safety, both the contractor and their employees have a responsibility to address at-risk situations as they become present. In general, the contractor is responsible for enforcing safety and health rules with all employees. The contractor is responsible for assuring that all work practices are performed in a manner that minimizes at-risk exposure. Contractor employees must identify at-risk exposures and develop safe alternatives or seek guidance before proceeding.

A. Confined Spaces. Prior to work being conducted in confined space, a pre-safety meeting must be conducted with the contractor and Enviro-Safe representative. The contractor must have an established confined space program in place which includes a permit process and training program and complies with OSHA confined space requirements. A copy of the program, training records and permit must be provided to Enviro-Safe prior to confined space work being conducted for recordkeeping purposes.

B. Lockout/Tagout. If work is to be conducted on equipment or systems that have hazardous energy sources, proper isolation of these sources must be conducted and the equipment or system deemed inoperative prior to the start of work. The contractor must have an established lockout tagout program in place which includes a training program and complies with OSHA lockout tagout requirements. The



Enviro-Safe representative must be informed when lockout tagout will be conducted that will impact the facility or other work operations.

C. Compressed Gas Cylinders. Compressed gas cylinders that become present must be securely fastened and must be in an upright position. Oxygen storage shall be separated from fuel storage (20 feet or 5 foot high or 1/2-hour fire rated partition). The type of gas that will be present must be communicated to the Enviro-Safe representative and a Safety Data Sheet (SDS) provided upon request.

D. Electrical Related Work. Electrical work must be conducted to protect contractor and Enviro-Safe employees from exposure to dangers such as electric shock, electrocution, fires and explosions. Areas where electrical work is being conducted should be barricaded to prohibit general access to the area while work is being performed. The contract must have established policies and procedures in place that complies with OSHA and NFPA 70 requirements. The Enviro-Safe representative should be notified when electrical work is occurring.

E. Emergency Management. Safety showers, fire extinguishers, fire doors, sprinkler heads, and similar emergency equipment is available and must be kept free of material, equipment or other blockage so they are readily accessible and available in an emergency situation. In addition, aisle must be kept clear and free of obstructions. If a safety system must be taken out of service or an aisle must be blocked to accomplished the work at hand, this must be coordinated through the Enviro-Safe representative prior to the work being conducted.

If a fire is detected, utilize the closest fire extinguisher to extinguish or reduce the magnitude of the fire. If the fire is not manageable with the fire extinguisher, pull the alarm, report it and evacuate. Evacuation alarm pull stations are located within the building (see posted Evacuation and Safety Maps). In the event the fire alarm or back-up air horns are activated, all personnel must evacuate the building through the nearest exit door and proceed to the site's Enviro-Safe sign on the southside of the property by the employee's parking lot. This is necessary to account for all personnel on-site. If it becomes necessary to turn off a sprinkler system, use a hydrant or impair other fire-fighting equipment for any reason, the Enviro-Safe representative must be informed before this occurs. The Enviro-Safe representative will take the appropriate action to prepare the site for this outage and confirm when the contractor can proceed. The Enviro-Safe representative should be immediately notified when the system is back in service.

If a tornado watch or warning becomes present, the contractor should take the appropriate action based upon the type of working being conducted to keep their employees safe. This should apply to severe weather conditions, as well.

If any other emergency situation becomes present at the site, the Enviro-Safe representative will be in communication with the contractor to keep them abreast of the situation.

F. Fall Protection. Adequate fall protection shall be provided by the contractor when the hazard of a fall exists as defined in the OSHA standards in the form of personal fall protection or a guard railing system. Contractors utilizing personal fall protection must be properly trained and the equipment must be appropriate to the hazard present. Contract employees operating aerial lifts shall be properly secured.

G. Fire Prevention. Due to the type and amount of chemicals stored at the site, fire prevention is paramount. Therefore, rubbish, debris and other flammable materials are not allowed to build up on-



site. In addition, there are a number of site policies and procedures that need to be followed. Specific details will be provided to all contractors prior to start of the project based on work to be completed.

H. Flammable and Combustible Materials. Flammable materials are readily stored and handled at the inside and outside the site and therefore, it is imperative that activities conducted within the facility and on the premises is authorized and the proper tools are used. There are locations where non-sparking tools are required, no cell phones are allowed, and other specific safety requirements must be adhered too. The Enviro-Safe representative will advise the contractor of these additional requirements, as needed. No explosives are permitted on the site.

I. Hazard Communication. Prior to bring chemicals on-site, the quantity must be provided and a Safety Data Sheet (SDS) must be submitted and approved. In addition, the Enviro-Safe representative is responsible for advising each contractor of hazardous materials that contractor employees may be exposed to at the site and the protective measures available. Safety Data Sheets (SDSs) or other technical information on the chemicals present at the site can be communicated by the Enviro-Safe representative upon request. Containers of chemicals brought on-site are required to be labeled and in good condition to avoid spillage. No chemical containers are permitted to be stored outside. The Enviro-Safe representative should be consulted for proper storage.

J. Hoist and Cranes. The use of hoists and cranes by contractors should be performed in a safe manner. Work shall not be performed under or immediately adjacent to loads being hoisted and all loose items of equipment or material shall be secured from falling. No riders are permitted on moving equipment, rigging, or loads.

K. Hot Work. Hot work (grinding, cutting, brazing, welding, etc.) may not be conducted on-site without a written hot work permit issued and signed by the Enviro-Safe representative. These permits shall only be issues for a specific period of time and a new permit must be issued after this period of time expires. The permit must be conspicuously displayed at the job location. While these activities are occurring, the contactor must provide a fire watch and a Class ABC fire extinguisher at the location. The fire watch must maintain in the area for 30-minutes after the work has commenced. The expired permit (or copy of the permit) must be provided to the Enviro-Safe representative upon completion of the work or expiration of the permit.

L. Housekeeping. Job site housekeeping is the contractor's responsibility and the job site must be as clean and orderly as possible while work is being performed. At the completion of the work, the job site must be left in an acceptable condition. The Enviro-Safe representative will make a final inspection to determine the adequacy of the final cleanup. For contract work extending beyond one week, it is the responsibility of the contractor to conduct a weekly job site safety and housekeeping inspection to ensure a clean work area is maintained.

M. Injury Reporting and Investigation. The treatment of injuries and illnesses sustained by contractor employees is the responsibility of the contractor. The contractor should have actionable emergency treatment procedures and emergency medical telephone numbers available. In the event of a life-threatening emergency, **9-1-1** should be summoned. For less serve incidents, the nearest hospital is:

Froedtert Menomonee Falls Community Hospital

(262) 251-1000



All OSHA recordable injuries or illnesses sustained on Enviro-Safe premises must be reported to the Enviro-Safe representative verbally as soon as reasonably possible with a written follow-up incident report provided within 24-hours of the occurrence. Depending on the incident that occurred, additional information may be requested by Enviro-Safe.

N. Ladders. Ladders brought on-site for use by contractor must be in good condition and ANSI approved. Proper ladder usage must be observed during use which includes three points of contact while on the ladder. Portable metal ladders are not permitted for electrical work. Substitute for ladders (chairs, packages, drums, bags, etc.) is prohibited.

O. Personal Protective Equipment. The contractor will be informed of the requirements for the use of personal protective equipment in all areas of the facility. The contractor is responsible for providing and informing their employees of these requirements while on-site. In general, safety glasses with side shields and safety shoes, are a minimum requirement. Other protective equipment will be identified as required based on specific job requirements. It is the responsibility of the contractor to enforce the use of required personal protective equipment by its employees.

P. Powered Industrial Trucks. Enviro-Safe powered industrial trucks (forklifts) are not allowed to be utilized by contractors unless approval for their use is provided by the Enviro-Safe representative. If authorization for forklifts is provided, proof of training must be provided to the Enviro-Safe representative or training must be provided by Enviro-Safe prior to use. If the powered industrial truck is brought on-site by the contractor, it is their responsibility to ensure their employees are properly training.

Q. Process Safety Management. The site does have areas that fall under the OSHA process safety management and therefore, management of change and pre-safety startup may be required which could include participation by contractor. Contractors shall be informed, when participating is required.

R. Respirator Protection. If a respirator is required to be worn to conduct their work, the contractor must have an established respirator protection program in place which includes medical clearance, fit testing and training unless it is only the use of a dust mask. There are times when Enviro-Safe employees conduct activities within the facility which requires the use of respirator. It is at these times that access may be prohibited or limited to contractors to certain areas.

S. Tools and Equipment. Contractors will furnish all tools and equipment necessary for the job. All equipment must be well maintained and meet regulations or industry standards. Use of tools not properly rated is strictly prohibited. Safety guards or other devices shall not be removed from tools or equipment except for repairs and must be replaced upon completion of repair. Borrowing Enviro-Safe tools and equipment is permitted only upon approval by the Enviro-Safe representative.

Any additional questions regarding health and safety requirements for the site should be directed to the Enviro-Safe representative.



ENVIRONMENTAL RESPONSIBILITY

Enviro-Safe has implemented an Environmental Management System and this document will convey basic environmental practices applicable to this facility. Contractors are required to comply with all federal, state and local environmental regulations, as well as company environmental policies and rules to eliminate or reduce as-risk situations that could result in creating an environmental hazard.

Chemicals brought on-site for use by contractors must be communicated to the Enviro-Safe representative. All Enviro-Safe generated wastes, both hazardous and non-hazardous, are to be managed on-site and not removed by contractors unless prior approval and arrangements have been agreed to between Enviro-Safe and the contractor.

A. Sanitary Sewage System. The site is connected to the Germantown Sanitary Sewage System and therefore, no dumping of chemicals into facility sewers and drains is permitted for any reason.


B. Spills. Contractors are required to comply with the facility's program for spill control to reduce potential risks. If a spill should occur of chemicals brought on-site by the contractor, it is the responsibility of the contractor to conduct clean-up operations with over sight from the Enviro-Safe representative. Any waste generated from these clean-up operations will be handled by Enviro-Safe and billed back to the contractor. If a spill should occur of chemicals on the premises as the result of the contractor's activities being conducted, Enviro-Safe will assist in the clean-up operations and any cost incurred by Enviro-Safe will be the responsibility of the contractor.

C. Storm Water Run-Off. The only run-off allowable from the site is storm water run-off. Therefore, no outdoor washing is permitted. In addition, no other discharges are authorized from the site.

D. Trash and Recyclable Material Generation. Dumpsters, and other normal plant rubbish receptacles, may be used only with the permission of the Enviro-Safe representative. Should the contractor fail to remove rubbish, etc., such removal will be done by Enviro-Safe at the contractor's expense. Recyclables generated should be accumulated and are the responsibility of the contractor to remove from the site for recycling. If the Enviro-Safe recyclable container is to be used, prior approval by the Enviro-Safe representative must be provided.

Any additional questions regarding environmental requirements for the site should be directed to the Enviro-Safe representative.

APPENDIX J: EMERGENCY MANAGEMENT PLAN (CONTIGENCY PLAN)

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1.0 PURPOSE

1.1 The purpose of the Emergency Management Plan has been designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air soil or surface water.

2.0 SCOPE

2.1 The plan has established procedures and actions to assist in preparing for unplanned sudden or non-sudden emergency events that may realistically occur at the facility and to assist in the decision-making process during these events to eliminate or reduce hazards to human health or environmental as the result of the incident. While no plan can take into consideration all possible emergency situations, the procedures included in this plan shall assist in making proper decisions.

3.0 LEGAL COMPLIANCE

3.1 This plan has been prepared in accordance with the following federal, state and local regulations:

- Emergency Action Plan [OSHA 29 CFR 1910.38]
- Fire Prevention Plan [OSHA 29 CFR 1910.39]
- Employee Alarm System [OSHA 29 CFR 1910.165]
- Portable Fire Extinguisher [OSHA 29 CFR 1910.157]
- Hazardous Waste Operations and Emergency Response [29 CFR 1910.120]
- Hazardous Substance Spill Notification [Wisconsin DNR Chapter NR 706]
- Contingency Plan [Wisconsin DNR Chapter NR 670.014(2)(g)]
- Preparedness and Prevention [Wisconsin DNR Chapter NR 670.014(f)]
- Hazardous Waste Regulations [Wisconsin DNR Chapter NR 660-679]
- Hazardous Material Incident Reporting [DOT 49 CFR 171.180]
- National Fire Protection Association [NFPA]
- Local Fire Department Ordinances

3.2 The Emergency Management Plan does not cover the Spill Prevention, Control and Countermeasure Plan (40 CFR Part 112) associated with the facility. This under a separate document.


4.0 AUTHORITY STATEMENT

4.1 The organization recognizes that during emergency situations special procedures must be followed to control and mitigate an emergency. Therefore management, by the approval of this plan, grants authority to the Emergency Coordinator (including alternatives) and other personnel named within this program to implement and carry out the Plan to the termination of the emergency situation.

5.0 ORGANIZATION AND PERSONNEL RESPONSIBILITIES

5.1 CEO. The CEO is the primary emergency coordinator under this Plan. When the CEO is unavailable to be on-site or on-call in a reasonable amount of time, either the President, Technical Services Manager or Operations Manager may be designed as an alternative primary emergency coordinator during this period of time. The CEO is responsible for the overall development, implementation and training requirements for the organization under this Plan. As the primary Emergency Coordinator, the CEO shall be thoroughly familiar with the plan, site operations, waste types handled, facility records and layout.

5.2 President. The President shall act as an alternative primary emergency coordinator in the event that the CEO is unavailable to be on-site or on-call in a reasonable amount of time.

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As an alternate Emergency Coordinator, the President shall be thoroughly familiar with the plan, site operations, waste types handled, facility records and layout.

- 5.3 Technical Services Manager. The Regulatory and Approvals Manager shall be responsible to provide chemical support to site and emergency response personnel regarding chemicals on-site upon request. The Technical Services Manager shall act as an alternative primary emergency coordinator in the event that the CEO and President is unavailable to be on-site or on-call in a reasonable amount of time. As an alternate Emergency Coordinator, the Technical Service Manager shall be thoroughly familiar with the plan, site operations, waste types handled, facility records and layout.
- 5.4 Operations Manager. The Operations Manager shall act as an alternative primary emergency coordinator in the event that the CEO, President or Technical Services Manager is unavailable to be on-site or on-call in a reasonable amount of time. As an alternate Emergency Coordinator, the Operations Manager shall be thoroughly familiar with the plan, site operations, waste types handled, facility records and layout.
- 5.5 First Aid Team. The First Aid Team shall have the responsibility to provide emergency first aid and medical care to a person during an emergency situation, as warranted or until trained personnel arrive.
- 5.6 Employees. Employees are responsible for following the specific emergency procedure and taking the appropriate action, as necessary, based upon the emergency situation.

6.0 DESIGNATED RESPONSIBILITIES


6.1 Designated responsibilities have been given to specific employees during emergency situations. The Emergency Management Contacts (Appendix A - Emergency Management Contacts) shall be posted throughout the facility for reference. The primary emergency coordinator has been designated and alternative emergency coordinators established when the primary emergency coordinator is unavailable to be on-site or on-call in a reasonable amount of time.

7.0 DEFINITIONS OF EMERGENCIES

- 7.1 Minor. An incident which will not seriously affect or interfere with the overall operations of the facility.
- 7.2 Major. An incident which affects an entire warehouse (ex. RM 124, RM 125, RM 126 or RM 127) or the entire buildings and which will disrupt operations.
- 7.3 Disaster. An event or occurrence that has taken place and has seriously impaired or halted operations.

8.0 TYPES OF EMERGENCIES AND PREFERRED MEANS OF REPORTING

- 8.1 The types of emergencies that are reasonably anticipated to occur includes fires/explosions, tornadoes, medical emergencies, spills/releases, severe weather conditions, utility outage, and workplace violence.
- 8.2 Specific emergency control procedures have been established for each type of emergency under Section 10.3 to 10.7, which provides more detailed information for specific emergency response. However, it must be stated that this list is not meant to be all-inclusive and that these procedures are general guidelines for actions that should be taken by the employees and to assist in guiding emergency management efforts during an emergency situation. Modifications of these procedures can occur

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during an emergency situation if it is determined that a different procedure will result in a better response to the situation.

9.0 EMERGENCY ALERTING PROCEDURE

- 9.1 In order to provide for the safety of employees and visitors, it is essential that early warning of emergency situations be made so that evacuation procedures can be implemented and the appropriate response personnel notified of the situation.
- 9.2 Notification for Employee or Small Area-Specific Incidents. Incidents that are employee or area specific and do not require the notification of the entire facility. The preferred means of notification is telephone from an area not involved in the emergency situation.
- 9.3 Notification for Serious or Facility-Wide Incidents. Facility wide emergency situations include incidents which require all or the majority of the facility to be notified. The preferred means of notification is the activation of the emergency alarm system from an area not involved in the emergency situation.
- 9.4 Notification of Transportation Incidents. The preferred means of notification is telephone from where the incident occurred immediately or as soon as reasonable after occurrence.


10.0 RESPONSE MANAGEMENT SYSTEM

- 10.1 This plan is intended to provide procedures to follow for effective and safe actions during emergency situations. While no plan can take into consideration all possible emergency situations, the guidelines included in this plan should assist in making proper decisions during those emergencies situation that could reasonably occur at the facility.
- 10.2 All emergencies require prompt and deliberate action. In the event of an emergency, it will be necessary to follow an established set of procedures. Such established procedures will be followed as closely as possible. However, in specific emergency situations, deviation from the established procedures may occur to provide a more effective plan for bringing the situation under control.
- 10.3 Fires and/or Explosions
Upon the cause or discovery of a fire, immediate action shall be taken. If a fire is small and well defined (minor), the employee may attempt to extinguish the fire using a fire extinguisher, at their discretion.

If a fire is large and/or uncontrollable (major or disastrous), the emergency alarm system shall be activated. Upon notification of evacuation by the alarm, all employees are required to shut-down their equipment (if reasonably feasible), evacuate the building, and proceed to the pre-determined designated meeting location (Enviro-Safe sign).

The critical operations shall commence upon the notification of an emergency situation:

Initial Response. The emergency coordinator shall proceed to the fire panel which shall provide some general indication to the area involved in the emergency situation and the type of fire system response, such as smoke detector or sprinkler system activation. Depending on the information provided from the fire panel, it may be decided to re-enter the building to assess the situation. If re-entry is conducted, it must be conducted in pairs and a walkie-talkie must be obtained to maintain continuous communications with the Operations Manager outside the building. All reasonable measures necessary shall be taken to ensure the fire/explosion do not spread by stop operations,

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collecting and containing discharges and removing or isolating containers. If the facility stops operations in response to a fire/explosion, the Emergency Coordinator shall monitor for leaks, pressure buildup, gas generation, or ruptures of containers.

Information Support. Once additional information regarding the situation has been obtained, the Operation Manager shall put on the information officer vest, obtain a walkie-talkie and evacuate the building. Once evacuated from the building, the Operations Manager is responsible for maintaining continuous communication with the emergency coordinator, obtain information regarding any missing employees, and wait for the emergency response personnel to arrive. Upon their arrival, all information known about the emergency situation should be provided.

Chemical Support. The Technical Services Manager shall proceed to evacuate the building and be prepared to provide support to the emergency response personnel arriving on the site regarding chemicals on-site upon request.

Accountability. The area managers shall be responsible for accounting for the employees, visitors, or contractors under their responsibility upon evacuation. The method used to achieve this is at the discretion of the area manager. It shall also be the area manager's responsibility to designate a secondary individual to assume these responsibilities in their absence.

Germantown Fire Department. The Germantown Fire Department shall act as the On-Scene Incident Commander upon their arrival. Once information is obtained regarding the situation, the Germantown Fire Department shall determine if additional County Hazardous Materials Response Teams are necessary and what levels and capabilities are needed. The Germantown Fire Department shall also coordinate any Local Emergency Planning activities that need to be considered, such as neighbor evacuations.


Once there is no longer a hazard present and the facility is deemed acceptable for occupancy by the emergency coordinator and/or the local fire department, re-entry into the facility shall be permitted. An incident investigation shall be conducted in accordance with the Incident Reporting and Investigation protocol established. The complexity of the incident report and investigation shall be dependant on the event.

10.4 Medical Situations and Emergencies

Upon discovery of an employee experiencing a medical situation, a member of the First Aid Team should be summoned as soon as reasonably feasible to the scene. If the employee is involved in a life-threatening incident, the discovering employee should call 9-9-1-1 immediately.

The First Aid Team member to initially respond to the medical emergency shall be responsible for conducting an initial assessment of the situation. If it is determined that additional medical services are not deemed necessary, the injured employee shall be directed to the on-site first aid cabinet and be treated by the employee themselves.

If additional medical treatment is required, but is not an immediate emergency situation, the injured employees shall be directed and escorted to the designated medical treatment facility by a designated employee.

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In the event of an urgent medical emergency, immediate urgent medical services shall be summoned by calling 9-9-1-1 and requesting paramedics. A designated employee should be present at the main entrance to escort and/or direct the paramedic to the injured employee upon their arrival.

Employees not immediately involved in the situation should remain isolated from the area and should not take any further action unless requested by the discovering employee or a member of the First Aid Team.

The priority shall be to ensure that proper care is provided to the employee involved in the medial situation. Once the employee has been attended too, if blood or other bodily fluids become present, they should be cleaned up as required under the Bloodborne Pathogen Exposure Control Plan. An incident investigation shall be conducted in accordance with the Incident Reporting and Investigation protocol established.

10.5 Spills and/or Releases

Upon the cause or discovery of a spill, the employee shall immediately stop the spill at its source, notify the Emergency Coordinator and describe the nature of the spill (i.e. type of material, quantity, etc.), location, and any other pertinent information relevant to the incident. From this information the Emergency Coordinator shall assess the magnitude and potential seriousness of the spill or release.

Incidental Spills. Incidental spills are spill events that does not cause or pose a substantial hazard or an imminent health or safety hazard to employees.

Emergency Spills. Emergency spills are spill events that cause unsafe exposure to a toxic chemical, requires employees to evacuate the area, poses immediate danger to life and health conditions, presents a fire or explosion hazard or requires other immediate attention because of danger.


If the leak or spill incident is determined to be an incidental spill event (minor) by the Emergency Coordinator and within the organization’s response capabilities, the necessary site personnel will be deployed to conduct clean-up activities.

If the leak or spill incident is determined to be an emergency spill even by the Emergency Coordinator, outside emergency personnel shall be summoned by dialing 9-9-1-1 and requesting “Hazmat Response.”

The additional on-site support shall commence upon the notification of a spill or release.

