FACT SHEET

Per s. 670.408, Wis. Adm. Code

PRELIMINARY DETERMINATION - HAZARDOUS WASTE FACILITY LICENSING
TRADEBE TREATMENT AND RECYCLING OF WISCONSIN, LLC
CITY OF MILWAUKEE, MILWAUKEE COUNTY
5611 WEST HEMLOCK STREET, MILWAUKEE, WISCONSIN
EPA ID #: WID988580056
FID: 241384000

October 19, 2026

INTRODUCTION

Tradebe Treatment and Recycling of Wisconsin, LLC ("Tradebe") currently operates a licensed hazardous waste storage and treatment facility in Milwaukee, Wisconsin. Container storage of hazardous waste is approved in various quantities within five (5) container storage areas as follows.

Area	Description	Maximum Hazardous Waste Storage	
		(55 gal eq)	(gallons)
1	North Drum Storage Warehouse	720	39,600
2	2007 Warehouse Addition	492	27,060
3	2014 Enclosure Building	216	11,880
4	2009 Lab Pack Building	345	18,975
5	2017 West Warehouse	836	45,995
Totals		**2,609**	**143,510**

Hazardous waste treatment in the form of fuels blending up to 6,000 gallons per day is also licensed at this location. Other waste management processing activities at this location include lab packing, bulking, and elementary neutralization. Tradebe also manages non-hazardous solid waste, universal waste, and used oil at the facility.

The primary function of the facility is the bulking and transfer of hazardous and nonhazardous solid waste for fuel blending onsite and other waste management methods. The types of waste accepted at the facility are primarily organic materials that are suitable for either recycling or fuel blending.

The department is issuing a preliminary conditional approval of the feasibility and plan of operation report (FPOR) for Tradebe submitted on September 17, 2024, dated September 2024, with updated cover letter received on September 26, 2024 and additional information submitted on March 13, 2025. Tradebe's predecessor, Badger Disposal, submitted the initial FPOR to the department at least 180 days before the expiration date of the operating license in accordance with s. NR 670.010(8), Wis. Adm. Code, to begin the license renewal process on February 1, 2017. Following the initial FPOR submittal, Tradebe submitted several revised FPORs in response to technical deficiencies, areas of incompleteness, and other department comments. A summary table of license renewal application submittals and department responses spanning from the initial submittal in February 2017 through the current FPOR dated September 2024 is included below for reference.

Date	Description
February 1, 2017	Badger submits initial 10-year renewal application (including a new FPOR)
May 2, 2017	Department issued a Notice of Incompleteness (NOI) to Tradebe for the February 1, 2017, FPOR.
May 25, 2018	Tradebe submits revised 10-year renewal FPOR.

Date	Description
November 5, 2018	Tradebe submits revised 10-year renewal FPOR.
January 11, 2019	Department issued NOI to Tradebe for the November 5, 2018, FPOR.
November 5, 2020	Tradebe submits revised 10-year renewal FPOR.
February 24, 2021	Department issued NOI to Tradebe for the November 5, 2020, FPOR.
January 11, 2023	Tradebe submits revised 10-year renewal FPOR.
June 30, 2023	Tradebe submits revised 10-year renewal FPOR.
July 25, 2023	Tradebe indicated its intent to withdraw the June 30, 2023, FPOR.
September 17, 2024	Tradebe submits revised 10-year renewal FPOR.

After the department issued a request for further information to Tradebe on January 24, 2025, Tradebe submitted a response on March 13, 2025. Multiple teleconferences were held between the department and Tradebe to further clarify aspects of the FPOR on September 18, 2025; October 15, 2025; October 24, 2025; November 4, 2025; and August 11, 2026. Responses to these information requests and additional clarifications were considered as part of the current preliminary determination.

This determination provides for the issuance of a hazardous waste storage and treatment license for a 4-year term.

PRELIMINARY DETERMINATION AND FINAL DECISION

The licensing process for hazardous waste facilities is established in chs. 289 and 291, Wis. Stats., and ch. NR 670, Wis. Adm. Code. The department has found Tradebe's license application to be administratively complete and has preliminarily determined that the department intends to renew the hazardous waste operating licenses. The department has also determined that a separate environmental analysis is not needed, as this determination is an integrated analysis action, pursuant to s. NR 150.20(2)(a)7s., Wis. Adm. Code.

The department has developed a preliminary determination dated October 19, 2026, that includes approval conditions needed to provide compliance with chs. NR 660 through NR 670, Wis. Adm. Code, and to protect human health and the environment. The approval conditions also established requirements regarding corrective action obligations per s. 291.37, Wis. Stats.

DOCUMENTS AVAILABLE FOR REVIEW

The administrative record consisting of the department's preliminary determination, the public notice and this fact sheet is available for public review on the department's website at http://dnr.wi.gov/topic/Waste/Comment.html, under the tab named "Hazardous Waste facility licensing determinations."

OPPORTUNITY TO COMMENT

To allow for public review and comment after the receipt of a complete license application the department has issued a public notice of its preliminary determination. This notice was published in the Wisconsin State Journal and Milwaukee Journal Sentinel and was announced through ads on local radio stations. The notice has been posted on the department's website at http://dnr.wi.gov/topic/Waste/Comment.html, under the tab named "Hazardous Waste facility licensing determinations."

The public notice includes information required by s. NR 670.410(4), Wis. Adm. Code. Pursuant to ch. 289 and ss. 1.11, Wis. Stats., the public is invited to submit written comments concerning the preliminary determination to the department during the 45-day public comment period ending on December 3, 2026. All comments and/or requests concerning the above documents can be sent to: Lauren Hill, Wisconsin Department of Natural Resources, 1027 W. Saint Paul Avenue, Milwaukee, Wisconsin, or via email to lauren.hill@wisconsin.gov. Members of the public can also contact Lauren Hill to be placed on the department's mailing list for interested parties for this facility.

After the close of the public comment period and before issuing a final determination, the department will evaluate all comments received. Each person who submitted written comments or requested notice of a decision will receive a notice of the final determination by the department. At the same time, the department will also respond to all significant comments, specify if there are any changes and indicate whether additional comments or new materials have been included in the administrative record. The department will then proceed to issue a final determination.

OPPORTUNITY TO REQUEST A HEARING

Pursuant to ss. 289.26 and 289.27, Wis. Stats., a public hearing concerning the preliminary determination may be requested in writing by any county, village, city or town, the applicant, or any six or more persons. The request shall indicate the interests of the municipality or persons who file the request and state the reasons why the hearing was requested. The hearing shall be conducted as an informational hearing utilizing the procedures in s. NR 2.135, Wis. Adm. Code unless the request filed indicates pursuant to s. 289.27(1), Wis. Stats., that the hearing is to be treated as a contested case, as provided under s. 227.42, Wis. Stats., and that:

1. A substantial interest of the person requesting the treatment of the hearing as contested case is injured in fact or threatened with injury by the department's action or inaction on the matter;
2. There is no evidence of legislative intent that the interest is not to be protected;
3. The injury to the person requesting the treatment of the hearing as a contested case is different in kind or degree from injury to the general public caused by the department's action or inaction on the matter; and
4. There is a dispute of material fact.

All hearing requests shall be filed with the department within 45 days after the publication date of this notice, by mailing to the Secretary, Department of Natural Resources by certified mail at the following address: P.O. Box 7921, Madison, WI 53707.

WHO TO CONTACT

To request additional information, please contact the department's representative:

Lauren Hill, Waste Management Engineer
Lauren.hill@wisconsin.gov
414-308-9881