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SENT ELECTRONICALY AND VIA UPS

September 17, 2024

Mr. Douglas Coenen,
Hazardous Waste Specialist
Hazardous Waste & Mining Section
State of Wisconsin Department of Natural Resources
PO Box 7021
101 S Webster Street
Madison, Wisconsin 53707

RE: Revised Feasibility and Plan of Operation Report Application

Tradebe Treatment and Recycling of Wisconsin, LLC
5611 West Hemlock Street
Milwaukee, WI 53223
EPAID Number WID988580056
FID # 241384000

Dear Mr. Coenen:

Today's electronic submittal contains a revised version of the Tradebe Treatment and Recycling of Wisconsin, LLC (Tradebe) Part A License Application and Feasibility and Plan of Operation Report (FPOR) for approval by Wisconsin Department of Natural Resources (DNR). Pursuant to NR 670.010(4), the information required for Part A of the application is provided on EPA form 8700-023. Additional requirements for the Part A per NR 670.012 and NR 671.013 are provided in Attachment A of the FPOR. The FPOR is included as Attachments A-V to the Part A application. These documents are also being provided as an application as an Industrial Solid Waste Processing Facility which will allow non-hazardous waste to be stored and managed according to the same terms and conditions as hazardous waste. A Solid Waste Facility Transfer Facility Plan of Operation Application Form 4400-284 is provided as an enclosure to this letter.

This submission of the hazardous waste license application is a continuation of the renewal process that began with a license renewal application from Badger Disposal in 2016. Tradebe's last revision of the application was unofficially submitted June 30, 2023. Based on preliminary comments from DNR it was decided that meeting to the discuss various topics impeding approval could be more productive than continuing to submit revisions for comment. With that in mind, Tradebe participated in several meetings with you and Andrea Keller NR Program Manager to resolve open issues and determine the best approach for the next, and hopefully final, round of revisions to application.

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As a result of those discussions, 392 of the 828 comments to previous versions of the application were eliminated in exchange for Tradebe's agreement to use the January 27, 2023, preliminary version #2 of the Wisconsin's Waste Analysis Plan (WAP) Example as guidance in development of Tradebe's WAP. Of the 436 remaining comments, 239 received a "no follow-up required" by DNR leaving 197 DNR comments to be addressed in this submission. A copy of the crosswalk addressing the 197 DNR comments is also provided as an enclosure to this letter.

For ease of review, a "Crosswalk" of the 197 outstanding topics/comments is provided as a separate attachment to this version of the Part A and FPOR. The crosswalk is provided as an Excel Spreadsheet and contains,

1. the original DNR comment,
2. the follow-up DNR comment with the notes from meetings between DNR and Tradebe, and,
3. Tradebe's revision notes which include where in this FPOR a revision was made or where discussion of that topic appears.

Per your instruction, to meet the requirements of NR 670.010(1); this FPOR renewal application is provided as a PDF uploaded as an electronic file to a Box.com file folder set up for Tradebe. Also, per your instruction, a hard copy will be mailed shortly after to serve as your unofficial "working" copy.

Also, per your instruction, the Wisconsin Department of Natural Resources Hazardous Waste License Application (FPOR) Completeness and Technical Evaluation Checklist is provided as an enclosure to this letter instead of an Attachment in the application.

After review, please inform Tradebe if certain individual digital files of certain sections are needed, and in what file format. We appreciate your cooperation and guidance and look forward to an expeditious and productive review process. Should you have any questions please contact Tita LaGrimas 219.746.8713 or tita.lagrimas@tradebe.com or Kendall Moore, 219.713.7812 or Kendall.moore@tradebe.com.

Respectfully,
Tradebe Treatment and Recycling of Wisconsin, LLC

Tita Lagrimas
VP of Regulatory Affairs and Sustainability

Enclosure: Solid Waste Transfer Facility Plan of Operation
Crosswalk of DNR Comments to Previous Submissions
WDNR Waste License Application (FPOR) Completeness and Technical Evaluation Checklist

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SENT ELECTRONICALY VIA EMAIL

September 24, 2024

Mr. Douglas Coenen,
Hazardous Waste Specialist
Hazardous Waste & Mining Section
State of Wisconsin Department of Natural Resources
PO Box 7021
101 S Webster Street
Madison, Wisconsin 53707

RE: Revised Cover Letter for the September 17, 2024, Submission of the Feasibility and Plan of Operation Report Application

Tradebe Treatment and Recycling of Wisconsin, LLC
5611 West Hemlock Street
Milwaukee, WI 53223
EPAID Number WID988580056
FID # 241384000

Dear Mr. Coenen:

This is a revision of the original cover letter sent September 17, 2024, to correct the list of Attachments that were submitted as part of the Tradebe Treatment and Recycling of Wisconsin, LLC (Tradebe) Feasibility and Plan of Operation Report (FPOR).

The September 17, 2024, electronic submittal contains a revised version of the FPOR for approval by Wisconsin Department of Natural Resources (DNR). Pursuant to NR 670.010(4), the information required for Part A of the application is provided in Attachment A using EPA form 8700-023. Additional requirements for the Part A, per NR 670.012 and NR 671.013, are also provided in Attachment A. The other elements of the FPOR are included as Attachments B-R excluding the letters K, L, M, N, O and Q.

This FPOR was also developed for approval as a Plan of Operation for a Solid Waste storage, transfer and processing facility, pursuant to NR 502. The FPOR, serving as the Solid Waste Plan of Operation, proposes to manage solid waste using the same conditions and waste management standards as those used for hazardous waste. Accordingly, this FPOR is being submitted to comply with the provisions of NR 500.05 as well as 502.05(8); NR 502.07(4) and NR 502.08(4).

This submission of the license application is a continuation of the renewal process that began with a license renewal application from Badger Disposal in 2016. Tradebe's last revision of the application was unofficially submitted June 30, 2023. Based on preliminary comments from DNR it was decided that meeting to the discuss various topics impeding approval could be more productive than

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continuing to submit revisions for comment. With that in mind, Tradebe participated in several meetings with you and Andrea Keller NR Program Manager to resolve open issues and determine the best approach for the next, and hopefully final, round of revisions to application.

As a result of those discussions, 392 of the 828 comments to previous versions of the application were eliminated in exchange for Tradebe's agreement to use the January 27, 2023, preliminary version #2 of the Wisconsin's Waste Analysis Plan (WAP) Example as guidance in development of Tradebe's WAP. Of the 436 remaining comments, 239 received a "no follow-up required" by DNR leaving 197 DNR comments to be addressed in this submission. A copy of the crosswalk addressing the 197 DNR comments is also provided as an enclosure to this letter.

For ease of review, a "Crosswalk" of the 197 outstanding topics/comments is provided as a separate attachment to this version of the Part A and FPOR. The crosswalk is provided as an Excel Spreadsheet and contains,

1. the original DNR comment,
2. the follow-up DNR comment with the notes from meetings between DNR and Tradebe, and,
3. Tradebe's revision notes which include where in this FPOR a revision was made or where discussion of that topic appears.

Per your instruction, to meet the requirements of NR 670.010(1); this FPOR renewal application is provided as a PDF uploaded as an electronic file to a Box.com file folder set up for Tradebe. Also, per your instruction, a hard copy will be mailed shortly after to serve as your unofficial "working" copy. Also, per your instruction, the Wisconsin Department of Natural Resources Hazardous Waste License Application (FPOR) Completeness and Technical Evaluation Checklist is provided as an enclosure to this letter instead of an Attachment in the application.

We appreciate your cooperation and guidance and look forward to an expeditious and productive review process. Should you have any questions please contact Tita LaGrimas 219.746.8713; tita.lagrimas@tradebe.com or Kendall Moore 219.713.7812; kendall.moore@tradebe.com

Respectfully,
Tradebe Treatment and Recycling of Wisconsin, LLC



Tita Lagrimas
VP of Regulatory Affairs and Sustainability

Enclosure:
Crosswalk of DNR Comments to Previous Submissions
WDNR Waste License Application (FPOR) Completeness and Technical Evaluation Checklist

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

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

Facility Name: **Tradebe Treatment and Recycling of Wisconsin, LLC.**	Date Application Received:
FID #: **241384000**	DNR Reviewer:
US EPA ID#: **WID988580056**	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 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, Sect. or N/A)**	**Complete ? (Y/N/ N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
Sect. A. General Requirements NR 670.010 to NR 670.014				
A.1. Two copies of license application submitted. NR 670.010(1)				Per D Coenen, submit an electronic copy of the FPOR (minus 2 x 3 drawings) including Part A Application for review
A.2. Appropriate plan review and license fees submitted. NR 670.010(12)	Previously submitted			
A.3. Report signed by a president, secretary, treasurer or vice president of a corporation or other approved signatory. NR 670.011(1)	Att. A			
A.4. Signature includes certification statement. NR 670.011(4)	Att. A			
A.5. Claims of confidentiality are met. NR 670.012	Att. A			
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)	N/A			
A.7. Documentation showing compliance with local approval requirements. NR 670.014(2)(w)	N/A			
A.8. Complete Part A application. NR 670.013	Part A and Att. A			
A.9. Technical data, such as design drawings and specifications and engineering studies are certified by WI registered PE. NR 670.014(1)	Provided in various sections of FPOR			Att. E has the 2nd containment calculations; Att R has facility dwgs, Att. P has PE certification and Atts. S-W have drawings.
A.10. General description of facility. NR 670.014(2)(a)	Att. B Sect. B.1			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N /N/A)	Technically Adequate? (Y/N/N/A)	Comments
A.11. Description of procedures, structures or equipment used to prevent hazards in unloading operations. NR 670.014(2)(h)1.	Att. E			
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.	Att. E, Sect. E.1.2			
A.13. Description of procedures, structures or equipment used to prevent contamination of water supplies. NR 670.014(2)(h)3.	Att. E, Sect. E.1.3			
A.14. Description of procedures, structures or equipment used to mitigate effects of equipment failure or power outages. NR 670.014(2)(h)4.	Att. E, Sect. E.1.4			
A.15. Description of procedures, structures or equipment used to prevent exposure of personnel. NR 670.0014(2)(h)5.	Att. E, Sect. E.1.5			
A.16. Description of procedures, structures or equipment used to prevent releases to the atmosphere. NR 670.0014(2)(h)6.	Att. E, Sect. E.1.6			
A.17. Traffic patterns, estimated traffic volume, traffic control, access road surfacing and load bearing capacity. NR 670.014(2)(j)	Att. B, Sect. B.8			
A.18. Chemical and physical analyses of the hazardous waste and debris to be handled at the facility. NR 670.014(2)(b)	Att. C			
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)	Att. C			
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)	N/A			
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)	Att. D, Sect. D.2.6 and D.2.7			
A.22. Ignitable and reactive waste is separated and protected from sources of ignition or reaction. NR 664.0017(1)	Att. B Sect. B.7.1			
A.23. Smoking and open flame are confined to specially designated locations when handling ignitable or reactive waste. NR 664.0017(1)	Att. B Sect. B.7.1			
A.24. “No Smoking” signs are conspicuously placed where there is a hazard from ignitable or reactive waste. NR 664.0017(1)	Att. B Sect. B.7.1			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/ N/A)	Technically Adequate? (Y/N/N/A)	Comments
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)	Att. C;			Compatibility testing of waste is described in Att C. results are documented in lab reports.
Sect. 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	Att. B, Sec B.20			
B.2. Identification of all WI solid or hazardous waste facilities for which applicant or other identified person is N/Amed in or subject to a department order or plan approval. NR 670.014(2)(x)1.b.	Att. B, Sec B.20			
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.	Att. B, Sec B.20			
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.	Att. B, Sec B.20			
Sect. 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.	Att. B. Intro-duction			Proposed roll Off box storage location is being removed from the application. No other changes are proposed.
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)	N/A			
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)	N/A			
C.4. Description of proposed physical changes related to the construction of buildings and other structures. NR 670.014(2)(x)2.b.3)	N/A			
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)	N/A			
C.6. Description of proposed physical changes related to any other changes anticipated with facility development. NR 670.014(2)(x)2.b.5)	N/A			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/ N/A)	Technically Adequate? (Y/N/N/A)	Comments
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)	N/A			
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)	N/A			
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)	N/A			
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)	N/A			
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)	N/A			
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)	N/A			
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)	N/A			
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)	N/A			
C.15. Discussion of the probable adverse and beneficial impacts on land use. NR 670.014(2)(x)2.d.3)	N/A			
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)	N/A			
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)	N/A			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/ N/A)	Technically Adequate? (Y/N/N/A)	Comments
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)	N/A			
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.	N/A			
C.20. Needs determination, per s. 289.28, Wis. Stat. NR 670.014(2)(x)3.	Att. B, Sect. B.19			
Sect. D. Groundwater Protection NR 670.014(3)				
D.1. If all regulated units meet NR 664.0090(2), this Sect. is not applicable.	N/A			
D.2. Summary of groundwater monitoring data from interim license period. NR 670.014(3)(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			
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			
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			
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			
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			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/ N/A)	Technically Adequate? (Y/N/N/A)	Comments
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			Tradebe did not have a contamination plume that entered the groundwater from a regulated unit at the time of this application. Badger Disposal has been issued a No Further Action letter from the WDNR for constituents detected in the groundwater., refer to Att. B, App. B-1
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			Hazardous constituents have not been measured in the groundwater exceeding concentration limits in NR 664.0094 Table 1. Badger Disposal has been issued a No Further Action letter from the WDNR for constituents detected in the groundwater., refer to Att. B, App. B-1
Sect. 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)	N/A			
E.2. Topographic map showing location of SWMU. NR 670.014(4)(a)1.				Drawing KPRG TTRWI-0011.1 *but doesn't show loading docks. Figure out where best to put this.*
E.3. Designate type of SWMU. NR 670.014(4)(a)2.	Att. B.24 Att. R			Drawing number TTRWI-006
E.4. General dimensions and structural description of SWMU. NR 670.014(4)(a)3.	Att. R			Drawing TTRWI-0008
E.5. When the SWMU was operated. NR 670.014(4)(a)4.	Att. D, Sec. D.1.1			
E.6. All wastes managed at the SWMU are specified. NR 670.014(4)(a)5.	Att. A			By the list of potential waste codes received
E.7. All available information pertaining to releases of hazardous waste constituents from hazardous waste units. NR 670.014(4)(b)	Att. B Sect. B.20			There have not been any releases of hazardous waste constituents from hazardous waste units, refer to Att. B
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)	N/A			The department has not determined an RFA is necessary.
Sect. 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.	Att. B sect. B.9 Att. Q, Appx. Q-3			
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.	Att. B sect. B.9 Att. Q, Appx. Q-3			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/ N/A)	Technically Adequate? (Y/N/N/A)	Comments
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.	Att. B sect. B.9 Att. Q, Appx. Q-3			Tradebe is not located in a 100-year floodplain.
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	Att. B sect. B.9 Att. Q, Appx. Q-3			Tradebe is not located in a 100-year floodplain.
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	N/A			Tradebe is not located in a 100-year floodplain.
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.	N/A			Tradebe is not located in a 100-year floodplain.
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)	N/A			Tradebe is not located in a 100-year floodplain.
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.	N/A			Tradebe is not located in a 100-year floodplain.
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)	Att. Q, Appx. Q-3			
F.10. Map shows map scale and date. NR 670.014(2)(s)1.	Att. Q, Appx. Q-3			
F.11. Map shows 100 year flood plain area. NR 670.014(2)(s)2.	Att. Q, Appx. Q-3			
F.12. Map shows surface waters, including intermittent streams. NR 670.014(2)(s)3	Att. Q, Appx. Q-4			Add screenshot of map from DNR site.
F.13. Map shows surrounding land uses (residential, commercial, agricultural, recreational). NR 670.014(2)(s)4	Att. Q, Appx. Q-1			Topo map TTRWI-0011 shows this.
F.14. Map shows wind rose (prevailing wind speed and direction). NR 670.014(2)(s)5	Att. Q, Appx. Q-2			
F.15. Map shows map orientation. NR 670.014(2)(s)6	Att. Q, Appx. Q-1			
F.16. Map shows legal boundaries of the hazardous waste facility. NR 670.014(2)(s)7	Att. Q, Appx. Q-5			Site survey
F.17. Map shows access control (fence, gates). NR 670.014(2)(s)8	Att. R, Appx. R-1			Drawing TTRWI-0001

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/ N/A)	Technically Adequate? (Y/N/N/A)	Comments
F.18. Map shows location of injection or supply wells on-site and off-site. NR 670.014(2)(s)9	N/A			
F.19. Map shows buildings and storage, treatment or disposal operations. NR 670.014(2)(s)10	Att. R, App. R-7			Drawing TTRWI-0006
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.	Att. R, App. R-14			Drawing TTRWI-0101
F.21. Map shows barriers for drainage or flood control. NR 670.014(2)(s)11.	Att. R, App. R-14			Drawing TTRWI-0101
F.22. Map shows location of operational units where hazardous waste will be treated, stored or disposed. NR 670.014(2)(s)12.	Att. R, App. R-12			Drawing TTRWI-0008
F.23. Facility is not located in a wetland. NR 670.014(2)(k)6.b.	Att. B sect. B.10			
F.24. Facility is not located in a critical habitat for threatened or endangered species. NR 670.014(2)(k)6.a.	Att. B, sect. B.10			
Sect. 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)	Att. C, Sec. C.1			
G.2. Analysis by WI certified labs. NR 664.0013(1)(a)1.	Att. C, Sec. C.1			
G.3. Description of other data to be used rather than lab analysis. NR 664.0013(1)(b)	Att. C, Sec. C.1			
G.4. For off-site waste, analysis upon receipt to verify waste matches description on manifest. NR 670.0013(1)(d)	Att. C, Sec. C.10			
G.5. Parameters for which waste will be analyzed and rationale. NR 664.0013(2)(a)	Att. C, Sec. C.11.1			
G.6. Test methods that will be used. NR 664.0013(2)(b)	Att. C, Sec. C.11			
G.7. Sampling methods to obtain representative sample. NR 664.0013(2)(c)	Att. C, Sec. C.10.7			
G.8. Frequency of repeating initial analysis to ensure it is accurate and up to date. NR 664.0013(2)(d)	Att. C, Sec. C.2.d			
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).	Att. C, Sec. C.6.3			
G.10. For off-site waste, the waste analysis generators agree to supply. NR 664.0013(2)(e)	Att. C, Sec. C.5.2			
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)	Att. C, Sec. C.10; C.11; & C.13(4)			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N /N/A)	Technically Adequate? (Y/N/N/A)	Comments
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)	N/A			Tradebe does not have any process vents that are covered by NR 664 and subch. BB standards.
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)	N/A			Tradebe is exempt from the monitoring of equipment under NR 664.1050 and subch. BB standards.
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)	Att. C sect. C.6.1			
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)	N/A			No treatment occurs at this site.
G.16. Information if seeking exemption to subch. CC requirements. NR 664.0013(2)(h)	N/A			Tradebe is not seeking exemption from subch. CC requirements
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)	Att. C, C.9 and C.10			
Sect. 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,	Att. B sect. B.3			
H.2. The artificial or Natural barrier surrounding active portions of facility and other means of controlled entry, such as gates or locked entrance NR 664.0014(2)(b)	Att. B sect. B.3			
H.3. The placement of "Danger – Unauthorized Persons Keep Out" signs at entrances and other locations. NR 664.0014(3)	Att. R			Drawing TTRWI-0003
H.4. Demonstration that the above security requirements are not necessary. NR 664.0014(1)	N/A			Tradebe is not stating that the security requirements are not necessary.
I. General Inspection Requirements NR 670.014(2)(e)				
I.1. Description of the equipment and devices inspected. NR 664.0015(2)(a)	Att. F App F-1			
I.2. Description of problems checked during the inspection. NR 664.0015(2)(c)	Att. F App F-1			
I.3. Inspection schedule for closed vent system and control device, required by NR 664.1033. NR 670.014(2)(d)	N/A			Tradebe does not have any subch. AA closed vent systems.