Initial Response. The emergency coordinator will cease all operations within the affected area including vehicular traffic, forklift use, or any other operations being conducted in the area involved in the emergency spill area. It will be determined if evacuation is necessary and if it will be isolated evacuation or total facility evacuation. All reasonable measures necessary shall be taken to ensure the fire/explosion do not spread by stop operations, collecting and containing discharges and removing or isolating containers. If the facility stops operations in response to a leak or spill event, the Emergency Coordinator shall monitor for toxic vapors, pressure buildup, gas generation, or ruptures of containers.

Information Support. Once additional information regarding the situation has been obtained, the Operation Manager shall put on the information officer vest, obtain a walkie-talkie and evacuate the building. Once evacuated from the

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building, the Operations Manager is responsible for maintaining continuous communication with the emergency coordinator, obtain information regarding any missing employees, and wait for the emergency response personnel to arrive. Upon their arrival, all information known about the emergency situation should be provided.

Chemical Support. The Technical Services Manager shall be prepared to provide support to the emergency response personnel regarding chemicals on-site upon request.

Accountability. The area managers shall be responsible for accounting for the employees, visitors, or contractors under their responsibility upon evacuation. The method used to achieve this is at the discretion of the area manager. It shall also be the area manager's responsibility to designate a secondary individual to assume these responsibilities in their absence.

Germantown Fire Department. The Germantown Fire Department shall act as the On-Scene Incident Commander upon their arrival. Once information is obtained regarding the situation, the Germantown Fire Department shall determine if additional County Hazardous Materials Response Teams are necessary and what levels and capabilities are needed. The Germantown Fire Department will also coordinate any Local Emergency Planning activities that need to be considered, such as neighbor evacuations.


Once there is no longer a hazard present and the facility is deemed acceptable for occupancy by the Emergency Coordinator and/or the local fire department, re-entry into the facility shall be permitted. An incident investigation shall be conducted in accordance with the Incident Reporting and Investigation protocol established. The complexity of the incident report and investigation shall be dependent on the event, the material, and quantity spilled/released. The CEO shall evaluate and determine the reportability of the spill and/or release to the appropriate governmental agencies, if and as necessary.

Spill incidents that occur while transporting hazardous materials or hazardous waste must be immediately report to the Operations Manager and handled in accordance with the DOT Pipeline and Hazardous Materials Safety Administration (PHMSA) within specific periods of time depending on the hazardous material incident. (Appendix G - DOT Guide for Preparing Hazardous Material Incident Reports)

10.6 Natural Events

Based upon the geographic location of the facility, the potential for emergencies caused by natural events includes tornadoes and other severe weather events.

Tornado Watch and Warning. The Emergency Coordinator shall be responsible for monitoring the current weather conditions. In the event a tornado watch becomes present, the situation and local weather conditions will be monitored. Upon a tornado watch being elevated to a tornado warning, all employees will seek shelter in the designated shelter areas (office bathrooms or warehouse lock room) within the facility immediately. Once in the shelter, the weather condition will continue to be monitored and decision made appropriate to the situation. Employees shall remain in the shelter area until further instructed by the emergency coordinator or their manager. If the tornado watch is cancelled and the weather conditions are no longer a threat, the emergency coordinator will advise all personnel and normal operations shall resume.

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Severe Weather. The emergency coordinator shall be responsible for monitoring the current weather conditions. In the event that a severe weather advisor is broadcasted for the area, the situation and local weather conditions will be monitored. Decisions will be made appropriate to the condition and situation for the safety of all employees. If the facility is to be closed due to the weather condition, employees shall be notified by the emergency coordinator or their manager.

10.7 Workplace Violence
Workplace violence includes, but is not limited to, intimidation, threats, physical attack, domestic violence or property damage and includes acts of violence committed by employees, clients, customers, relatives, acquaintances or strangers on the premises. All employees are encouraged to be alert to the possibility of violence on the part of the employees, former employees, contractors, or other visitors.

If workplace violence is experienced or becomes present that presents an imminent danger or results in anyone being physically harmed, the local authorities should be immediately contacted. If workplace violence is experienced or becomes present that does not involve imminent danger, the Emergency Coordinator should be immediately advised of the situation. The Emergency Coordinator will handle the situation with caution and concern for safety of themselves and those around the situation. Immediate action shall be taken to address the matter appropriately. Remedial actions will depend on the severity and the nature of the incident.

11.0 INCIDENT FOLLOW-UP

11.1 Once the immediate emergency situation has been ceased, the Technical Services Manager shall provide for treating, storing or disposing of recovered waste, contaminated soil or surface water or any other material that results from a release, fire or explosion at the facility. In addition, the Technical Services Manager shall ensure no waste that may be incompatible with the released material is treated, stored or disposed of until cleanup procedures are completed.


11.2 The emergency equipment present in the affected area of the incident shall be cleaned and deemed fit for its intended use before operations may resumed.

11.3 A incident requiring the implementation of actions outlined in this plan shall be documented on the Incident Report and shall include the time, date and details. Within 15-days after the incident, a written report regarding the incident shall be submitted to the WDNR. The report shall include (1) owner name, address, phone number, (2) facility name, address, phone number, (3) date, time and type of incident, (4) name and quantity of material involved, (5) the extent of injuries if any, (6) an assessment of actual or potential hazards to human health or the environment, and (7) estimated quantity and disposition of recovered material that resulted from the incident.

12.0 EMERGENCY ESCAPE ROUTES AND MAPS

12.1 Emergency escape routes are depicted on the evacuation and safety maps which are posted throughout the facility for immediate reference in the instance that an emergency would occur that requires evacuation. The evacuation and safety maps include the current location and exit routes. (Appendix B - Facility Site and Evacuation Maps)

12.2 The evacuation and safety maps shall be reviewed for accuracy routinely. When changes are made to the working space necessitating changing the maps, the responsible parties will be notified to amend the maps.

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13.0 EMPLOYEE EVACUATION AND ACCOUNTABILITY

- 13.1 The emergency coordinator shall be responsible for determining which emergency situations require facility evacuation and notification will be provided to employees verbally, by the telephone system or activation of the manual emergency alarm system. Once it is determined that evacuation is required, all personnel, visitors, contractors or vehicles shall only enter under controlled access.
- 13.2 Aisle space shall be maintained to allow the unobstructed movement of personnel, fire protection equipment and spill control equipment to all areas within the facility.
- 13.3 Upon evacuation, managers are responsible for accounting for all employees under their immediate supervision. Departments with temporary employees, contractors, visitors and/or guests are responsible for accounting for these individuals. Individuals missing should be immediately reported to the Emergency Coordinator.
- 13.4 Entry back into an evacuated area or facility will be coordinated through the Emergency Coordinator and only after the area has been deemed safe for re-entry.

14.0 EMERGENCY CRITICAL OPERATIONS AND SHUTDOWN


- 14.1 The purpose of critical operations is to perform additional duties in an emergency situation to ensure proper procedures are carried out in an emergency situation and information is provided in a timely manner upon the arrival of emergency personnel. Specific duties and responsibilities outside the scope of this plan are communicated to individuals through standard operating procedures and training.
- 14.2 Emergency shut-down operations are documented within the standard operating procedures. The standard operating procedures are maintained and readily accessible to operators. Operators are training in emergency shut-down procedures as part of operator training.
- 14.3 The main utility shut-offs and procedures are indicated below and identified within the facility.

Electricity. The electricity for the facility is supplied by WE Energies and can be shut-off at the main electrical panels located in RM 124 on the south wall and RM 127 on the west wall.

Natural Gas. The natural gas for the facility is supplied by WE Energies and the main supply enters the property at the meter located on the westside of the building. A shut-off valve is located at the meter.

Water Supply and Sanitary Sewer. The water to the facility is supplied by the Village of Germantown. The sanitary sewer system is managed by the Village of Germantown Wastewater Utility which administers compliance with Wisconsin Department of Natural Resources (WDNR) and the Milwaukee Metropolitan Sewerage District (MMSD) requirements. To prevent a release to the sanitary sewer system, there are no floor drains located within the warehouses. In addition, anything beyond domestic waste is prohibited from being poured down the drains located in the kitchen, rest rooms and laboratory sink.

Storm Water Sewer. The storm water from the site discharges into the detention pond via two locations affixed with matting and rip-rap armour installed at the discharge points. In the case of a leak or spill, the storm water sewer drain in the

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area will be immediately sealed off using a drain blocker drain cover that forms a complete seal around the drain.

15.0 RESCUE AND MEDICAL DUTIES (FIRST AID RESPONSE TEAM)

- 15.1 The purpose of the First Aid Team is to perform medical duties until paramedics or other emergency medical personnel become present. The medical duties shall be conducted in the scope of the team's training, which shall include general first aid and CPR procedures.
- 15.2 Internal and external emergency management contacts for the facility have been designated and posted throughout the facility, which includes the list of employees on the First Aid Team. (Appendix A - Emergency Management Contacts).

16.0 ALARM SYSTEM AND EMERGENCY EQUIPMENT


- 16.1 The facility has established an employee alarm system that provides warnings for emergency evacuation. The alarm is distinctive and recognizable as a signal to perform action under the plan.
- 16.2 In addition, the facility has installed and maintains various types of emergency equipment on-site (telephone system and two-way radios) to aid in the warning and management of emergency situations. The Operations Manager shall be responsible for the maintenance of systems and equipment installed at the facility. (Appendix C - Alarm and Emergency Equipment).
- 16.3 All employees have access to the alarm system, phone system and two-way radios in all areas where material processing (including hazardous waste) occurs, including pouring, mixing or handling. It is the policy of the facility that two operators must be on the premises while the facility is operating and material processing is being conducted.

17.0 FIRE HAZARDS AND PREVENTION

- 17.1 A fire hazard assessment has been conducted for the facility to identify those areas, chemicals, or equipment that could realistically pose a fire hazard. As a result, fire prevention measures have been established to mitigate and reduce such events from occurring. (Appendix G - Fire Prevention Assessment)

18.0 EXTERNAL EMERGENCY RESPONSE and NOTIFICATION

- 18.1 The organization has attempted to establish prearrangement agreement to familiarize police, fire departments and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to the facility and evacuation routes in the form of written notification (Appendix E – External Emergency Response Notifications). The written notifications describe arrangements assumed by the organization and offers an invitation for a site visit. If no response is received, it will be assumed that the local emergency services are in agreement and no further action is required.
- 18.2 The organization has notified local hospitals to ensure they are familiar with the organization, properties of waste handled and the potential resulting injuries and illnesses.
- 18.3 These arrangements with local emergency services will be periodically verified or updated to ensure the most current and accurate information is provided. In addition, when there is a change to the information previously provided.

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19.0 EXTERNAL EMERGENCY NOTIFICATION

19.1 The local fire department shall maintain the role of the Incident Commander during emergency situations at the site. As a result, it will be the fire department that would determine the need for area evacuation of neighboring properties through the local emergency planning committee.

20.0 TRAINING

20.1 Employees shall be trained appropriate to the level of their expected involvement in emergency response activities. The objective of the training program shall be to ensure that personnel are knowledgeable of their roles and responsibilities concerning the plan and its procedures to affect a safe and expedient response to an emergency situation.

20.2 Training shall be provided at the time of initial employment and annually thereafter as depicted in the Training and Competence Plan for all employees, as applicable (See Appendix I through M for specific training program details). Additional training may be conducted wherever there is a change to the employee's responsibilities, changes to materials or equipment within the facility affecting the plan, the plan is updated, or exercises/drills indicate that employees do not understand their responsibilities.

20.3 The organization shall periodically evaluate their training programs. Training shall be documented to demonstrate competence and knowledge, as well as, what is acceptable performance.

20.4 Contractor that shall be on-site shall be trained to the appropriate response level require should an emergency situation become present while they are on-site.

21.0 EXERCISES AND DRILLS

21.1 To ensure that the plan will meet current conditions and that all involved individuals shall respond properly, the plan will be routinely tested. All drills shall be documented, indicating the results of the exercise and any problems that were encountered, along with recommendations for plan modifications and improvements. Corrective and preventative actions shall be documented. (Appendix D - Exercise and Drill Documentation)


22.0 SPILL RELEASE AND REPORTING

22.1 A release occurs when any liquid, gas or solid escapes from its normal containment or process into the atmosphere or environment. Spills that exceed their established reportable quantity threshold for a specific chemical within a 24-hour period must be reported immediately to specific governmental agencies. (Appendix E - Spill Reporting Notification)

22.2 Decision about reportability of a release or spill that occurred and the responsibility of notification and/or submittal of the reports to governmental agencies shall be conducted by the CEO.

23.0 REVIEWS AND AMENDMENTS

23.1 The plan shall be reviewed and immediately amended, if necessary, whenever (1) the facility license is revised, (2) the plan fails in an emergency or the after-action review indicates that certain elements of the plan should be modified or improved, (3) the incident investigation results in action to changes in the plan, (4) the facility changes its design, construction, operation, maintenance or other circumstances in a way that materially increases the potential for fires, explosions or releases of hazardous waste or

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hazardous waste constituents, or changes the response necessary in an emergency, (5) the list of emergency coordinators or their information changes, or (6) the list of emergency equipment changes. Changes are recorded in the Revision Summary of this document.

24.0 RELATED DOCUMENTS


- 24.1 Appendix A - Emergency Management Contacts
- 24.2 Appendix B - Emergency Escape Routes and Accountability
- 24.3 Appendix C - Alarm and Emergency Equipment
- 24.4 Appendix D - Exercise and Drill Documentation
- 24.5 Appendix E - External Emergency Response Notifications
- 24.6 Appendix F - Intentionally Left Blank
- 24.7 Appendix G - Fire Prevention Assessment
- 24.8 Appendix H - Spill Release Reporting
- 24.9 Appendix I - Emergency Management Training Protocol
- 24.10 Appendix J - Spill Response Training Protocol
- 24.11 Appendix K - Fire Extinguisher Training Protocol
- 24.12 Appendix L - 40-Hour Hazwoper Training Protocol
- 24.13 Appendix M - 8-Hour Hazwoper Training Protocol
- 24.14 Appendix N - Critical Roles, Operations and Shut-Down Training Protocol
- 24.15 Appendix O - Fire Prevention Training Protocol
- 24.16 Appendix P – Flammable and Combustible Training Protocol
- 24.17 Appendix Q - Quick Reference Guide

25.0 REFERENCE DOCUMENTS


- 25.1 OSHA Emergency Response Plan [29 CFR 1910.38]
- 25.2 OSHA Fire Prevention Plan [29 CFR 1910.39]
- 25.3 OSHA Employee Alarm System [29 CFR 1910.165]
- 25.4 OSHA Portable Fire Extinguisher [29 CFR 1910.157]
- 25.5 OSHA Hazardous Waste Operations and Emergency Response [29 CFR 1910.120]
- 25.6 WDNR Hazardous Waste Regulations [Wisconsin DNR Chapter NR 660-679]
- 25.7 WDNR Hazardous Substance Spill Notification [Wisconsin DNR Chapter NR 706]
- 25.8 WDNR Contingency Plan [Wisconsin DNR Chapter NR 670.014(2)(g)]
- 25.9 WDNR Preparedness and Prevention [Wisconsin DNR Chapter NR 670.014(f)]
- 25.10 DOT Hazardous Material Incident Reporting [DOT 49 CFR 171.180]
- 25.11 National Fire Protection Association Requirements (NFPA)
- 25.12 Local Fire Department Ordinances
- 25.13 Incident Reporting and Investigation Plan [EHS-WI-004]
- 25.14 Medical Services and Management Plan [EHS-WI-008]
- 25.15 Bloodborne Pathogen Plan [EHS-WI-007]
- 25.16 Total Preventative Maintenance Plan
- 25.17 Training and Competence Plan

26.0 REVISION SUMMARY

Revision	Date	Description of changes	Requested By
000	1/20/2016	Initial Release	D. Zellmer
001	2/9/2016	Updated Concentra Urgent Care address in Section 17.	D. Zellmer
002	12/31/2017	Updated format and elements of the plan to be more reflective for the facility.	D. Zellmer

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003	6/24/2018	Updated 24-Hour emergency response company information.	D. Zellmer
004	3/7/2019	Reviewed and updated plan content. Revised associated appendixes.	D. Zellmer
005	3/19/2019	Updated to include a training protocol for fire extinguishers.	D. Zellmer
006	2/1/2020	Updated to include elements required for the hazardous waste license.	D. Zellmer
007	3/20/2020	Updated to correct typos and update internal and third emergency response information.	D. Zellmer
008	4/3/2020	Updated to include comments received from Stantec upon review.	D. Zellmer
009	10/12/2020	Updated the Emergency Contact List and added Appendix N.	D. Zellmer
010	7/25/2021	Updated to include revisions based upon WDNR comments.	D. Zellmer
011	11/22/2021	Updated to include revised Evacuation and Safety Map.	D. Zellmer
012	4/28/2022	Updated to change local Hospital on Emergency Management Contact list.	D. Zellmer
013	7/29/2022	Updated per WDNR recommendations.	D. Zellmer

Document No.: WI-EHS-005	Revision Date: 7/29/2022	Revision No.: 013	
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Certified By: CEO	Certified Date: 7/29/2022		

APPENDIX A: EMERGENCY MANAGEMENT CONTACTS

Enviro-Safe Resource Recovery, LLC. - W130 N10500 Washington Drive, Germantown, Wisconsin, 53022

EMERGENCY COORDINATORS AND ALTERNATIVES

<u>Contacts</u>	<u>Title</u>	<u>Office</u>	<u>Cellular</u>
Dawn Zellmer ⁽¹⁾	CEO	(262) 790-2500 Ext. 104	(262) 613-2542
Jeff Vilione ⁽²⁾	President	(262) 790-2500 Ext. 101	(262) 613-5902
Michael Walsh ⁽²⁾	Technical Services Manager	(262) 790-2500 Ext. 106	(708) 751-0207
Bobby Wiedenfeld ⁽²⁾	Operations Manager	(262) 790-2500 Ext. 103	(414) 308-7492
Paul Monet	Marketing and Sales Manager	(262) 305-6964 Ext. 116	(262) 957-4406

⁽¹⁾ Primary emergency coordinator. ⁽²⁾ Alternate emergency coordinator.

FIRST AID RESPONSE TEAM

FOR MEDICAL EMERGENCIES CONTACT THE FIRST AID TEAM WITH APPROPRIATE LOCATION

<u>Contacts (On-Site)</u>	<u>Cellular</u>	<u>Contacts (Drivers)*</u>	<u>Cellular</u>
Andy Kruis	(414) 659-3875	Ben Cody	(262) 305-1158
Linda Liederbach	(414) 313-2904	Kevin Kyrola	(262) 364-6583
Mike Walsh	(708) 751-0207		
Bobby Wiedenfeld	(414) 380-7492		
Dawn Zellmer	(262) 613-2542		

*Transportation drivers have also been trained in First Aid Response but are not routinely on-site.

EMERGENCY RESPONSE/MEDICAL EMERGENCIES

FOR LIFE THREATING EMERGENCIES CALL 9-1-1 IMMEDIATELY.


Germantown Fire Department	(262) 253-7795 or 911	24-Hours a Day
Germantown Police Department	(262) 253-7790 or 911	24-Hours a Day
Ascension Wisconsin Hospital	(262) 415-2001	24-Hours a day
Nova Medical Center	(414) 800-0014	Mon-Fri 8:30am to 6:00pm

HAZARDOUS SUBSTANCE RELEASE/SPILLS

National Response Center (NRC)	(800) 424-8802
Wisconsin Department of Natural Resources (WDNR)	(800) 943-0003
Wisconsin State Emergency Response Board (SERB)	(608) 242-3232
Washington County Office of Emergency Management (LEPC)	(262) 335-4399
Clean Harbors Environmental Services (24-Hour Emergency Contact)	(800) 645-8265
Hepaco, Inc. (24-Hour Emergency Contact)	(800) 888-7689

OTHER EMERGENCY NUMBERS

OSHA Federal Office (As Required)	(800) 943-0003
OSHA Milwaukee Office	(414) 297-3315
WE Energies Gas Leak Emergency Hotline	(800) 261-5325
WE Energies Electrical Emergency Hotline	(800) 662-4797

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Certified By: CEO		Certified Date: 7/29/2022	

**APPENDIX B
EMERGENCY EVACUATION ROUTES and ACCOUTABILITY**

Emergency evacuation routes are present as part of the evacuation and safety maps located within each area of the facility for immediate reference in the instance that an emergency would occur that requires evacuation. The evacuation map includes the current location and exit routes, as well as, emergency equipment locations.

The primary meeting locations upon evacuations are as follows: Enviro-Safe Outside Sign

Geographical Map



Geographical Map -
2021-08-05.pdf

Facility Site Map



Facility Site Map -
2020-08-08.pdf

Evacuation and Safety Map



Evacuation and
Safety Map - 2022-0-

Employee Accountability

Upon evacuation, the organization is responsible for accounting for all employees present on the premises. Organizations with temporary employees, visitors and/or guests are responsible for accounting for these individuals, as well, to ensure no employee is deemed missing upon arrival by responding emergency personal.

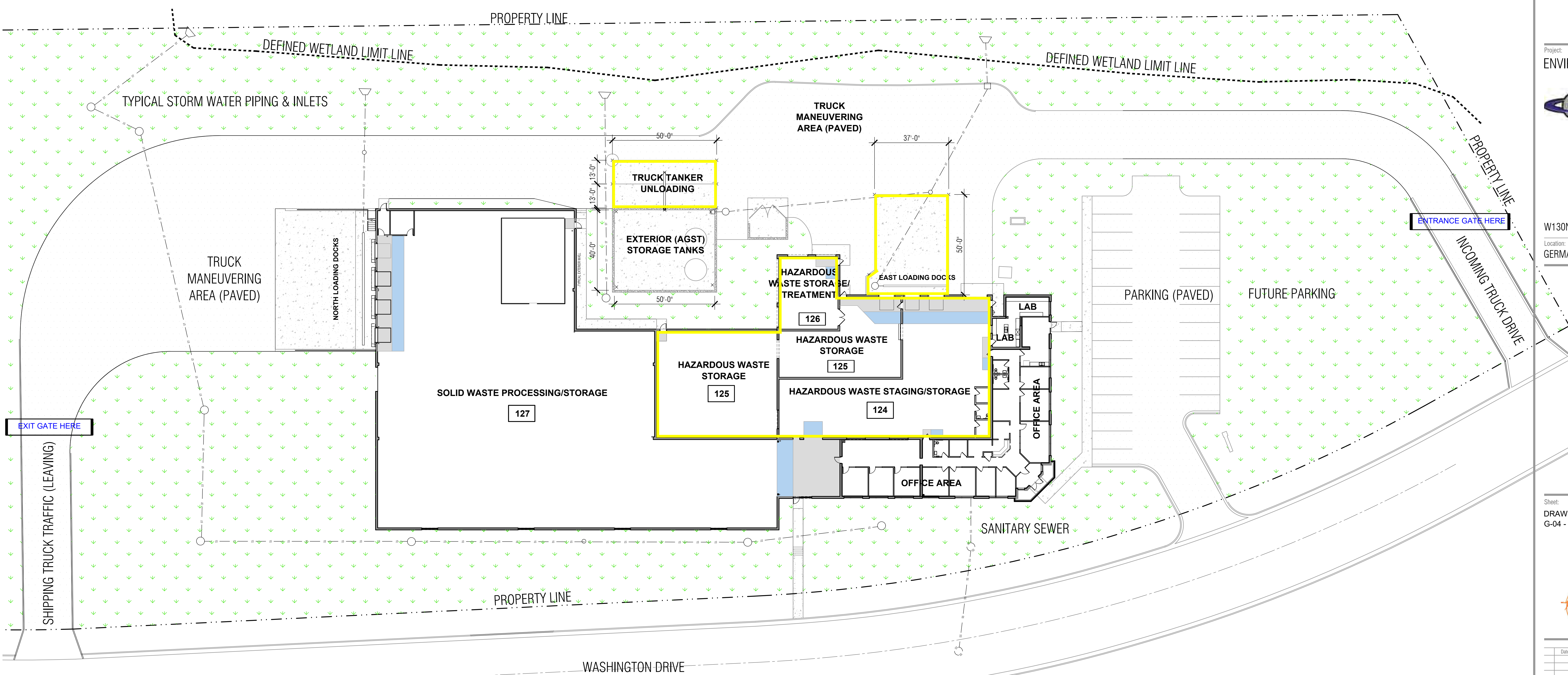
The area managers shall be responsible for accounting for the employees, visitors, or contractors under their responsibility upon evacuation. The method used to achieve this is at the discretion of the area manager. It shall also be the area manager's responsibility to designate a secondary individual to assume these responsibilities in their absence.

Area Managers:	Sales and Marketing Manager	Paul Monet
	Technical Services Manager	Michael Walsh
	Operations Manager	Bobby Wiedenfeld



DISCLAIMER: This map is not guaranteed to be accurate, correct, current, or complete and conclusions drawn are the responsibility of the user.

- MAP KEY**
- INTERIOR RAMPED FLOOR (6")
 - INTERIOR LANDING AREA (TYP ELEV 797.00')
 - EXTERIOR CONCRETE PAVING
 - ASPHALTIC PAVING
 - TURF OR NATURAL AREA
 - EXTERIOR WALL
 - LIMITS OF HAZARDOUS WASTE STORAGE
 - SANITARY SEWER
 - STORM SEWER
 - CATCH BASIN INLET OR MANHOLE
 - STORM SUMP
 - TRENCH DRAIN
 - STORM OUTFALL
 - 18,000 GAL 18M TANK
 - HAZARDOUS MATERIAL STORAGE 18,000 GAL



Overall Site Plan
 SCALE: 1" = 20'-0"
 SCALE: 1" = 20' PLOTTED ON 30" x 42"

Project:
 ENVIRO-SAFE ADDITION



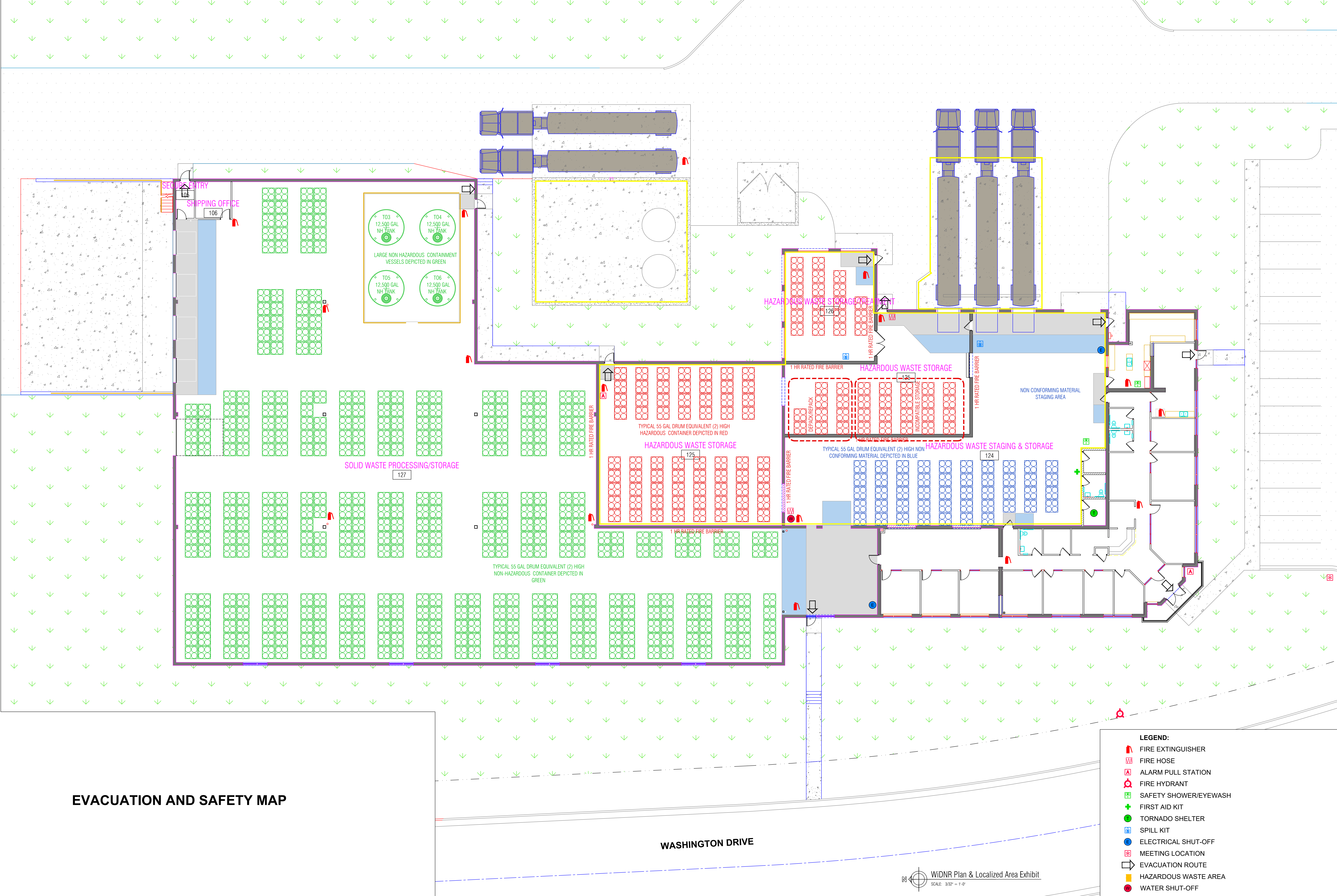
Location:
 W130N10500 WASHINGTON DR
 GERMANTOWN, WI 53022

Sheet:
 DRAWINGS & MAPS:
 G-04 - FACILITY MAP



Date	Issue Set

Date:
 2022-08-08
 Project No.:
 0019-42
 Sheet No.:




EVACUATION AND SAFETY MAP

WASHINGTON DRIVE

WIDNR Plan & Localized Area Exhibit
SCALE: 3/32" = 1'-0"

LEGEND:

- FIRE EXTINGUISHER
- FIRE HOSE
- ALARM PULL STATION
- FIRE HYDRANT
- SAFETY SHOWER/EYEWASH
- FIRST AID KIT
- TORNADO SHELTER
- SPILL KIT
- ELECTRICAL SHUT-OFF
- MEETING LOCATION
- EVACUATION ROUTE
- HAZARDOUS WASTE AREA
- WATER SHUT-OFF

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Document Title: EMERGENCY MANAGEMENT PLAN			
Certified By: CEO	Certified Date: 7/29/2022		

**APPENDIX C
ALARM and EMERGENCY EQUIPMENT**

Alarm System


The facility has installed and maintains an employee alarm system that provides signal for emergency evacuation. The alarm is distinctive and recognizable as a signal to perform action under the plan.

Emergency Equipment


The facility has installed and maintains various types of emergency equipment on-site to aid in the warning and management of emergency situations that may potential arise. The Operations Manager is responsible for maintenance of equipment and systems installed through the Total Preventative Maintenance Plan.

Emergency Equipment

Equipment	Inspection Requirements	Regulatory Citation
Alarm System and Communications		
Controls, Panels, Power System, Annunciators	Annually	NFPA 72
Notification Appliances	Annually	NFPA 72
Initiating Appliances	Annually	NFPA 72
Supervisory Appliances	Semi-Annually	NFPA 72
Battery Load Testing	Semi-Annually	NFPA 72
Smoke Detector Sensitivity Testing	One Year After Installation – 2-Years Thereafter	NFPA 72
Phone System	None	N/A
Two-Way Radios	None	N/A
Bloodborne Pathogen Clean-Up Supplies and/or Kits		
Inspection	Monthly	OSHA 1910.1030
Emergency and Exit Lights		
Functional Test – 30 Seconds	Monthly	NFPA 101
Functional Test – 90 Minutes	Annually	NFPA 101
Emergency Shower/Eyewash Unit		
Inspection: All Types	Weekly	ANSI Z358:1
Maintenance: All Types	Annually	ANSI Z358.1
Fire Extinguishers		
Inspection: All Types	Monthly	NFPA 10
Maintenance and Certification: All Types	Annually	NFPA 10
Internal Examination: CO2, Wet Chemical	Every 5-Years	NFPA 10
Internal Examination: Foam	Every 3-Years	NFPA 10

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Internal Examination: Dry Chemical and Halogenated Agents	Every 6-Years	NFPA 10
Hydrostatic Test: CO2, Wet Chemical, Foam and Water	Every 5-Years	NFPA 10
Hydrostatic Test: Dry Chemical, Halogenated Agents	Every 12-Years	NFPA 10
Fire Hydrant		
Fire Hydrant (Property of the Village of Germantown)	Annually	NFPA 291
First Aid Supplies and/or Kits		
Inspection	Monthly	1910.151
Spill Kits		
Inspection	Monthly	WDNR Chapter NR 706
Storm Sewer Drain Blocker	Monthly	WDNR Chapter NR 706
Sprinkler System		
Inspection	Quarterly	NFPA 25
Inspection	Annually	NFPA 25
Internal Inspections	Every 5-Years	NFPA 25

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Document Title: EMERGENCY MANAGEMENT PLAN			
Certified By: CEO		Certified Date: 7/29/2022	

**APPENDIX D
EMPLOYEE TRAINING AND DRILLS**

Employee Training

Employees shall be trained on the various subject matter appropriate to the level of their expected involvement and roles in emergency situations to ensure personnel are knowledgeable of their roles and responsibilities. The specific training details can be found in the Training and Competence Plan.

Employee Drills

To ensure that the plan will meet current conditions and that all involved individuals will respond properly, the plan will be routinely tested. All drills shall be documented, indicating the results of the exercise and any problems that were encountered, along with recommendations for plan modifications or improvements. Corrective and preventative actions shall be documented.

Evacuation Drill Form



Exercise and Drill
Document.pdf

FIRE DRILL EVALUATION CHECKLIST

DRILL INFORMATION

Name of Building/Facility _____

Building/Facility Address _____

Location of Drill (Specific floor/wing/etc) _____ Date of Drill ____ / ____ /20__

Time Drill Initiated ____:____ AM/PM Time All Occupants Vacated ____:____ AM/PM Elapsed Time _____ Min.

Drill Monitor Name: _____ Title/Position _____

Weather: TEMP: Cold / Warm / Hot WINDS: Calm / Breezy / Windy PRECIP: Sunny / Cloudy / Rain / Snow / Sleet

PRE DRILL ASSESSMENT

Evacuation routes posted Yes No
Evacuation signs are in good condition Yes No
Exits are clearly marked Yes No
Exit signs are properly illuminated Yes No
Exit doors operating properly Yes No
Egress routes free of obstructions Yes No
Egress routes properly lighted Yes No

COMMUNICATION

Method of Drill Activation:

Alarm Activation PA System
 In-House Word of Mouth Other: _____

Drill preannounced Yes No
Fire department present for drill Yes No
Alarm monitoring company notified Yes No
Security notified Yes No N/A

FIRE CONTAINMENT

Doors and windows closed Yes No
Rooms checked prior to closing doors Yes No
Doors left unlocked Yes No
Fire extinguisher taken to location of fire Yes No
Door hold-open devices operated appropriately Yes No N/A

EVACUATION

All occupants participated and evacuated Yes No
Restrooms were checked for occupants Yes No
Evacuation was orderly Yes No
Visitors escorted and accounted for Yes No
Special needs persons accommodated Yes No
Elevators were used during evacuation Yes No
Overall response of occupants
 Satisfactory Unsatisfactory

Noise level of evacuation
 Satisfactory Unsatisfactory

Number of occupants evacuated

Visitors:_____ Staff:_____ Tenants:_____ TOTAL:_____

UTILITIES

Electrical appliances were turned off Yes No N/A
Lights were turned off Yes No N/A
HVAC units were shut down Yes No N/A

PLAN

Evacuation performed according to plan Yes No
Occupants met at designated meeting places according to the plan Yes No
Designated meeting place(s) located at safe distances from building Yes No
Fire drill/incident response team(s) responded according to plan Yes No
Fire drill/incident response team(s) carried out assigned duties Yes No
Fire department "mock" notified according to plan Yes No

FIRE ALARM SYSTEMS

Fire alarm clearly heard in all areas Yes No
Alarm monitoring company received alarm Yes No
Electro-magnetic locks operated appropriately Yes No N/A
Public address system clearly heard in all areas Yes No N/A
Elevators recalled to correct floor Yes No N/A

Any item receiving a "No" or "Unsatisfactory" is an item that the facility should work on to correct.

FIRE AND EMERGENCY EVACUATION DRILL OBJECTIVES

- Evaluate the effectiveness of the occupants abilities to evacuate a building
- Evaluate the effectiveness and adequateness of the fire and life safety evacuation plan
- Evaluate occupants ability to recognize the fire/evacuation alarm
- Determine whether the occupant takes appropriate actions upon hearing/seeing the evacuation/fire alarm
- Determine that the occupant begins the evacuation process in an acceptable manner and/or per plan
- Evaluate the occupants ability to provide assistance to visitors or individuals who are experiencing difficulty
- Evaluate the occupants ability to recognize and take appropriate actions when a means of egress is unsafe
- Ensure occupants report in at designated meeting places

RECORD KEEPING

At a minimum the following information is required to be collected during fire drills per the International Fire Code:

1. Identity of the person conducting the drill
2. Date and time of the drill
3. Notification method used
4. Staff members on duty and participating
5. Number of occupants evacuated
6. Special conditions simulated
7. Problems encountered
8. Weather conditions when occupants evacuated
9. Time required to accomplish complete evacuation


ALARM ACTIVATION

Where a fire alarm system is provided, emergency evacuation drills shall be initiated by activating the fire alarm system.

DRILL TIMES





Drill shall be held at unexpected times and under varying conditions to simulate the unusual conditions that occur in case of fire.



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Document Title: EMERGENCY MANAGEMENT PLAN			
Certified By: CEO	Certified Date: 7/29/2022		

**APPENDIX E
EXTERNAL EMERGENCY RESPONSE NOTIFICATIONS**

The organization has established a prearranged agreement with the local police department, fire department, and emergency response teams. The prearrangements have been established in the form of written notification to the agencies listed below and includes information on the building layout, hazardous of the waste handled, places where personnel work, entrances to the site and evacuation routes. In addition, arrangements have been made with outside emergency response contractors. The organization has notified local occupational clinics and hospitals to ensure they are familiar with the organization, properties of waste handled and the potential resulting injuries and illnesses. A copy of the Emergency Management Plan and all revisions are provided to these entities per NR 664.0053(2).

Police Department	Germantown Police Department N112 W16877 Mequon Road Germantown, WI 53022 Chief of Police: Mr. Peter Hoell Phone: (262) 253-7780 or 911	 Submittal - Police Dept.pdf
Fire Department	Germantown Fire Department N115 W18752 Edison Drive Germantown, WI 53022 Fire Chief: Mr. John Delain Phone: (262) 253-7780 or 911	 Submittal - Fire Dept.pdf
Occupational Medical Clinic	Nova Medical Centers 8514 Brown Deer Road Milwaukee, WI 53224 Phone: (414) 800-0014 Jeffrey Peters	 Submittal - Medical Clinic.pdf
Hospital	Ascension Wisconsin Hospital N88 W14275 Main Street Menomonee Falls, WI 53051 Phone: (262) 415-2001	 Submittal - Hospital.pdf

The organization has established a prearranged agreement with outside companies to respond should a spill incident occur to assist in spill response, management, cleanup and regulatory reporting and requirements.

Spill Response Contractor (Primary)	Clean Harbors Environmental Services N104 W13275 Donges Bay Road Germantown, WI 53022 Phone: (262) 236-8130 24-Hour Phone: (800) 645-8265	 Clean Harbor Emergency Repsons
Spill Response Contractor (Secondary)	Hepaco, Inc. 8184 Starwood Drive Loves Park, IL 61111 Phone: (815) 885-4840 24-Hour Phone: (800) 885-4840	 Hepaco.pdf



April 29, 2022

CERTIFIED MAIL W/RETURN RECEIPT
7013 1090 0001 6922 1158

Germantown Police Department
N112 W16877 Mequon Road
Germantown, WI 53022

Enviro-Safe Resource Recovery
W130 N10500 Washington Drive
Germantown, WI 53022

Dawn Zellmer
Tel: (262) 790-2500
Fax: (262) 790-2560
dzellmer@enviro-safe.com

Subject: WDNR LQG Preparedness and Prevention (NR 665.0037)
Enviro-Safe Consulting, LLC. dBA Enviro-Safe Resource Recovery
EPA ID Number: WIR00142877

In accordance with WDNR NR 665.0037 under Wisconsin's Hazardous Waste Management Rules (Chapter NR 660-679, Wis. Admin. Code) for Small Quantity Generators (SQG), Enviro-Safe is required to notify and make emergency response arrangements with local authorizes as the result of the hazardous waste being handled at their location. As a result, Enviro-Safe shall assume that the above reference agency will accept and assume primary authority should an emergency situation occur at the site and will summons other departments to provide support as deemed necessary.

The company is required to provide local police, fire departments, hospitals and state or local emergency response teams with a layout of the facility, which may be useful in the event of an emergency involving an exposure or release, and a copy of the most current version of the site's Emergency Management Plan. The plan is designed to minimize hazards to human health and the environment from fires, explosions, or unplanned sudden or gradual releases of hazardous waste to the air, soil, or surface water. Please review the information provided and retain in your files for future reference, if needed.

In addition, below is a summary of the routine hazardous waste that are currently being generated or handled at the site with the properties of the wastes handled and the potential resulting injuries and illnesses based upon the general guidance from the 2022 Emergency Response Guide (ERG).

Waste Types	Waste Properties	Potential Injuries/Illnesses
Non-RCRA (Non-Hazardous) Waste	Non-DOT	See 2022 ERG 159 Attachment
Flammable Gases	DOT Class 2.1	See 2022 ERG 115 Attachment
Non-Flammable Gases	DOT Class 2.2	See 2022 ERG 120 Attachment
Flammable Liquids	DOT Class 3	See 2022 ERG 127 Attachment
Flammable Solids	DOT Class 4.1	See 2022 ERG 133 Attachment



Spontaneously Combustible	DOT Class 4.2	See 2022 ERG 135 Attachment
Dangerous When Wet Materials	DOT Class 4.3	See 2022 ERG 139 Attachment
Oxidizers	DOT Class 5.1	See 2022 ERG 140 Attachment
Organic Peroxide	DOT Class 5.2	See 2022 ERG 148 Attachment
Poison/Toxic	DOT Class 6	See 2022 ERG 151 Attachment
Corrosive Liquids	DOT Class 8	See 2022 ERG 154 Attachment
Miscellaneous	DOT Class 9	See 2022 ERG 171 Attachment

Routine updates shall be provided to ensure the most current information is available. In addition, if you would like to arrange an on-site visit to become familiar with the facility, please contact me to discuss scheduling.

If you have any questions regarding the information provided, please feel free to contact me at (262) 790-2500 or dzellmer@enviro-safe.com

Best Regards,
Dawn Zellmer
CEO

Enclosure(s): Facility Layout
USB Flash Drive including Emergency Management Plan
USB Flash Drive including 2022 Emergency Response Guide (ERG)

c: File

Track Another Package +

Tracking Number: 9500110363912125781194

Remove X

Your item has been delivered and is available at a PO Box at 1:04 pm on May 5, 2022 in GERMANTOWN, WI 53022.

USPS Tracking Plus® Available ∨

Delivered, PO Box

May 5, 2022 at 1:04 pm
GERMANTOWN, WI 53022

Feedback

Get Updates ∨

Text & Email Updates



Tracking History



May 5, 2022, 1:04 pm

Delivered, PO Box

GERMANTOWN, WI 53022

Your item has been delivered and is available at a PO Box at 1:04 pm on May 5, 2022 in GERMANTOWN, WI 53022.

May 5, 2022, 12:58 pm

USPS in possession of item

GERMANTOWN, WI 53022

USPS Tracking Plus®



Product Information



Postal Product:

First-Class Package Service - Retail

Features:

USPS Tracking®

See Less

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FAQs

Feedback



April 29, 2022

CERTIFIED MAIL W/RETURN RECEIPT
7013 1090 0001 6922 1165

Germantown Fire Department
N115 W18752 Edison Drive
Germantown, WI 53022

Enviro-Safe Resource Recovery
W130 N10500 Washington Drive
Germantown, WI 53022

Dawn Zellmer
Tel: (262) 790-2500
Fax: (262) 790-2560
dzellmer@enviro-safe.com

Subject: WDNR SQG Preparedness and Prevention (NR 665.0037)
Enviro-Safe Consulting, LLC. dBA Enviro-Safe Resource Recovery
EPA ID Number: WIR00142877

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The company is required to provide local police, fire departments, hospitals and state or local emergency response teams with a layout of the facility, which may be useful in the event of an emergency involving an exposure or release, and a copy of the most current version of the site's Emergency Management Plan. The plan is designed to minimize hazards to human health and the environment from fires, explosions, or unplanned sudden or gradual releases of hazardous waste to the air, soil, or surface water. Please review the information provided and retain in your files for future reference, if needed.