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/ N/A)	Technically Adequate? (Y/N/N/A)	Comments
I.4. Inspection schedule for subch. BB pumps in light liquid service, required by NR 664.1052. NR 670.014(2)(d)	N/A			Tradebe is maintains a list of BB Equipment that is exempt from the monitoring requirements per NR 664.1050(6)
I.5. Inspection schedule for subch. BB compressors, required by NR 664.1053. NR 670.014(2)(d)	N/A			Tradebe does not have any subch. BB compressors.
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)	N/A			Tradebe does not have any subch. BB pumps or valves in heavy liquid service, pressure relief devices or connectors.
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)	N/A			Tradebe does not have any subch. BB pumps, valves, pressure relief devices or connectors.
I.8. Areas subject to spills inspected daily when in use. NR 664.0015(2)(d)	Att. F, App. F-1, F-2			
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)	Att. F, App. F-1, F-2			
I.10. Schedule to remedy ensures problem does not lead to environmental or health hazard. NR 664.0015(3)	Att. F Sect. F.6			
I.11. Inspection log will be kept for at least 3 years and includes date and time of inspection; inspector N/Ame; observations made; date and type of remedial actions. NR 664.0015(4)	Att. F Sect. F.7			
Sect. J. Contingency Plan Requirements NR 670.014(2)(g)				
J.1. Copy of Contingency Plan. NR 670.014(2)(g)	Att. G			
J.2. Plan is designed to minimize hazards to human health or the environment in the event of a release. NR 664.0051(1)	Att. G Sect. 1.2			
J.3. Provisions in the plan will be carried out immediately if release threatens human health or the environment. NR 664.0051(2)	Att. G Sect. 1.2 & Sect. 2			
J.4. Describes actions facility personnel will take if a release. NR 664.0052(1)	Att. G Sect. 3 & Sect. 4			
J.5. If using SPCC, it has been amended to incorporate hazardous waste provisions. NR 664.0052(2)	N/A			
J.6. Describes arrangements with local emergency agencies, hospitals and contractors. NR 664.0052(3)	Att. G, Sect. 3-2			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/ N/A)	Technically Adequate? (Y/N/N/A)	Comments
J.7. Current list of emergency coordinator (primary and alternate) N/Ames, addresses and home/office phone numbers. NR 664.0052(4)	Att. G Sect. 2, Table 1			
J.8. Current list of emergency equipment, describing location, physical description and capability of each item. NR 664.0052(5)	Att. G Sect. 5			
J.9. Evacuation plan, sigN/Als to begin evacuation and alternate routes. NR 664.0052(6)	Att. G Sect. 6			
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	Att. G, Sect. 3-2			
J.11. Plan will be reviewed and amended, as necessary. NR 664.0054	Att. G, Sect. 8			
J.12. Emergency coordinator always on premises or on call. NR 664.0055	Att. G, Sect. 2, Table 2, Sect. 3-1			
J.13. Emergency coordinator is thoroughly familiar with plan, site operations, waste types handled, facility records and layout. NR 664.0055	Att. G, Sect. 3-1			
J.14. Emergency coordinator has authority to commit resources to carry out contingency plan. NR 664.0055	Att. G, Sect. 3-1			
J.15. Emergency coordinator activates alarms and notifies state or local agencies. NR 664.0056(1)	Att. G, Sect. 3-1			
J.16. Emergency coordinator identifies the character, sources, amount and extent of release. NR 664.0056(2)	Att. G, Sect. 3-1			
J.17. Emergency coordinator assesses possible hazards to human health and environment. NR 664.0056(3)	Att. G, Sect. 3-1			
J.18. Emergency coordinator notifies local authorities if evacuation is necessary. NR 664.0056(4)(a)	Att. G, Sect. 3-1			
J.19. Emergency coordinator notifies emergency response officials of release outside of facility. NR 664.0056(4)(b)	Att. G, Sect. 3-1 & sect. 4			
J.20. Emergency coordinator takes reasoN/Able measures to ensure fire, explosion or release do not occur or spread to other hazardous waste. NR 664.0056(5)	Att. G, Sect. 3-1 & Sect. 4			
J.21. Emergency coordinator monitors for leaks, pressure build-up, and gas generation if operations stop. NR 664.0056(6)	Att. G, Sect. 3-1 & Sect. 4			
J.22. Emergency coordinator arranges for treatment, storage, or disposal of materials after emergency. NR 664.0056(7)	Att. G, Sect. 3-1 & Sec. 4			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
.23. Emergency coordinator ensures no incompatible waste is treated, stored or disposed until cleanup is completed. NR 664.0056(8)(a)	Att. G, Sec. 3-1 Att. G, Sec. 4			
J.24. Emergency coordinator ensures all emergency equipment is clean and fit for use before operations resume. NR 664.0056(8)(b)	Att. G, Sec. 3-1 Att. G, Sec. 4			
J.25. Owner or operator notifies department and state and local authorities before resuming operations. NR 664.0056(9)	Att. G, Sec. 3-1 Att. G, Sec. 4			
J.26. Implementation of plan will be noted in operating log and incident report sent to WDNR in 15 days. NR 664.0056(10)	Att. G, Sec. 3-1 Att. G, Sec. 4			
Sect. 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)	Att. H Sec. H1.3.a			
K.2. Training program teaches personnel hazardous waste management procedures relevant to the positions in which they are employed. NR 664.0016(1)(b)	Att. H Sec. H.1.6			
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)	Att. H Sec. H1.			
K.4. Personnel complete training within 6 months of being in new position and before working in unsupervised positions. NR 664.0016(2)	Att. H Sec. H.2			
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)	Att. H Sec. H.1.1			
K.6. Brief description of how training will be designed to meet actual job tasks. NR 670.014(2)(L)	Att. H Sec. H.1.3			
L. Closure Plan Requirements NR 670.014(2)(m)				
L.1. Copy of Closure Plan. NR 670.014(2)(m)	Att. I			
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)	Att. I Sec. I.4			
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)	Att. I Sec. I.4			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
L.4. Description of the maximum extent of operations during the active life of the facility. NR 664.0112(2)(b)	Att. I Sec. I.1.2			
L.5. Estimate of maximum inventory during active life of facility. NR 664.0112(2)(c)	Att. I Sec. I.2.4			
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)	Att. I Sec. I.4			
L.7. Identification of the types of off-site hazardous waste management units to be used. NR 664.0112(2)(c)	Att. I Sec. I.2.3			
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)	Att. I.4			
L.9 Detailed description of other activities necessary to ensure all partial and final closure satisfy the closure performance standards. NR 664.0112(2)(e)	Att. I.4			
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	Att. I.4			
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)	N/A			Tradebe does not have hazardous waste tanks on site.
L.12. Schedule for closure of each hazardous waste management unit and final closure of the facility. NR 664.0112(2)(f)	Att. I.8			
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)	N/A			
L.14. Alternative requirements for closure established by the department. NR 664.0112(2)(h)	N/A			
L.15. Department will be notified at least 180 days prior to partial or final closure. NR 664.0112(4)(a)	Att. I.8			
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)	Att. I.8			
L 17. Partial and final closure activities are completed within 180 days after receiving the final volume of hazardous waste. NR 664.0113(2)	Att. I.8			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
L.18. All contaminated equipment, structures, and soils will be properly disposed of or decontaminated. NR 664.0114	Att. I.7			
L.19. Within 60 days of completing final closure, a certification of closure will be sent to the department. NR 664.0115	Att. I.8			
Sect. 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)	Att. I.9 and App. I.2			
M.2. Cost estimate equals the cost of final closure when facility operations make closure the most expensive. NR 664.0142(1)(a)	Att. 1.9			
M.3. Cost estimate is based on hiring a third party to close the facility. NR 664.0142(1)(b)	Att. I.9			
M.4. Cost estimate does not incorporate any salvage value of hazardous waste, structures, equipment, land or assets. NR 664.0142(1)(c)	Att. I.9			
M.5. Closure estimate does not include a zero cost for hazardous waste that might have economic value. NR 664.0142(1)(d)	Att. I.9			
M.6. Facility has established financial assurance that covers the closure cost estimate. NR 664.0143	Att. I, App. I-3			Tradebe is providing the current closure bond; this bond will be increased upon acceptance by the WNDR
M.7. The financial assurance mechanism meets all applicable requirements in NR 664.0143.	Att. I App. I-3			
M.8. If a new facility, the financial assurance is submitted 60 days prior to initial receipt of waste. NR 670.014(2)(o)	N/A			Tradebe is not a new facility.
Sect. 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)	Att. J			
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)	Att. J			
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)	Att. J			
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).	N/A			Tradebe is not a new facility.

Licensing Standard and Code Citation	Location In Report (Page Or Sect.)	Complete (Y/N)	Technically Adequate (Y/N)	Comments
PART 2 – UNIT SPECIFIC REQUIREMENTS				
Sect. 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	App. F-1 & F-2			
A.2. Inspection frequency of container storage areas is adequate to prevent environmental or human health incident. NR 664.0015(2)(d)	Att. F, sect. F.5			
A.3. Inspection schedule for subch. CC containers, as required by 664.1086. NR 670.014(2)(e)	Att. C, Sect. C.9(5)			
A.4. Inspection schedule includes inspection and monitoring requirements in NR 664.1088 for containers. NR 670.014(2)(e)	Att. F, Sect. F.1.1, App. F-1			
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)	Att. F, sect. F.5 & App. F-3			
Sect. 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)	Att. D, Sect. D.2.5.a, and App F-3			
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)	Att. D Sect. D.2.5.b,			
B.3. Capacity of containment system is 10% of the volume of containers or the volume of the largest container, whichever is greater. Containers without free liquids need not be considered. NR 664.0175(2)(c)	Att. D Sect. D.2.5.c App. E-1,			
Licensing Standard and Code Citation	**Location In Report (Page, Sect. or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
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)	Att. D Sect. D.1.4 & D.2.5.d App.E-1 App F-1			

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)	Att. D Sect. D.2.5.e, App F-1			
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)	Att. D Sect. D.2.5.f			
B.7. Description of basic design parameters, dimensions and materials of construction of the containment system. NR 670.015(1)(a)	Att. D Sect. D.1			Also see Drawing TTRWI-0008
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)	Att. D Sect. D.1.2			
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)	Att. D Sect. D.1.3 Att. E, App. E-1			
B.10. Provisions for preventing or managing run-on. NR 670.015(1)(d)	Att. D Sect. D.1.4 & D.2.5.d App F-1			
B.11. How accumulated liquids will be analyzed and removed to prevent overflow. NR 670.015(1)(e)	Att. D Sect. D.1.5			
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)	Att. D Sect. D.1.6			All container management areas are designed for free liquids
Licensing Standard and Code Citation	**Location In Report (Page, Sect. or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
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)	Att. D Sect. D.1.6			Waste received at Tradebe does contain free liquids.
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)	Att. D Sect. D.1.6			
Sect. 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	Att. D Sect. D.2.6 Att. R			Drawing number TTRWI-0006 in Att. R

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)	Att. D Sect. D.1.1, D.1.4, D.2.5, & D.2.7, D.2.10, Att. R			Drawing number TTRWI-0006 in Att. R
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)	Att. D Sect. D.2.7			
C.4. Precautions taken to prevent reactions generating extreme heat or pressure, fire or explosions or violent reactions. NR 664.0017(2)(a)	Att. D Sect.D.2.7 & D.2.7a			
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)	Att. D Sect.D.2.7 & D.2.7a			
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)	Att. D Sect.D.2.7 & D.2.7a			
C.7. Precautions taken to prevent reactions damaging the structural integrity of the device or facility. NR 664.0017(2)(d)	Att. D Sect.D.2.7 & D.2.7a			
C.8. Precautions taken to prevent reactions through other means to threaten human health or the environment. NR 664.0017(2)(e)	Att. D Sect.D.2.7 & D.2.7a			
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)	Att. D Sect.D.2.7 & D.2.7.a			
Licensing Standard and Code Citation	**Location In Report (Page, Sect. or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
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)	Att. D Sect. D.2.7.a			
Sect. D: Tank Standards – General NR 670.016				
D.1. Dimensions and capacity of each tank. NR 670.016(2)	N/A			Tradebe does not have hazardous waste storage tanks.
D.2. Description of feed systems, safety cutoff, bypass systems and pressure controls. NR 670.016(3)	N/A			Tradebe does not have hazardous waste storage tanks.
D.3. Diagram of piping, instrumentation and process flow for each tank system. NR 670.016(4)	N/A			Tradebe does not have hazardous waste storage tanks.

D.4. Description of spill prevention controls, such as check valves, dry disconnect couplings. NR 664.0194(2)(a)	N/A			Tradebe does not have hazardous waste storage tanks.
D.5. Description of overfill 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks.
Sect. E: Tank Standards – Inspections NR 670.014(2)(e)				
E.1. Inspection schedule for tank overfill controls. NR 664.0195(1).				
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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks.
Licensing Standard and Code Citation	**Location In Report (Page, Sect. or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
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			Tradebe does not have hazardous waste storage tanks.
Sect. 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			Tradebe does not have hazardous waste storage tanks.
F.2. Design standards for construction of the tank and ancillary equipment. NR 664.0191(2)(a)	N/A			Tradebe does not have hazardous waste storage tanks.

F.3. Hazardous characteristics for the wastes handled. NR 664.0191(2)(b)	N/A			Tradebe does not have hazardous waste storage tanks.
F.4. Existing corrosion protection measures. NR 664.0191(2)(c)	N/A			Tradebe does not have hazardous waste storage tanks..
F.5. The age of the tank system, either documented or estimated. NR 664.0191(2)(d)	N/A			Tradebe does not have hazardous waste storage tanks..
F.6. Results of a leak test, internal inspection or other tank integrity examination. NR 664.0191(2)(e)	N/A			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks..
F.10. Tank system or secondary containment system removed from service immediately. NR 664.0196	N/A			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks..
Licensing Standard and Code Citation	**Location In Report (Page, Sect. or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
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			Tradebe does not have hazardous waste storage tanks
F.14. Visual inspection of the release conducted. NR 664.0196(3)	N/A			Tradebe does not have hazardous waste storage tanks
F.15. Further migration of the spill to soils or surface water was prevented. NR 664.0196(3)(a)	N/A			Tradebe does not have hazardous waste storage tanks.
F.16. Visible contamination of the soil or surface water was removed and properly disposed. NR 664.0196(3)(b)	N/A			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks.
F.18. Written report submitted to the Department within 30 days of detecting the release. NR 664.0196(4)(c)	N/A			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks
Sect. 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			Tradebe does not have hazardous waste storage tanks
G.2. Design standards to which the tanks and ancillary equipment are constructed. NR 664.0192(1)(a)	N/A			Tradebe does not have hazardous waste storage tanks
G.3. Hazardous characteristics of the wastes to be handled. NR 664.0192(1)(b)	N/A			Tradebe does not have hazardous waste storage tanks.
Licensing Standard and Code Citation	**Location In Report (Page, Sect. or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
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			Tradebe does not have hazardous waste storage tanks
G.5. Soil moisture content, pH, sulfides level, and resistivity. NR 664.0192(1)(c)1	N/A			Tradebe does not have hazardous waste storage tanks
G.6. Structure to soil potential. NR 664.0192(1)(c)1	N/A			Tradebe does not have hazardous waste storage tanks.
G.7. Influence of nearby underground metal structures, such as piping. NR 664.0192(1)(c)1	N/A			Tradebe does not have hazardous waste storage tanks.
G.8. Existence of stray electric current. NR 664.0192(1)(c)1	N/A			Tradebe does not have hazardous waste storage tanks.

G.9. Existing corrosion-protection measures. NR 664.0192(1)(c)1	N/A			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks.
G.12. Corrosion-resistant coating with cathodic protection. NR 664.0192(1)(c)2.b.	N/A			Tradebe does not have hazardous waste storage tanks
G.13. Electrical isolation devices such as insulating joints, flanges, etc. NR 664.0192(1)(c)2.c.	N/A			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks.
Licensing Standard and Code Citation	**Location In Report (Page, Sect. or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks.
Licensing Standard and Code Citation	**Location In Report (Page, Sect. or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
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			Tradebe does not have hazardous waste storage tanks.
Sect. 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks.

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks.
H.13. Free of cracks and gaps. NR 664.0193(5)(a)3.	N/A			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks
H.18. Constructed with chemical-resistant water stops in place at all joints. NR 664.0193(5)(b)3.	N/A			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks

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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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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; seal less or magnetic coupling pumps and seal less 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			Tradebe does not have hazardous waste storage tanks
H.27. If seeking an alternative to the requirements of this Sect., 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			Tradebe does not have hazardous waste storage tanks

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
H.28. If seeking an alternative to the requirements of this Sect., 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			Tradebe does not have hazardous waste storage tanks
Sect. 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste 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			Tradebe does not have hazardous waste storage tanks
Sect. 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			Tradebe 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			Tradebe does not treat, store or dispose of hazardous waste in miscellaneous units.

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe does not treat, store or dispose of hazardous waste in miscellaneous units.

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
J.15. Volume and physical and chemical characteristics of the waste in the unit. NR 664.0601(2)a.	N/A			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe does not treat, store or dispose of hazardous waste in miscellaneous units.

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
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			Tradebe 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			Tradebe does not treat, store or dispose of hazardous waste in miscellaneous units.
J.30. Atmospheric, meterologic and topographic characteristics of the unit and the surrounding area. NR 664.0601(3)d.	N/A			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe does not treat, store or dispose of hazardous waste in miscellaneous units.

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
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			Tradebe 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			Tradebe does not treat, store or dispose of hazardous waste in miscellaneous units.
Sect. 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe does not have process vents subject to NR 664 subch. AA.

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
K.8. List of all information references and sources used in preparing the documentation. NR 670.024(4)(a)	N/A			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe 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			Tradebe does not have process vents subject to NR 664 subch. AA.
Sect. 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)	Att. F, App. F-2			Tradebe maintains a list of third-party vendor supplied equipment used in transfers of liquids i> 10% organics in accordance with the exemption in NR 664.1050 (6)
L.2. Equipment identification number and hazardous waste management unit identification. NR 670.025(1)(a)	N/A			Tradebe maintains a list of third-party vendor supplied equipment used in transfers of liquids i> 10% organics in accordance with the exemption in NR 664.1050 (6)
L.3. Approximate location within the facility, as identified on a facility plot plan. NR 670.025(1)(b)	N/A			Tradebe maintains a list of third-party vendor supplied equipment used in transfers of liquids i> 10% organics in accordance with the exemption in NR 664.1050 (6)
L.4. Type of equipment. NR 670.025(1)(c)	N/A			Tradebe maintains a list of third-party vendor supplied equipment used in transfers of liquids i> 10% organics in accordance with the exemption in NR 664.1050 (6)

Commented [KM1]: Why is this on the inspection schedule?

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
L.5. Percent by weight total organics in the hazardous waste stream at each piece of equipment. NR 670.025(1)(d)	N/A			Tradebe maintains a list of third-party vendor supplied equipment used in transfers of liquids i> 10% organics in accordance with the exemption in NR 664.1050 (6)
L.6. Hazardous waste state (gas, vapor, etc.) at each piece of equipment. NR 670.025(1)(e)	N/A			Tradebe maintains a list of third-party vendor supplied equipment used in transfers of liquids i> 10% organics in accordance with the exemption in NR 664.1050 (6)
L.7. Method of compliance with the applicable subch. BB standard. NR 670.025(1)(f)	Att. F Sect. F.1.1			Tradebe is exempted from BB per NR 664.1050 (6) < 300 hours. Tradebe maintains a log of pumping activity.
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)	Att. F Sect. F.1.1			Tradebe is exempted from BB per NR 664.1050 (6) < 300 hours. Tradebe maintains a log of pumping activity.
L.9. Additional documentation necessary to determine compliance with the subch. BB standards. NR 670.025(4)	Att. F Sect. F.1.1			Tradebe is exempted from BB per NR 664.1050 (6) < 300 hours. Tradebe maintains a log of pumping activity.
L.10. Documentation demonstrating compliance with NR 664.1060 includes the information in L.11 to L.17. NR 670.025(5)	N/A			
L.11. List of all information references and sources used to prepare the documentation. NR 670.025(5)(a)	N/A			
L.12. Records, including the dates, of each compliance test required by NR 664.1033(10). NR 670.025(5)(b)	N/A			
L.13. Design analysis, specifications, drawings, schematics and piping and instrumentation diagrams based on the appropriate Sect.s of ATPI Course 415 or other engineering text that present basic control device design information. NR 670.025(5)(c)	N/A			
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			
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			
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			

Licensing Standard and Code Citation	Location In Report (Page, Sect. or N/A)	Complete ? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
L.17. If applying to use an alternate control device, a performance test plan if using test data. NR 670.025(3)	N/A			
Sect. 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)	N/A			Tradebe does not have licensed hazardous waste storage tanks.
M.2. Identification of each container area subject to subch. CC. NR 670.027(1)(b)	Att. D Sect D.1.1			
M.3. Owner/operator certification that the requirements of subch. CC are met for container storage areas. NR 670.027(1)(b)	Att. A			
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)	N/A			Tradebe does not have any containers subject to Container Level 3 Standards.
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, App. B. NR 670.027(1)(c)	N/A			Tradebe does not have any permanent total enclosures.
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)	N/A			Tradebe does not have any closed-vent systems.
M.7. An emission monitoring plan for Method 21 in 40 CFR part 60 App. A and control device monitoring methods. NR 670.027(1)(f)	N/A			Tradebe does not have any control devices.

State of Wisconsin
Department of Natural Resources
Bureau of Waste and Materials Management
PO Box 7921, Madison WI 53707-7921
dnr.wi.gov

Solid Waste Transfer Facility Plan of Operation Application

Notice: Under ch NR 502, Wis. Adm. Code, an owner or operator must obtain prior written approval of a plan of operation and a license from the Department of Natural Resources (Department) before establishing or expanding a solid waste transfer facility. This form contains the information needed to apply for approval of a plan of operation. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law [ss. 19.31-19.39, Wis. Stats.].