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Non-Flammable Gases	DOT Class 2.2	See 2022 ERG 120 Attachment
Flammable Liquids	DOT Class 3	See 2022 ERG 127 Attachment
Flammable Solids	DOT Class 4.1	See 2022 ERG 133 Attachment



Spontaneously Combustible	DOT Class 4.2	See 2022 ERG 135 Attachment
Dangerous When Wet Materials	DOT Class 4.3	See 2022 ERG 139 Attachment
Oxidizers	DOT Class 5.1	See 2022 ERG 140 Attachment
Organic Peroxide	DOT Class 5.2	See 2022 ERG 148 Attachment
Poison/Toxic	DOT Class 6	See 2022 ERG 151 Attachment
Corrosive Liquids	DOT Class 8	See 2022 ERG 154 Attachment
Miscellaneous	DOT Class 9	See 2022 ERG 171 Attachment

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If you have any questions regarding the information provided, please feel free to contact me at (262) 790-2500 or dzellmer@enviro-safe.com

Best Regards,
Dawn Zellmer
CEO

Enclosure(s): Facility Layout
USB Flash Drive including Emergency Management Plan
USB Flash Drive including 2022 Emergency Response Guide (ERG)

c: File

Track Another Package +

Tracking Number: 9500110363912125781187

Remove X

Your item was delivered in or at the mailbox at 8:34 am on May 6, 2022 in GERMANTOWN, WI 53022.

USPS Tracking Plus[®] Available ∨

Delivered, In/At Mailbox

May 6, 2022 at 8:34 am
GERMANTOWN, WI 53022

Feedback

Get Updates ∨

Text & Email Updates



Tracking History



May 6, 2022, 8:34 am

Delivered, In/At Mailbox

GERMANTOWN, WI 53022

Your item was delivered in or at the mailbox at 8:34 am on May 6, 2022 in GERMANTOWN, WI 53022.

May 6, 2022, 6:10 am

Out for Delivery

GERMANTOWN, WI 53022

May 5, 2022, 3:04 pm
Arrived at Post Office
GERMANTOWN, WI 53022

May 5, 2022, 12:58 pm
USPS in possession of item
GERMANTOWN, WI 53022

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Product Information



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First-Class Package Service - Retail

Features:

USPS Tracking®

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Go to our FAQs section to find answers to your tracking questions.

FAQs



April 29, 2022

CERTIFIED MAIL W/RETURN RECEIPT
7013 1090 0001 6922 1134

Nova Medical Centers
8514 Brown Deer Road
Milwaukee, WI 53224

Enviro-Safe Resource Recovery
W130 N10500 Washington Drive
Germantown, WI 53022

Dawn Zellmer
Tel: (262) 790-2500
Fax: (262) 790-2560
dzellmer@enviro-safe.com

Subject: WDNR SQG Preparedness and Prevention (NR 665.0037)
Enviro-Safe Consulting, LLC. dBA Enviro-Safe Resource Recovery
EPA ID Number: WIR00142877

In accordance with WDNR NR 665.0037 under Wisconsin's Hazardous Waste Management Rules (Chapter NR 660-679, Wis. Admin. Code) for Small Quantity Generators (SQG), Enviro-Safe is required to notify and make emergency response arrangements with local authorizes as the result of the hazardous waste being handled at their location. As a result, Enviro-Safe shall assume that the above reference agency will accept and assume primary authority should an emergency situation occur at the site and will summons other departments to provide support as deemed necessary.

The company is required to provide local police, fire departments, hospitals and state or local emergency response teams with a layout of the facility, which may be useful in the event of an emergency involving an exposure or release, and a copy of the most current version of the site's Emergency Management Plan. The plan is designed to minimize hazards to human health and the environment from fires, explosions, or unplanned sudden or gradual releases of hazardous waste to the air, soil, or surface water. Please review the information provided and retain in your files for future reference, if needed.

In addition, below is a summary of the routine hazardous waste that are currently being generated or handled at the site with the properties of the wastes handled and the potential resulting injuries and illnesses based upon the general guidance from the 2022 Emergency Response Guide (ERG).

Waste Types	Waste Properties	Potential Injuries/Illnesses
Non-RCRA (Non-Hazardous) Waste	Non-DOT	See 2022 ERG 159 Attachment
Flammable Gases	DOT Class 2.1	See 2022 ERG 115 Attachment
Non-Flammable Gases	DOT Class 2.2	See 2022 ERG 120 Attachment
Flammable Liquids	DOT Class 3	See 2022 ERG 127 Attachment
Flammable Solids	DOT Class 4.1	See 2022 ERG 133 Attachment



Spontaneously Combustible	DOT Class 4.2	See 2022 ERG 135 Attachment
Dangerous When Wet Materials	DOT Class 4.3	See 2022 ERG 139 Attachment
Oxidizers	DOT Class 5.1	See 2022 ERG 140 Attachment
Organic Peroxide	DOT Class 5.2	See 2022 ERG 148 Attachment
Poison/Toxic	DOT Class 6	See 2022 ERG 151 Attachment
Corrosive Liquids	DOT Class 8	See 2022 ERG 154 Attachment
Miscellaneous	DOT Class 9	See 2022 ERG 171 Attachment

Routine updates shall be provided to ensure the most current information is available. In addition, if you would like to arrange an on-site visit to become familiar with the facility, please contact me to discuss scheduling.

If you have any questions regarding the information provided, please feel free to contact me at (262) 790-2500 or dzellmer@enviro-safe.com

Best Regards,
Dawn Zellmer
CEO

Enclosure(s): Facility Layout
USB Flash Drive including Emergency Management Plan
USB Flash Drive including 2022 Emergency Response Guide (ERG)

c: File

Track Another Package +

Tracking Number: 9500110363912125781163

Remove X

Your item was delivered to the front desk, reception area, or mail room at 10:34 am on May 6, 2022 in MILWAUKEE, WI 53224.

USPS Tracking Plus[®] Available ∨

Delivered, Front Desk/Reception/Mail Room

May 6, 2022 at 10:34 am
MILWAUKEE, WI 53224

Feedback

Get Updates ∨

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Tracking History



May 6, 2022, 10:34 am

Delivered, Front Desk/Reception/Mail Room
MILWAUKEE, WI 53224

Your item was delivered to the front desk, reception area, or mail room at 10:34 am on May 6, 2022 in MILWAUKEE, WI 53224.

May 6, 2022, 7:20 am

Out for Delivery
MILWAUKEE, WI 53224

May 6, 2022, 7:09 am
Arrived at Post Office
MILWAUKEE, WI 53223

May 6, 2022, 4:57 am
Arrived at USPS Facility
MILWAUKEE, WI 53223

May 6, 2022, 4:57 am
Departed USPS Regional Facility
OAK CREEK WI DISTRIBUTION CENTER

May 5, 2022, 10:05 pm
Arrived at USPS Regional Facility
OAK CREEK WI DISTRIBUTION CENTER

May 5, 2022, 5:25 pm
Departed Post Office
GERMANTOWN, WI 53022

May 5, 2022, 12:56 pm
USPS in possession of item
GERMANTOWN, WI 53022

Feedback

USPS Tracking Plus®



Product Information



Postal Product:

First-Class Package Service - Retail

Features:

USPS Tracking®

See Less



April 29, 2022

CERTIFIED MAIL W/RETURN RECEIPT
7013 1090 0001 6922 1127

Ascension Wisconsin Hospital
N88 W14275 Main Street
Menomonee Falls, WI 53051

Enviro-Safe Resource Recovery
W130 N10500 Washington Drive
Germantown, WI 53022

Dawn Zellmer
Tel: (262) 790-2500
Fax: (262) 790-2560
dzellmer@enviro-safe.com

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Best Regards,
Dawn Zellmer
CEO

Enclosure(s): Facility Layout
USB Flash Drive including Emergency Management Plan
USB Flash Drive including 2022 Emergency Response Guide (ERG)

c: File

Track Another Package +

Tracking Number: 9500110363912125781170

Remove X

Your item was delivered in or at the mailbox at 10:10 am on May 6, 2022 in MENOMONEE FALLS, WI 53051.

USPS Tracking Plus[®] Available ∨

Delivered, In/At Mailbox

May 6, 2022 at 10:10 am
MENOMONEE FALLS, WI 53051

Feedback

Get Updates ∨

Text & Email Updates



Tracking History



May 6, 2022, 10:10 am

Delivered, In/At Mailbox

MENOMONEE FALLS, WI 53051

Your item was delivered in or at the mailbox at 10:10 am on May 6, 2022 in MENOMONEE FALLS, WI 53051.

May 6, 2022, 7:00 am

Out for Delivery

MENOMONEE FALLS, WI 53051

May 6, 2022, 6:49 am
Arrived at Post Office
MENOMONEE FALLS, WI 53051

May 5, 2022, 5:25 pm
Departed Post Office
GERMANTOWN, WI 53022

May 5, 2022, 12:57 pm
USPS in possession of item
GERMANTOWN, WI 53022

USPS Tracking Plus®



Product Information



Feedback

Postal Product:

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USPS Tracking®

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Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs



Emergency Response Resource Book

Clean Harbors International Response Team

24-Hour Emergency Response Services

800.645.8265 (800.OIL.TANK)



COMPANY QUALIFICATIONS

Clean Harbors manages over three thousand environmental emergency responses or disaster recovery operations on land and water throughout North America each year. Whether it's a cleanup and removal of a single mercury bottle or a large-scale multiphase containment and cleanup of a coastal oil spill or damage from a hurricane, companies and governmental agencies trust our expertise and technical knowledge to handle any emergency with the highest regard to the environment and health and safety.

Since 1980, Clean Harbors has taken the lead in identifying the most effective, safe, and environmentally sound options for managing environmental emergencies. Our commitment to integrity and high performance standards has resulted in long-standing business relationships with government agencies, insurance companies, and public/private companies. With more than 100 service locations and over 48 waste management facilities in the North America, Clean Harbors is your single source for the safest and most efficient management of any environmental emergency.

Emergencies can happen anywhere and anytime in facilities, on roadways or in waterways. When time and safety are of the essence, Clean Harbors is ready to take control of your emergency situation and make appropriate decisions that will save you time and money. Depending on the nature of the emergency, Clean Harbors can deploy mobilized central command centers and a national response team. Command centers are fully equipped with communication and computer equipment, and utilize a satellite link to Clean Harbors systems allowing the team to effectively coordinate all response activities, even in the most remote locations.

Public and private companies along with local, state, provincial, and federal government agencies trust Clean Harbors to handle their emergency response and disaster recovery needs because they know we have the experience, technical knowledge, and operational resources to get the job done right, while adhering to strict regulatory statutes as well as health and safety standards. From immediate response and containment to cleanup operations, Clean Harbors provides the manpower and equipment, logistical support, ICS/NIMS integration, and operational oversight to manage any size environmental emergency.

Clean Harbors can rapidly deploy hundreds of experienced 40-hour OSHA certified workers to meet the needs of any incident. Whatever the response requires, from Level C through Level A, we handle a wide range of hazardous materials including oil, gasoline, chemical, PCB's, and biological hazards.

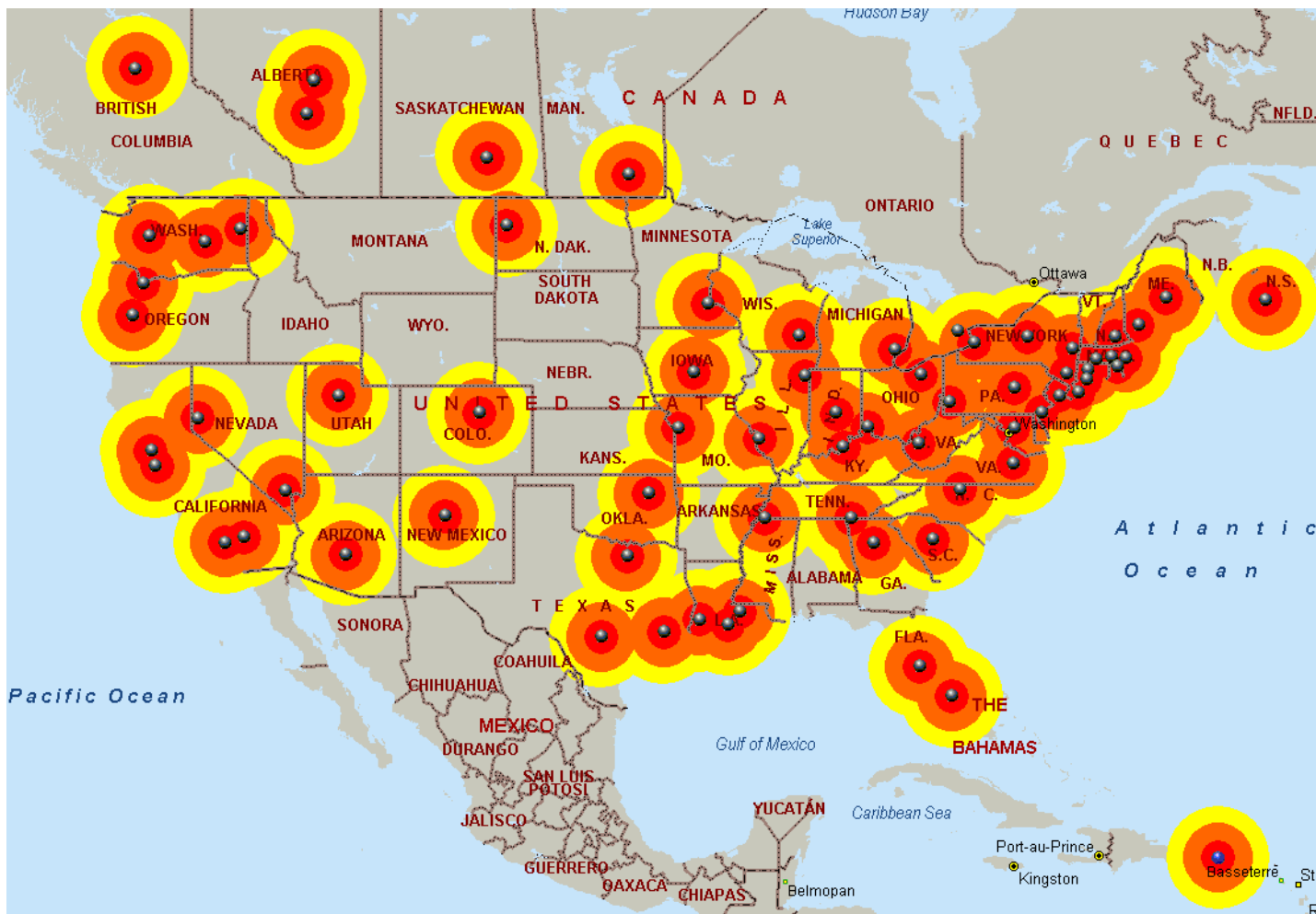
Clean Harbors typically responds to over-the-road incidents, punctured lines, tank overflows, leaking drums, and saddle tank spills, to major and catastrophic incidents such as large pipeline ruptures, ship groundings, tanker truck rollovers and facility releases that can easily threaten oceans, rivers, streams and lakes, as well as roadways, facilities, and public areas.

Clean Harbors offers its customers emergency response services along with the necessary backup components to complete an entire project. Services such as environmental remediation including surface remediation, groundwater restoration, underground storage tank management, and site decontamination are essential to successful emergency response activities. Our remedial programs are designed to provide both planned and emergency services to any environmental situation that can develop from an emergency spill.

One call to 800.645.8265 (800.OIL.TANK) from anywhere across North America connects you to Clean Harbors' network of emergency response service centers. With our experience, technical knowledge and vast array of resources, Clean Harbors provides a complete solution. Customers know they are in good hands.

For more information about Clean Harbors and the services we provide, please visit our website at www.cleanharbors.com.

EMERGENCY RESPONSE COVERAGE MAP



Coverage Map Updated 2017

- Red = 50 mile coverage area
- Orange = 100 mile coverage area
- Yellow = 150 mile coverage area

Black pegs = United States Service Centers
Red pegs = Canadian Service Centers
Blue peg = Puerto Rican Service Center



ER & OSRO OVERVIEW

ABOUT HEPACO

Founded in 1984, **HEPACO, LLC** (HEPACO) is a professional environmental services company with strategically-located service centers providing coverage throughout the Eastern United States, and beyond.

EMERGENCY RESPONSE & OSRO CAPABILITIES

HEPACO has highly-trained personnel and state-of-the-art equipment ready and able to respond to a wide variety of environmental emergencies including waterway releases, derailments, pipeline releases, leaking storage tanks, roadside spills, damaged freight, leaking transformers, abandoned wastes, and facility contamination.

HEPACO maintains an OSRO Classification (OSRO #32) throughout our operating area. Classifications are based upon minimum equipment amounts and response time standards outlined in the Coast Guard's OSRO Classification Guidelines.



EMERGENCY RESPONSE HISTORY

	Emergency Responses
2019	15,000 +
2018	6,300 +
2017	3,700 +
2016	3,300 +

BOOM DEPLOYMENT HISTORY

	ER	Training/Exercise
2019	29	49
2018	34	23
2017	22	18
2016	43	39

OUR SPECIALIZED EQUIPMENT

- Air compressors < 185 CFM
- Air knifing equipment
- Boats, 12 feet to 32 feet
- Containment boom (75,000+ linear feet)
- Confined Space Entry equipment
- Confined Space Rescue equipment
- Dedicated response trailers
- Dedicated response vehicles
- Elastec BoomVane™
- Flare stacks
- Frac tanks 500 BBL

- Heavy equipment (yellow iron)
- Hydraulic gear pumps
- Level A PPE
- Line camera equipment
- Line jetting equipment
- Mechanical recovery systems
- Mercury monitoring & recovery equipment
- Midland and C-Kits
- Mobile command centers
- Pneumatic pumps: aluminum
- Pneumatic pumps: poly
- Pneumatic pumps: stainless
- Pressure wash trucks & trailers
- Roll off boxes

- Roll off trucks
- Skimmers: dual drum and Weir
- Transfer trailers
- Vacuum tankers
- Vacuum trucks: HiRail
- Vacuum trucks: Industrial
- Vacuum trucks: Master Vac
- Vacuum trucks: Turbo



45+ SERVICE CENTERS ACROSS THE EASTERN UNITED STATES
VISIT US ONLINE AT: www.HEPACO.com

CONTACT:

TIM ACRI, CHMP

Senior Vice President
513.309.7461
tacri@HEPACO.com



SAFETY IS AT THE HEART OF OUR CORE VALUES

HEPACO has a deeply-ingrained safety program that is embraced across every level of our organization. We maintain an **Experience Modification Rating** (EMR) of **0.75**. All HEPACO field personnel receive extensive training and are part of a medical monitoring program. In addition to HAZWOPER, RCRA, DOT, confined space entry/rescue and first aid/CPR training, we maintain a wide variety of certifications, including **SafeLand, Pipeline Operator Qualified (OQ), Loss Prevention Systems (LPS), API Tank Entry Supervisor (TES), and API WorkSafe**. HEPACO is pre-qualified by the contractor screening consortiums ISNetworld, CCS, PEC Premier and Avetta. We are also a permitted hazardous waste transporter and a U.S. Coast Guard classified **Oil Spill Response Organization** (OSRO #32).


PERSONNEL CERTIFICATIONS & TRAINING

- 10-Hr OSHA
- 30-Hr OSHA
- 40-Hr HazWoper
- 8-Hr HazWoper Refresher
- Advanced Rail Car / Tank Car Specialists
- API Tank Entry Supervisor (TES)
- API WorkSafe
- Biohazard / Bloodborne Pathogens
- Confined Space Entry
- Confined Space Rescue
- CPR Trained
- Diking / Damming (Containment)
- DOT CDL Drivers
- EMT / Paramedics HAZMAT Endorsed Drivers
- e-RAILSAFE
- Fall Protection
- Fire Fighters
- FRA Roadway Worker
- HAZMAT Endorsed Drivers
- Heavy Equipment Operator
- Level A PPE Response
- On-Track Safety
- PEC SafeLand
- Tank Truck Specialists
- Transfer: Cargo
- Transfer: Rail
- Transfer: Tank
- Transportation (Bulk, Freight, Packages)
- TWIC Card
- UST Removal




45+ SERVICE CENTERS ACROSS THE EASTERN UNITED STATES

VISIT US ONLINE AT: www.HEPACO.com

Document No.: WI-EHS-005	Revision Date: 7/29/2022	Revision No.: 013	
Document Title: EMERGENCY MANAGEMENT PLAN			
Certified By: CEO		Certified Date: 7/29/2022	

APPENDIX F

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Document No.: WI-EHS-005	Revision Date: 7/29/2022	Revision No.: 013	
Document Title: EMERGENCY MANAGEMENT PLAN			
Certified By: CEO	Certified Date: 7/29/2022		

**APPENDIX G
FIRE PREVENTION ASSESSMENT**

COMPANY: Enviro-Safe Resource Recovery **REVIEWER:** Dawn Zellmer
LOCATION: Germantown, WI **REVIEW DATE:** 4/28/2022

FIRE HAZARDS (check all that apply):

Ignition Sources		
<input checked="" type="checkbox"/> Chemicals: Transferring Operations	<input type="checkbox"/> Electrical Installation: Overloads	<input type="checkbox"/> Hot Processes or Hot Work: Welding
<input checked="" type="checkbox"/> Chemicals: Storage	<input type="checkbox"/> Electrical Installation: Over Heating	<input type="checkbox"/> Hot Processes or Hot Work: Cutting
<input type="checkbox"/> Chemicals: Spontaneous Ignition	<input type="checkbox"/> Electrical Installation: Improper Rating	<input type="checkbox"/> Hot Processes of Hot Work: Brazing
<input type="checkbox"/> Chemicals: Self-Heating	<input type="checkbox"/> Electrical Equipment: Damaged Cables	<input type="checkbox"/> Steam Pipes
<input type="checkbox"/> Mechanical Equipment: Frictional Heat	<input type="checkbox"/> Electrical Equipment: Faulty or Misuse	<input type="checkbox"/> Smoker Materials: Cigarettes/ Matches/ Lighters
<input checked="" type="checkbox"/> Mechanical Equipment: Static Charge	<input type="checkbox"/> Naked Flames: Open Flame Equipment	<input type="checkbox"/> Electrical, Gas or Oil Filled Heaters
<input type="checkbox"/> Other:	<input type="checkbox"/> Other:	<input type="checkbox"/> Other:

Fuel Sources		
<input checked="" type="checkbox"/> Flammable Liquids	<input checked="" type="checkbox"/> Wood Pallets	<input type="checkbox"/> Paper Products
<input type="checkbox"/> Flammable Gases	<input checked="" type="checkbox"/> Packaging Materials	<input checked="" type="checkbox"/> Litter and Rubbish
<input type="checkbox"/> Other:	<input type="checkbox"/> Other:	<input type="checkbox"/> Other:


Oxygen Sources		
<input checked="" type="checkbox"/> Air: Natural	<input checked="" type="checkbox"/> Air: Mechanical	<input type="checkbox"/> Oxidizing Chemicals/Materials
<input type="checkbox"/> Other:	<input type="checkbox"/> Other:	<input type="checkbox"/> Other:

CONTROLS (check all that apply):

Engineering Controls	
<input type="checkbox"/> Electrical Installation	<input checked="" type="checkbox"/> Fire Control Equipment: Alarm
<input type="checkbox"/> Electrical Equipment	<input checked="" type="checkbox"/> Fire Control Equipment: Sprinkler System
<input checked="" type="checkbox"/> Non-Sparking Tools	<input checked="" type="checkbox"/> Fire Control Equipment: Fire Extinguisher
<input type="checkbox"/> Static-Dissipating Shoes/Boots	<input checked="" type="checkbox"/> Fire Control Equipment: Smoke Detectors
<input checked="" type="checkbox"/> Uniform (Cotton)	<input checked="" type="checkbox"/> Flammable Storage Warehouse and/or Cabinets
<input checked="" type="checkbox"/> Other: Ventilation (6 air exchanges per hour)	<input checked="" type="checkbox"/> Other: Gas Detection System

Administrative Controls	
<input checked="" type="checkbox"/> Smoking Policy	<input checked="" type="checkbox"/> Flammable/Combustible Waste Material Policy
<input checked="" type="checkbox"/> Hot Work Policy	<input type="checkbox"/> Electrical Equipment Testing and Maintenance
<input checked="" type="checkbox"/> Grounding and Bonding Policy/Equipment	<input checked="" type="checkbox"/> Fire Control Equipment Testing and Maintenance
<input checked="" type="checkbox"/> Combustible and Flammable Handling and Storage Policy	<input type="checkbox"/> Other:

ADDITIONAL COMMENTS

Document No.: WI-EHS-005	Revision Date: 7/29/2022	Revision No.: 013	
Document Title: EMERGENCY MANAGEMENT PLAN			
Certified By: CEO	Certified Date: 7/29/2022		

**APPENDIX H
SPILL REPORTING REQUIREMENTS AND NOTIFICATIONS**

In addition to the emergency response procedures previously established and outlined with this plan, additional immediate reporting requirements shall be required for discharges of spills of hazardous substances.

WDNR Reportable Spills

Spills are reportable to the Wisconsin DNR if:

- there is an impact to human health (an evacuation is considered a threat to human health)
- there is an impact to the environment (includes sanitary sewer, storm sewer and/or surface water)
- there is a fire, explosion or safety hazard
- the spill has NOT been immediately cleaned up (in accordance with NR700-726)
- the spill is more than reportable quantities:
 - petroleum product completely contained on an impervious surface.
 - less than 1 gallon of gasoline or light grade petroleum product onto a pervious surface or runs off an impervious surface.
 - less than 5 gallons of medium or heavy grade petroleum products onto a pervious surface or runs off an impervious surface.

****Special Note.** A hazardous substance that is “discharged” into a secondary containment structure, that is completely contained and can be recovered with no discharge to the environment, is not subject to the discharge notification requirement.**

WDNR Notification

In the event of a release, **call the 24-hour spill hotline at 1-800-943-0003.**

If there is a release that could threaten human health outside the facility or if a spill reaches surface water, **immediately notify the National Response Center at (800) 424-8802.**

The Notification for Hazardous Substance Discharge Form – Non-Emergency Only (Form 4400-225) is now a web form accessible through the Submittal Portal (<https://dnr.wisconsin.gov/topic/Brownfields/Submittal.html>).

WDNR Spill Fact Sheet



EHS010 -
Emergency Respons

WDNR Spill Coordinators




EHS010 -
Emergency Respons

Regional Hazardous Material Response Team Map



Regional
Hazardous Material:

Document No.: WI-EHS-005	Revision Date: 7/29/2022	Revision No.: 013	
Document Title: EMERGENCY MANAGEMENT PLAN			
Certified By: CEO		Certified Date: 7/29/2022	

Federal Reporting Requirements

A responsible party may also have to comply with other state and/or federal reporting requirements relating to the Emergency Planning and Community Right to Know Act (EPCRA) or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Contact the CEO for assistance.

DOT Incident Reporting Requirements

The Hazardous Material Regulations require certain types of incidents to be reported to the Pipeline and Hazardous Materials Safety Administration (PHMSA) within specific periods of time depending on the hazardous material incident. See the DOT Guide for Preparing Hazardous Material Incident Reports.

DOT Guide for Preparing Hazardous Material Incident Reports (F5800.1)



DOT Hazardous
Material Incident Re

Contingency Plan Activation Notification

In the event that the Emergency Management Plan is activated, a written report shall be submitted to the WDNR within 15-days of the incident. The written report should contain the minimum required information.



Immediate Reporting Required for Hazardous Substance Spills

If you are aware of a hazardous substance spill notify the Department of Natural Resources (DNR). State law requires the IMMEDIATE reporting of hazardous substance spills and other discharges to the environment.

**CALL 800-943-0003
TO REPORT SPILLS**

Use **DNR Form 4400-225** to report other hazardous substance discharges.



Other hazardous substance discharges discovered during an environmental assessment or laboratory analysis of soil, sediment, groundwater or vapor samples, including historical contamination and contamination caused by an ongoing long-term release, should be reported to the DNR by submitting the DNR web form *Notification for Hazardous Substance Discharge Form – Non-Emergency Only (Form 4400-225)*. Directions for accessing and submitting web form 4400-225 are available at <https://dnr.wisconsin.gov/topic/Brownfields/Submittal.html>.

- ✓ Report hazardous substance discharges as soon as visual or olfactory evidence confirms a discharge or laboratory data is available to document a discharge. Do not wait to complete a Phase II environmental assessment, or other similar report, to notify the DNR.

Reporting is everyone's responsibility

Individuals and entities that cause a hazardous substance spill or discharge to the environment are required by state law to notify the DNR immediately - as soon as the spill or discharge is identified. Individuals and entities that own or control property where the spill or discharge occurred must report the discharge immediately if it is not reported by the person or entity that caused the discharge.

For public health and safety, the DNR encourages everyone to report known hazardous substance discharges. Reporting a spill or other discharge, in itself, does not make a person or entity liable for the contamination.

Proper spill containment, cleanup, and disposal is always required

Every person/entity (including lenders and local governments) that causes a hazardous substance discharge, or owns or controls property at which a discharge occurred, must comply with the response action requirements in [Wis. Admin. Chs. NR 700 to 799](#). No spill or discharge is exempt from the duty to properly contain, clean up and dispose of the substance and associated contaminated media, such as soil, water and other affected materials.

Spill reporting exemptions

All spills must be cleaned up, but it is generally not necessary to report recent spills that are:

- less than 1 gallon of gasoline
- less than 5 gallons of any petroleum product other than gasoline
- any amount of gasoline or other petroleum product that is completely contained on an impervious surface
- individual discharges authorized by a permit or program approved under Wis. Stat. Chs. 289 - 299
- less than 25 gallons of liquid fertilizer
- less than 250 pounds of dry fertilizer
- pesticides that would cover less than 1 acre of land if applied according to label instructions
 - * NOTE: Reporting is required if the ongoing, long-term release or application of a permitted pesticide, fertilizer or other substance accumulates to levels that exceed current health or safety standards.
- less than the federal reportable quantities listed in 40 C.F.R. §§ 117 or 302
 - * NOTE: U.S. EPA (federal) spill reporting requirements are outlined on the internet at <https://www.epa.gov/emergency-response/when-are-you-required-report-oil-spill-and-hazardous-substance-release>.

Spill reporting exemptions do not apply (and reporting is required) when:

- the spilled substance has not evaporated or been cleaned up in accordance with Wis. Admin. chs. NR 700–799 the spilled substance is a potential fire, explosion or safety hazard
- the spilled substance causes, or threatens to cause, chronic or acute human health concerns
 - * NOTE: If you are unsure about potential human health effects, consult with local or state health officials.
- the spilled substance adversely impacts, or threatens to impact, the air, lands or waters of the state (as either a single discharge or when accumulated with past discharges) - even if the degree of the impact has not yet been thoroughly evaluated
 - * NOTE: If the substance causes sheen on surface water, has entered or is on the verge of entering the waters of the state, DNR will consider the spilled substance a threat to impact, or to have adversely impacted, waters of the state and reporting is required.

Terms, definitions, statutes and rules

Hazardous substance — Any substance that can cause harm to human health and safety, or the environment, because of where it is spilled, the amount spilled, its toxicity or its concentration. Even common products such as milk, butter, pickle juice, corn, beer, etc., may be considered a hazardous substance if discharged to a sensitive area.

Discharge — Spilling, leaking, pumping, pouring, emitting, emptying, dumping, etc., to land, air or water.

Spill — A discharge that is typically a one-time event or occurrence, and usually inadvertent.

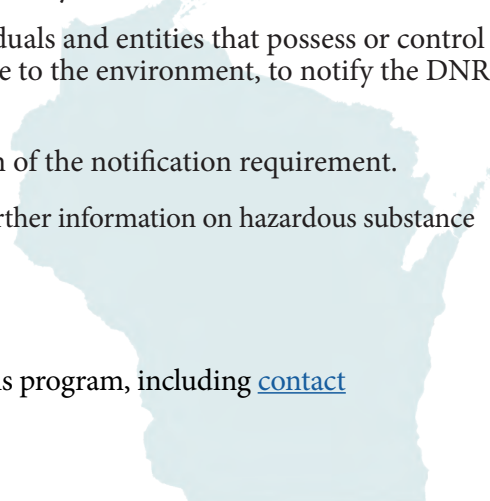
Wis. Stat. § 292.11(2) and Wis. Admin. § NR 706.05 — Require individuals and entities that possess or control a hazardous substance, or that cause the discharge of a hazardous substance to the environment, to notify the DNR immediately about the discharge.

Wis. Stat. § 292.99 — Authorizes penalties up to \$5,000 for each violation of the notification requirement.

Consult [Wis. Stat. Ch. 292](#) and [Wis. Admin. §§ 700 – 799](#), and dnr.wi.gov for further information on hazardous substance spill and discharge reporting, investigation and cleanup.

DNR contact information

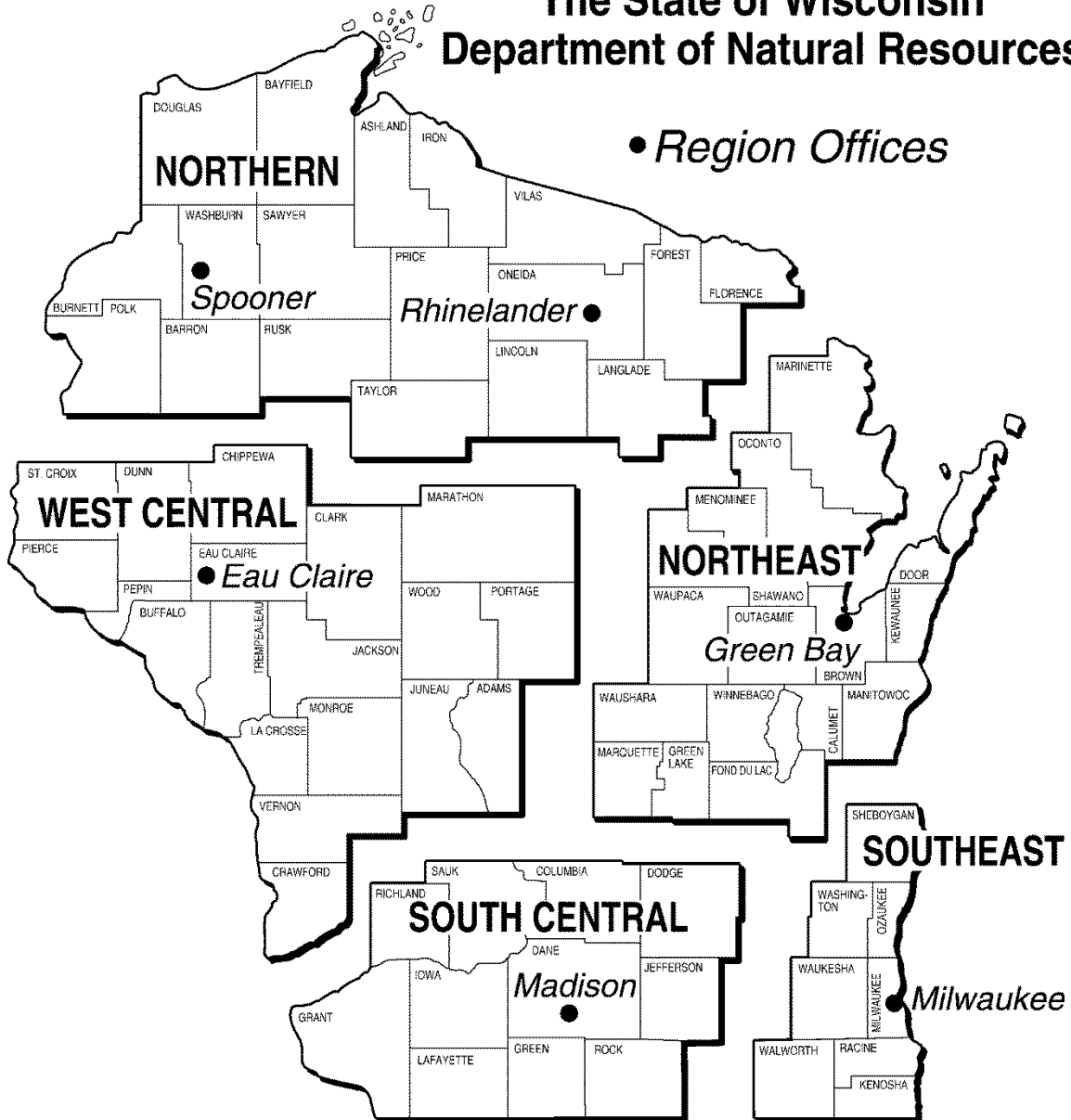
To report a discharge call 1-800-943-0003. For more information on the spills program, including [contact information](#), visit dnr.wi.gov, search “Spills”.



DNR Spill Coordinator Telephone Numbers

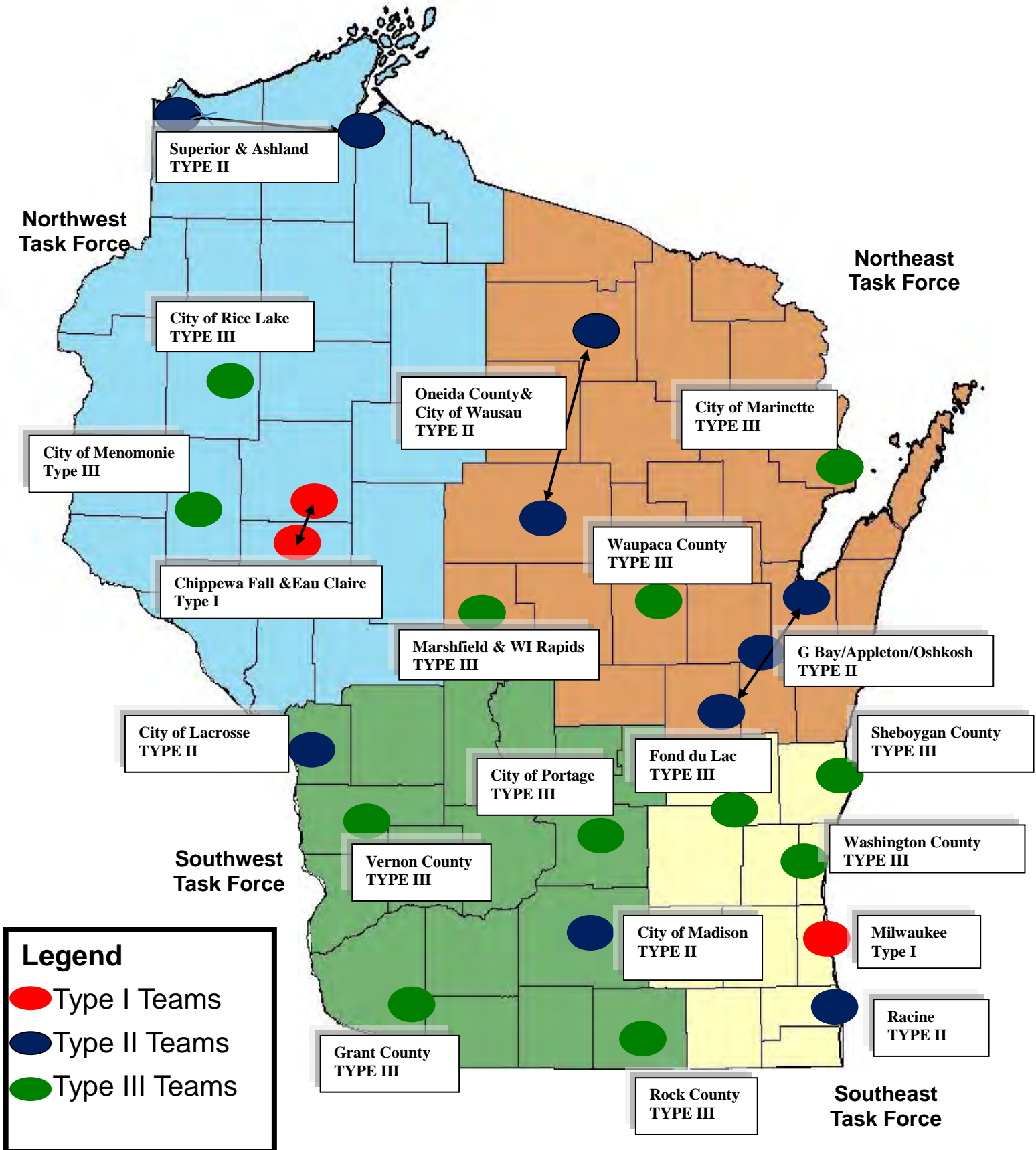
Name	Region	Office
24 Hour Hotline	Statewide	800-943-0003
Maizie Reif	Northeast	920-360-4291
Jeff Paddock	Northern	715-828-8544
Trevor Bannister	South Central	608-347-0058
Riley Neumann	Southeast	414-750-7030
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Wisconsin Department of Natural Resources
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dnr.wi.gov, search "spills"

Wisconsin Hazardous Materials Response System



Legend

- Type I Teams
- Type II Teams
- Type III Teams



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

Guide for Preparing Hazardous Materials Incidents Reports



Revised January 2004
Supersedes Previous Edition



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

Hazardous Materials Incident Reporting

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Overview

Hazardous Materials Incident Report

Department of Transportation Form F 5800.1

What Federal Regulation Requires Me To Submit the Report?

The Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) require certain types of incidents be reported to the Pipeline and Hazardous Materials Safety Administration (PHMSA). Section 171.15 of the HMR requires an immediate telephonic report (within 12 hours) of certain types of hazardous materials incidents. Section 171.16 requires a written report for certain types of hazardous materials incidents within 30 days of the incident, and a follow-up written report within one year of the incident, based on certain circumstances. Each type of report is explained below. (The full text of these sections is at the end of the instructions.)

What is the Purpose of the Report?

The information you are providing in this report is fundamental to hazardous material transportation risk analysis and risk management by government and industry. It allows us to better understand the causes and consequences of hazardous material transportation incidents. The data is used to identify trends and provide basic program performance measures. It helps to demonstrate the effectiveness of existing regulations and to identify areas where changes should be considered. It also assists all parties, including industry segments and individual companies, to understand the types and frequencies of incidents, what can go wrong, and possible measures that would prevent their recurrence. Your accurate and complete description of incidents can make a significant contribution to continual safety improvement through better regulations, cooperative partnerships, and individual efforts.

Who Must Complete the Report?

Any person in possession of a hazardous material during transportation, including loading, unloading and storage incidental to transportation, must report to the Department of Transportation (DOT) if certain conditions are met. This means that when the conditions apply for completing the report, the entity having physical control of the shipment is responsible for filling out and filing DOT Form F 5800.1.

Generally, the entity having physical control of the shipment during transportation will be the carrier. For incidents that occur when a hazardous material is stored temporarily during transportation, the entity in physical possession of the shipment may be a warehouse or similar storage facility.

Loading operations. Incidents that occur while a shipper is loading a hazardous material onto a transport vehicle or into a bulk packaging, such as a cargo tank, portable tank, or rail tank car, before the carrier arrives at the facility to pick up the shipment are not required to be reported because these incidents occur prior to the onset of transportation in commerce. Incidents that occur while the carrier that will be transporting the hazardous material is observing or participating in loading operations must be reported because the carrier is deemed to be in possession of the hazardous material at that point; thus, these incidents occur during transportation. For these incidents, the carrier must complete the report.

Unloading operations. Incidents that occur or are discovered while a consignee is unloading a hazardous material from a transport vehicle or bulk packaging after the carrier has delivered the material are not required to be reported because these incidents occur after transportation has ended. Incidents that occur while the carrier that delivered the hazardous material is observing or participating in unloading operations must be reported because the carrier is deemed to be in possession of the hazardous material at that point; thus, these incidents occur during transportation. For these incidents, the carrier must complete the report.

What Definitions Should I Know in Order to Complete the Report?

In order to accurately complete the report, you should be familiar with the following terms. A complete list of definitions is contained in § 171.8.

Bulk packaging—a packaging, other than a vessel or a barge, including a transport vehicle or freight container, in which hazardous materials are loaded with no in-

termediate form of containment and that has:

- (1) A maximum capacity greater than 450 liters (119 gallons) as a receptacle for a liquid;
- (2) A maximum net mass greater than 400 kilograms (822 pounds) and a maximum capacity greater than 450 liters (119 gallons) as a receptacle for a solid; or
- (3) A water capacity greater than 454 kilograms (1,000 pounds) as a receptacle for a gas as defined in § 173.115.