Steps to follow to obtain approval and a license to operate a solid waste transfer facility:

Step	Purpose	Form
1. Have your site inspected	Assure proper setbacks and understand requirements	Initial Site Inspection (ISI) Application (form 4400-209)
→ 2. Submit your plan for operating your site.	Describe how your facility will operate and be laid out.	Solid Waste Transfer Facility Plan of Operation Application (form 4400-284)
If DNR approves your plan for operating your facility, we will send you a license application.		
3. Apply for a license to operate.	Provide basic information about facility such as location and contact information.	Solid Waste Facility Initial License Application (form 4400-088)
Note: The above Department facility siting process does not relieve the applicant of obtaining any local approvals or permits for the proposed facility prior to constructing or operating the facility.		

Instructions: Follow steps 1 and 2, listed above, to apply for a solid waste transfer facility Plan of Operation Approval and include the following:

1. A cover letter briefly describing the proposed solid waste transfer facility design and operation along with identifying the desired Department action or response.
2. A Completed "Chapter NR 502 Non-Landfill Solid Waste Facility Initial Site Inspection (ISI) Application Form" (DNR Form 4400-209).
3. A Completed "Solid Waste Transfer Facility Plan of Operation Application" (DNR Form 4400-284, this form).

Send two copies of the application packet (cover letter, completed forms and attachments) to the Solid Waste Program Supervisor at the Department's Regional Office where your facility is located (see enclosed map). Upon receipt of a complete application the Department may request an electronic version of the application packet.

Note: The Department may require additional information to be submitted prior to completing its review. Large complex facilities may be required to submit estimated costs for closure of the facility in order to provide financial responsibility, under NR 502.04(6) Wis. Adm. Codes. An Environmental Monitoring Plan, under NR 502.04(5) Wis. Adm. Code, may be required for facilities with potential surface water, ground water or air emission impacts.

Schedule of Fees (NR 520.15 Table 2): The Department will send an acknowledgement letter and invoice containing the applicable fees for review of the proposed facility, in accordance with the following table. More complex facilities may be required, as a condition of their approval, to submit a Construction Documentation Report for Department review prior to obtaining an initial license.

Transfer Facility Types	Initial Site Inspection	Initial Plan Review	Construction Report Review (if required)	Annual License
Small: 50 to100 tons per day	$550	$660	$330	$165
Large: Greater than100 tons per day	$550	$1,650	$660	$550

Definitions: Under NR 500.03(238), Wis. Adm. Code, a solid waste "transfer facility" means a solid waste facility at which transferring of solid waste from one vehicle or container to another, generally of larger capacity, occurs prior to transporting solid waste to the point of processing or disposal. Typically, this transfer activity is performed to consolidate materials for economic shipment off-site.

Note: If you perform more than manual separating of recyclable materials while materials are being transferred, this would be considered Solid Waste Processing. Solid Waste Processing Facility license and approval requirements are found under s. NR 502.08 Wis. Adm. Code and are not covered by this application form.

Section I - Applicant Information

Contact Last Name	First	MI	Title
LaGrimas	Tita		Vice President

Address	City	State	ZIP Code
4343 Kennedy Avenue	East Chicago	IN	46312

Phone Number (include area code)	Mobile Number (include area code)	Email
	(219) 746-8713	tita.lagrimas@tradebe.com

Company / Municipality Name	Company / Municipality Website
Tradebe Treatment and Recycling, LLC	Tradebe.com

Section II - Facility Information

1. This application is for:
- ○ New Solid Waste Transfer Facility
- ◉ Expansion of Existing Solid Waste Transfer Facility, license #3386

2. Proposed Facility Type:
- ○ Small: 50 to 100 tons per day
- ◉ Large: greater than 100 tons per day

Facility Name: Tradebe Treatment and Recycling of Wisconsin, LLC

Facility Location (Street Address, Fire Lane #)						◉ City ○ Town ○ Village	ZIP Code
5611 West Hemlock Street						of Milwaukee	53223

Authorized Facility Contact Name	Title
Tita LaGrimas	Vice President of Regulatory Affairs

Phone Number (include area code)	Mobile Number (include area code)	Email
	(219) 746-8713	tita.lagrimas@tradebe.com

Legal Description of Property	¼ ¼	¼	Section	Township	Range ◉E ○W	County
	SW	SW	14	N	21	Milwaukee

Present ownership of proposed facility property: Badger Realty

Total acreage and present land use of property	Estimated square footage of transfer activity
	27,646

The proposed transfer operation will be performed (check one):
- ◉ inside an existing building
- ○ inside a proposed building
- ○ outside (explain):

List the anticipated service area for the facility:
Facility will serve Wisconsin and greater midwest region but will also act as a national service providers accepting waste from customers across the country.

List the Waste Type(s) that will be accepted: ☒ *check if separate sheet is attached*

Non Hazardous Waste for this application. The facility does also accept hazardous waste. See Attachment A for detailed list.

List the name and license numbers of the facilities to which materials from the transfer operation will be sent: ☐ *check if separate sheet is attached*
This facility will use an extensive and changing list of potential outlets.

Section III - General Operating Requirements NR 502.07(7)

As owner/operator, I agree to operate and maintain the solid waste transfer facility in compliance with these operating requirements. (Confirm by checking each box.) **For any unchecked boxes**, I have explained why in the cover letter or separate document accompanying this application and justified why the department should issue an exemption to that requirement.

1.	☒	Prominently post a sign at the entrance to the facility, which indicates the name, license number, hours of operation, waste types accepted, necessary safety precautions and any other pertinent information specified by the Department. Note: Alternatives to posting a sign may be implemented with Department concurrence for facilities not open to the public.
2.	☒	Use a structure, roofed and enclosed on at least 3 sides or otherwise enclosed to satisfactorily control dust, papers, and other waste materials, will be provided.
3.	☒	Handle water that comes in contact with solid waste as wastewater and collect and treat it at a facility permitted to accept it.
4.	☒	Operate the facility under the direct supervision of responsible individuals who are thoroughly familiar with the requirements and the operational procedures of the transfer facility.
5.	☒	Restrict access to the facility except when an attendant is on duty.
6.	☒	Contain storage of solid waste on the premises for a period greater than 24 hours in vehicles or containers used by a licensed collection and transportation service.
7.	☒	Unload solid waste only in designated areas within the enclosed structure
8.	☒	Confine solid waste to the unloading, loading and handling areas
9.	☒	Keep the transfer facility and adjacent area clean and free of litter.
10.	☒	Sewage solids, sludge, asbestos or wastes containing free liquids will not be accepted.
11.	☐	Infectious or hazardous waste will not be accepted under any circumstance.
12.	☒	Control dust and odor generated by the unloading of solid waste and the operation of the transfer facility at all times.
13.	☒	Burning of solid waste will not be conducted.
14.	☒	Solid waste which is burning or is at a temperature likely to cause fire or is flammable or explosive will not be accepted.
15.	☒	Provide equipment to control accidental fires, and make arrangements with the local fire protection agency to provide immediate services when needed.
16.	☒	Provide means to control flies, rodents and other insects or vermin.
17.	☒	Make provisions for adequate maintenance of the transfer facility after each day of operation.
18.	☒	Provide a means of communication for emergency purposes.
19.	☒	Provide alternative methods of waste processing or disposal in the event that the transfer facility is rendered inoperable.
20.	☒	Limit recycling activities to manual separation from the incoming waste only within designated solid waste transfer areas. With the exception for baling, separated recyclable materials will not be further sorted, dismantled or size reduced at this location.
21.	☒	Only materials with an established market will be recycled and will be stored in a manner that does not diminish their marketability. Maintain records on the types of materials recycled along with information on shipment dates, quantities and destination facilities.
22.	☒	Handle and store recyclable material in a manner that does not create fire hazards or nuisance conditions. Note: The location of recycling activities should be identified on the facility layout plans in Section VI.

Section IV - General Facility Closure Requirements NR 502.04 (3)

As owner/operator, I agree, upon closure of the solid waste transfer facility to complete all of the following: (Confirm by checking each box.) **For any unchecked boxes,** I have explained why in the cover letter or separate document accompanying this application and justified why the department should issue an exemption to that requirement.

1.	☒	Notify the Department in writing at least 60 days prior to ceasing to accept waste at the facility and post a sign in a prominent location notifying users of the date on which the facility shall cease to accept waste. Note: Alternatives to posting a sign may be implemented with Department concurrence for facilities not open to the public.
2.	☒	Notify the Department and post a sign as soon as practical in the case of ceasing to accept waste for an extended period due to unplanned and unforeseeable circumstances.
3.	☒	Within 5 calendar days after ceasing to accept waste at the facility, remove all putrescible waste and containerize, properly utilize or dispose of all other waste.
4.	☐	Within 60 days after ceasing to accept waste at the facility, remove all waste.

Section V - Operation and Maintenance Plans NR 502.07(4)

Attach technical procedures, as a written operating plan, with page numbers, sections , or appendices referenced in the location column of this section.

	Written Plans are required to identify or explain:	Where is this located in Attached Plan?
1.	persons responsible for building maintenance, daily operation and control of the facility	Attachment G
2.	methods of visually screening waste handling operations from the surrounding area	Attachment C
3.	type and quantity of waste handled, and specific waste types not accepted at the facility	Attachment A
4.	Quality Assurance and Quality Control measures to prevent delivery of unacceptable material such as asbestos, infectious waste, explosive waste, hazardous waste, or other materials that endanger safety	Attachment C
5.	source of water supply and wastewater treatment	N/A
6.	daily clean-up procedure	Attachment F
7.	names, locations and type of all solid waste facilities to which materials from the transfer facility will be hauled	Maintained on-site
8.	procedures for alternative routing of inbound waste during inoperable periods	Attachment D
9.	discussion of safety equipment and procedures to be used at the facility	Attachment E and G
10.	vehicle types that will use the facility and their traffic routing	Attachment B
11.	methods of volume reduction to be used such as compacting, grinding, compressing, or tamping	Attachment D
12.	locations for staging in-bound materials as well as storage of any non-transferred solid waste or separated recyclables beyond the end of the working day	Attachment D
13.	equipment and procedures designed to control dust odors, noise, fire and windblown litter	Attachment G
14.	design criteria used to select equipment capacity and building configuration and sizing	Attachment D

Section VI - Engineering Plans NR 502.07(5)

Attach visual supporting documents containing appropriate scale and sufficient legends to show required details including page numbers, sections, or appendices referenced in the location column of this section.

	Engineering Plans Requirements	Where is this located in Attached Plan?
1.	Map indicating present land use within ¼ mile of property	Attachment Q
2.	An existing conditions map that shows the entire facility and the area within 1/2 mile. The minimum scale shall be 1 inch = 400 ft. This map shall include;	Attachments Q and R
2a.	The facility boundary, property lines, easements and right-of-way; building foundations, roads, utilities and other structures	Attachment Q
2b.	Existing topography, wooded areas, drainage swales, surface waters, wetlands, floodplains and similar drainage features	Attachments Q, R and Appendix B-1
2c.	The location of soil borings and test pits; features of historical and archaeological significance; parks or public areas and other features as appropriate	Attachments Q and R
3.	A facility plan map that includes the proposed facility. The extent of coverage and scale shall be the same as that for the existing conditions map. This map shall include:	Attachment R
3a.	Access roads and traffic patterns, buildings, scales, utility lines, drainage diversion	Attachment R
3b.	Screening, means of access control, final topography, areas to be cleared of vegetation and other design features	Attachment R
4.	A proposed process layout plan that shows the receiving, storage and loadout areas. The minimum scale shall be 1 inch = 20 ft. The plans shall include:	Attachment R
4a.	Design details for the receiving area configuration and traffic flow patterns, storage area and equipment configuration	Attachment R
4b.	Loadout areas and equipment configuration, and other design features.	Attachment R

Section VII - Environmental Assessment Information NR 502.04(4)

Only required for Large (greater than 100 ton per day) Transfer Facilities.

☐ Check if a copy of the DNR WEPA EA Short Form is attached providing information needed to allow the Department to evaluate reasonably foreseeable significant adverse impacts on the human environment.

Section VIII - Professional Engineer Certification NR 500.05(4)

I hereby certify that I am a licensed professional engineer in the State of Wisconsin in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this document had been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements of chs. NR 500 to 538, Wis. Adm. Code.

Printed Name	Title
Signature	Date Signed

Section IX- Applicant Certification

1. By signing this form, I hereby certify that I am the owner or authorized representative of the proposed solid waste transfer facility identified in this application. I also certify that the information provided on this application form is true.

2. I certify that the above-described solid waste transfer facility will be constructed and operated pursuant to rules in ch. NR 502, Wis. Adm. Code, and in accordance with the documents submitted and conditions in the Department issued Plan of Operation Approval.

3. I certify that changes in the facility design, operation or capacity, not addressed by Department issued approvals, will be submitted to the Department as Plan Modifications for this facility prior to implementation.

Printed Name of Owner or Authorized Representative	Title
Tita Lagrimas	VP of Regulatory Affairs
Signature of Owner or Authorized Representative	Date Signed
	September 17, 2024

TRADEBE
Treatment and Recycling ™

ATTACHMENT A

RCRA SUBTITLE C ACTIVITIES FORMS

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal (Select only one.)

☐	Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time.
☐	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
	☐ Site was a TSD facility, a reverse distributor, and/or generator of ≥ 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)
☐	Notifying that regulated activity is no longer occurring at this Site
☐	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
☑	Submitting a new or revised Part A (permit) Form

2. Site EPA ID Number

W	I	D	9	8	8	5	8	0	0	5	6

3. Site Name

Tradebe Treatment and Recycling of Wisconsin, LLC

4. Site Location Address

Street Address **5611 West Hemlock Street**		
City, Town, or Village **Milwuakee**		County **Milwaukee**
State **WI**	Country **US**	Zip Code **53223**
Latitude	Longitude	☐ Use Lat/Long as Primary Address

5. Site Mailing Address ☐ Same as Location Street Address

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

6. Site Land Type

☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary)	**562211**	C.	
B.	**562212**	D.	

8. Site Contact Information

☐ Same as Location Address

First Name **Tita**	MI	Last Name **LaGrimas**
Title **VP Regulatory**		
Street Address **4343 Kennedy Avenue**		
City, Town, or Village **East Chicago**		
State **IN**	Country **Lake**	Zip Code **46312**
Email **tita.lagrimas@tradebe.com**		
Phone **(219)746-8713**	Ext	Fax

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner

☐ Same as Location Address

Full Name **Badger Investment Reality, LLC**	Date Became Owner (mm/dd/yyyy) **1/1/2003**

Owner Type

☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

Street Address **N55 W34685 Road East**		
City, Town, or Village **Oconomowoc**		
State **WI**	Country **Milwaukee**	Zip Code **53223**
Email		
Phone **(414)236-1082**	Ext	Fax
Comments		

B. Name of Site's Legal Operator

☐ Same as Location Address

Full Name **Tradebe Treatment and Recycling of Wisconsin, LLC**	Date Became Operator (mm/dd/yyyy) **4/1/2017**

Operator Type

☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

Street Address		
City, Town, or Village		
State	Country	Zip Code
Email		
Phone **(414)760-9175**	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

☑ Y ☐ N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c	
☑	a. LQG	-Generates, in any calendar month, 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste (includes quantities imported by importer site); 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.
☐	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.
☐	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
☐ Y ☑ 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. *Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.*	
☑ Y ☐ N	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities.	
☑ Y ☐ N	4. Receives Hazardous Waste from Off-site	
☐ Y ☑ N	5 Recycler of Hazardous Waste	
☐	a. Recycler who stores prior to recycling	
☐	b. Recycler who does not store prior to recycling	
☐ Y ☑ N	6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.	
☐	a. Small Quantity On-site Burner Exemption	
☐	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.

		See	**App.**	**A-1**		

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.

N/A						

11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)

A. Other Waste Activities

☑ Y ☐ N	1. Transporter of Hazardous Waste—If "Yes", mark all that apply.
☑	a. Transporter
☑	b. Transfer Facility (at your site)
☐ Y ☑ N	2. Underground Injection Control
☐ Y ☑ N	3. United States Importer of Hazardous Waste
☐ Y ☑ N	4. Recognized Trader—If "Yes", mark all that apply.
☐	a. Importer
☐	b. Exporter
☐ Y ☑ N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If "Yes", mark all that apply.
☐	a. Importer
☐	b. Exporter

B. Universal Waste Activities

☑ Y ☐ 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.
☑	a. Batteries
☑	b. Pesticides
☑	c. Mercury containing equipment
☑	d. Lamps
☑	e. Aerosol Cans
☐	f. Other (specify) _____
☐	g. Other (specify) _____
☐ Y ☑ N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

☐ Y ☑ N	1. Used Oil Transporter—If "Yes", mark all that apply.
☐	a. Transporter
☐	b. Transfer Facility (at your site)
☑ Y ☐ N	2. Used Oil Processor and/or Re-refiner—If "Yes", mark all that apply.
☑	a. Processor
☐	b. Re-refiner
☐ Y ☑ N	3. Off-Specification Used Oil Burner
☑ Y ☐ N	4. Used Oil Fuel Marketer—If "Yes", mark all that apply.
☑	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
☐	b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Pharmaceutical Activities

☐ Y ☑ N	1. Operating under 40 CFR Part 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.
☐	a. Healthcare Facility
☐	b. Reverse Distributor
☐ Y ☑ N	2. Withdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of your hazardous waste, including hazardous waste pharmaceuticals.

12. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262, Subpart K.

☐ Y ☑ N	A. Opting into or currently operating under 40 CFR Part 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.
☐	1. College or University
☐	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
☐	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university
☐ Y ☑ N	B. Withdrawing from 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories.

13. Episodic Generation

☐ Y ☑ 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.

14. LQG Consolidation of VSQG Hazardous Waste

☐ Y ☑ 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 VSQG hazardous waste.

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

☐ Y ☑ N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
	A. ☐ Central Accumulation Area (CAA) or ☐ Entire Facility
	B. Expected closure date: _____ mm/dd/yyyy
	C. Requesting new closure date: _____ mm/dd/yyyy
	D. Date closed : _____ mm/dd/yyyy ☐ 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8) ☐ 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)

16. Notification of Hazardous Secondary Material (HSM) Activity

☑ Y ☐ 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.

17. Electronic Manifest Broker

☐ Y ☑ 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?

18. Comments (include item number for each comment)

Item 10.b see Appendix A-1 for Hazardous Waste Codes.
Item 11.C.2.a Site may store Used Oil greater than 35 days.
Tradebe may also receive universal waste, used oils, electronic and non-hazardous waste at the facility.

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) **7/19/2024**
Printed Name (First, Middle Initial Last) **Tita Lagrimas**	Title **VP of Regulatory Affairs**
Email **Tita.Lagrimas@Tradebe.com**	

Signature of legal owner, operator or authorized representative Henry Krier	Date (mm/dd/yyyy) 8-07-24
Printed Name (First, Middle Initial Last) **Henry Krier**	Title **Property Owner**
Email **henry@krierlands.com**	

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/hw/where-2018-definition-solid-waste-rule-effect 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 **5/1/2017** (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
08	See Appendix A-1	1000	0	NA

EPA ID Number | W | I | D | 9 | 8 | 8 | 5 | 8 | 0 | 0 | 5 | 6 |

OMB# 2050-0024; Expires 04/30/2024

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT PART A FORM

1. Facility Permit Contact

First Name	**Tita**	MI		Last Name	**Lagrimas**
Title	**VP of Regulatory Affairs**				
Email	**Tita.Lagrima@Tradebe.com**				
Phone	**(219)746-8713**	Ext		Fax	

2. Facility Permit Contact Mailing Address

Street Address	**4343 Kennedy Avenue**		
City, Town, or Village	**East Chicago**		
State **IN**	Country **Lake**	Zip Code **46312**	

3. Facility Existence Date (mm/dd/yyyy)

1/1/1990

4. Other Environmental Permits

A. Permit Type	B. Permit Number	C. Description
R	**6 0 2 6**	**Storage Hazardous Waste Containers**
R	**4 3 9 5**	**HW Treatment Container Commercial**
R	**3 3 8 6**	**Solid Waste Transfer**
N	**W I - S 0 6 7 8 5 7 - 5**	**General Industrial Stormwater**

5. Nature of Business

Primary Operations are storage, treatment/fuel blending, and processing which includes bulking, repackaging and consolidation of hazardous and non-hazardous waste, universal waste, secondary hazardous material and exempt wastes .

6. Process Codes and Design Capacities

Line Number		A. Process Code			B. Process Design Capacity (1) Amount	B. Process Design Capacity (2) Unit of Measure	C. Process Total Number of Units	D. Unit Name
X	1	S	0	1	254,375	G	4625	Container Storage
X	2	T	0	4	10000	U	002	Fuel Blend Tankers

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								D. Processes (2) Process Description (if code is not entered in 7.D1))
																See Appendix A-2

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

Item 6 - Container storage areas include: Areas 1, 2, 3, 4 and 5 with total capacity for a combination of hazardous and non-hazardous waste of 4,625 (55) gallon units. Hazardous will be limited to 4,109 (55) gallon units. Could be less if larger units are used. Tradebe handles hazardous and non-hazardous waste.
Item 7 - Please see Appendix A-2.

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APPENDIX A-1

WASTE CODES
for
FEDERALLY REGULATED HAZARDOUS WASTES
and
HAZARDOUS SECONDARY MATERIAL ACTIVITY

D001	F001	K001	K048	K123	P001	P048	P102	U001	U046	U091	U136	U181	U234
D002	F002	K002	K049	K124	P002	P049	P103	U002	U047	U092	U137	U182	U235
D003	F003	K003	K050	K125	P003	P050	P104	U003	U048	U093	U138	U183	U236
D004	F004	K004	K051	K126	P004	P051	P105	U004	U049	U094	U140	U184	U237
D005	F005	K005	K052	K131	P005	P054	P106	U005	U050	U095	U141	U185	U238
D006	F006	K006	K060	K132	P006	P056	P108	U006	U051	U096	U142	U186	U239
D007	F007	K007	K061	K136	P007	P057	P109	U007	U052	U097	U143	U187	U240
D008	F008	K008	K062	K141	P008	P058	P110	U008	U053	U098	U144	U188	U243
D009	F009	K009	K069	K142	P009	P059	P111	U009	U055	U099	U145	U189	U244
D010	F010	K010	K071	K143	P010	P060	P112	U010	U056	U101	U146	U190	U246
D011	F011	K011	K073	K144	P011	P062	P113	U011	U057	U102	U147	U191	U247
D012	F012	K013	K083	K145	P012	P063	P114	U012	U058	U103	U148	U192	U248
D013	F019	K014	K084	K147	P013	P064	P115	U014	U059	U105	U149	U193	U249
D014	F020	K015	K085	K148	P014	P065	P116	U015	U060	U106	U150	U194	U271
D015	F021	K016	K086	K149	P015	P066	P118	U016	U061	U107	U151	U196	U278
D016	F022	K017	K087	K150	P016	P067	P119	U017	U062	U108	U152	U197	U279
D017	F023	K018	K088	K151	P017	P068	P120	U018	U063	U109	U153	U200	U280
D018	F024	K019	K093	K156	P018	P069	P121	U019	U064	U110	U154	U201	U328
D019	F025	K020	K094	K157	P020	P070	P122	U020	U066	U111	U155	U202	U353
D020	F026	K021	K095	K158	P021	P071	P123	U021	U067	U112	U156	U203	U359
D021	F027	K022	K096	K159	P022	P072	P127	U022	U068	U113	U157	U204	U364
D022	F028	K023	K097	K161	P023	P073	P128	U023	U069	U114	U158	U205	U367
D023	F032	K024	K098	K169	P024	P074	P185	U024	U070	U115	U159	U206	U372
D024	F034	K025	K099	K170	P026	P075	P188	U025	U071	U116	U160	U207	U373
D025	F035	K026	K100	K171	P027	P076	P189	U026	U072	U117	U161	U208	U385
D026	F037	K027	K101	K172	P028	P077	P190	U027	U073	U118	U162	U209	U386
D027	F038	K028	K102	K174	P029	P078	P191	U028	U074	U119	U163	U210	U387
D028	F039	K029	K103	K175	P030	P081	P192	U029	U075	U120	U164	U211	U389
D029		K030	K104	K176	P031	P082	P194	U030	U076	U121	U165	U213	U390
D030		K031	K105	K177	P033	P084	P196	U031	U077	U122	U166	U214	U391
D031		K032	K106	K178	P034	P085	P197	U032	U078	U123	U167	U215	U392
D032		K033	K107	K181	P036	P087	P198	U033	U079	U124	U168	U216	U394
D033		K034	K108		P037	P088	P199	U034	U080	U125	U169	U217	U395
D034		K035	K109		P038	P089	P201	U035	U081	U126	U170	U218	U404
D035		K036	K110		P039	P092	P202	U036	U082	U127	U171	U219	U409
D036		K037	K111		P040	P093	P203	U037	U083	U128	U172	U220	U410
D037		K038	K112		P041	P094	P204	U038	U084	U129	U173	U221	U411
D038		K039	K113		P042	P095	P205	U039	U085	U130	U174	U222	
D039		K040	K114		P043	P096		U041	U086	U131	U176	U223	
D040		K041	K115		P044	P097		U042	U087	U132	U177	U225	
D041		K042	K116		P045	P098		U043	U088	U133	U178	U226	
D042		K043	K117		P046	P099		U044	U089	U134	U179	U227	
D043		K046	K118		P047	P101		U045	U090	U135	U180	U228	

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APPENDIX A-2

DESCRIPTION OF HAZARDOUS WASTES

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		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)
	1	D	0	0	1	265,000	Short Ton	S	0	1	T	0	4	0	0	0	
	2	D	0	0	2	265,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
	3	D	0	0	3	20,500	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
	4	D	0	0	4	100,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
	5	D	0	0	5	100,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
	6	D	0	0	6	100,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
	7	D	0	0	7	100,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
	8	D	0	0	8	100,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
	9	D	0	0	9	100,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
1	0	D	0	1	0	100,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
1	1	D	0	1	1	100,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
1	2	D	0	1	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
1	3	D	0	1	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
1	4	D	0	1	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
1	5	D	0	1	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
1	6	D	0	1	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
1	7	D	0	1	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
1	8	D	0	1	8	100,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
1	9	D	0	1	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
2	0	D	0	2	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
2	1	D	0	2	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
2	2	D	0	2	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
2	3	D	0	2	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
2	4	D	0	2	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
2	5	D	0	2	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
2	6	D	0	2	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
2	7	D	0	2	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
2	8	D	0	2	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
2	9	D	0	2	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
3	0	D	0	3	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
3	1	D	0	3	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
3	2	D	0	3	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
3	3	D	0	3	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									(2) Process Description (If code is not entered in 7.D1)
								(1) Process Codes									
3	4	D	0	3	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
3	5	D	0	3	5	265,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
3	6	D	0	3	6	265,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
3	7	D	0	3	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
3	8	D	0	3	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
3	9	D	0	3	9	265,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
4	0	D	0	4	0	265,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
4	1	D	0	4	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
4	2	D	0	4	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
4	3	D	0	4	3	100,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
4	4	F	0	0	1	265,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
4	5	F	0	0	2	265,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
4	6	F	0	0	3	265,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
4	7	F	0	0	4	265,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
4	8	F	0	0	5	265,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
4	9	F	0	0	6	10,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
5	0	F	0	0	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
5	1	F	0	0	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
5	2	F	0	0	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
5	3	F	0	1	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
5	4	F	0	1	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
5	5	F	0	1	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
5	6	F	0	1	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
5	7	F	0	2	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
5	8	F	0	2	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
5	9	F	0	2	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
6	0	F	0	2	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
6	1	F	0	2	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
6	2	F	0	2	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
6	3	F	0	2	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
6	4	F	0	2	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
6	5	F	0	2	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
6	6	F	0	3	2	10,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									(2) Process Description (If code is not entered in 7.D1)
								(1) Process Codes									
6	7	F	0	3	4	10,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
6	8	F	0	3	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
6	9	F	0	3	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
7	0	F	0	3	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
7	1	F	0	3	9	424,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
7	2	K	0	0	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
7	3	K	0	0	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
7	4	K	0	0	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
7	5	K	0	0	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
7	6	K	0	0	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
7	7	K	0	0	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
7	8	K	0	0	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
7	9	K	0	0	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
8	0	K	0	0	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
8	1	K	0	1	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
8	2	K	0	1	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
8	3	K	0	1	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
8	4	K	0	1	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
8	5	K	0	1	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
8	6	K	0	1	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
8	7	K	0	1	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
8	8	K	0	1	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
8	9	K	0	1	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
9	0	K	0	2	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
9	1	K	0	2	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
9	2	K	0	2	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
9	3	K	0	2	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
9	4	K	0	2	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
9	5	K	0	2	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
9	6	K	0	2	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
9	7	K	0	2	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
9	8	K	0	2	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
9	9	K	0	2	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		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)
10	0	K	0	3	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
10	1	K	0	3	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
10	2	K	0	3	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
10	3	K	0	3	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
10	4	K	0	3	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
10	5	K	0	3	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
10	6	K	0	3	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
10	7	K	0	3	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
10	8	K	0	3	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
10	9	K	0	3	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
11	0	K	0	4	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
11	1	K	0	4	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
11	2	K	0	4	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
11	3	K	0	4	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
11	4	K	0	4	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
11	5	K	0	4	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
11	6	K	0	4	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
11	7	K	0	5	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
11	8	K	0	5	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
11	9	K	0	5	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
12	0	K	0	6	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
12	1	K	0	6	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
12	2	K	0	6	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
12	3	K	0	6	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
12	4	K	0	7	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
12	5	K	0	7	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
12	6	K	0	8	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
12	7	K	0	8	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
12	8	K	0	8	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
12	9	K	0	8	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
13	0	K	0	8	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
13	1	K	0	8	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
13	2	K	0	9	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		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)
13	3	K	0	9	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
13	4	K	0	9	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
13	5	K	0	9	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
13	6	K	0	9	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
13	7	K	0	9	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
13	8	K	0	9	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
13	9	K	1	0	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
14	0	K	1	0	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
14	1	K	1	0	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
14	2	K	1	0	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
14	3	K	1	0	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
14	4	K	1	0	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
14	5	K	1	0	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
14	6	K	1	0	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
14	7	K	1	0	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
14	8	K	1	0	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
14	9	K	1	1	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
15	0	K	1	1	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
15	1	K	1	1	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
15	2	K	1	1	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
15	3	K	1	1	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
15	4	K	1	1	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
15	5	K	1	1	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
15	6	K	1	1	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
15	7	K	1	1	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
15	8	K	1	2	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
15	9	K	1	2	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
16	0	K	1	2	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
16	1	K	1	2	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
16	2	K	1	3	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
16	3	K	1	3	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
16	4	K	1	3	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
16	5	K	1	4	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									(2) Process Description (If code is not entered in 7.D1)
								(1) Process Codes									
16	6	K	1	4	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
16	7	K	1	4	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
16	8	K	1	4	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
16	9	K	1	4	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
17	0	K	1	4	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
17	1	K	1	4	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
17	2	K	1	4	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
17	3	K	1	5	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
17	4	K	1	5	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
17	5	K	1	5	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
17	6	K	1	5	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
17	7	K	1	5	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
17	8	K	1	5	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
17	9	K	1	6	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
18	0	K	1	6	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
18	1	K	1	7	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
18	2	K	1	7	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
18	3	K	1	7	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
18	4	K	1	7	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
18	5	K	1	7	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
18	6	K	1	7	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
18	7	K	1	7	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
18	8	K	1	7	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
18	9	K	1	8	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
19	0	P	0	0	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
19	1	P	0	0	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
19	2	P	0	0	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
19	3	P	0	0	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
19	4	P	0	0	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
19	5	P	0	0	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
19	6	P	0	0	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
19	7	P	0	0	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
19	8	P	0	0	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		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)
19	9	P	0	1	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
20	0	P	0	1	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
20	1	P	0	1	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
20	2	P	0	1	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
20	3	P	0	1	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
20	4	P	0	1	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
20	5	P	0	1	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
20	6	P	0	1	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
20	7	P	0	1	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
20	8	P	0	2	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
20	9	P	0	2	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
21	0	P	0	2	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
21	1	P	0	2	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
21	2	P	0	2	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
21	3	P	0	2	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
21	4	P	0	2	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
21	5	P	0	2	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
21	6	P	0	2	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
21	7	P	0	3	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
21	8	P	0	3	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
21	9	P	0	3	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
22	0	P	0	3	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
22	1	P	0	3	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
22	2	P	0	3	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
22	3	P	0	3	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
22	4	P	0	3	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
22	5	P	0	4	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
22	6	P	0	4	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
22	7	P	0	4	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
22	8	P	0	4	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
22	9	P	0	4	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
23	0	P	0	4	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
23	1	P	0	4	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))																		
Line Number		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)
23	2	P	0	4	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
23	3	P	0	4	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
23	4	P	0	4	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
23	5	P	0	5	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
23	6	P	0	5	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
23	7	P	0	5	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
23	8	P	0	5	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
23	9	P	0	5	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
24	0	P	0	5	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
24	1	P	0	5	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
24	2	P	0	6	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
24	3	P	0	6	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
24	4	P	0	6	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
24	5	P	0	6	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
24	6	P	0	6	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
24	7	P	0	6	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
24	8	P	0	6	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
24	9	P	0	6	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
25	0	P	0	6	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
25	1	P	0	7	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
25	2	P	0	7	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
25	3	P	0	7	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
25	4	P	0	7	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
25	5	P	0	7	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
25	6	P	0	7	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
25	7	P	0	7	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
25	8	P	0	7	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
25	9	P	0	7	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
26	0	P	0	8	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
26	1	P	0	8	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
26	2	P	0	8	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
26	3	P	0	8	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
26	4	P	0	8	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									(2) Process Description (If code is not entered in 7.D1)
								(1) Process Codes									
26	5	P	0	8	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
26	6	P	0	8	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
26	7	P	0	9	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
26	8	P	0	9	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
26	9	P	0	9	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
27	0	P	0	9	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
27	1	P	0	9	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
27	2	P	0	9	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
27	3	P	0	9	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
27	4	P	0	9	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
27	5	P	1	0	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
27	6	P	1	0	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
27	7	P	1	0	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
27	8	P	1	0	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
27	9	P	1	0	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
28	0	P	1	0	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
28	1	P	1	0	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
28	2	P	1	0	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
28	3	P	1	1	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
28	4	P	1	1	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
28	5	P	1	1	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
28	6	P	1	1	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
28	7	P	1	1	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
28	8	P	1	1	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
28	9	P	1	1	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
29	0	P	1	1	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
29	1	P	1	1	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
29	2	P	1	2	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
29	3	P	1	2	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
29	4	P	1	2	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
29	5	P	1	2	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
29	6	P	1	2	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
29	7	P	1	2	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		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)
29	8	P	1	8	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
29	9	P	1	8	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
30	0	P	1	8	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
30	1	P	1	9	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
30	2	P	1	9	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
30	3	P	1	9	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
30	4	P	1	9	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
30	5	P	1	9	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
30	6	P	1	9	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
30	7	P	1	9	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
30	8	P	1	9	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
30	9	P	2	0	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
31	0	P	2	0	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
31	1	P	2	0	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
31	2	P	2	0	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
31	3	P	2	0	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
31	4	U	0	0	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
31	5	U	0	0	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
31	6	U	0	0	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
31	7	U	0	0	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
31	8	U	0	0	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
31	9	U	0	0	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
32	0	U	0	0	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
32	1	U	0	0	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
32	2	U	0	0	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
32	3	U	0	1	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
32	4	U	0	1	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
32	5	U	0	1	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
32	6	U	0	1	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
32	7	U	0	1	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
32	8	U	0	1	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
32	9	U	0	1	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
33	0	U	0	1	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		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)
33	1	U	0	1	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
33	2	U	0	2	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
33	3	U	0	2	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
33	4	U	0	2	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
33	5	U	0	2	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
33	6	U	0	2	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
33	7	U	0	2	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
33	8	U	0	2	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
33	9	U	0	2	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
34	0	U	0	2	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
34	1	U	0	2	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
34	2	U	0	3	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
34	3	U	0	3	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
34	4	U	0	3	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
34	5	U	0	3	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
34	6	U	0	3	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
34	7	U	0	3	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
34	8	U	0	3	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
34	9	U	0	3	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
35	0	U	0	3	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
35	1	U	0	3	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
35	2	U	0	4	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
35	3	U	0	4	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
35	4	U	0	4	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
35	5	U	0	4	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
35	6	U	0	4	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
35	7	U	0	4	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
35	8	U	0	4	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
35	9	U	0	4	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
36	0	U	0	4	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
36	1	U	0	5	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
36	2	U	0	5	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
36	3	U	0	5	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))																		
Line Number		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)
36	4	U	0	5	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
36	5	U	0	5	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
36	6	U	0	5	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
36	7	U	0	5	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
36	8	U	0	5	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
36	9	U	0	5	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
37	0	U	0	6	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
37	1	U	0	6	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
37	2	U	0	6	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
37	3	U	0	6	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
37	4	U	0	6	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
37	5	U	0	6	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
37	6	U	0	6	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
37	7	U	0	6	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
37	8	U	0	6	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
37	9	U	0	7	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
38	0	U	0	7	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
38	1	U	0	7	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
38	2	U	0	7	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
38	3	U	0	7	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
38	4	U	0	7	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
38	5	U	0	7	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
38	6	U	0	7	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
38	7	U	0	7	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
38	8	U	0	7	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
38	9	U	0	8	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
39	0	U	0	8	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
39	1	U	0	8	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
39	2	U	0	8	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
39	3	U	0	8	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
39	4	U	0	8	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
39	5	U	0	8	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above
39	6	U	0	8	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0		Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									(2) Process Description (If code is not entered in 7.D1)
								(1) Process Codes									
39	7	U	0	8	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
39	8	U	0	8	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
39	9	U	0	9	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
40	0	U	0	9	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
40	1	U	0	9	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
40	2	U	0	9	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
40	3	U	0	9	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
40	4	U	0	9	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
40	5	U	0	9	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
40	6	U	0	9	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
40	7	U	0	9	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
40	8	U	0	9	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
40	9	U	1	0	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
41	0	U	1	0	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
41	1	U	1	0	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
41	2	U	1	0	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
41	3	U	1	0	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
41	4	U	1	0	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
41	5	U	1	0	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
41	6	U	1	0	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
41	7	U	1	1	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
41	8	U	1	1	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
41	9	U	1	1	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
42	0	U	1	1	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
42	1	U	1	1	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
42	2	U	1	1	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
42	3	U	1	1	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
42	4	U	1	1	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
42	5	U	1	1	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
42	6	U	1	1	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
42	7	U	1	2	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
42	8	U	1	2	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
42	9	U	1	2	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		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	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
43	1	U	1	2	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
43	2	U	1	2	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
43	3	U	1	2	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
43	4	U	1	2	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
43	5	U	1	2	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
43	6	U	1	2	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
43	7	U	1	3	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
43	8	U	1	3	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
43	9	U	1	3	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
44	0	U	1	3	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
44	1	U	1	3	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
44	2	U	1	3	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
44	3	U	1	3	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
44	4	U	1	3	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
44	5	U	1	3	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
44	6	U	1	4	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
44	7	U	1	4	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
44	8	U	1	4	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
44	9	U	1	4	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
45	0	U	1	4	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
45	1	U	1	4	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
45	2	U	1	4	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
45	3	U	1	4	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
45	4	U	1	4	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
45	5	U	1	4	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
45	6	U	1	5	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
45	7	U	1	5	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
45	8	U	1	5	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
45	9	U	1	5	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
46	0	U	1	5	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
46	1	U	1	5	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
46	2	U	1	5	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		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)
46	3	U	1	5	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
46	4	U	1	5	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
46	5	U	1	5	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
46	6	U	1	6	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
46	7	U	1	6	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
46	8	U	1	6	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
46	9	U	1	6	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
47	0	U	1	6	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
47	1	U	1	6	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
47	2	U	1	6	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
47	3	U	1	6	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
47	4	U	1	6	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
47	5	U	1	6	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
47	6	U	1	7	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
47	7	U	1	7	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
47	8	U	1	7	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
47	9	U	1	7	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
48	0	U	1	7	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
48	1	U	1	7	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
48	2	U	1	7	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
48	3	U	1	7	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
48	4	U	1	7	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
48	5	U	1	8	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
48	6	U	1	8	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
48	7	U	1	8	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
48	8	U	1	8	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
48	9	U	1	8	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
49	0	U	1	8	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
49	1	U	1	8	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
49	2	U	1	8	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
49	3	U	1	8	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
49	4	U	1	8	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
49	5	U	1	9	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		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)
49	6	U	1	9	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
49	7	U	1	9	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
49	8	U	1	9	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
49	9	U	1	9	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
50	0	U	1	9	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
50	1	U	1	9	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
50	2	U	2	0	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
50	3	U	2	0	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
50	4	U	2	0	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
50	5	U	2	0	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
50	6	U	2	0	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
50	7	U	2	0	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
50	8	U	2	0	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
50	9	U	2	0	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
51	0	U	2	0	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
51	1	U	2	0	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
51	2	U	2	1	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
51	3	U	2	1	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
51	4	U	2	1	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
51	5	U	2	1	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
51	6	U	2	1	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
51	7	U	2	1	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
51	8	U	2	1	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
51	9	U	2	1	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
52	0	U	2	1	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
52	1	U	2	2	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
52	2	U	2	2	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
52	3	U	2	2	2	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
52	4	U	2	2	3	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
52	5	U	2	2	5	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
52	6	U	2	2	6	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
52	7	U	2	2	7	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
52	8	U	2	2	8	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number	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)
52 9	U 2 3 4	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
53 0	U 2 3 5	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
53 1	U 2 3 6	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
53 2	U 2 3 7	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
53 3	U 2 3 8	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
53 4	U 2 3 9	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
53 5	U 2 4 0	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
53 6	U 2 4 3	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
53 7	U 2 4 4	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
53 8	U 2 4 6	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
53 9	U 2 4 7	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
54 0	U 2 4 8	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
54 1	U 2 4 9	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
54 2	U 2 7 1	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
54 3	U 2 7 8	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
54 4	U 2 7 9	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
54 5	U 2 8 0	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
54 6	U 3 2 8	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
54 7	U 3 5 3	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
54 8	U 3 5 9	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
54 9	U 3 6 4	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
55 0	U 3 6 7	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
55 1	U 3 7 2	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
55 2	U 3 7 3	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
55 3	U 3 8 5	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
55 4	U 3 8 6	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
55 5	U 3 8 7	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
55 6	U 3 8 9	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
55 7	U 3 9 0	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
55 8	U 3 9 1	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
55 9	U 3 9 2	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
56 0	U 3 9 4	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above
56 1	U 3 9 5	1,000	Short Ton	S 0 1 T 0 4 0 0 0	Included with above

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line Number		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)
56	2	U	4	0	4	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
56	3	U	4	0	9	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
56	4	U	4	1	0	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above
56	5	U	4	1	1	1,000	Short Ton	S	0	1	T	0	4	0	0	0	Included with above

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ATTACHMENT B

FEASIBILITY PLAN OF OPERATION REPORT GENERAL REQUIREMENTS & FACILTY DESCRIPTION

ATTACHMENT B
GENERAL REQUIREMENTS AND FACILITY DESCRIPTION
NR 670.014(2)
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ATTACHMENT B
GENERAL REQUIREMENTS AND FACILITY DESCRIPTION
NR 670.014(2)

INTRODUCTION

Tradebe Treatment and Recycling of Wisconsin, L.L.C., located in Milwaukee, WI (Tradebe), is a licensed hazardous waste storage and treatment facility, authorized under Wisconsin Department of Natural Resource (DNR) License #4395 for treatment and #6026 for storage.