Cargo tank—a bulk packaging that is:

- (1) A tank intended primarily for the carriage of liquids or gases and includes appurtenances, reinforcements, fittings, and closures;
- (2) Permanently attached to or forms a part of a motor vehicle, or is not permanently attached to a motor vehicle but which, by reason of its size, construction, or attachment to a motor vehicle, is loaded or unloaded without being removed from the motor vehicle; and
- (3) Not fabricated under a specification for cylinders, intermediate bulk containers, multi-unit tank car tanks, portable tanks, or tank cars.

Hazardous material—a substance or material that has been determined to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and that has been so designated. The term includes hazardous substances, hazardous wastes, marine pollutants, elevated temperature materials, materials designated as hazardous under the provisions of § 172.101, the Hazardous Materials Table (HMT), and materials that meet the defining criteria for hazard classes and divisions in Part 173.

Hazardous substance—a material, including its mixtures and solutions, that—

- (1) Is listed in Appendix A to § 172.101;
- (2) Is in a quantity, in one package, which equals or exceeds the reportable quantity (RQ) listed in Appendix A to § 172.101; and

Table 1 Reportable Quantities.

RQ pounds (kilograms)	Concentration by Weight	
	Percent	PPM
5000 (2270)	10	100,000
1000 (454)	2	20,000
100 (45.4)	0.2	2,000
10 (4.54)	0.02	200
1 (0.454)	0.002	20

- (3) When in a mixture or solution—
- For radionuclides, conforms to paragraph 7 of Appendix A to § 172.101.
 - For other than radionuclides, is in a concentration by weight which equals or exceeds the concentration corresponding to the RQ of the material, as shown in Table 1.

The term *hazardous substance* does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance in Appendix A to § 172.101, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas useable for fuel (or mixtures of natural gas and such synthetic gas).

Hazardous waste—any material that is subject to the Hazardous Waste Manifest Requirements of the U.S. Environmental Protection Agency specified in 40 CFR Part 262.

Loading incidental to movement—loading by carrier personnel or in the presence of carrier personnel of packaged or containerized hazardous material onto a transport vehicle, aircraft, or vessel for the purpose of transporting it, including the loading, blocking, and bracing of a hazardous materials package in a freight container or transport vehicle, and segregating a hazardous material in a freight container or transport vehicle from incompatible cargo. For a bulk packaging, *loading incidental to movement* means filling the packaging with a hazardous material for the purpose of transporting it. *Loading incidental to movement* includes transloading.

Marine pollutant—a material that is listed in Appendix B to § 172.101 (also see

§ 171.4) and, when in a solution or mixture of one or more marine pollutants, is packaged in a concentration that equals or exceeds:

- Ten percent by weight of the solution or mixture for materials listed in Appendix B; or
- One percent by weight of the solution or mixture for materials that are identified as severe marine pollutants in Appendix B.

Movement—the physical transfer of a hazardous material from one geographic location to another by rail car, aircraft, motor vehicle, or vessel.

Storage incidental to movement—storage of a transport vehicle, freight container, or package containing a hazardous material by any person between the time that a carrier takes physical possession of the hazardous material for the purpose of transporting it until the package containing the hazardous material is physically delivered to its destination.

Transloading—the transfer of a hazardous material from one bulk packaging to another bulk packaging, from a bulk packaging to a non-bulk packaging, or from a non-bulk packaging to a bulk packaging for the purpose of continuing the movement of the hazardous material in commerce.

Transportation—the movement of property and loading, unloading, or storage incidental to that movement.

Undeclared hazardous material—a hazardous material that is:

- Subject to any of the hazard communication requirements in subparts C (Shipping Papers), D (Marking), E (Labeling), and F (Placarding) of Part 172 of this subchapter, or an alternative marking requirement in Part 173 of this subchapter (such as §§ 173.4(a)(10) and 173.6(c)); and
- Offered for transportation in commerce without any visible indication to the person accepting the hazardous material for transportation that a hazardous material is present, on either an accompanying shipping document, or the outside of a transport vehicle, freight container, or package.

Unintentional release—the escape of a hazardous material from a package on an occasion not anticipated or planned. This includes releases resulting from collision, package failures, human error, criminal activity, negligence, improper packing, or unusual conditions such as the operation of pressure relief devices as a result of over-pressurization, overfill, or fire exposure. It does not include releases, such as venting of packages, where allowed, and the operational discharge of contents from packages.

Unloading incidental to movement—removing a packaged or containerized hazardous material from a transport vehicle, aircraft, or vessel, or, for a bulk packaging, emptying a hazardous material from the bulk packaging after the hazardous material has been delivered to the consignee when performed by carrier personnel or in the presence of carrier personnel.

Additionally, for purposes of reporting on this form, the following definitions apply:

Lading retention system—a lading retention system consists of those items or equipment that provide containment of hazardous materials at some point during transportation, including loading and unloading. The cargo tank shell, associated piping, and valves are an example of a lading retention system. Dents or damage to a tank requiring repair to an accident protection system guarding the tank are examples of incidents that must be reported. Paint chips and scratches to either the tank or the accident protection system are examples of incidents that do not require reporting.

Major transportation artery—a highway, main road or secondary road but not a side street or dirt road. In the case of rail, any rail line except a rail spur.

When Must I Submit a Written Report (DOT Form F 5800.1)?

Under § 171.16, you must submit a written report within 30 days after any of the following:

- An incident that was reported by telephonic notice under § 171.15;
- An unintentional release (see definitions) of a hazardous material during transportation including loading, unloading and temporary storage related to transportation;
- A hazardous waste is released;

Table 2 Examples to Clarify When to Report Structural Damage to a Specification Cargo Tank.

Incident Report Required	No Incident Report Required
Damage to an outlet valve that affects seating and requires replacement.	Handle broken or knocked off valve - but otherwise undamaged.
Serious damage that, if worse, could have resulted in the loss of the contents of the cargo tank. Damage to outlet lines that contain hazardous materials during transportation is in this category.	Serious damage that, even if worse, would not have resulted in the loss of the contents of the cargo tank. Damage to outlet lines that are normally not charged during transportation is in this category.
Cargo tank damage that requires professional inspection or recertification to ensure it is capable of meeting requirements.	Minor damage that obviously will not affect continuation of the cargo tank in service.
Cargo tank damage that requires immediate or subsequent repair because of questions about cargo tank integrity.	Cargo tank damage that requires repair for cosmetic reasons only.

- An undeclared shipment with no release is discovered; or
- A specification cargo tank 1,000 gallons or greater containing any hazardous materials that—
 - (1) Received structural damage to the lading retention system or damage that requires repair to a system intended to protect the lading retention system, and
 - (2) Did not have a release.

To clarify the requirement for a report based on structural damage to a specification cargo tank, Table 2 illustrates some examples.

When Is a Report Not Required?

You are not required to report a release of a hazardous material if **ALL** of the following apply:

- The shipment is not being offered for transportation or being transported by air;
- None of the criteria in § 171.15(a) applies;
- The material is not a hazardous waste;
- The material is properly classed as an ORM-D, or a Packing Group III material in Class or Division 3, 4, 5, 6.1, 8, or 9;
- Each package has a capacity of less than 20 liters (5.2 gallons) for liquids or less than 30 kg (66 pounds) for solids;
- The total aggregate release is less than 20 liters (5.2 gallons) for liquids or less than 30 kg (66 pounds) for solids;

- The material does not meet the definition of an undeclared hazardous material in § 171.8; and
- The shipment is an undeclared material discovered in an air passenger's checked or carry-on baggage during the airport screening process.

Also, you are not required to report releases of minimal amounts of material (i.e., a pint or less) released from the manual operation of seals of pumps, compressors, or valves, during the connecting or disconnecting of loading and unloading lines, or, for materials for which venting is authorized, from vents, provided these releases do not result in property damage or trigger any of the telephonic notifications requirements found in § 171.15.

When Must I Make a Telephonic Report?

Under § 171.15, you must provide **telephone notice within 12 hours** after the incident occurs when one of the following conditions occurs during the course of transportation and is a direct result of the hazardous material:

- A person is killed;
- A person receives an injury requiring admittance to a hospital;
- The general public is evacuated for one hour or more;
- One or more major transportation arteries or facilities are closed for one hour or more;

- The operational flight plan or routine of an aircraft is altered;
- Fire, breakage, spillage or suspected radioactive contamination occurs involving a radioactive material;
- Fire, breakage, spillage or suspected contamination occurs involving an infectious substance other than a diagnostic specimen or regulated medical waste;
- There is a release of a marine pollutant in a quantity exceeding 450 liters (119) gallons for liquids or 400 kilograms (882 pounds) for solids; or
- A situation exists of such a nature that in the judgment of the person in possession of the hazardous material, it should be reported to DOT's National Response Center (NRC) even though it does not meet the above criteria.

You may decide that the situation should be reported even though it does not meet any of the above criteria. Make sure that you request the NRC report number when you make your telephonic report.

What Telephone Number Do I Call to Make an Immediate Notification of a Hazardous Materials Incident?

You must call 800-424-8802 (toll-free) or 202-267-2675 (toll call) to make a telephonic incident report. This is the number to the NRC.

This call must be made within 12 hours of the events that trigger this requirement. If the incident involves an infectious substance, you may notify the Director, Center for Disease Control and Prevention (CDC), U.S. Public Health Service, Atlanta, Georgia, toll free at 800-232-0124. If a discrepancy of a shipment intended for air is discovered following its acceptance aboard aircraft, notify the nearest Federal Aviation Administration Civil Aviation Security Office as soon as practical.

How Long Do I Have to Submit the Written Report?

You must submit your written report within **30 days of discovery of the incident**, § 171.16(a).

Am I Required to Update the Information in the Report?

Yes. You must use DOT Form F 5800.1 and check the "A supplemental (follow-up) report" box on question #2 to provide additional information after the initial report. You are required to provide updates for up to one year after the initial filing if more information is gained or new developments arise concerning the following, for example:

- A death results from injuries caused by a hazardous material;
- The person responsible for preparing the original report learns that there is a misidentification of hazardous material or package information;
- Damage or loss or related costs that were not known at the time the report was filed become known; or
- Revised estimates of damages, losses, and related costs result in a change of \$25,000 or more, or 10% of the original cost estimates, whichever is greater, even if the original estimate was under \$500.

How and Where Do I Submit My Completed Report?

- You can mail paper copies of the report to the Information Systems Manager, U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, Office of Hazardous Materials Safety, PHH-63, Washington, DC 20590-0001; or

- You can submit the report on-line at <http://hazmat.dot.gov>.

How Long Must I Keep a Copy of the Report?

You must keep a copy of each report or an electronic image of the report for two years after the date you submit it to PHMSA (§ 171.16(b)(3)).

Where Must I Keep a Copy of the Report?

The report must be accessible through your company's principal place(s) of business. You must be able to make the report available upon request to authorized representatives or a special agent of the Department within 24 hours of such a request (§ 171.16(b)(3)).

How Can I Get a Blank Copy of the DOT Form F 5800.1?

There are a variety of sources for obtaining the DOT Form F 5800.1. Please note that you are allowed to make unlimited photocopies of the form and distribute them.

- You may obtain limited copies of the form from the Information Systems Manager at the above address.
- You may download a copy of the form from our website at <http://hazmat.dot.gov/spills.htm>
- Our Fax on Demand service has copies of the instructions and the form. Call 800-467-4922 and choose the Fax on Demand option #2.

How Long Does It Take To Complete the Report?

PHMSA anticipates that it will take you approximately 1.6 hours to complete this report. This estimate includes the time it will take you to review the instructions, search your existing data sources for information, gather the required data, and complete and review the report.

How Can I Comment on the Length of Time Needed to Complete the Report or on the Amount of Information Required in the Report?

You can send your comments on the report, and any suggestions you have for reducing the amount of time needed to complete the report, to the following address:

- (1) Information Systems Manager, U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, Office of Hazardous Materials Safety, PHH-63, Washington, DC 20590-0001.

Please verify that your information is accurate. Although the required information is generally available at the time of the incident, you may need to do some additional investigation in order to obtain all of the facts pertaining to deaths, injuries or damage amounts. If you submit complete and accurate information at the time you file the report, it will decrease the chance of your having to supply missing information to DOT at a later date. PHMSA may follow up on incomplete forms.

Instructions

Completing DOT Form F 5800.1

Please print. Fill in all applicable blanks accurately to the best of your ability.

Part I: Report Type

- (1) *This is to report:* Check the box that describes why you are filling out this form. This will normally be "A" A hazardous material incident." If you are reporting an undeclared shipment with no release, check the corresponding box, "B)." If you are reporting an incident involving a cargo tank motor vehicle containing a hazardous material that received structural damage to the lading retention system that may affect its ability to retain lading but does not release a hazardous material, check that appropriate box, "C)."
- (2) *Indicate what type of report this is:* If this is an initial report, check the "initial report" box. If this is a follow-up to a previous report, check the "A supplemental (follow-up) report" box. If you are using additional pages, check the "Additional Pages" box.

Part II: General Incident Information

- (3), (4) *Date & Time of Incident:* Enter the date and time the incident occurred. If you do not know the actual date and time, give the date and time you discovered the incident. Use 24-hour time for the incident time (e.g., "2400" for midnight, "1200" for noon, "0747" for 7:47 a.m., "2115" for 9:15 p.m.).
- (5) *Enter National Response Center Report Number:* If this incident was reported to the NRC, fill in the report number NRC assigned to the incident.
- (6) *If you submitted a report to another Federal DOT agency, enter the agency and report number:* If you were required to fill out a report for another federal agency such as the Federal Railroad Administration (FRA) or the Federal Motor Carrier Safety Administration (FMCSA) for this incident, please include the agency and report number. This will facilitate our combination of information.

- (7) *Location of Incident:* Enter the geographic location of the incident (city, county, state, and zip code). If you do not know the actual location where the incident occurred, give the location where it was discovered. If the incident occurred at an airport or rail yard, include the name of the facility. If the incident occurred on a body of water, include the name and/or river mile. If you do not know the street address, or if the incident occurred on a highway, include a description such as "On I-70, mile marker 240."
- (8) *Mode of Transportation:* Enter the code that corresponds to the mode of transportation in which the incident occurred or was discovered. If the incident occurred or was discovered in an in-transit storage area (e.g., a terminal or warehouse), check the box that corresponds to the mode by which the package was last transported.
- (9) *Transportation Phase:* Enter the code that describes where the incident occurred in the transportation system. In transit means the incident occurred or was first discovered while the package was in the process of being transported. In-transit storage is storage incidental to transportation, such as at a terminal waiting for the next leg of transportation.
- (10) *Carrier/Reporter:* Provide the name, street address, Federal DOT number (if applicable), and hazmat registration number of the carrier or the entity who is reporting the incident (if other than a carrier). The entity in physical possession of the material when the incident occurred or was discovered must report the incident.
- (11) *Shipper/Offeror:* Enter the information about the person or entity that originally offered for transportation the material or package involved in the incident.
- (12) *Origin:* Enter the origin of the shipment if the address is different than the shipper/offeror information entered in item #11.
- (13) *Destination:* Enter the final destination of the shipment involved in the incident.
- (14) through (19):
- Hazardous Material Description:* Enter the proper shipping name, technical or trade name, hazard class or division, ID number, packing group, and amount of material released. All of this information, except the amount of material released, can be found on the shipping papers that accompany the shipment, § 172.202. When indicating the amount of material released, include units of measurements (e.g.: 115 gallons, 69 tons).
- (20) *Was the material shipped as a hazardous waste?* Check the "Yes" box if the material meets the definition of a hazardous waste in § 171.8 (requires an EPA Uniform Hazardous Waste Manifest). Include the EPA Manifest number.
- (21) *Is this a Toxic by Inhalation (TIH) material?* If the material involved in the incident meets the definition of a Toxic by inhalation material in § 173.132, check the "Yes" box and enter the Hazard Zone in the space provided.
- (22) *Was the material shipped under an Exemption, Approval, or Competent Authority Certificate?* If the shipment was shipped under an exemption, an approval, or a Competent Authority Certificate, check the "Yes" box and provide the appropriate assigned number.
- (23) *Was this an undeclared hazardous materials shipment?* If this material was not indicated in any way to be a hazardous material even though it was required to be described as such on a shipping paper, or if the material would normally be exempted from the shipping paper requirements (such as a small quantity material) and does not have the required markings, it is considered an undeclared hazardous material shipment. Check the appropriate box.

Table 3 Non-bulk and IBC Packaging Identification Codes.

Non-Bulk Packaging		
Outer Packaging		
Type	Material	Head Type
1 Drum	A Steel	1 Non-removable
2 Wooden Barrel	B Aluminum	2 Removable
3 Jerrican	C Natural Wood	
4 Box	D Plywood	
5 Bag	F Reconstituted Wood	
6 Composite Packaging	G Fiberboard	
7 Pressure receptacle	H Plastic	
	L Textile	
	M Paper, multiwall	
	N Metal other than Steel or aluminum	
	P Glass, porcelain, or stoneware	
Inner Packaging		
1 Bottle	A Metal (any type)	
2 Can	B Glass, Porcelain, or stoneware	
3 Box	C Plastic	
4 Bag	D Fiberboard or cardboard	
5 Cylinder	E Wood (any type)	
IBC Packaging Identification Codes		
Material of Construction		
1 Metal	3 Composite	5 Wooden
2 Plastic	4 Fiberboard	6 Flexible

Part III: Packaging Information

- (24) *Packaging Type:* Check the box that corresponds to the type of packaging involved in the incident. If more than one packaging type was involved in an incident, reproduce Part III of the form and fill out this section for each of the packaging types. For example, if three different packaging types were involved in an incident, fill out a separate Part III for each packaging type. If the type of packaging is not represented, check the "Other" box and enter a brief description such as "non-specification bulk bin."
- (25) *Enter the appropriate failure codes (found at the end of the instructions):* Enter the codes that describe what failed on the packaging, how the packaging failed, and the cause(s) of the failure. Be sure to enter the codes from the list that corresponds to the particular packaging types checked above (#24). Enter the most important failure point in line 1. If there is a second failure point, enter in line 2. If there are more

than two failure points, provide additional information in this format in Part VI. The following explains the content of each line:

What Failed: You can enter up to 2 "What Failed" codes to describe the part of the packaging that fails and was the immediate cause of the release. Often, on a simple packaging, only one code will be required. On more complex packaging, additional entries will help identify where that failure occurred. The first entry should designate the specific point of failure, followed by entries that help identify where that failure occurred. For instance, a deteriorated gasket on a pipe flange on the liquid line would have failure code 121 for gasket entered first and failure code 118 for flange entered second.

How Failed: Enter the "Failure" code that describes how

the corresponding part of the packaging failed. The primary way the packaging failed should be entered first.

Cause(s) of Failure: Enter the "Cause of Failure" code that describes what caused the corresponding part of the packaging to fail in the way it did. The most probable or fundamental cause of failure should be entered first.

If none of the codes on the list fit exactly, use the closest match and provide additional detail in Part VI. Also, if you believe a better set of codes would be more descriptive of what failed, how it failed, and the causes of failure, suggest them in Part VII.

(26a) *Provide the complete packaging identification markings, if available:* Every specification packaging, UN or DOT, has a packaging identification printed or stamped on it or on a plate attached to the packaging. Examples are provided on the form.

(26b) *For Non-bulk, IBC, or non-specification packaging:* Only fill out 26b if the marking is incomplete, destroyed, or unknown. Fill in the Outer and Inner packaging type and Material of Construction information, as appropriate. If the packaging is non-bulk or Intermediate Bulk Container (IBC), use the codes in Table 3 to enter the number or letter that applies for either non-bulk or IBC packaging. For non-bulk, IBC or non-specification packaging provide a *description* of the packaging in the space(s) provided.

(27) *Describe the package capacity and the quantity:* Enter the total capacity of the inner and outer package. Also enter the actual amount of hazardous material that was shipped in the package, the number of packages in the shipment, and the number of packages that failed. Please include the units of measurement (liter, gallons, pounds, cubic feet, etc.)

(28) *Provide package construction and test information, as appropriate:* In the case of Non-bulk packagings

or IBCs enter the name of the packaging manufacturer or the symbol of the manufacturer *only if* complete identification markings were not provided in #26b. Enter the date of manufacture and the serial number, if applicable. Enter the last test date if the packaging requires periodic testing. Also include the design pressure, shell thickness, head thickness, and service pressure if the failed packagings are of the type indicated in parenthesis after each question. If the packaging contained a valve, or other device that failed and resulted in a hazardous material release, enter the valve or device type, manufacturer (if present and legible), and model number (if present and legible).

- (29) *If the package is for Radioactive Materials, complete the following:* Complete this question *only if* a radioactive material was involved. Indicate the packaging category, the packaging certification, certification number, and which nuclides were present, the transportation index (TI), activity of the nuclides, and the criticality safety index.

Part IV: Consequences

- (30) *Result of Incident:* Check all boxes that describe what occurred during the incident or as a result of the incident. For example, in a situation where a truckload of 55 gallon drums of corrosive liquids overturns resulting in a release that contaminates a nearby wetlands and stream the boxes "Spillage," "Material Entered Waterway/Storm Sewer," and "Environmental Damage" may apply.
- (31) *Emergency Response:* Check all boxes that correspond with any emergency response and cleanup crews that participated in resolving the incident. If a fire crew, EMS, or police unit responded to the incident, include the report number.
- (32) *Damages:* You are required to provide information on estimated damages if your damages exceed \$500.00. This figure includes the

cost of the material lost, property damage, vehicle damage, response costs, and clean-up costs. If you do not know these amounts at the time you complete the report, or the actual costs are revised by more than \$25,000, you must submit a follow-up report after you determine the amounts. The following definitions explain each of the costs:

Material Loss: Enter the value of material released and unrecoverable. Base this entry on the amount of material released multiplied by the unit value (e.g., price per gallon or price per pound) as listed on the shipper's invoice. If the invoice is not available, estimate the cost per unit using the shipper's basis.

Carrier Damage: Enter the total value of damage incurred by the carrier. Major components include costs to repair the damaged vehicle and costs resulting from damage to cargo. If the vehicle is declared "totaled," enter the insured value of the vehicle. This entry should not include damage to other property or to vehicles owned by other persons.

Property Damage: Enter the total value of costs resulting from damage to the property of others involved in the incident. These include: repair and replacement costs of other vehicles; repair and replacement costs to buildings and other fixed facilities; and restoration of open land beyond decontamination and cleanup.

Response Cost: Enter the total value of response costs. Response costs are those costs incurred immediately after the incident, and include local emergency response from police and fire departments and emergency response teams, as well as costs incurred by the responsible party. Response costs also include costs to contain the hazardous material released.