Tradebe also has Solid Waste Facility Operation License #3386 which allows Tradebe to accept 50-100 tons per day. The conditions for that approval are incorporated into this FPOR for joint approval to store and manage solid waste under the same conditions as hazardous waste. Revision to the previous approval includes a change in category to become a large facility solid waste facility receiving greater than 100 tons per day.

Tradebe also has an exemption from the requirements of NR 289.53 issued by DNR on February 9, 2006 to allow Tradebe to store and transfer PCB wastes. This FPOR renews that approval.

Container storage of hazardous waste is approved in various quantities within five storage buildings. Hazardous waste treatment in the form of fuels blending is also approved. Other waste management activities include lab packing, bulking, transfer, elementary neutralization, and non-hazardous waste handling.

The department issued a final determination to approve Tradebe's feasibility and plan of operation report (FPOR submitted by Badger Disposal) on June 29, 2007. Since that time several modifications to the facility's license and FPOR have been approved. Those modification were:

a. December 20, 2007, regarding the 2007 Warehouse Building Addition (Area 2).
b. June 16, 2010, regarding the 2009 Lab Pack Building (Area 4).
c. November 20, 2014, regarding the Enclosure Building (Area 3).
d. April 12, 2017, regarding the West Drum Storage Warehouse (Area 5).
e. February 22, 2018, discontinue lab certification and name change.
f. April 15, 2020, changes to berms in Area 4 and containment capacity recalculations.

See Attachment D, Waste Management Activities, for further description of licensed and license exempt activities.

B.1 GENERAL DESCRIPTION: NR 670.014(2)(a)

Section B.1 provides a general description of the Tradebe facility in an equivalent manner to that prescribed in NR 670.014. This section includes general facility information about the facility

described by this Feasibility and Plan of Operations Report (FPOR). Complete details can be found in Attachment D of this FPOR. Tradebe maintains a treatment and storage facility at the following address:

Tradebe Treatment and Recycling of Wisconsin, LLC
5611 West Hemlock Street
Milwaukee, Wisconsin 53223

B.1.a Description of Facility

Tradebe leases the property at 5611 West Hemlock Street from Badger Investment Realty. Surveys, maps and legal descriptions of the property are included in Attachments Q and R. Certified Survey maps 8176 and 6287 in Appendix Q-2 show that Tradebe leases Lot 1 shown on survey 8176. Survey 8176 shows that Lot 1 is bordered by Hemlock Street to the north, Lot 11 to west, and Parcel 1 to the east and northeast. Additionally, the eastern portion of Lot 1 is bordered to the east by a 50' Union Pacific Railway Company easement and Parcel 1 on a portion of the southeast border. The legal description of the property includes Parcel 2 of Certified Survey Map 6287. Survey Map 6287 is an older Survey Map and included here for reference purposes only. Map 6287 does not show the entire property that Tradebe leases.

The eastern portion of Lot 1 shown on map 8176, southeast of Parcel 1, is an unpaved area with vegetation. This area is outside the operating facility's fenceline. Tradebe has access to this area by means of a gate shown on the eastern portion of the fence in Drawing TTR-0001. The property and fence lines are also shown on that drawing.

The office building, which was previously leased by Tradebe, is a separate building located on the east side of the property, separated by asphalt pavement from the active facility. This building and property are no longer leased by Tradebe.

B.1.b Facility Operations

Tradebe's primary facility operations consists of container storage of hazardous waste and non-hazardous waste, and fuels blending, lab packing, bulking, transfering, and elementary neutralization of hazardous and non-hazardous waste.

As part of the operations described above, Tradebe will also receive and manage Hazardous Secondary Materials (HSM) Universal Waste, Used Oils, electronic and non-hazardous waste at the facility.

Hazardous waste that is manifested to or otherwise accepted by Tradebe from off-site locations is subject to the management requirements of Tradebe's license until the waste is shipped to an off-site facility.

B.1.c Container Management Areas

Per NR 660.10(43)(a) Tradebe's facility consists of five (5) container management areas that are utilized to store, and manage wastes prior to the shipment off-site

The container management area designations are listed below in Table B-1:

Table B-1

CONTAINER MANAGEMENT AREAS				
Area 1 (aka North Drum Storage Warehouse)	Area 2 (aka 2007 Addition)	Area 3 (aka Enclosure Building)	Area 4 (aka 2009 Lab Pack Building)	Area 5 (aka West Warehouse)

B.2 CHEMICAL AND PHYSICAL ANALYSIS NR 670.014(2)(b) & (c)

Tradebe gathers the information necessary to properly treat, store and dispose of waste. A description of the chemical and physical analysis of the hazardous waste managed at Tradebe is detailed in the facility's Waste Analysis Plan, which is included in Attachment C.

B.3 SECURITY PROCEDURES AND EQUIPMENT NR 670.014(2)(d)

Tradebe prevents unknowing entry and minimizes the possibility of unauthorized entry by maintaining a fence around the facility. Access to the facility is through the main gate which remains locked and requires visitors to be buzzed in by a Tradebe employee or provided with a limited use access code. Once inside, Tradebe personnel monitor visitor whereabouts and direct visitor movements.

There is 24-hour internally monitored surveillance system for the facility records activity with cameras at the main gate, building exteriors and building interiors. After working hours there is no access through the main gate and each building is locked.

B.4 INSPECTION SCHEDULE NR 670.014 (2)(e)

A copy of Tradebe's Inspection Schedule along with general inspection requirement for NR 664.0015 are located in Attachment F.

B.5 CONTINGENCY PLAN NR 670.014(g)

A copy of Tradebe's Contingency Plan is located in Attachment G. The purpose of this contingency plan is to prevent or minimize hazards to human health or the environment from fires, explosions, or uncontrolled releases of hazardous waste or hazardous waste constituents to air, land, or water.

B.6 DESCRIPTION OF PROCEDURES, STRUCTURES, OR EQUIPMENT USED AT THE FACILITY TO PREVENT HAZARDS DESCRIBED AT NR 670.014 (2)(h)

Information responsive to NR 670.014(2)(h)(1-6) are found in Attachment E.

B.7 DESCRIPTION OF PRECAUTIONS TAKEN TO PREVENT ACCIDENTIAL IGNITTION OR REACTION OF IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES NR 670.014(2)(i)

Special precautions are taken to prevent accidental ignition or reaction of waste. Sections D.2.6 and D.2.7 describe handling procedures for ignitable, reactive and incompatible waste.

B.7.1 General Requirements for Ignitable, Reactive, or Incompatible Waste NR 664.0017

In compliance with NR 664.0017(1) Tradebe prohibits smoking in any of the buildings for this facility. No smoking signs are conspicuously displayed at entryways to all buildings and strictly enforced by all Tradebe employees. Additionally, Tradebe does not expose waste to flames, hot surfaces, sparks etc. or any source that may cause ignition or undesired reaction.

Tradebe's storage and waste management activities are conducted in a way that does not not produce extreme heat. Fume hoods are used by the laboratory to control fumes during analytical procedures. Containers are opened briefly for sampling. Bulking and transfer activities are managed to prevent toxic mists, flammable fumes or gases, fumes and dust.

The overall operation prevents any process, procedure or action that would damage the structural integrity of the facility buildings or threaten human health or the environment.

B.8 TRAFFIC PATTERNS, ESTIMATED TRAFFIC VOLUME TRAFFIC CONTROL, ACCESS ROAD SURFACING AND LOAD-BEARING CAPACITY NR 670.014(2)(j)

Currently, Tradebe receives approximately eight (8) waste delivery trucks each day. This includes vans, trailers, and straight trucks carrying waste in drums, totes, and cubic yard boxes; or bulk shipment in tanker and roll off boxes. Transport is via vehicles having a gross (loaded) weight of less than 80,000 pounds.

There is also truck traffic from the Tradebe facility to other facilities to transfer the following:

(1) Empty waste containers;
(2) Receipts of waste which will not be managed at the facility,
(3) Wastes generated by the facility, and
(4) Fuel-blended wastes for use in the secondary market (i.e. sent to cement kilns).

Outbound truck traffic is approximately four (4) trucks per day. These trucks include (but are not limited to) van trailer, tanker trucks, and possibly roll-off boxes having a gross (loaded) weight less than 80,000 pounds.

Trucks usually reach the facility by traveling either via Interstate 43 or U.S. Highway 41/45 (either northbound or southbound) and exiting onto County Route PP (Good Hope Road) and traveling approximately three (3) miles westbound to North 60th Street from Interstate 43 or traveling approximately three (3) miles eastbound from U.S. Highway 41/45. They turn northbound on North 60th Street approximately 1/4 mile to West Hemlock Street. After turning eastbound on West Hemlock Street, vehicles travel approximately 1,000 feet to the entrance of the facility at the end of the road.

Trucks leaving the facility will follow this same route in reverse. U.S. Highway 41/45 and Interstate 43 are both four-lane highways which typically carry heavy truck traffic, and which will easily accommodate the facility traffic described above. Good Hope Road is a straight, four-lane road and North 60th Street is a two-lane road. Good Hope Road and North 60th Street are both capable of carrying the traffic described above. The travel routes to and from the facility are the same as described above. All of the roadways on the facility property will be asphalt paved and are designed and constructed to accommodate vehicles typically received at Tradebe.

Drawing number TTRWI-0004, provided as Appendix R-3, illustrates the traffic patterns for the facility. All personnel and visitor vehicle(s) are to be parked in designated parking areas outside of the operating portions of the facility.

Trucks waiting to enter the facility, while multiple loads are being delivered, are parked on Hemlock Street which is a public road adjacent to the Tradebe facility. Trucks are not allowed to be parked on this road overnight or over the weekend. The trucks will be attended by their drivers while waiting to loaded or unloaded at the Tradebe facility.

B.9 FLOOD PLAIN NR 670.014(2)(k)3

Tradebe is not located within a 100-year flood plain; therefore, the requirements of NR 670.014(2)(k)(4) and (5) do not apply. The Tradebe facility appears on the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer FIRMette map as in an Area of Minimal Flood Hazard. FEMA Flood Insurance Rate Map also illustrates the Tradebe facility is in Zone X. Both the FEMA maps, refer to Attachment Q, Appendix Q-3, illustrate that the facility is not located in a 100-year floodplain; therefore, the facility meets the locational requirements of NR 670.014(2)(k).

B.10 ENDANGERED SPECIES AND WETLANDS NR 670.014 (2)(k)6

The current preliminary review is provided as Appendix B-1. The Endangered Resources Review were requested and will be added to Appendix B-1 when available.

A map from the National Wetlands Inventory is included in Appendix B-1 which shows the nearest the nearest waterway or wetland to this facility is the Lincoln Creek which is 538 feet from the facility.

B.11 TRAINING NR 670.014(2)(L)

Tradebe's personnel training outline is included as Appendix H-1 and includes information about introductory and continuing training programs. A brief description of how the training is designed to meet job tasks is provided as Appendix H-2 and Attachment H demonstrates Tradebe's compliance with the requirements of NR 664.0016.

B.12 CLOSURE PLAN NR 670.014(2)(m-p)

Tradebe's Closure Plan provided as Attachment I provides including all provisions for all requirements of NR 670.014(2)(m). An updated closure cost estimate is included as Appendix I-2 and includes a copy of the most recent Closure Cost Bond (Appendix I-1).

No hazardous waste units have been closed and therefore no documentation of filed notices is required.

B.13 INSURANCE POLICY NR 670.014(q)

A copy of the facility's insurance policy is provided as Attachment J.

B.14 TOPOGRAPHIC MAP, WIND ROSE, LOCATION OF OPERATIONAL UNITS NR 670.014(2)(s)

A topographic map drawing included as Appendix Q-1 shows the area surrounding the facility at a distance of 1,000 feet. The scale is one (1) inch equal to not more than 200 feet. The map includes contours sufficient to show surface water flow in the vicinity to and from each operational unit.

The closest stream or waterway to the site is Lincoln Creek located approximately 538 feet northeast of the facility. Lincoln Creek is an intermittent stream that has an elevation of approximately 700 feet, while the Tradebe site is located at an elevation of approximately 724 feet (see Appendix B-1).

1. Map scale and date. Appendix R-1
2. 100-year floodplain area. Appendix Q-4
3. Surface waters including intermittent streams. Appendix B-1
4. Surrounding land uses (residential, commercial, agricultural, recreational). Appendix Q-1
5. A wind rose (i.e., prevailing wind-speed and direction). Appendix Q-3
6. Orientation of the map (north arrow). Provided on each.
7. Legal boundaries of the HWM facility site. Appendix Q-2 (site survey)

8. Access control (fences, gates). Appendices R-1, R-2, R-3,
9. Injection and withdrawal wells both on-site and off-site. (N/A)
10. Buildings; treatment, storage or disposal operations; or other structure (recreation areas, runoff control systems, access and internal roads, storm, sanitary and process sewerage systems, loading and unloading areas, fire control facilities, etc.) Appendix R-1 through R-8
11. Barriers for drainage or flood control. Appendices R-9 and R-10
12. Location of operational units within the HWM facility site, where hazardous waste is (or will be) treated, stored or disposed (include equipment cleanup areas). Appendices R-4 and R-5

B.15 SUMMARY OF PRE-APPLICATION MEETING LIST ATTENDEES / ADDRESSES AND COPIES OF WRITTEN COMMENTS OR MATERIALS SUBMITTED DURING THE MEETING NR 670.014(2)(v)

On May 8, 2020, Tradebe personnel and WDNR personnel discussed a submittal of a Feasibility and Plan of Operation Report (FPOR) application to WDNR. It was determined that Tradebe would resubmit a FPOR application. WDNR and Tradebe agreed that a new FPOR submittal would be submitted by Tradebe in September 2020. That version was submitted. To address WDNR comments to that submission Tradebe met with members of WDNR on November 9, 2022. During that meeting Tradebe offered to submit the revised FPOR by January 9, 2023. That version was submitted. To address WNDR comments to that submission Tradebe met with DNR (Douglas Coenen and Andrea Keller) on several dates in late 2023 to discuss and resolve some of the 850 comments and questions from DNR pertaining to the original submission of the application in 2018.

B.16 DOCUMENTATION SHOWING COMPLIANCE WITH LOCAL APPROVAL REQUIREMENTS NR 670.014(2)(w)

The Tradebe facility is not an interim status facility; submitting an initial FPOR application, nor proposing to expand the existing facility (i.e., construction) for those reasons a written request and standard notice was not submitted to the affected municipality.

Tradebe was granted a Certificate of Occupancy by the City of Milwaukee on November 22, 2022, along with a variance to allow hazardous waste storage in an area otherwise zoned as light industrial. The Certificate of Occupancy and variance expire in November of 2032.

B-17 OWNERSHIP NR 670.014(2)(x)1.

The sole owner of Tradebe Treatment and Recycling of Wisconsin, LLC is Tradebe Treatment and Recycling, LLC with a principal office located at 234 Hobart Street, Meriden, Connecticut 06450. Tradebe Treatment and Recycling, LLC owns 100% of the membership interests in the limited liability company.

Tradebe Treatment and Recycling, LLC does not own any other Wisconsin based solid or hazardous waste facilities nor has Tradebe Treatment and Recycling, LLC owned any Wisconsin

solid or hazardous waste facilities. Tradebe is and/or will comply with all plan approvals and orders relating to this facility.

B.18 ENVIRONMENTAL IMPACT REVIEW NR 670.014(2)(x)2.

As stated in item B.10 above, the current preliminary review is provided as Appendix B-1. The Endangered Resources Review were requested and will be added to Appendix B-1 when available.

B.19 NEEDS DETERMINATION NR 670.014(2)(x)(3)

Tradebe has submitted this renewal FPOR to WDNR for review as required by Wisconsin Statues, chapter 289.28. This Statement of Needs includes a statement explaining the need for approval of the Tradebe facility and the hardships which might result without Tradebe's services to its clientele.

The most direct means of recycling is by redirecting unwanted products to people who can use them. Companies often buy too much of a certain product or change their manufacturing process and no longer need that product. Used oil and other recyclable materials eventually become so old that they are unusable for the intended purposes. It is time-consuming and costly for a company to individually find a user outside of their organization for these unwanted or off-spec products. These companies usually find that disposal of these unwanted products is much more cost-effective. Tradebe has nationwide contacts with industries which have specific product needs and any of these unwanted products can fulfill the needs of these other users.

As previously stated in B-21, Tradebe is owned by Tradebe Treatment and Recycling, LLC. Tradebe Treatment and Recycling, LLC operates hazardous wastes facilities in other states with recycling technologies being employed. Tradebe Treatment and Recycling, LLC specializes in recycling technology that recovers usable compounds from waste streams that often were rendered non-usable, thus extending the life of a chemical. With Tradebe’s recycling units, Tradebe can provide services to Wisconsin generators to help recycle more materials.

Some materials simply cannot be recycled because they either have no reclamation value or a user cannot be located within a reasonable amount of time. In these cases, fortunately, the recycling process is not limited to reuse. These waste materials can become resources for "co-processing". Co-processing is any manufacturing process which uses waste materials in either a single or combined operation to produce a product. Cement manufacturing is one of the largest co-processing industries. Organic liquid wastes replace nonrenewable fossil fuels as the energy source for kiln operation. Wastewaters are used for cooling and make-up water in the cement making process. Wastes used in co-processing not only contribute to the production of an essential product, but conserve natural resources. Co-processing has been hailed by the EPA as one of the most viable waste recycling technologies in existence today.

Wisconsin has a limited number of in-state commercial hazardous waste management facilities.

These facilities are primarily involved in solvent reclamation. A limited number of liquid incineration and aqueous inorganic treatment also takes place in Wisconsin. As a result, Wisconsin has a shortfall in hazardous waste management capacity. Waste disposal costs continue to rise nationally as Congress expands the list of wastes which are restricted from land disposal and as waste capacity continues to decrease. The Tradebe facility provides storage prior to access to other hazardous waste treatment technologies. Tradebe offers access to Wisconsin generators for hazardous waste treatment options, such as incineration, stabilization as well as landfill facilities.

Activities conducted at Tradebe's facility are based on the objective of redirecting materials from waste streams for the purpose of beneficial reuse or extending the life of a chemical whenever possible, thus reducing the amount of wastes disposed of in landfills. The recycling for most of the materials which are handled at Tradebe is most cost-effective when managed in bulk quantities. The materials received at Tradebe are primarily generated by commercial, institutional and industrial companies which do not generate bulk quantities. Much of this waste can be diverted from landfills and incinerators into various recycling processes or beneficial reuse products. The purpose of this Tradebe reclamation bulking facility is to collect and direct both nonhazardous and hazardous wastes into recycling processes. This presents a very attractive alternative to disposing of this waste in landfills or through incineration.

Tradebe strives to seek more sophisticated and economical means of servicing the hazardous waste management industry. As process equipment improves, as Congress expands the list of wastes restricted from land disposal, and as Tradebe's existing and future clientele’s waste needs evolve and expand, Tradebe must remain responsive and competitive, and continue providing an environmentally acceptable and secure means of recycling and/or processing nonhazardous and hazardous wastes.