Remediation/Cleanup Cost: Enter the total value of the cost to cleanup and remediate the site. Cleanup costs are those costs incurred to collect, transport, and ultimately dispose of all material collected during the response phase. Remediation costs are those costs incurred to restore the incident scene to its pre-incident state, and could include excavation, disposal and replacement of contaminated soil, pumping, treatment and re-injection of contaminated groundwater, or absorption and disposal of hazardous material released into surface water.

- (33a) *Did the hazardous material cause or contribute to a human fatality?* If a person was fatally injured by contact with the hazardous material or its vapors or by a fire or explosion that resulted from the hazardous material, check the "Yes" box and enter the number of fatalities that resulted directly from the hazardous material.
- (33b) *Were there human fatalities that did not result from the hazardous material?* If the fatalities were not caused directly by the hazardous material, check the "Yes" box and enter the number of fatalities. An example: if a passenger car collided with a cargo tank carrying gasoline and the automobile driver was killed due to the collision, then the fatality was *not* caused by the hazardous material released. If, however, the accident resulted in the release of gasoline from the cargo tank and a resulting fire killed the automobile driver, then the fatality was caused by the hazardous material.
- (34) *Did the hazardous material cause or contribute to a personal injury?* If a person was injured by contact with the hazardous material or its vapors or by a fire or explosion that resulted from the hazardous material, check the "Yes" box and enter the number of persons injured by the hazardous material.

Hospitalized means *admitted* to a medical facility, not treated and released from a facility, such as a hospital emergency room, where the person was never admitted to the hospital proper. Non-hospitalized individuals are those who may have received attention from medical personnel on-site or at a facility (including hospital emergency room), but were not admitted to a medical facility. Indicate the number of injured employees, emergency responders (firefighters, police, medics, etc.) and members of the general public.

- (35) *Did the hazardous material cause or contribute to an evacuation?* If the incident required the evacuation or removal of persons from a specific area because of possible or actual contact with the hazardous materials involved in the incident, check the "Yes" box. Separately specify the numbers of individuals from the general public evacuated and number of employees of the facility or workers in the area that were evacuated. Also provide the total number of individuals evacuated. Indicate the duration of the evacuation (in hours).
- (36) *Was a transportation artery or facility closed?* If a road or transportation facility was closed due to the incident, check the "Yes" box and indicate the duration (in hours) here.
- (37) *Was the material involved in a crash or derailment?* Check the "Yes" box if a hazardous material was involved in a crash or derailment. Provide the estimated speed and weather conditions at the time of the crash, such as rain, blowing snow, sleet, iced roadway, sun glare, fog, dry pavement, high winds, etc. Indicate if the vehicle overturned or left the roadway or track.

Part V: Air Incident Information

This section is for incidents with packagings transported or intended for transportation by aircraft. If your packaging was not transported or intended to be transported by air, skip this section.

- (38) *Was the shipment on a passenger aircraft?* Indicate whether the shipment in question was on a commercial passenger aircraft. If so, indicate if the material was tendered (accepted for shipment) as cargo, or was located in a passenger's baggage, either in the cabin or baggage compartment.
- (39) *Where did the incident occur or where was the incident discovered?* Indicate where in the course of transportation the incident occurred or was discovered.
- (40) *What phase(s) had the shipment already undergone prior to the incident?* Check all boxes that describe the transportation phases the shipment went through before the incident occurred or was discovered.

Part VI: Description of Events and Packaging Failure

Please describe the events involved in the incident to provide us with a better understanding of the incident. Include information that has not been collected elsewhere on this form, and include special scenarios, outstanding circumstances, or other information that provides a complete picture of the incident. Describe the sequence of events that led to the incident, the package failure (if any) and actions taken at the time of discovery. Submit photographs and diagrams when necessary for clarification. You may continue on additional sheets if necessary.

Part VII: Recommendations/ Actions Taken to Prevent Future Incidents

Recommendations may be preliminary in nature, may suggest actions by other parties, and may be subject to further investigation, refinement, acceptance, or rejection. Often, it may be beyond the ability of the preparer to offer recommendations, but where such recommendations can be made they have the potential of resulting in important improvements with safety benefits. For instance, such information can help companies identify common problems and alert the DOT to the need for additional measures such as outreach or broad training needs. This information can also help support regulatory changes.

Part VIII: Contact Information

Provide the name, title, telephone number, fax number, business name and address, hazmat registration number and email address of the contact person at your company who can answer questions about the information provided on this form. Make sure to check the box that describes the function of your firm: carrier, shipper, facility owner/operator, or other. If "Other" is checked, describe the function.

Failure Codes for All Packaging Types—Complete List

Code	What Failed	Code	How Failed
101	Air Inlet	301	Abraded
102	Auxiliary Valve	302	Bent
103	Basic Material	303	Burst or Ruptured
104	Body	304	Cracked
105	Bolts or Nuts	305	Crushed
106	Bottom Outlet Valve	306	Failed to Operate
107	Check Valve	307	Gouged or Cut
108	Chime	308	Leaked
109	Closure (e.g., Cap, Top, or Plug)	309	Punctured
110	Cover	310	Ripped or Torn
111	Cylinder Neck or Shoulder	311	Structural
112	Cylinder Sidewall - Near Base	312	Torn Off or Damaged
113	Cylinder Sidewall - Other	313	Vented
114	Cylinder Valve		
115	Discharge Valve or Coupling	Code	Cause(s) of Failure
116	Excess Flow Valve	501	Abrasion
117	Fill Hole	502	Broken Component or Device
118	Flange	503	Commodity Self-ignition
119	Frangible Disc	504	Commodity Polymerization
120	Fusible Pressure Relief Device or Element	505	Conveyer or Material Handling Equipment Mishap
121	Gasket	506	Corrosion - Exterior
122	Gauging Device	507	Corrosion - Interior
123	Heater Coil	508	Defective Component or Device
124	High Level Sensor	509	Derailment
125	Hose	510	Deterioration or Aging
126	Hose Adaptor or Coupling	511	Dropped
127	Inlet (Loading) Valve	512	Fire, Temperature, or Heat
128	Inner Packaging	513	Forklift Accident
129	Inner Receptacle	514	Freezing
130	Lifting Feature	515	Human Error
131	Lifting Lug	516	Impact with Sharp or Protruding Object (e.g., nails)
132	Liner	517	Improper Preparation for Transportation
133	Liquid Line		
134	Liquid Valve	518	Inadequate Accident Damage Protection
135	Loading or Unloading Lines		
136	Locking Bar	519	Inadequate Blocking and Bracing
137	Manway or Dome Cover	520	Inadequate Maintenance
138	Mounting Studs	521	Inadequate Preparation for Transportation
139	O-Ring or Seals		
140	Outer Frame	522	Inadequate Procedures
141	Piping or Fittings	523	Inadequate Training
142	Piping Shear Section	524	Incompatible Product
143	Pressure Relief Valve or Device - Non-Reclosing	525	Incorrectly Sized Component or Device
144	Pressure Relief Valve or Device -Reclosing	526	Loose Closure, Component, or Device
145	Remote Control Device		
146	Sample Line	527	Misaligned Material, Component, or Device
147	Stub Sill (Tank Car)		
148	Sump	528	Missing Component or Device
149	Tank Head	529	Overfilled
150	Tank Shell	530	Over-pressurized
151	Thermometer Well	531	Rollover Accident
152	Threaded Connection	532	Stub Sill Separation from Tank (Tank Cars)
153	Vacuum Relief Valve		
154	Valve Body	533	Threads Worn or Cross Threaded
155	Valve Seat	534	Too Much Weight on Package
156	Valve Spring	535	Valve Open
157	Valve Stem	536	Vandalism
158	Vapor Valve	537	Vehicular Crash or Accident Damage
159	Vent		
160	Washout	538	Water Damage
161	Weld or Seam		

Failure Codes by Packaging Type General Non-bulk and IBCs

Code	What Failed
103	Basic Material
104	Body
105	Bolts or Nuts
108	Chime
109	Closure (e.g., Cap, Top, or Plug)
110	Cover
119	Frangible Disc
120	Fusible Pressure Relief Device or Element
121	Gasket
125	Hose
128	Inner Packaging
129	Inner Receptacle
130	Lifting Feature
132	Liner
140	Outer Frame
143	Pressure Relief Valve or Device - Non-Reclosing
144	Pressure Relief Valve or Device - Reclosing
161	Weld or Seam

Code How Failed

301	Abraded
302	Bent
303	Burst or Ruptured
304	Cracked
305	Crushed
306	Failed to Operate
307	Gouged or Cut
308	Leaked
309	Punctured
310	Ripped or Torn
311	Structural
312	Torn Off or Damaged
313	Vented

Code Cause(s) of Failure

501	Abrasion
503	Commodity Self-ignition
504	Commodity Polymerization
505	Conveyer or Material Handling Equipment Mishap
506	Corrosion - Exterior
507	Corrosion - Interior
508	Defective Component or Device
510	Deterioration or Aging
511	Dropped
513	Forklift Accident
514	Freezing
515	Human Error
516	Impact with Sharp or Protruding Object (e.g., nails)
517	Improper Preparation for Transportation
521	Inadequate Preparation for Transportation
522	Inadequate Procedures
523	Inadequate Training
529	Overfilled
530	Overpressurized
534	Too Much Weight on Package
535	Valve Open
536	Vandalism
537	Vehicular Crash or Accident Damage
538	Water Damage

Failure Codes by Packaging Type (continued)**Cylinders****Code What Failed**

111	Cylinder Neck or Shoulder
112	Cylinder Sidewall - Near Base
113	Cylinder Sidewall - Other
114	Cylinder Valve
119	Frangible Disc
120	Fusible Pressure Relief Device or Element
122	Gauging Device
132	Liner
143	Pressure Relief Valve or Device - Non-Reclosing
144	Pressure Relief Valve or Device - Reclosing
161	Weld or Seam

Code How Failed

301	Abraded
303	Burst or Ruptured
304	Cracked
306	Failed to Operate
307	Gouged or Cut
308	Leaked
309	Punctured
313	Vented

Code Cause(s) of Failure

501	Abrasion
502	Broken Component or Device
503	Commodity Self-ignition
504	Commodity Polymerization
505	Conveyer or Material Handling Equipment Mishap
506	Corrosion - Exterior
507	Corrosion - Interior
508	Defective Component or Device
510	Deterioration or Aging
512	Fire, Temperature, or Heat
513	Forklift Accident
514	Freezing
515	Human Error
516	Impact with Sharp or Protruding Object (e.g., nails)
517	Improper Preparation for Transportation
519	Inadequate Blocking and Bracing
520	Inadequate Maintenance
521	Inadequate Preparation for Transportation
522	Inadequate Procedures
523	Inadequate Training
524	Incompatible Product
525	Incorrectly Sized Component or Device
526	Loose Closure, Component, or Device
527	Misaligned Material, Component, or Device
528	Missing Component or Device
529	Overfilled
530	Over-pressurized
535	Valve Open
536	Vandalism
537	Vehicular Crash or Accident Damage

Portable Tanks**Code What Failed**

105	Bolts or Nuts
106	Bottom Outlet Valve
107	Check Valve
108	Chime
109	Closure (e.g., Cap, Top, or Plug)
110	Cover
119	Frangible Disc
120	Fusible Pressure Relief Device or Element
121	Gasket
122	Gauging Device
125	Hose
127	Inlet (Loading) Valve
131	Lifting Lug
132	Liner
135	Loading or Unloading Lines
137	Manway or Dome Cover
140	Outer Frame
141	Piping or Fittings
143	Pressure Relief Valve or Device - Non-Reclosing
144	Pressure Relief Valve or Device - Reclosing
152	Threaded Connection
153	Vacuum Relief Valve
161	Weld or Seam

Code How Failed

301	Abraded
302	Bent
303	Burst or Ruptured
304	Cracked
305	Crushed
306	Failed to Operate
307	Gouged or Cut
308	Leaked
309	Punctured
310	Ripped or Torn
312	Torn Off or Damaged
313	Vented

Code Cause(s) of Failure

501	Abrasion
502	Broken Component or Device
503	Commodity Self-ignition
504	Commodity Polymerization
505	Conveyer or Material Handling Equipment Mishap
506	Corrosion - Exterior
507	Corrosion - Interior
508	Defective Component or Device
509	Derailment
510	Deterioration or Aging
511	Dropped
512	Fire, Temperature, or Heat
514	Freezing
515	Human Error
517	Improper Preparation for Transportation
520	Inadequate Maintenance
521	Inadequate Preparation for Transportation
522	Inadequate Procedures
523	Inadequate Training
524	Incompatible Product
525	Incorrectly Sized Component or Device
526	Loose Closure, Component, or Device
527	Misaligned Material, Component, or Device
528	Missing Component or Device
529	Overfilled
530	Overpressurized
531	Rollover Accident
536	Vandalism
537	Vehicular Crash or Accident Damage

Bulk Tank Vehicles—Cargo Tank Motor Vehicles (CTMV) and Tank Cars**Code What Failed**

101	Air Inlet
105	Bolts or Nuts
106	Bottom Outlet Valve
107	Check Valve
110	Cover
115	Discharge Valve or Coupling
116	Excess Flow Valve
117	Fill Hole
118	Flange
119	Frangible Disc
120	Fusible Pressure Relief Device or Element
121	Gasket
122	Gauging Device
123	Heater Coil
124	High Level Sensor
125	Hose
126	Hose Adaptor or Coupling
127	Inlet (Loading) Valve
131	Lifting Lug
132	Liner
133	Liquid Line
134	Liquid Valve
135	Loading or Unloading Lines
136	Locking Bar
137	Manway or Dome Cover
138	Mounting Studs
139	O-Ring or Seals
141	Piping or Fittings
142	Piping Shear Section
143	Pressure Relief Valve or Device - Non-Reclosing
144	Pressure Relief Valve or Device - Reclosing
145	Remote Control Device
146	Sample Line
147	Sub Sill (Tank Car)
148	Sump
149	Tank Head
150	Tank Shell
151	Thermometer Well
152	Threaded Connection
153	Vacuum Relief Valve
154	Valve Body
155	Valve Seat
156	Valve Spring
157	Valve Stem
158	Vapor Valve
159	Vent
160	Washout
161	Weld or Seam

Code How Failed

301	Abraded
302	Bent
303	Burst or Ruptured
304	Cracked
305	Crushed
306	Failed to Operate
307	Gouged or Cut
308	Leaked
309	Punctured
310	Ripped or Torn
311	Structural
312	Torn Off or Damaged
313	Vented

Code Cause(s) of Failure

501	Abrasion
502	Broken Component or Device
503	Commodity Self-ignition
504	Commodity Polymerization

(Continued on next page)

**Failure Codes by Packaging Type
Bulk Tank Vehicles—Cargo Tank
Motor Vehicles (CTMV) and Tank Cars
Code Cause(s) of Failure**

505	Conveyer or Material Handling Equipment Mishap
506	Corrosion - Exterior
507	Corrosion - Interior
508	Defective Component or Device
509	Derailment
510	Deterioration or Aging
511	Dropped
512	Fire, Temperature, or Heat
515	Human Error
517	Improper Preparation for Transportation
518	Inadequate Accident Damage Protection
519	Inadequate Blocking and Bracing
520	Inadequate Maintenance
521	Inadequate Preparation for Transportation
522	Inadequate Procedures
523	Inadequate Training
524	Incompatible Product
525	Incorrectly Sized Component or Device
526	Loose Closure, Component, or Device
527	Misaligned Material, Component, or Device
528	Missing Component or Device
529	Overfilled
530	Overpressurized
531	Rollover Accident
532	Stub Sill Separation from Tank (Tank Cars)
533	Threads Worn or Cross Threaded
536	Vandalism
537	Vehicular Crash or Accident Damage

**Incident Reporting
Requirements**

§ 171.15 Immediate notice of certain hazardous materials incidents.

(a) General. As soon as practical but no later than 12 hours after the occurrence of any incident described in paragraph (b) of this section, each person in physical possession of the hazardous material must provide notice by telephone to the National Response Center (NRC) on 800-424-8802 (toll free) or 202-267-2675 (toll call). Notice involving an infectious substance (etiologic agent) may be given to the Director, Centers for Disease Control and Prevention (CDC), U.S. Public Health Service, Atlanta, Ga., 800-232-0124 (toll free), in place of notice to the NRC. Each notice must include the following information:

- (1) Name of reporter;
- (2) Name and address of person represented by reporter;
- (3) Phone number where reporter can be contacted;
- (4) Date, time, and location of incident;
- (5) The extent of injury, if any;
- (6) Class or division, proper shipping name, and quantity of hazardous materials involved, if such information is available; and
- (7) Type of incident and nature of hazardous material involvement and whether a continuing danger to life exists at the scene.

(b) Reportable Incident. A telephone report is required whenever any of the following occurs during the course of transportation in commerce (including loading, unloading, and temporary storage):

- (1) As a direct result of a hazardous material—
 - (i) A person is killed;
 - (ii) A person receives an injury requiring admittance to a hospital;
 - (iii) The general public is evacuated for one hour or more;
 - (iv) A major transportation artery or facility is closed or shut down for one hour or more; or
 - (v) The operational flight pattern or routine of an aircraft is altered;
- (2) Fire, breakage, spillage, or suspected radioactive contamination occurs involving a radioactive material (see also § 176.48 of this subchapter);

- (3) Fire, breakage, spillage, or suspected contamination occurs involving an infectious substance other than a diagnostic specimen or regulated medical waste;
- (4) A release of a marine pollutant occurs in a quantity exceeding 450 L (119 gallons) for a liquid or 400 kg (882 pounds) for a solid; or
- (5) A situation exists of such a nature (e.g., a continuing danger to life exists at the scene of the incident) that, in the judgment of the person in possession of the hazardous material, it should be reported to the NRC even though it does not meet the criteria of paragraph (b) (1), (2), (3) or (4) of this section.

(c) Written report. Each person making a report under this section must also make the report required by § 171.16 of this Subpart.

Note to § 171.15: Under 40 CFR 302.6, EPA requires persons in charge of facilities (including transport vehicles, vessels, and aircraft) to report any release of a hazardous substance in a quantity equal to or greater than its reportable quantity, as soon as that person has knowledge of the release, to DOT's National Response Center at (toll-free) 800-424-8802 or (toll) 202-267-2675.

§ 171.16 Detailed hazardous materials incident reports.

(a) General. Each person in physical possession of a hazardous material at the time that any of the following incidents occurs during transportation (including loading, unloading, and temporary storage) must submit a Hazardous Materials Incident Report on DOT Form F 5800.1 (01-2004) within 30 days of discovery of the incident:

- (1) Any of the circumstances set forth in § 171.15(b);
- (2) An unintentional release of a hazardous material or the discharge of any quantity of hazardous waste;
- (3) A specification cargo tank with a capacity of 1,000 gallons or greater containing any hazardous material suffers structural damage to the lading retention system or damage that requires repair to a system intended to protect the lading retention system, even if there is no release of hazardous material; or
- (4) An undeclared hazardous material is discovered.

(b) Providing and retaining copies of the report.

Each person reporting under this section must—

(1) Submit a written Hazardous Materials Incident Report to the Information Systems Manager, PHH-63, Pipeline and Hazardous Materials Safety, Department of Transportation, Washington, DC 20590-0001, or an electronic Hazardous Material Incident Report to the Information System Manager, PHH-63, Pipeline and Hazardous Materials Safety Administration, Department of Transportation, Washington, DC 20590-0001 at <http://hazmat.dot.gov>;

(2) For an incident involving transportation by aircraft, submit a written or electronic copy of the Hazardous Materials Incident Report to the FAA Security Field Office nearest the location of the incident; and

(3) Retain a written or electronic copy of the Hazardous Materials Incident Report for a period of two years at the reporting person's principal place of business. If the written or electronic Hazardous Materials Incident Report is maintained at other than the reporting person's principal place of business, the report must be made available at the reporting person's principal place of business within 24 hours of a request for the report by an authorized representative or special agent of the Department of Transportation.

(c) Updating the incident report.

A Hazardous Materials Incident Report must be updated within one year of the date of occurrence of the incident whenever:

(1) A death results from injury caused by a hazardous material;

(2) There was a misidentification of the hazardous material or packaging information on a prior incident report;

(3) Damage, loss or related cost that was not known when the initial incident report was filed becomes known; or

(4) Damage, loss, or related cost changes by \$25,000 or more, or 10% of the prior total estimate, whichever is greater.

(d) Exceptions. Unless a telephone report is required under the provisions of § 171.15 of this part, the requirements

of paragraphs (a), (b), and (c) of this section do not apply to the following incidents:

(1) A release of a minimal amount of material from—

(i) a vent, for materials for which venting is authorized;

(ii) the routine operation of a seal, pump, compressor, or valve; or

(iii) connection or disconnection of loading or unloading lines, provided that the release does not result in property damage.

(2) An unintentional release of hazardous material when:

(i) The material is properly classed as—

(A) ORM-D; or

(B) a Packing Group III material in Class or Division 3, 4, 5, 6.1, 8, or 9;

(ii) Each packaging has a capacity of less than 20 liters (5.2 gallons) for liquids or less than 30 kg (66 pounds) for solids;

(iii) The total aggregate release is less than 20 liters (5.2 gallons) for liquids or less than 30 kg (66 pounds) for solids; and

(iv) The material is not—

(A) offered for transportation or transported by aircraft,

(B) a hazardous waste, or

(C) an undeclared hazardous material.

(3) An undeclared hazardous material discovered in an air passenger's checked or carry-on baggage during the airport screening process. (For discrepancy reporting by carriers, see § 175.31 of this subchapter.)



Hazardous Materials Incident Report

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 2137-0039. The filling out of this information is mandatory and will take 96 minutes to complete.

INSTRUCTIONS: Submit this report to the Information Systems Manager, U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, Office of Hazardous Materials Safety, DHM-63, Washington, D.C. 20590-0001. If space provided for any item is inadequate, use a separate sheet of paper, identifying the entry number being completed. Copies of this form and instructions can be obtained from the Office of Hazardous Materials Website at <http://hazmat.dot.gov>. If you have any questions, you can contact the Hazardous Materials Information Center at 1-800-HMR-4922 (1-800-467-4922) or online at <http://hazmat.dot.gov>.