B.20 ADDITIONAL INFORMATION REQUIREMENTS AND INFORMATION REQUIREMENTS FOR SOLID WASTE MANAGEMENT UNITS NR 670.014(3) and NR 670.014(4)

NR 670.014(3) is not applicable to Tradebe because the regulated Solid Waste Management Units (SWMUs) at Tradebe are not regulated for releases into the uppermost aquifer under NR 664 Subchapter F. The SWMUs at Tradebe include the following container storage and processing areas:

- Area 1 and Indoor Tanker Loading (Dock Number 2)
- Outdoor Loading Dock Number 1 for Containers
- Area 2 and Indoor Tanker Loading (Dock Number 3)
- Area 3 and Indoor Loading (Dock Number 5)
- Area 4
- Outdoor Loading (Dock Number 4) (non- hazardous waste only)
- Area 5

The location, general dimensions, and structural descriptions of the units are found in drawings provided in section D.1.1 and Drawing TTRWI-0008 of Attachment R. Type of unit, and operational timeframes are also provided there. Because this is a storage and treatment facility all incoming waste that is received at the facility may use one of the list SWMUs therefore, waste managed in each unit is is included in the list of potential waste codes that may be received by the facility as part of Attachment A.

If SWMUs meet the conditions under NR 664.0090(2), NR 670.014(3) is not applicable. Tradebe meets the conditions under NR 664.0090(2)(b) as follows:

(1) Each SWMU is an engineered structure.

(2) The SWMUs will only receive, store and manage liquid hazardous waste in containers. Liquids are not deposited into the SWMU, as would be the case for other types of SWMUs such as landfills or surface impoundments. Liquid wastes are received in containers, which are placed indoors, in containment areas and/or on containment pallets. Tradebe has not had a liquid release that migrated outside the storage buildings.

(3) All waste containers are stored indoors, in enclosed buildings and are not exposed to precipitation. The container management areas and tanker loading areas are designed with berms to prevent spills from exiting the building and also to prevent precipitation from entering the buildings (see sections D.2.5.d; D.2.5.e; and E.2.2). Loading Dock Number 1 is concrete construction and slopes to a sump with a valve which is kept closed when the dock is use (e.g., container unloading or loading) to prevent transfer of material off-site should a release occur during the unloading/loading activities. (see section E.1.1)

(4) The waste is contained inside containers and the containers are stored inside secondary containment areas in a building, providing both inner and outer layers of containment. The floors of the container management and handling areas are constructed of concrete that is sealed with an impervious coating. (see section D.2.5.a)

(5) Tradebe observes the container management areas on a regular basis during operation and inspections of all container management areas are documented (see Attachment F).

(6) Tradebe will continue to conduct inspections of the container management areas during the active life of each SWMU and during closure activities (see Attachment F). A long-term care period is not anticipated for container management areas.

(7) Tradebe has measures in place to prevent hazardous constituents from migrating beyond the secondary containment for the container management areas. These measures include frequent inspection of containers and immediate response to any releases at the facility to prevent a release from exiting the containment area (see Attachments F for inspections and Attachment G for spill response).

Per NR 670.014(4)(b); Tradebe experienced a small release of petroleum based products, as the result of precipitation event, from an empty drum roll off hopper in June 2017, during an agency inspection. Tradebe reported the incident to the WDNR and excavated the impacted soils. Samples of the removed soils were analyzed by a third-party laboratory. The results indicated the soils were non-hazardous waste and the soil was sent off site for disposal.

Tradebe is aware that the former operator had experienced releases that occurred outside of the buildings on facility grounds. The former operator conducted a series of investigations at the request of the WDNR. As a result of these investigations, the WDNR issued the former operator a No Action Required #09-41-579085 General Property #07-41-579898 dated August 14, 2017 (see Appendix B-2).

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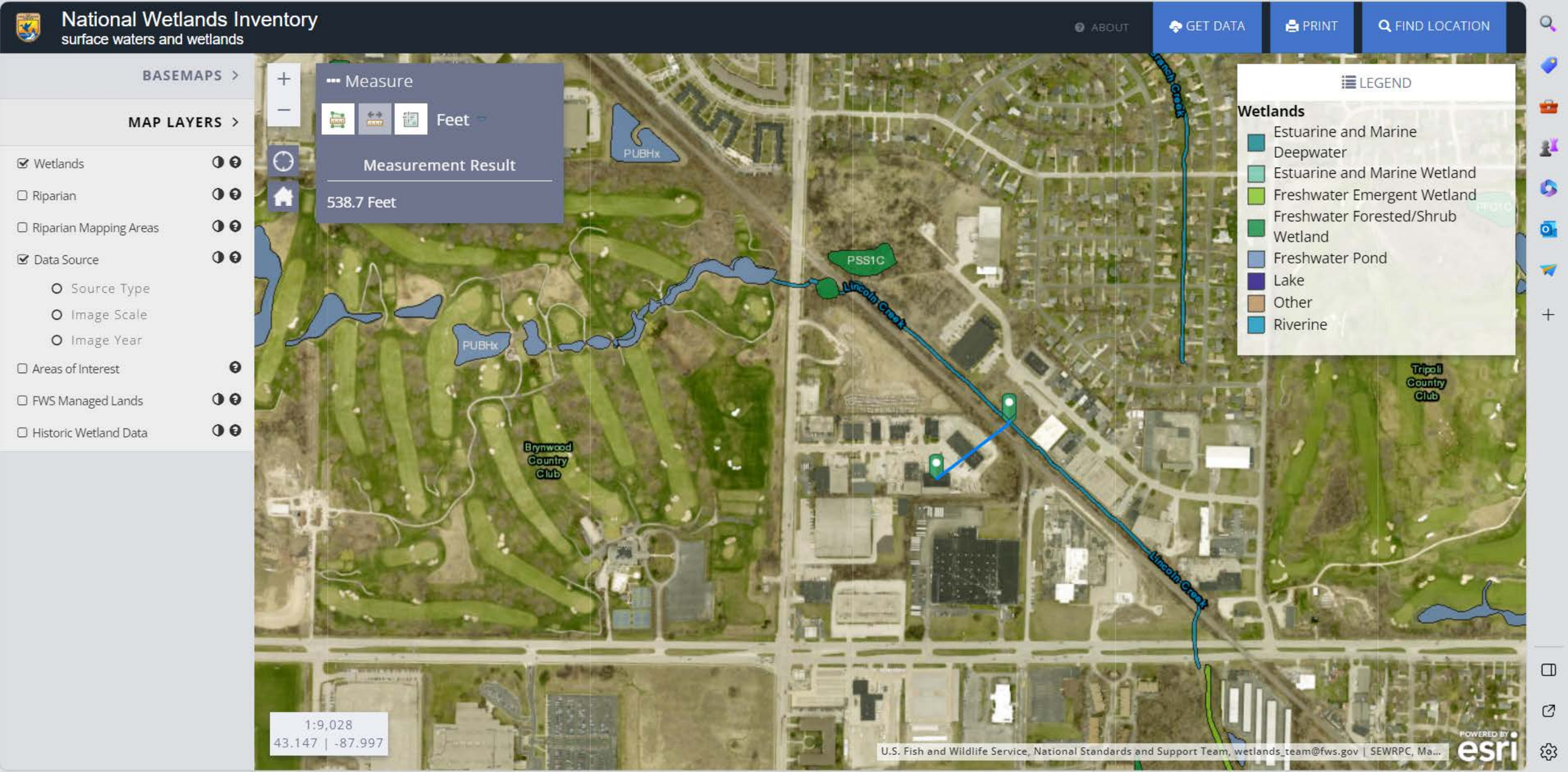
APPENDIX B-1

National Wetland Inventory Map

and

Environmental Assessment

Preliminary Report


National Wetlands Inventory
surface waters and wetlands
ABOUT
GET DATA
PRINT
FIND LOCATION
BASEMAPS
MAP LAYERS
Wetlands
Riparian
Riparian Mapping Areas
Data Source
Source Type
Image Scale
Image Year
Areas of Interest
FWS Managed Lands
Historic Wetland Data
Measure
Feet
Measurement Result
538.7 Feet
LEGEND
Wetlands
Estuarine and Marine Deepwater
Estuarine and Marine Wetland
Freshwater Emergent Wetland
Freshwater Forested/Shrub Wetland
Freshwater Pond
Lake
Other
Riverine
PUBHx
PSS1C
Lincoln Creek
Brynwood Country Club
Tripoli Country Club
1:9,028
43.147 | -87.997
U.S. Fish and Wildlife Service, National Standards and Support Team, wetlands_team@fws.gov | SEWRPC, Ma...
POWERED BY esri

Endangered Resources Preliminary Assessment

Created on **3/19/2024**. This report is good for one year after the created date.

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

Results

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

Further actions are required to ensure compliance with Wisconsin's Endangered Species Law (s. 29.604 Wis. Stats.) and the Federal Endangered Species Act (16 USC ss 1531-43).

At least one of the following situations apply (likely not all):

- The species recorded are state or federal threatened or endangered animals or the project is within a range or zone.
- The species recorded are state threatened or endangered plants on public land.
- The species recorded are federal threatened or endangered plants on federal land or involve federal funds or a federal permit.

Therefore you should request an Endangered Resources Review https://dnr.wi.gov/topic/ERReview/Review.html. An ER Review is the mechanism to ensure compliance with Wisconsin's Endangered Species Law (s. 29.604 Wis. Stats.) and the Federal Endangered Species Act (16 USC ss 1531-43). The ER Review will list the endangered resources that have been recorded within the vicinity of the project area and follow-up actions may be necessary.

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

Project Information

Landowner name	**Badger Realty**
Project address	**5611 West Hemlock street** **Milwaukee, Wisconsin 53223**
Project description	

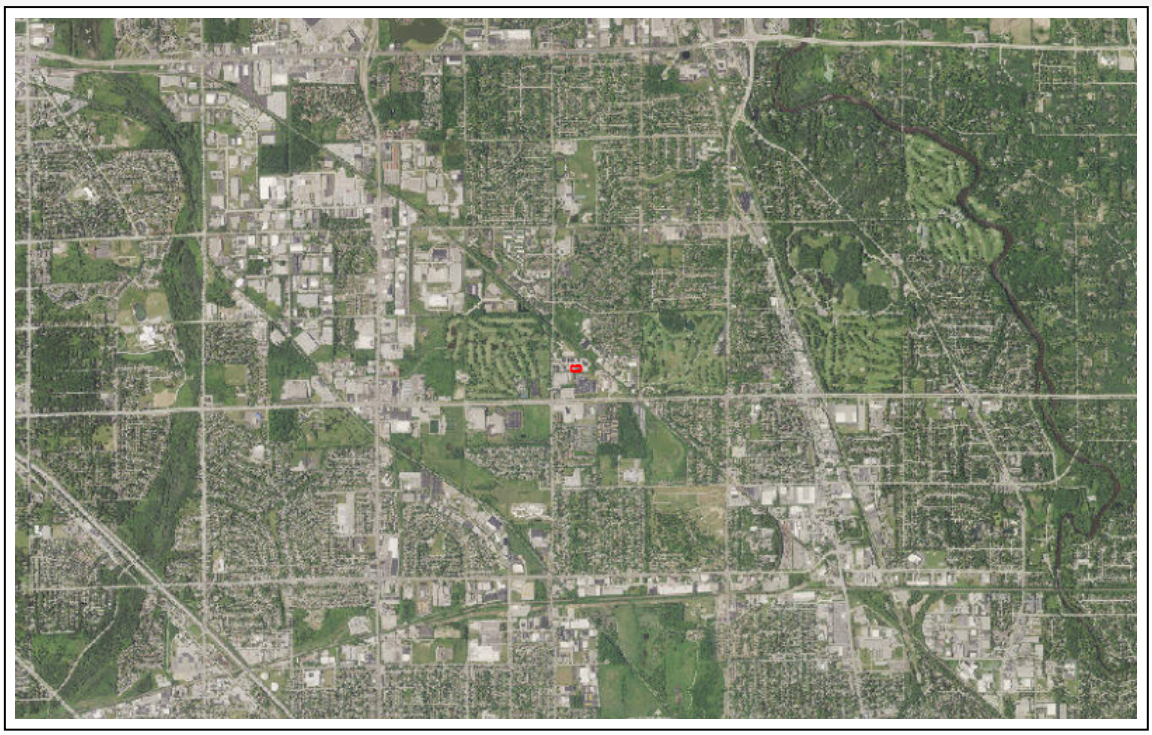
Project Questions

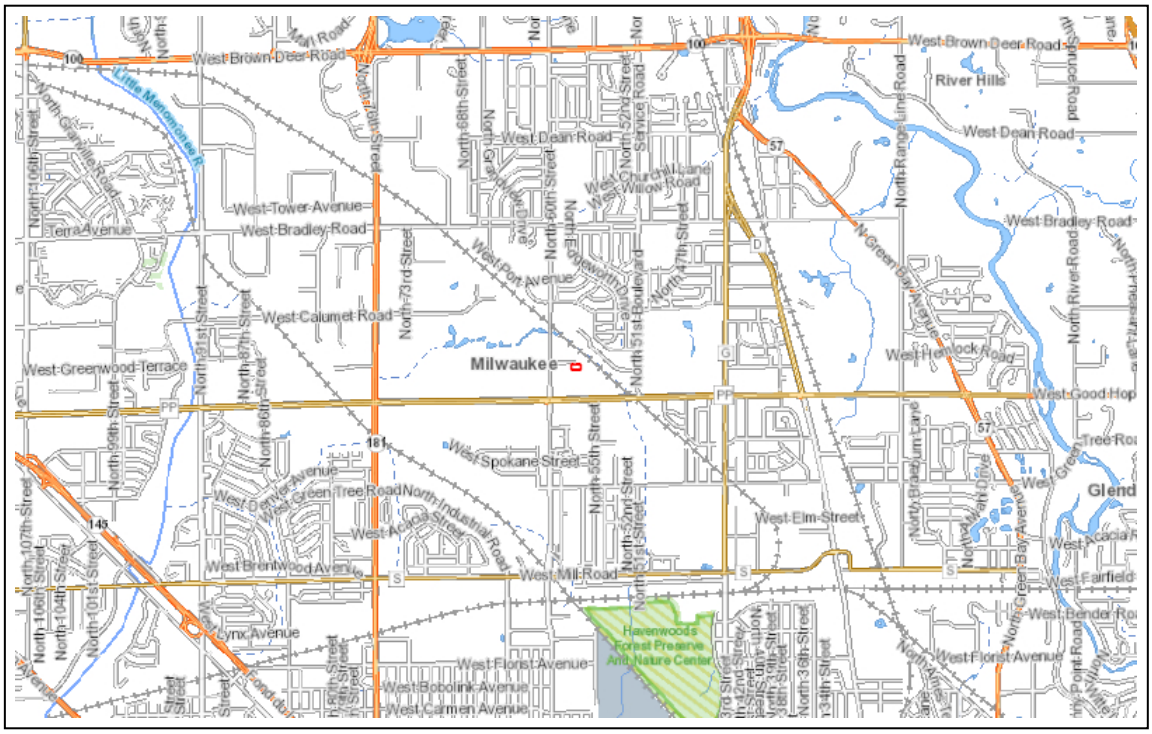
Does the project involve a public property?	**No**
Is there any federal involvement with the project?	**No**
Is the project a utility, agricultural, forestry or bulk sampling (associated with mining) project?	**No**
Is the project property in Managed Forest Law or Managed Forest Tax Law?	**No**
Project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

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

Urban/residential	**No**
Manicured lawn	**No**
Artificial/paved surface	**No**
Agricultural land	**No**
Areas covered in crushed stone or gravel	**No**

Project Area Maps





The information shown on these maps has been obtained from various sources, and is 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. Users of these maps should confirm the ownership of land through other means in order to avoid trespassing. 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/.

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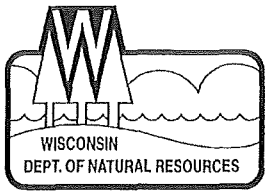
APPENDIX B-2

No Action Required

2017 Release

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

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



August 14, 2017

Mr. Henry Krier
Badger Investment Realty, LLC
5611 W. Hemlock St.
Milwaukee, WI 53223

Subject: Liability Clarification and "No Action Required" Determination at
Badger Disposal, 5611 W. Hemlock St., Milwaukee, Wisconsin
DNR BRRTS No Action Required #09-41-579085 General Property #07-41-579898
FID#241384000

Dear Mr. Krier:

Purpose
The purpose of this letter is to provide you with clarifications as to environmental liabilities and current environmental conditions at 5611 W. Hemlock St., Milwaukee, Wisconsin ("the Property"). The Property consists of approximately three acres of land located in Milwaukee County, identified by tax parcel number 1040701000. Refer to the attached Figure 2 for a site map of the Property.

Summary Determination
Hazardous substance discharges have occurred on the Property. However, the Wisconsin Department of Natural Resources (DNR) has determined that no response actions are required. The DNR has made this determination based on the data made available to the DNR and the criteria in s. NR 716.05, Wis. Admin. Code.

Request
On July 31, 2017, Friess Environmental Consulting, Inc. (FEC), requested on behalf of Badger Investment Realty, LLC, (Badger) that the DNR issue a liability clarification letter under s. 292.55, Wis. Stats. The letter contains a determination as to whether response actions are needed under the ch. NR 700 Wisconsin Administrative code rule series based on the discharge of one or more hazardous substances at the Property. The DNR received the fee for providing assistance, in accordance with s. NR 749.04(1), Wis. Adm. Code.

In order for the DNR to make this determination, you have requested a review of the following documents:

- Notification for Hazardous Substance Discharge, Form 4400-225 dated March 7, 2017
- Technical Assistance Environmental Liability Clarification Request Form 4400-237 dated March 6, 2017;
- No Action Required Request for the Property Located at 5611 W. Hemlock St. in Milwaukee, Wisconsin – FEC Project No. 170205 dated March 6, 2017, prepared by FEC
- Additional Sampling Results and Resubmittal of the No Action Required Request for the Property Located at 5611 West Hemlock Street in Milwaukee, Wisconsin – FEC Project No. 170205 dated May 3, 2017, prepared by FEC
- Revised/Resubmitted Form 4400-237 received May 9, 2017, prepared by FEC
- Additional Sampling Results and Resubmittal of the No Action Required Request for the Property Located at 5611 West Hemlock Street in Milwaukee, Wisconsin – FEC Project No. 170205 dated July 31, 2017, prepared by FEC

The DNR has examined the reports listed above and provides the following summary of the case and opinions concerning environmental conditions at the Property.

Background and Summary of Environmental Conditions

The Property is currently occupied by Badger Disposal of WI, Inc. which uses the Property for comprehensive industrial waste management (treatment, storage and disposal (TSD) facility). Badger Disposal has occupied the Property since 2003. Former occupants of the Property included Plastics Corp. Molders, Friction House Heavy Duty Brakes and Red Rock EOG Disposal. A Phase I Environmental Site Assessment (ESA) conducted by the Weavers Consultant Group (Weaver) in January 2016 identified a recognized environmental condition associated with the Property based on its use as a TSD facility. In February 2017, Weaver conducted a Phase II ESA consisting of the advancement of five soil borings with collection of shallow and deep soil samples and one groundwater sample submitted for laboratory analysis for volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), RCRA metals and polychlorinated bi-phenols (PCBs). Laboratory results reported no detections above reporting limits or background threshold values for RCRA metals or PCBs. No VOCs were reported above method detection limits or soil standards (residual contaminant levels (RCLs)) in any of the samples except for one location, B-4, where low level tetrachloroethene was detected in the shallow sample at a concentration exceeding its RCL based on protection of groundwater. Naphthalene was the only VOC detected in the groundwater sample collected from the B-4 location. The result was reported as an estimated concentration, below groundwater standards. Select PAHs were detected in shallow samples collected at four of the five soil boring locations at concentrations exceeding their respective groundwater and industrial direct contact RCLs. Shallow soil was described as containing trace amounts of foundry sand.

FEC submitted the March 6, 2017 No Action Required Request to DNR summarizing the results of the Weaver Phase II ESA and concluded that PAH contamination found in the shallow samples collected at the Property was related to the waste (foundry sand) described by Weaver as being present in the shallow soils. DNR did not concur with this interpretation and opened a case for the Property requesting Badger to conduct additional investigation of the PAH and the PCE contamination. In response, on March 29, 2017, FEC conducted additional investigation by advancing six additional soil probes. Their investigation described the presence of recycled asphalt (no foundry sand noted) and silty clay fill to a depth of two feet below ground surface (bgs) in three of the six samples. Two of these three contained PAHs in exceedance of direct contact or protection of groundwater RCLs. FEC attributed the contaminants to the asphalt in the sampled material. The other four samples did not contain elevated PAHs. One soil sample was collected for VOC analysis at a depth of 4-5 feet in the vicinity of B-4 where PCE had been detected in the 1-2 foot sample. An estimated concentration of 1,1,1 trichloroethane was the only VOC detected, well below its RCLs.

Because no additional investigation had been conducted at two locations where the highest concentrations of PAHs had been identified, DNR requested additional sampling near locations SB-1 and SB-5 to confirm whether PAH contamination is associated with recycled asphalt or related to a hazardous substance spill. DNR also requested additional investigation in the vicinity of the PCE contamination, SB-4, or submittal of additional justification for why it's not needed. FEC returned to the site on June 30, 2017 and collected seven additional soil probes in the areas specified by DNR. Soil collected from two borings in the vicinity of SB-4 were analyzed for VOCs at depths of 1-2 feet and 4-5 feet bgs. No VOCs were detected in the samples. No PAHs were detected in the fourteen soil samples submitted for analytical testing from depth of 1-2 and 4-5 feet bgs. FEC concluded that the additional soil sampling confirms the limited extent of impacts at the site and attributes the identified PAHs to the presence of recycled asphalt within fill material on the Property. Sampling indicates that groundwater and underlying native soils have been not been impacted.

Liability Determination

The Wisconsin Hazardous Substance Spill Law, s. 292.11, Wis. Stats., commonly called the Spill Law, requires those who cause, possess or control a hazardous substance discharge to "take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands or waters of this state." Section 292.55, Wis. Stats., authorizes the DNR to issue clarification letters concerning liability for environmental pollution.

The data summarized above indicates that one or more hazardous substance discharges have occurred on the Property. However, based on the criteria in s. NR 716.05(2)(a), Wis. Adm. Code, and the criteria in ss. NR 708.09 (1) and (2), Wis. Adm. Code, the DNR has determined that no response action, including further site investigation activities, is required under the NR 700, Wis. Adm. Code rule series to respond to these identified discharges. However, as with any property, if soil is excavated in the future, the property owner at the time of excavation must determine whether the material is considered a solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules.

The DNR does not approve Phase I or Phase II ESAs because rules have not been established in Wisconsin to define what constitutes an adequate Phase I ESA or Phase II ESA. The DNR does use as guidance the American Society for Testing and Materials ("ASTM") International Standard Guide for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E1527-13) and Phase II Environmental Site Assessment Process (E1903-11).

The number and location of monitoring points, the types of media sampled, the number of samples collected, and the laboratory analysis performed are a matter of professional opinion. All areas of the Property were not assessed, the numbers of samples collected were limited based on professional judgment and financial considerations, and samples were not analyzed for all parameters. Therefore, the DNR can only respond to the information and data as presented in the reports and cannot predict what might be discovered in the future and the consequences of those discoveries.

This letter relates and refers only to those conditions described above and to information and data submitted to the DNR in FEC's request for this letter. The DNR makes no determination concerning the presence or absence of hazardous substances, other than those identified in the documents and reports listed above, which were submitted to us. In the future, if the DNR becomes aware of new information concerning the contaminants referenced above, or the presence of other contaminants on the Property, the DNR will evaluate that data at that time to determine if any response actions are required. Whenever possible, the DNR requires the person who caused the discharge to take the appropriate response actions.

The Bureau for Remediation and Redevelopment Tracking System (BRRTS) identification number for this activity is shown at the top of this letter. The DNR tracks information on all case determinations such as this letter in a DNR database that is available on the Internet at: http://dnr.wi.gov/topic/Brownfields/botw.html Since there is no action required for this case, the DNR converted the original BRRTS case number 02-41-579085 to 09-41-579085 to identify this site activity as a "No Action Required" determination.

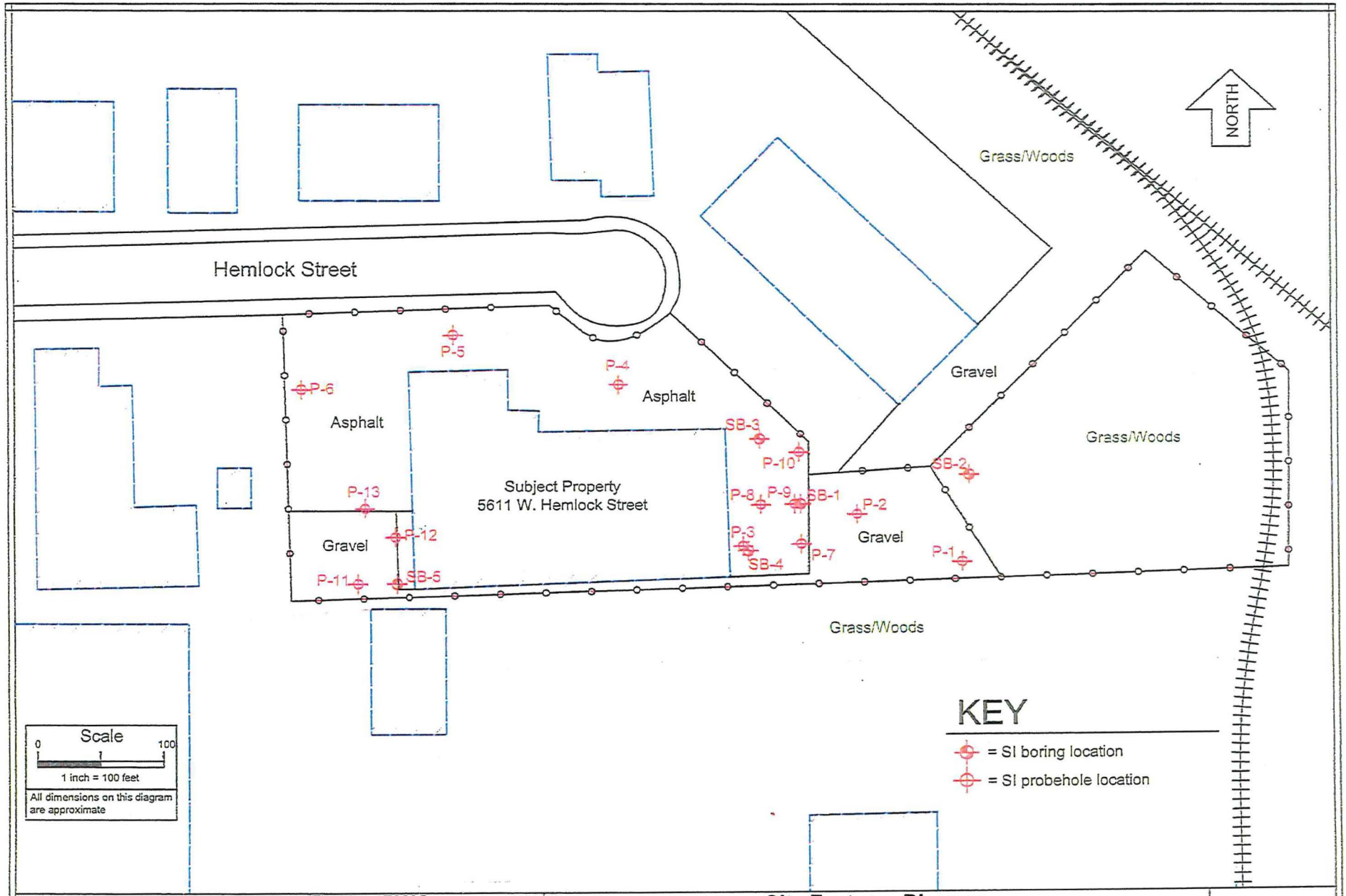
If you have any questions, please contact me at (414) 263-8533, by writing to the address at the top of this letter or by email to nancy.ryan@wisconsin.gov.

Sincerely,

Nancy D. Ryan, Hydrogeologist
Remediation and Redevelopment Program

Attachment: Figure 2

Cc: Rick Friesske, FEC



FRIESS ENVIRONMENTAL CONSULTING, INC.

File No.: 170205a	
DWG Date: 7-4-17	
Rev Date:	
Drawn By: TJO	
Checked By (PM): TJO	

Site Features Diagram
Badger Disposal Property
5311 Hemlock Street
Milwaukee, Wisconsin

Figure
2

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Sturtevant Service Center
9531 Rayne Road
Sturtevant WI 53177

Scott Walker, Governor
Daniel L. Meyer, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711



February 23, 2018

File Ref: FID 241384000
Milwaukee
HW / CMEL

Tita Lagrimas
Tradebe Treatment & Recycling of WI LLC
5611 W Hemlock St.
Milwaukee, WI 53223 4711

Subject Treatment Storage & Disposal inspection at Tradebe Treatment & Recycling of WI LLC
Return to Compliance

Dear Tita Lagrimas:

On June 28, 2017, the Department conducted a treatment storage & disposal inspection at Tradebe Treatment & Recycling of WI LLC (Tradebe) located at 5611 W Hemlock St, Milwaukee, Wisconsin. The inspection indicated Tradebe was not in compliance with the hazardous waste inspection requirements stated in Chapters NR 660 to 679, Wisconsin Administrative Code and the conditions of the operating license or plan approval and all subsequent modifications. In a letter dated September 28, 2017, the Department listed the eighteen specific areas of alleged noncompliance.

The Department received your submittals dated October 31, 2017, and November 14, 2017. The submittals verified the facility has corrected the alleged noncompliance with Chapters 660 to 679 NR Wisconsin Administrative Code and the conditions of the operating license or plan approval and all subsequent modifications

As part of its hazardous waste regulatory program, the Department may perform additional inspections at this facility to ensure compliance with chapters NR 660 to 679, Wisconsin Administrative Code and/or the conditions of the operating license or plan approval and all subsequent modifications.

If you have any questions or comments, please feel free to contact me at (262) 884-2342.

Thank you for your cooperation.

Sincerely,

Mike Ellenbecker

Michael Ellenbecker
Hazardous Waste Program Coordinator

cc: SE Facility File

TRADEBE
Treatment and Recycling ™

ATTACHMENT C

WASTE ANALYSIS PLAN

ATTACHMENT C
WASTE ANAYSIS PLAN

C.1 General Overview

Pursuant to s. NR 670.014(2)(c) Wis. Adm. Code, Tradebe Treatment and Recycling Wisconsin, (Tradebe) must develop and follow a Waste Analysis Plan (WAP) that meets the requirements of s. NR 664.0013, Wis. Adm. Code. Pursuant to that code, ~~T~~this WAP establishes procedures the facility will use to obtain a detailed chemical and physical analysis of a representative sample of the wastes and provide the information which must be known to treat, store, or dispose of waste. Procedures described here include: ~~for the following:~~

~~1. Store, treat, and dispose of each waste container properly and safely.~~

2.1. ~~Identify t~~The procedures used ~~for obtaining a~~ to screen ~~waste analysis of~~ each waste ~~container~~ movement prior to its acceptance at the facility.

3.2. The frequency at which analysis of waste occurs. ~~to ensure that waste is characterized accurately~~.

4.3. Upon waste container receipt, procedures to confirm that:

a. The contents conform to the approved waste profile ~~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.

5.4. Procedures for handling discrepancies and rejected shipments.

6.5. When the facility needs to conduct an analysis of the waste.

7.6. The methods used to obtain a representative sample~~d~~

8.7. The parameters for which ~~each~~ waste is analyzed and the rationale for selecting these parameters.

9.8. The test methods used to test for each parameter.

10.9. A quality assurance/quality control (QA/QC) program for waste sampling and analysis, along with a corrective action program.

11.10. Procedures to perform the waste ~~determination~~screening and characterization ~~for~~of wastes generated by Tradebe and shipped to other facilities.

12.11. Procedures to comply with the manifesting discrepancy requirements at NR 665.0072 for inbound waste, and comply with manifesting requirements for outbound shipments.

13.12. Procedures to comply with LDR requirements for inbound and outbound shipments.

14.13. Recordkeeping and reporting procedures ~~associated with~~ required for these activities.

The facility uses ~~competent~~ qualified individuals as defined in section C.2.1 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 and described in Attachment H of this license application.

Section NR 662.011, Wis. Adm. Code, requires Wisconsin generators to make an accurate waste determination at the point of generation, before any dilution, mixing or other alteration occurs. This WAP helps the facility use the information provided by the generator 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 operating record and is based on the generator's analytical testing of a representative sample of the waste using a laboratory certified or registered under ch. NR 149, (or the data produced meets the requirements for discretionary acceptance per NR 149.11) and/or is a knowledge-based determination. ~~that meets the "acceptable knowledge" criteria as defined in section 1.1of this WAP.~~

The facility accepts waste in a variety of container configurations such as "containerized waste", "bulk container waste, bulk waste, and bulk load", "bulk or consolidation packs", and "lab packs". These terms are defined in section **Error! Reference source not found.**~~C.2 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.

C.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.~~ the barcode label is applied to container, the signed manifest per NR 662.042 and acceptance letter per NR 664.0012 are sent to the generator, and the material is placed in storage.

Acceptable Knowledge means knowledge-based determinations that are based on relevant and reliable (i.e., verifiable) information from any source. 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 or information gathered by the Approvals Team prior to shipment of the material to the facility. ~~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 is used by the generator to complete the WIP and certified by the generator to be accurate and complete in accordance with NR 662.011(4)(a), the hazardous waste generator standards. This information is certified on the WIP and LDR. ~~needs to be accurate and complete in order to correctly identify the waste.~~ The facility objectively reviews the information provided by the generator in the WIP and uses this WAP to screen incoming material to verify the validity of the information. ~~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 i~~Information provided by the generator demonstrates the generator's intent to ~~competence in~~ comply~~ing~~ 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 class and/or type of material (e.g., paints, lamps). Each bulk or consolidation pack container is required, by the facility, to be shipped in proper packaging and if necessary, is ~~p~~re-packaged in accordance with applicable U.S. DOT regulations prior to shipment offsite. Examples of wastes delivered in this way include but are not limited to, 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 as debris) with the compatible contents of another container or tank, such that they are in contact with each other. Lab-packing/repacking does not constitute consolidation.

~~**Competent Individual**~~ **Qualified Personnel or Tradebe Personnel** means a person by way of training, ~~and/or~~ experience~~,~~ and/or~~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 mean 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).

Depacking means the act of separating the contents of a lab pack.

Discrepancy For the purposes of this WAP ~~Level I, II, and III analyses,~~ "discrepancy" means a difference in piece count between the waste received at the facility when compared to ~~its WIP,~~ the manifest or a difference between WIP and screening results that results in significant changes to management of the waste. ~~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.~~ Significant manifest differences which are differences in the quantity or type of hazardous waste designated on the manifest or shipping paper, and the quantity and type of hazardous waste a facility actually receives; and/or
- ~~The waste is a different waste stream than the waste described in the WIp.~~ Obvious differences which can be discovered by inspection or waste screening, such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest or shipping paper
- ~~The waste codes in the WIP, manifest, and LDR document do not align.~~ Significant differences between the WIP and screening results are differences that result in changes in how the waste is stored and/or managed. When determining a significant difference between the WIP and screening results, consideration is given to an expected variation in range of the screening results due to representative sampling of 10% of a waste stream or shipment.

Facility means Tradebe Treatment and Recycling Wisconsin.

Fingerprint Analysis means the examination of sampling and analysis of several key chemical and physical parameters of a waste to substantiate or verify the ~~composition of a waste~~ the results are within range of ~~as determined~~ previously determined ~~during~~ Pre-acceptance analysis results. ~~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 or non-hazardous wastes that possess ~~substantial~~ heat value 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 blended material must meet standards set by NR 668.03 and BIF specifications. Fuel blending is hazardous waste treatment that requires a

license.

Lab Pack means an over-packed container, usually a steel, fiber, or polyethylene ~~drum~~container, containing a variety of small containers of chemicals of ~~the same~~compatible 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 an alternate ~~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 660.10(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.~~

~~**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.

Recontainerization means transfer of waste from it's original container into a new container.

Inbound Shipment means a a single truckload of containers from various offsite generators. ~~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, created by the generator or third party on behalf of the generator, for a specific waste stream. ~~that~~ It is intended to contain all the information which must be known by the facility to properly ~~process,~~ treat, store, and/or ~~transship~~dispose of the waste according to the applicable standards set at ~~this~~ chs. NR 664 and NR 668, Wis. Adm. Code.

Waste Analysis means any of the following:
1. visual inspection.
2. ~~waste information~~ Review of information provided by the generator including analytical results. ~~gathered from~~
3. analytical screening ~~testing~~ of representative samples by Tradebe.
4. ~~and from~~ Information gathered by knowledge-based determinations.

Waste Movement refers to a generator's waste shipment.

Waste Stream means a single type of solid waste or hazardous waste from a single generator.

C.1.2 Facility Activities

Storage: See Attachment D

A description of the waste management activities including but not limited to, waste storage and treatment is found in Attachment D of this FPOR.

~~• (List each licensed container storage area by the name used in the Feasibility and Plan of Operation (FPOR))~~

~~The following is a list of licensed tank storage areas:~~
~~• (List each licensed tank storage area by the name used in the FPOR)~~

Processing: See Attachment B

~~The following is a list of processing activities and areas:• (List and briefly describe each processing activity and location/area that occurs at the facility by the name/location used in the FPOR. Note that the FPOR must describe in more detail describe these processes, their locations, and controls). Examples of non-licensed treatment may include:~~

- ~~Consolidation into containers~~
- ~~Consolidation into tanks~~
- ~~Decanting or other separation of the container contents~~
- ~~Elementary neutralization~~
- ~~Recycling~~
- ~~Lab packing/de-packing~~
- ~~Wastewater Treatment Unit (WWTU) treatment~~
- ~~Drum/container cleaning~~
- ~~Aerosol can puncturing~~

Treatment: See Attachments B and D

~~The following is a list of licensed hazardous waste treatment activities and areas:~~

~~• (List and briefly describe each licensed treatment activity and location/area that occurs at the facility by the name/location used in the FPOR. Note that the FPOR must describe in more detail describe these processes, their locations, and controls) Examples of -licensed treatment may include:~~

- ~~Stabilization~~
- ~~Distillation, fractionization, thin film evaporation~~
- ~~Retorting~~
- ~~Precipitation, sedimentation, filtration, or other chemical or physical contaminant removal~~
- ~~Blending/pulping of high viscosity solids or semi-solids~~
- ~~Regenerative carbon filtration~~
- ~~Evaporation, dehydration~~

C.2.0 Waste Prequalification

Prior to the initial shipment, a waste stream ~~approved to be shipped to or accepted by the facility must~~ will be pre-approved through the waste prequalification process. ~~As described is section 3.0 Waste Analysis of this WAP, t~~The prequalification process requires completion and certification 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 will not be granted ~~of having~~ an approved WIP. Tradebe will not accept wastes with ~~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~~ are required to be scheduled in advance of arrival. The facility will not ~~approve the~~ schedule ~~of~~ any shipment of wastes that have not been prequalified as described in the above paragraph. ~~through the WIP process described herein.~~ Unscheduled shipments of wastes will not be accepted for waste management until

the Facility confirms ~~with the generator that~~ the shipment is intentional and is properly represented by the accompanying manifest and shipping papers.

In the normal course of business, ~~T~~the facility does not accept "unknown" wastes for storage or waste management that has not previously been characterized by the generator. If an unknown waste ~~is delivered to~~ arrives at 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 known waste delivery and is off-loaded by the facility), ~~then~~ the facility will contact Wisconsin DNR and local authorities (e.g. police or fire department) and assist those agencies in proper directing that material to appropriate outlets. ~~either rejects the waste or makes a waste determination in accordance with s. NR 662.011 Wis. Adm. Code for the purpose preparing the waste for proper shipment to an appropriate off-site facility, and preforms the waste analysis required by s. NR 664.0013, Wis. Adm. Code, prior to placing the waste into storage~~

For any authorized agent that represents ~~the~~ a generator (such as consultants or brokers), the facility will obtain ~~written evidence~~ documentation ~~that demonstrates~~ that the agent has authority to act on behalf of the generator for the purpose of arranging for the management of the generator's waste stream.

C.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 WIP is intended to contain all the information which must be known by the facility to properly treat, store, and/or dispose of the waste according to the NR 664 and NR 668, Wis. Adm. Code.

The Facility uses the following methods to meet this requirement:

Knowledge-Based Information provided by the Generator

In lieu of analytical testing ~~on~~ of a representative sample, a generator may meet the ~~waste analysis~~ requirements for knowledge-based determination ~~are met~~ when the data used to make a knowledge-based determination meets the definition of "acceptable knowledge" in this WAP, and is used to complete the WIP and certified by the generator. In this case the waste ~~analysis~~ determination must contain information consistent with the generator requirements of s. NR 662. 011(4)(a) Wis. Adm. Code.

The generator will use acceptable knowledge to complete ~~Acceptable knowledge~~ the WIP, and certify the information is correct. Once approved, the WIP will satisfy the requirements of Section 664.0013(1)(a)1. The information used by the generator as acceptable knowledge may include ~~any~~ one or more 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.

Representative Sample Analysis by the Generator

When ~~available~~ the generator's acceptable knowledge is inadequate to determine whether the waste exhibits one or more hazardous characteristics, ~~the~~ waste analysis must ~~contain~~ produce 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 laboratory standard operating procedures based on the analytical methods listed in this WAP are performed on 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 or the data produced meets the requirements for discretionary acceptance per NR 149.11.

When the generator has analytical testing data available, that data can be submitted for approval of the WIP without pre-acceptance testing. Analytical data is also requested from the generator when there are discrepancies in the WIP and results of analytical testing by the facility. The generator's waste analysis data ~~must~~ include, as supporting information, a description of how the samples used were collected~~representative samples~~, and ~~the~~ any laboratory's report(s) showing the analytical methods, detection limits, results, and quality control checks.

If the facility is informed by the generator that analytical data was generated by 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 will request ~~requires~~ the generator to submit, the laboratory's audit results and/or any laboratory certifications. The facility ~~must~~ will review these audit results and any laboratory certifications and conclude ~~that~~ if they are

equivalent to that which a laboratory certified or registered under ch. NR 149 must achieve, prior to approving the waste stream. If the generator fails/refuses to submit the information requested, the generator's analytical data will not be used to approve the waste stream or resolve a discrepancy.