PART I - REPORT TYPE

1. This is to report: **A) A hazardous material incident** **B) An undeclared shipment with no release**
 C) A specification cargo tank 1,000 gallons or greater containing any hazardous materials that (1) received structural damage to the lading retention system or damage that requires repair to a system intended to protect the lading retention system and (2) did not have a release.
2. Indicate whether this is: An initial report A supplemental (follow-up) report Additional Pages

PART II - GENERAL INCIDENT INFORMATION

3. Date of Incident: _____ 4. Time of Incident (use 24-hour time): _____
5. Enter National Response Center Report Number (if applicable): _____
6. If you submitted a report to another Federal DOT agency, enter the agency and report number: _____
7. Location of Incident: City: _____ County: _____ State: _____ ZIP Code (if known): _____
 Street Address/Mile Marker/Yardname/Airport/Body of Water/River Mile _____
8. Mode of Transportation Air Highway Rail Water
9. Transportation Phase In Transit Loading Unloading In Transit Storage
10. Carrier/Reporter Name _____
 Street _____
 City _____ State _____ ZIP Code _____
 Federal DOT ID Number _____ Hazmat Registration Number _____
11. Shipper/Offeror Name _____
 Street _____
 City _____ State _____ ZIP Code _____
 Waybill/Shipping Paper _____ Hazmat Registration Number _____
12. Origin (if different from shipper address) Street _____
 City _____ State _____ ZIP Code _____
13. Destination Street _____
 City _____ State _____ ZIP Code _____
14. Proper Shipping Name of Hazardous Material: _____
15. Technical/Trade Name: _____
16. Hazardous Class/Division: _____ 17. Identification Number: _____ (E.g. UN2764, NA 2020) 18. Packing Group: _____ (if applicable) 19. Quantity Released: _____ (Include Measurement Units)
20. Was the material shipped as a hazardous waste? Yes No If yes, provide the EPA Manifest Number: _____
21. Is this a Toxic by Inhalation (TIH) material? Yes No If yes, provide the Hazard Zone: _____
22. Was the material shipped under an Exemption, Approval, or Competent Authority Certificate? Yes No
 If yes, provide the Exemption, Approval, or CA number: _____
23. Was this an undeclared hazardous materials shipment? Yes No

PART III - PACKAGING INFORMATION

24. Check Packaging Type (check only one - if more than one, list type of packaging, copy Part III, and complete for each type:

- Non-bulk IBC Cargo tank Motor Vehicle (CTMV) Tank Car
 Cylinder RAM Portable Tank Other _____

25. See instructions and enter the appropriate failure codes found at the end of the instructions. Be sure to enter the codes from the list that corresponds to the particular packaging type checked above. Enter the number of codes as appropriate to describe the incident. Enter the most important failure point in line 1. If there are more than two failure points, provide in this format in part VI.

1. What Failed: _____ How Failed: _____ Causes of Failure: _____
2. What Failed: _____ How Failed: _____ Causes of Failure: _____

26a. Provide the packaging identification markings, if available.

Identification Markings: _____

(Examples: 1A1/Y1.4/150/92/USA/RB/93/RL, UN31H1/Y0493/USA/M9339/10800/1200, DOT - 105A - 100W (RAIL), DOT 406 (HIGHWAY), DOT 51, DOT 3-A)

26b. For Non-bulk, IBC, or non-specification packaging, if identification markings are incomplete or unavailable, see instructions and complete the following:

Single Package or Outer Packaging:

Packaging Type: _____

Material of Construction: _____

Head Type (Drums only): Removable Non - Removable

Single Package or Inner Packaging (if any):

Packaging Type: _____

Material of Construction: _____

27. Describe the package capacity and the quantity:

Single Package or Outer Packaging:

Package Capacity: _____

Amount in Package: _____

Number in Shipment: _____

Number Failed: _____

Single Package or Inner Packaging (if any):

Package Capacity: _____

Amount in Package: _____

Number in Shipment: _____

Number Failed: _____

28. Provide packaging construction and test information, as appropriate:

Manufacturer: _____

Manufacture Date: _____

Serial Number: _____

Last Test Date: _____

Material of Construction: _____ (if Tank Car, CTMV, Portable Tank, or Cylinder)

Design Pressure: _____ (if Tank Car, CTMV, Portable Tank)

Shell Thickness: _____ (if Tank Car, CTMV, Portable Tank)

Head Thickness: _____ (if Tank Car, CTMV)

Service Pressure: _____ (if Cylinder)

If valve or device failed:

Type: _____ Manufacturer: _____ Model: _____
(if present and legible) (if present and legible)

29. If the packaging is for Radioactive Materials, complete the following:

Packaging Category: Type A Type B Type C Excepted Industrial

Packaging Certification: Self Certified U.S. Certification Certification Number _____

Nuclide(s) Present: _____ Transport Index: _____

Activity: _____ Critical Safety Index: _____

PART IV - CONSEQUENCES

30. Result of Incident (check all that apply): Spillage Fire Explosion Material Entered Waterway/Storm Sewer
 Vapor (Gas) Dispersion Environmental Damage No Release

31. Emergency Response : The following entities responded to the incident: (Check all that apply)
 Fire/EMS Report # _____ Police Report # _____ In-house cleanup Other Cleanup

32. Damages: Was the total damage cost more than \$500? Yes No
If yes, enter the following information: If no, go to question 33.
Material Loss: _____ Carrier Damage: _____ Property Damage: _____ Response Cost: _____ Remediation/Cleanup Cost: _____
\$ _____ \$ _____ \$ _____ \$ _____ \$ _____
(See damage definitions in the instructions)

33a. Did the hazardous material cause or contribute to a human fatality? Yes No
If yes, enter the number of fatalities resulting from the hazardous material:
Fatalities: _____ Employees _____ Responders _____ General Public _____

33b. Were there human fatalities that did not result from the hazardous material? Yes No If yes, how many? _____

34. Did the hazardous material cause or contribute to personal injury? Yes No
If yes, enter the number of injuries resulting from the hazardous material:
Hospitalized (Admitted Only): _____ Employees _____ Responders _____ General Public _____
Non-Hospitalized: _____ Employees _____ Responders _____ General Public _____
(e.g.: On site first aid or Emergency Room observation and release)

35. Did the hazardous material cause or contribute to an evacuation? Yes No
If yes, provide the following information:
Total number of general public evacuated _____ Total number of employees evacuated _____ Total Evacuated _____
Duration of the evacuation _____ (hours)

36. Was a major transportation artery or facility closed? Yes No If yes, how many? _____ (hours)

37. Was the material involved in a crash or derailment? Yes No
If yes, provide the following information: Estimated speed (mph): _____ Weather conditions: _____
Vehicle overturn? Yes No
Vehicle left roadway/track? Yes No

PART V - AIR INCIDENT INFORMATION (please refer to § 175.31 to report a discrepancy for air shipments)

38. Was the shipment on a passenger aircraft? Yes No
If yes, was it tendered as cargo, or as passenger baggage?
 Cargo Passenger baggage

39. Where did the incident occur (if unknown, check the appropriate box for the location where the incident was discovered)?
 Air carrier cargo facility Sort center Baggage area
 By surface to/from airport During flight During loading/unloading of aircraft

40. What phase(s) had the shipment already undergone prior to the incident? (Check all that apply)
 Shipment had not been transported Transported by air (first flight) Transport by air (subsequent flights)
 Initial transport by highway to cargo facility Transfer at sort center/cargo facility

PART VI - DESCRIPTION OF EVENTS & PACKAGE FAILURE


Describe the sequence of events that led to the incident and the actions taken at the time it was discovered. Describe the package failure, including the size and location of holes, cracks, etc. Photographs and diagrams should be submitted if needed for clarification. Estimate the duration of the release, if possible. Describe what was done to mitigate the effects of the release. Continue on additional sheets if necessary.

PART VII - RECOMMENDATIONS/ACTIONS TAKEN TO PREVENT RECURRENCE

Where you are able to do so, suggest or describe changes (such as additional training, use of better packaging, or improved operating procedures) to help prevent recurrence. Provide recommendations for improvement to hazardous materials transportation beyond the control of your individual company. Continue on additional sheets if necessary.

PART VIII- CONTACT INFORMATION

Contact's Name (Type or Print): _____ Telephone Number: () _____
Contact's Title: _____ Fax Number: () _____
Business Name and Address: _____ Hazmat Registration Number (if not already provided): _____
E-mail Address: _____ Date: _____
Preparer is: Carrier Shipper Facility Other _____

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**APPENDIX I
EMERGENCY MANAGEMENT PLAN TRAINING PROTOCOL**

PURPOSE To ensure employees are trained on the various subject matter appropriate to the level of their expected involvement during an emergency situation at the facility.

SCOPE Employees who are present within the facility. See the Training Matrix for specific details.

REQUIREMENT Training is required initially for all employees and annually thereafter.

EQUIPMENT The following equipment is present within the facility and may be utilized in an emergency situation:

- Alarm and Emergency Equipment
- First Aid Kits and Supplies
- Spill Response Kits
- Personal Protective Equipment

TRAINING MATERIALS The below materials should be used to meet the training requirements:

- Emergency Management Plan Presentation


TRAINING TOPICS The elements covered within the training program includes:

- Introduction
- Types of Emergencies
- Fire Hazards
- Fire Extinguishers
- Medical Events
- Spills and Response
- Weather Conditions and Events
- Evacuation Routes and Assembly Location
- Emergency Numbers
- Duties of All Employees

REOCCURRING TRAINING Reoccurring training shall be conducted annually for all applicable employees. The reoccurring training will include a review of the original training topics, as well as, emphasis on changes and a review of events that have occurred.


DOCUMENTATION Maintain the completed quiz and/or employee sign-in sheet as documentation of training and comprehension.

ADDITIONAL COMMENTS Additional training may be required for fire extinguisher, spill response, medical response or other elements of the Emergency Management Plan.

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**APPENDIX J
EMERGENCY MANAGEMENT PLAN SPILL RESPONSE TRAINING PROTOCOL**

PURPOSE	To ensure employees conducting spill response activities are knowledgeable of the spill response procedures for the facility.
SCOPE	Employees who conduct work within the operations, technical services or operate transportation vehicles. See Training Matrix for specific details.
REQUIREMENT	Training is required initially for designated employees and annually thereafter.
EQUIPMENT	Employees that conduct spill response and clean-up will use the following equipment: <ul style="list-style-type: none"> • Spill Response Kits • Personal Protective Equipment
TRAINING MATERIALS	The below materials should be used to meet the training requirements: <ul style="list-style-type: none"> • Non-Emergency Hazmat Spill Response Training Video (18:30min) • Non-Emergency Hazmat Spill Response Training Quiz • Spill Kit Contents Review
TRAINING TOPICS	The elements covered within the training program includes: <ul style="list-style-type: none"> • Introduction • Purpose of the Standard • Levels of Response • First Responder Awareness Level • Spill Response • Emergency Response Reporting Procedure
REOCCURRING TRAINING	Reoccurring training shall be conducted annually for all applicable employees. The reoccurring training will include a review of the original training topics, as well as, emphasis on changes and a review of events that have occurred.
DOCUMENTATION	Maintain the completed quiz and/or employee sign-in sheet as documentation of training and comprehension.
ADDITIONAL COMMENTS	None

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**APPENDIX K
EMERGENCY MANAGEMENT PLAN FIRE EXTINGUISHER TRAINING PROTOCOL**

PURPOSE	To ensure employees are familiar and knowledgeable with the use of fire extinguishers should they need to be used.
SCOPE	Employees who conduct work within the operations, technical services or operate transportation vehicles. See Training Matrix for specific details.
REQUIREMENT	Training is required initially and annually thereafter.
EQUIPMENT	Employees that may conduct fire-fighting activities in response to a small fire event will use the following equipment: <ul style="list-style-type: none"> • Fire Extinguishers
TRAINING MATERIALS	The below materials should be used to meet the training requirements: <ul style="list-style-type: none"> • Fire Extinguisher Training Video (6:00 min) • Fire Extinguisher Training Quiz
TRAINING TOPICS	The elements covered within the training program includes: <ul style="list-style-type: none"> • Familiarization with Fire Extinguishers • General Principles of Fire Extinguisher Use • Hazards Involved with Incipient Stage Fires • Types of Fire Extinguishers • Identification of the Classes of Fires • PASS for Fire Extinguishers
REOCCURRING TRAINING	Reoccurring training shall be conducted annually for all applicable employees. The reoccurring training will include a review of the original training topics, as well as, emphasis on changes and a review of events that have occurred.
DOCUMENTATION	Maintain the completed quiz and/or employee sign-in sheet as documentation of training and comprehension.
ADDITIONAL COMMENTS	None

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APPENDIX L
EMERGENCY MANAGEMENT PLAN 40-HOUR HAZWOPER TRAINING PROTOCOL

PURPOSE	To ensure employees are familiar and knowledgeable to response to chemical release emergencies.
SCOPE	Employees who conduct work within the operations, technical services or operate transportation vehicles. See Training Matrix for specific details.
REQUIREMENT	Training is required initially. An 8-Hour Hazwoper refresher course is required annually thereafter.
EQUIPMENT	Employees that conduct spill response and clean-up will use the following equipment: <ul style="list-style-type: none"> • Spill Kits
TRAINING MATERIALS	The below materials should be used to meet the training requirements: <ul style="list-style-type: none"> • None
TRAINING TOPICS	The elements covered within the training program includes: <ul style="list-style-type: none"> • Course Overview and Pre-Test • Regulatory Overview • Hazard Recognition • Table Top Exercise – Hazard Analysis • Health Effects of Chemical Exposure • Physical Hazards • Causes of Accidents and Accident Prevention • General Work Practices • Respiratory Protection • Respirator Workshop • Personal Protective Equipment • PPE and Respirator Practical Exercise • Decontamination • Environmental Sampling • Sampling Practical • Site Safety Plans • Work Plans • Software, Chemical Reactivity Worksheet and Other Resources • Medical Surveillance and Monitoring • Air Monitoring • Air Monitoring Practical and Discussion • Level A and B Demonstration • Decontamination Practical Exercise • Level C Dress Out Activity • Discussion of Levels of Protection • Emergency Response Activities • Sources of Information • Hazardous Waste Remediation • Overview of Related Regulations • DOT Hazardous Materials


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- Site Entry Exercise
- Post Test and Course Closure

REOCCURRING TRAINING Reoccurring training will be the 8-Hour Hazwoper Training.


DOCUMENTATION Maintain the course outline and certificate of completion as documentation of training and comprehension.

ADDITIONAL COMMENTS Lindberg Compliance Services Group, LLC.
S79 W17027 Green Street
Muskego, WI 53150
Phone: (414) 422-4800
Email: bill@lindberg-group.com

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**APPENDIX M
EMERGENCY MANAGEMENT PLAN 8-HOUR HAZWOPER TRAINING PROTOCOL**

PURPOSE	To ensure employees are familiar and knowledgeable to response to chemical release emergencies.
SCOPE	Employees who conduct work within the operations, technical services or operate transportation vehicles. See Training Matrix for specific details.
REQUIREMENT	Training is required annually after successful completion of the 40-Hour Hazwoper initial training.
EQUIPMENT	Employees that conduct spill response and clean-up will use the following equipment: <ul style="list-style-type: none"> • Spill Kits
TRAINING MATERIALS	The below materials should be used to meet the training requirements: <ul style="list-style-type: none"> • None
TRAINING TOPICS	The elements covered within the training program includes: <ul style="list-style-type: none"> • Introduction and Pre-Test • Review of Past Years' Experience, Round Table Discussion and Case Studies • New Regulations • Chemical Hazards • Chemical Hazards, Characteristics, and Health Hazards • New Resources, Internet and Reference Books • PPE, Respirators, New Innovations • Air Monitoring, New Equipment, Review Techniques • Site Safety Plan, On-Line Generators, Problems/Corrections • Post Test and Course Summary • Questions and Answers
DOCUMENTATION	Maintain the course outline and certificate of completion as documentation of training and comprehension.
ADDITIONAL COMMENTS	Lindberg Compliance Services Group, LLC. S79 W17027 Green Street Muskego, WI 53150 Phone: (414) 422-4800 Email: bill@lindberg-group.com

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**APPENDIX N
CRITICAL ROLES, OPERATIONS AND SHUT-DOWN TRAINING PROTOCOL**

PURPOSE	To ensure employees assigned responsibilities beyond general passive responses (such as evacuation, take shelter, etc.) are knowledgeable in the additional actions to be performed.
SCOPE	Employees who are assigned to be the primary or secondary emergency coordinator, provide information support, provide chemical support, are an accountability manager during evacuation, or is expected to potentially conduct critical shut-down operations.
REQUIREMENT	Training is required when initially assigned additional responsibilities under the Plan and when changes occur.
EQUIPMENT	<p>Employees that conduct critical roles or operations will use the following equipment:</p> <ul style="list-style-type: none"> • Employee Accountability Board • Highly Visible Vest • Emergency Shut-Down Locations and Operations
TRAINING MATERIALS	<p>The below materials should be used to meet the training requirements:</p> <ul style="list-style-type: none"> • None
TRAINING TOPICS	<p>The elements covered within the training program includes:</p> <ul style="list-style-type: none"> • Emergency Coordinator Responsibilities • Information Officer Responsibilities • Chemical Support Responsibilities • Accountability Manager: Employee Accountability Board, Designated Assembly Location, Accounting Method and Missing Person Notification • Critical Shut-Down Operation: Emergency Shut-Down Locations for Electricity, Natural Gas and Water and Actual Shut-Down Procedures • Questions and Answers
REOCCURRING TRAINING	Reoccurring training shall be conducted annually for all applicable employees. The reoccurring training will include a review of the original training topics, as well as, emphasis on changes and a review of events that have occurred.
DOCUMENTATION	Maintain the completed quiz and/or employee sign-in sheet as documentation of training and comprehension.
ADDITIONAL COMMENTS	None

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**APPENDIX O
EMERGENCY MANAGEMENT PLAN FIRE PREVENTION TRAINING PROTOCOL**

PURPOSE	To ensure employees are knowledgeable in the best safety practices to prevent fires from occurring and how to response should a fire become present within the workplace.
SCOPE	Employees who conduct work within the operations, technical services or operate transportation vehicles. See Training Matrix for specific details.
REQUIREMENT	Training is required initially.
EQUIPMENT	Employees that conduct activities in areas where there is a potential for fires to occur will use the following equipment: <ul style="list-style-type: none"> • Fire Extinguisher
TRAINING MATERIALS	The below materials should be used to meet the training requirements: <ul style="list-style-type: none"> • Fire Prevention Training Video (15:17 minutes) • Fire Prevention Training Quiz
TRAINING TOPICS	The elements covered within the training program includes: <ul style="list-style-type: none"> • Fire Prevention Guidelines • How Fire Starts • Fire Prevention Best Safety Practices • Fire Classifications • Fire Extinguisher Usage • Summary
REOCCURRING TRAINING	Reoccurring training shall be conducted periodically as deemed necessary.
DOCUMENTATION	Maintain the completed quiz and/or employee sign-in sheet as documentation of training and comprehension.
ADDITIONAL COMMENTS	None

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**APPENDIX P
EMERGENCY MANAGEMENT PLAN FLAMMABLE AND COMBUSTIBLE LIQUIDS TRAINING
PROTOCOL**

PURPOSE To ensure employees are knowledgeable in the proper manner to work with or near flammable and combustible liquids.

SCOPE Employees who conduct work within the operations, technical services or operate transportation vehicles. See Training Matrix for specific details.

REQUIREMENT Training is required initially.

EQUIPMENT Employees that conduct activities in areas where flammable and combustible liquids are present will use the following equipment:

- Grounding and Bonding Equipment

TRAINING MATERIALS The below materials should be used to meet the training requirements:

- Flammable and Combustible Liquid Training Video (5:28 minutes)
- Static Electricity Training Video
- Flammable and Combustible Liquid Training Quiz


TRAINING TOPICS The elements covered within the training program includes:

- Technical Aspects of Flammability
- Explanation of the Hazardous Associated with Flammable/Combustible
- Sources of Ignition
- Prevention of Ignition Sources
- Familiarization with Static Electricity
- Factors influencing Static Electricity Present
- How Static Electricity is Created
- How to Control Static Electricity
- Best Safety Practices

REOCCURRING TRAINING Reoccurring training shall be conducted periodically as deemed necessary.

DOCUMENTATION Maintain the completed quiz and/or employee sign-in sheet as documentation of training and comprehension.

ADDITIONAL COMMENTS None

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APPENDIX Q: QUICK REFERENCE GUIDE

Enviro-Safe Resource Recovery, LLC. - W130 N10500 Washington Drive, Germantown, Wisconsin, 53022

EMERGENCY COORDINATORS and NOTIFICATION SYSTEM

<u>Contacts</u>	<u>Office</u>	<u>24-Hour Number</u>
Dawn Zellmer, CEO	(262) 790-2500 Ext. 104	(262) 613-2542
Jeff Vilione, President	(262) 790-2500 Ext. 101	(262) 613-5906
Michael Walsh, Technical Services	(262) 790-2500 Ext. 106	(708) 751-0207
Bobby Wiedenfeld, Operations	(262) 790-2500 Ext. 103	(414) 308-7492
Paul Monet, Sales and Marketing	(262) 790-2500 Ext. 116	(262) 305-6964

ON-SITE WASTE INFORMATION

Waste Types	Waste Properties	Potential Injuries/Illnesses	Special Medical Considerations	Maximum Amount On-Site
Non-RCRA (Non-Hazardous) Waste	Non-DOT	See ERG 159	None	~240,000 gallons
Flammable Gases	DOT Class 2.1	See ERG 115	None	Limited Amount
Non-Flammable Gases	DOT Class 2.2	See ERG 120	None	Limited Amount
Flammable Liquids	DOT Class 3	See ERG 127	None	~100,000 gallons
Flammable Solids	DOT Class 4.1	See ERG 133	None	~20,000 gallons
Spontaneously Combustible	DOT Class 4.2	See ERG 135	None	~550 gallons
Dangerous When Wet Materials	DOT Class 4.3	See ERG 139	None	~550 gallons
Oxidizers	DOT Class 5.1	See ERG 140	None	~1,500 gallons
Organic Peroxides	DOT Class 5.2	See ERG 148	None	~1,500 gallons
Poison/Toxic	DOT Class 6	See ERG 151	None	~550 gallons
Corrosive Liquids	DOT Class 8	See ERG 154	None	~5,280 gallons
Miscellaneous	DOT Class 9	See ERG 171	None	~20,000 gallons

FACILITY MAP

The Evacuation and Safety Map identifies where hazardous waste is generated, stored and treated including the location of on-site notification system (alarm system) and fire hydrant.



Evacuation and
Safety Map