C.3.1 Waste Information Profile

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:

C.3.1.1 WIP Content:

~~Documentation from the generator or their authorized agent:~~

1. A ~~detailed~~ description of the process that generated the waste.
2. ~~1.~~An indication whether the waste determination was based on sampling or generator knowledge.
3. If sampling was used by the generator to determine if the waste is or is not a characteristic hazardous waste~~,~~ those results are used to complete the WIP and may be submitted as part of the pre-acceptance process or when there is a discrepancy in the fingerprint analysis results. The results will include ~~then~~ a description on how the samples were collected. ~~are a representative sample.~~
4. If ~~generator~~ acceptable 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 should be used by the generator to complete each question on the WIP form.
5. ~~2.~~If pre-acceptance analytical screening of the initial shipment of the waste stream does not verify the information on the WIP or if subsequent shipments of the waste stream have fingerprint screening results outside the acceptable range then documentation supporting the knowledge-based determination may be requested.
6. ~~3.~~The generator's certification that the hazardous waste determination ~~that shows compliance~~ complies with s. NR 662.011 Wis. Adm. Code.
7. The generator's certification that ~~L~~laboratory data ~~analytical reports as~~ needed to support an accurate waste determination under NR 661.011 and an accurate waste analysis under NR 664.0013(1)(a), were used to complete the WIP unless acceptable knowledge d~~oes~~id not necessitate analysis~~them~~.
8. The waste's waste screening ~~analysis~~ meets section **Error! Reference source not found.**~~3.0 Waste Analysis~~ of this WAP.
9. All questions are answered on the WIP form such that ~~A~~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 is presented.

8. Indication on the WIP form as to whether ~~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~~665, Wis. Adm. Code.
9. An LDR document ~~in compliance with~~ required by 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).
11. ~~An annual signed statement that certifies the waste generating process and the chemical and physical characteristics of the waste remain unchanged and that the WIP remains complete and accurate.~~

The WIP form used by the facility to capture this information is included in Appendix C-1. The WIP form will ~~must~~ be accompanied by any supportive documents requested or voluntarily submitted by the generator. ~~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 a waste stream ~~clearly must~~ will identify the WIP number for each different waste stream in the delivery.

C.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~~ will do one of the following:

1. Approve the WIP.
2. Determine that the WIP requires modification and/or 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 a copy of the acceptance ~~documentation of this~~ notification along 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 not completed on~~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 other information contradicts that classification. ~~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?~~

- Pre-acceptance analytical screening fails to validate the information on the WIP.

An incomplete or inconsistent WIP ~~cannot~~ will not be approved and therefore the waste cannot be accepted ~~into~~ by 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~~ will not approve the waste for acceptance into the facility.

The facility documents the approval of each WIP using the acceptance notification. The~~is~~ acceptance notification ~~approval~~ is retained with that WIP along with ~~and~~ any supporting documentation or ~~along with any~~ conditions of approval that must be followed by the generator or transporter. The WIP~~, all~~ any supporting documentation ~~package~~, and the acceptance notification ~~approval is~~ are retained as part of the facility's operating record and is summarized in information ~~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~~ including marking it with the unique WIP number. These operating record requirements ~~can~~ may be achieved with electronic documents. If so, the documents will be ~~provided they are properly~~ organized, secured, free of ~~from~~ unauthorized editing, and readily available.

C.3.1.3 WIP Updates

In accordance with s. NR 664.0013(1)(c), Wis. Adm. Code, the WIP ~~process~~ review 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 analytical results of the ~~inspection of~~ wastes indicate that the waste received at the facility:

a. Does not match the waste described in the WIP or is outside the acceptable range for that waste stream.

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 by the generator 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 or the data produced must meet the requirements for discretionary acceptance per NR 149.11. In accordance with s. NR 664.0013(1)(a), only representative samples are used by generators to obtain the detailed chemical and physical analysis.

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 sub ch. 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.~~ The generator must certify to inform Tradebe of any characterization, chemical or process change to the waste stream prior to shipping. If a notification is not received, and the fingerprint analytical screening results do not deviate from the acceptable ranges, the WIP will automatically renew annually.

~~For the waste to be accepted again, the generator or authorized agent must provide a statement signed by the generator of authorized agent that certifies the waste generating process and the chemical and physical characteristics of the waste remain unchanged.~~ If changes have occurred, then a new WIP is required. ~~If a signed certification statement is not returned to the facility, the WIP approval is voided.~~ Records documenting these actions are kept with the WIP's documentation package for at least 3 years from the date that the waste that is the subject of the documentation was last sent to on~~-site~~ or off-site treatment, storage, or disposal. The 3-year record retention period is automatically extended during the course of any unresolved enforcement action regarding the management of that waste ~~regulated activity~~ or as requested by the department (s. NR 668.07(1)(h) via 668.07(2)(e) Wis. Adm. Code).

C.3.2 Determination of Outbound Designated Facility

As part of the prequalification process during WIP approval, the facility also identifies ~~the~~ potential ~~designated~~ outbound facilit~~y~~ies~~(s)~~ to which the facility ~~is intends to~~ may ship the waste after the waste has been accepted ~~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~~ appropriate potential outbound facilit~~y~~ies~~(s) is~~ are ~~reasonably~~ anticipated to be available.

C.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.

C.5.0 Shipment Screening, Analysis, and Acceptance

When the facility receives a shipment of waste, the facility ~~must~~ will successfully complete ~~and document~~ the following procedures to accept the waste into a license RCRA 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~~ significant discrepancies as described at NR 665.0072, 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. Visually inspect ~~Check~~ the condition of each container per Level 1 and 2 standards at NR 664.1086 (also see D.2.9) and check the type of container used for that waste ~~and~~to verify that the container is U.S. DOT approved. If not in a U.S. DOT approved container, then the facility ~~must~~ will repackage the waste into an approved U.S. DOT container. ~~The facility~~ and check~~s~~ 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 pre-acceptance ~~a Level I~~ analysis on representative samples of the initial shipment of ~~each~~ a waste stream~~shipment received~~ that requires testing. ~~as described in section 5.1 Level I Analysis of this WAP.~~
   b. Perform fingerprint analysis on representative samples of subsequent waste movements of an approved waste stream that requires testing. ~~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 additional testing as a quality control measure and to aid in resolving discrepancies in test results and the WIP. ~~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~~ Report laboratory results. A sample of the reporting ~~the~~ form~~(s)~~ is included in Appendi~~xces~~ C-2. ~~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,~~discovered, 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.

This facility will accept analysis results from other Tradebe laboratories in lieu of repeating those analytical procedures provided that the analytical methods used by the other Tradebe labs are consistent with those required by Wisconsin code.

Table 1~~**Table 1**~~ gives an overview of the~~se~~ general analyses for containers and bulk loads. ~~and~~ **Table** ~~**Table 3**~~ summarizes the analytical parameters and rationales used to determine the general and specific characteristics of a waste stream. Specific analyses based on waste management method are given below in section 7.0 of this WAP.

Table 1: ~~Required~~General Analyses to be Performed ~~by the Facility~~ for Incoming Waste Movements ~~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 containers/bulk containers**~~
Parameter	**Analytical Method ***	**Review Required**	**Review Required**	~~**Review Required**~~
Physical Evaluation**	M-1	Yes		~~Yes~~
pH***	M-2	~~Yes~~	Yes	~~Yes~~
Flash point/Ignitability***	M-3	~~Yes~~	Yes	~~Yes~~
Water Reactivity	M-4		Yes	~~Yes~~
~~Reactive Sulfides Screen~~	~~M-5~~		~~Yes~~	~~Yes~~
~~Reactive Cyanides Screen (Spot Test~~)	~~M-6~~		~~Yes~~	~~Yes~~
Oxidizer Screen	M-7		Yes	~~Yes~~
Specific Gravity	M-8		Yes	~~Yes~~
~~% Suspended Solids~~	~~M-9~~		~~Yes~~	~~Yes~~
~~Chlorine Spot Test~~Total Halogens	M-10		Yes	~~Yes~~
Polychlorinated Biphenyl (PCB) Screen	M-11		Yes	~~Yes~~
~~TCLP~~	~~M-12~~		~~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~~

* See Section 7.1.5 ~~Table 3: Analytical Parameters and Rationales~~ for analysis tables for fuel blending and other specific waste management methods ~~see section 7.1 Fuel Blending of this WAP~~.
** opening container for evaluation is done only when deemed by the facility to be safe.
**** pH and ignitibility test methods must be conducted when the waste is a liquid. Ignitability is not performed on waste where the generator has already assigned a D001 waste code.

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~~required to comply with chs. NR 660 to 679 Wis Adm. Code or the waste is assigned to a management method listed below in section 7.0 of this WAP. **Note that a physical evaluation (method M-1) is ~~still required for all~~ only performed on specific wastes as described below.**

~~1.~~ Household hazardous waste as defined by s. NR 661.0004(2)(a) Wis. Adm. Code.

~~2.~~1. Empty hazardous waste containers as defined in s. NR 661.0007 Wis. Adm. Code.

This applies to a portable container which has been emptied, but which may hold residuals of the product or chemical. Examples of containers are: portable tanks, drums, barrels, cans, bags, liners, etc. A container shall be determined "empty" according to the criteria specified in in s. NR 661.0007 Wis. Adm. Code.

Information from the manifest is entered into the database to confirm waste profile approval. The Land Disposal Restrictions notice (when presented) is reviewed. 10% of the RCRA empty drums are opened and visually inspected.

~~3.~~2. 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.~~

This includes products voluntarily removed from the marketplace by a manufacturer or distributor, in response to allegations of adverse health effects associated with product use.

Tradebe may approve virgin, off-specification, outdated, obsolete, unsalable, or unusable commercial products that are hazardous wastes.

Approval of the waste will involve review of waste profile and safety data sheet. The completed wastes profile will include:

- A physical description of the waste and the process generating the wastes.
- Identification of applicable hazardous waste code(s).
- Physical properties and chemical characteristics of the wastes.
- The waste profile must also include safety data sheet(s), or equivalent technical information for the commercial product.
- The waste profile will contain the certification regarding the accuracy of the information provided.

- The waste profile will include additional data provided by the generator, such as information analytical information and if applicable product contamination, etc.
- If the profile identifies the commercial product has been mixed with or contaminated by other hazardous wastes, the Generator must identify the contamination/chemical constituent on the profile.

Based on an evaluation of the information provided on and with the wastes profile, Tradebe may approve or disapprove commercial product waste. If approved an appropriate waste management will be assigned.

Information from the manifest is entered into the database to confirm waste profile approval. The Land Disposal Restrictions notice (when presented) is reviewed. Screening of the inbound shipment will include, a review of the manifest and land disposal restrictions notification (if provided at time of shipment), along with the following information compared against the shipment, and the approved waste profile information:

1. Waste quantity, container count and container type identified on the manifest correspond with the shipment.
2. Containers are in acceptable condition; compatible with the approved wastes and there are no visible leaks.
3. Hazardous waste codes on the manifest and Land Disposal Restrictions notice (if provided at time of shipment) are consistent with each other, along with the container labels.
4. Correct labels/markings

Once the paperwork review and verification of container quantity is completed, the waste can be accepted.

Bulk container shipments of virgin, off-specification, outdated, obsolete, unsalable, or unusable commercial products will also be sampled in accordance with Attachment C.

~~4.~~3. 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. Non RCRA empty aerosol cans, gas cylinders, and propane cylinders.
b. Paints.
c. Pharmaceuticals as defined by s. NR 666.500(9) Wis. Adm. Code.

~~5.~~4. Manufactured articles as defined in section **Error! Reference source not**

found.~~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.~~5. Lab packs as defined in section **Error! Reference source not found.**~~1.1 Definitions~~.

After preapproval by Tradebe's Approval or Lab Pack Department the waste can be scheduled for management by Tradebe. When a lab pack shipment is received at Tradebe, the following screening procedure applies.

Information from the manifest is entered into the database to confirm waste profile approval. The Land Disposal Restrictions notice (when presented) is reviewed.

The following information is reviewed and compared against the manifest, packing list information and the lab pack container:

1. Waste quantity, container count and container type on the manifest are consistent with the shipment.
2. Outer containers are in acceptable condition; compatible with the approved waste profile, and there is no observable, cracks, gaps, holes, or visible leaking.
3. The hazardous waste codes on the manifest and Land Disposal Restrictions notice (when presented) are consistent with information in Tradebe's database. The lab pack outer container labels are correct and consistent with manifest.
4. Packing list/inventory is consistent with the Facility's approved lab pack list.

Once this review is complete and satisfactory, the lab packs can be accepted.

~~7.~~6. 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.

7. Contaminated personal protective equipment (PPE).

8. Debris as defined by s. NR 668.02(7) Wis. Adm

~~9.~~ . ~~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 form a pipe run that contains lead paint. Demolition of a wall covered in lead paint.~~ These materials will be visually inspected at time of receipt.

Information from the manifest is entered into the database to confirm waste profile approval. Screening of the inbound shipment will include, a review of the manifest and land disposal restrictions notification (if provided at time of shipment), along with the following information compared against the shipment, and the approved waste profile information:

1. Verification waste meets RCRA's definition of debris.
2. Verification waste corresponds with waste profile information.
3. Approved waste codes for offsite treatment/disposal facility.
4. Waste quantity, container count and container type identified on the manifest correspond with the shipment.
5. Container integrity is inspected.
6. Hazardous waste codes on the manifest and Land Disposal Restrictions notice (if provided at time of shipment) are consistent with each other, along with the container labels.
7. Correct labels/markings on container.

Once the paperwork review and verification of container quantity is completed, the waste can be accepted.

9. **Aerosol Cans and Gas Cylinders** (Examples: Consumer products from manufacture, Household hazardous waste collection, propane cylinders)

Information from the manifest is entered into the database to confirm waste profile approval. The Land Disposal Restrictions notice (when presented) is reviewed. Screening of the inbound shipment will include, a review of the manifest and land disposal restrictions notification (if provided at time of shipment), along with the following information compared against the shipment, and the approved waste profile information:

1. Waste quantity, container count and container type identified on the manifest correspond with the shipment.
2. Containers are in acceptable condition; compatible with the approved
3. wastes and there are no visible leaks.
4. Hazardous waste codes on the manifest and Land Disposal Restrictions

5. notice (if provided at time of shipment) are consistent with each other, along with the container labels.
6. Correct labels/markings

Once the paperwork review and verification of container quantity is completed, the waste can be accepted.

10. **Chemical-containing equipment removed from service.** (Examples: cathode ray tubes, batteries, florescent light tubes, etc.)

Information from the manifest is entered into the database to confirm waste profile approval. The Land Disposal Restrictions notice (when presented) is reviewed. Screening of the inbound shipment will include, a review of the manifest and land disposal restrictions notification (if provided at time of shipment), along with the following information compared against the shipment, and the approved waste profile information:

1. Waste quantity, container count and container type identified on the manifest correspond with the shipment.
2. Containers are in acceptable condition; compatible with the approved wastes and there are no visible leaks.
3. Hazardous waste codes on the manifest and Land Disposal Restrictions notice (if provided at time of shipment) are consistent with each other, along with the container labels.
4. Correct labels/markings.

Once the paperwork review and verification of container quantity is completed, the waste can be accepted.

11. **Waste produced from the demolition or dismantling of industrial process equipment or facilities contaminated with chemicals from the process destined for offsite treatment.**

Information from the manifest is entered into the database to confirm waste profile approval. Screening of the inbound shipment will include, a review of the manifest and land disposal restrictions notification (if provided at time of shipment), along with the following information compared against the shipment, and the approved waste profile information:

1. Waste quantity, container count and container type identified on the manifest correspond with the shipment.
2. Containers are in acceptable condition; compatible with the approved

wastes and there are no visible leaks.
3. Hazardous waste codes on the manifest and Land Disposal Restrictions
notice (if provided at time of shipment) are consistent with each other, along with the container labels.
4. Correct labels/markings
5. Verification equipment meets RCRA's definition of debris.
6. Approved waste codes for offsite treatment/disposal facility.
7. Inspected to verify no free liquids are contained in the equipment.

Once the paperwork review and verification of container quantity is completed, the waste can be accepted.

12. **Controlled substances** regulated by the Federal Government including illegal drugs and/or materials from clandestine labs.

13. **Materials designated for storage and subsequent transshipment off-site.** These materials are received at the facility for storage and subsequent transshipment only and are not processed. Opening containers of the waste listed below can cause unnecessary exposure or risks to employees (e.g. poison inhalation waste, dangerous when wet, cyanides, sharps, etc.). The wastes that pose risks to our employees are not subject to onsite waste management other than storage, this waste is shipped offsite for final treatment and disposal.

1. Any DOT hazard class 4.3 Dangerous when wet
2. Any dot hazard class 4.2 or combination with DOT hazard class 4.1. Spontaneously combustible (4.2) and flammable solid (4.1)
3. Any DOT hazard class 5.2. Organic peroxide, not inclusive of subsidiary explosive or temperature controlled.
4. Any DOT hazard class of 6.1 Poison inhalation Hazard
5. Any DOT hazard class, 2, 2.1, 2.2, 2.3. Cylinders or aerosols in general.
6. No P-listed organics.
7. No nitrocellulose bearing waste.
8. No sharps (unused or used).
9. No Mercury
10. No cyanides.
11. Specimens (non BIO) in preservative.
12. No reactive sulfides.

The following DOT hazard classes present a high level of risk of producing an odor within and outside the facility, for that reason the containers will not be opened for a visual inspection.

1. No strong odor chemicals, (mercaptans, lachrymators).

14. **Waste from a remedial project** in which the sampling and analysis plan was approved by a federal or state agency (e.g., CERCLA or Potentially Responsible Party type project).

    1. Tradebe will conduct a visual inspection of the waste,
    2. Perform a verification of profile information and approved waste codes for offsite treatment and disposal facility.
    3. A review analytical provided by Responsible Party and Regulatory Agency will be read prior to receipt and acceptance of waste.

15. **Non-infectious waste.**

    Information from the manifest is entered into the database to confirm waste profile approval. Screening of the inbound shipment will include, a review of the manifest and land disposal restrictions notification (if provided at time of shipment), along with the following information compared against the shipment, and the approved waste profile information:

    1. Waste quantity, container count and container type identified on the manifest correspond with the shipment.
    2. Containers are in acceptable condition; compatible with the approved wastes and there are no visible leaks.
    3. Waste codes on the manifest are consistent with profile and container labels.
    4. Correct labels/markings

    Once the paperwork review and verification of container quantity is completed, the waste can be accepted.

16. **Asbestos containing waste from building demolition or cleaning**. This applies to asbestos-bearing waste insulation materials, such as wallboard, wall spray coverings, pipe insulation, etc.

    ~~c.~~ Information from the manifest is entered into the database to confirm waste profile approval. The Land Disposal Restrictions notice (when presented) is reviewed. Asbestos waste received is packaged in accordance with asbestos regulations, (e.g. wetted down, double bagged, and sealed). Tradebe will visually inspect the asbestos outer package and it's marking against the inbound paperwork. This material will be shipped offsite for disposal.

C.5.1 Level I Analysis

Prior to acceptance, the facility opens and visually inspects 10% of each waste movement ~~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 C.**Error! Reference source not found.**~~5.0 Shipment Screening, Analysis, and Acceptance~~ of this WAP - except that the following containers are not required to be opened:
  - manufactured articles including cylinders.
  - small containers within a lab pack container
  - containers of materials that are not deemed by the facility to be unsafe to open.

~~Upon opening each container and bulk load, t~~The facility performs a~~n~~ physical evaluation~~examination~~ on 10% of the waste movement and compares ~~the waste~~ it to the information provided by the generator, including ~~on the~~ label(s), manifest/shipping paper, and/or WIP.

C.5.1.1 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 physical evaluation of the waste or WIP indicates that the waste is potentially ignitable or corrosive, and the generator has not assigned a D001 or D002 waste code, 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 with an acidic or basic odor but do not include a D001 or D002 waste code.
- Waste having a petroleum- or solvent-like odor but does not include a D001 or D002 waste code.
- Wastes that are not already characterized as exhibiting the characteristic of ignitability (D001) or corrosivity (D002).

C.5.1.2 Representative Sampling:

The facility collects a representative sample for analytical testing from each container

and bulk load of a waste movement 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:

- 10% of the containers ~~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 based on the professional judgement of the sampler. In this case collect ~~at least~~ one representative sample is collected 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 select parameters from the ~~a~~ Level I sample and analysis category ~~is~~may be performed on the container in question ~~all containers~~or the waste may be re-profiled or rejected.
- Sampling and analytical testing is not required for the sample-exempt wastes listed in section C.**Error! Reference source not found.**~~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. In those instances, 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). The layered sample is rigorously mixed to achieve homogeneity prior to analysis to evaluate conformance with WIP information. When appropriate (based on the laboratory's professional judgement), individual ~~(un-composited)~~ samples of individual phases layers can be used for analysis to evaluate conformance with WIP information.

In addition, grab samples of individual containers from multiple generators may be composited when the physical evaluations of the wastes are consistent, and the waste is destined for the same waste management method. Compositing is not allowed for pre=-acceptance test parameters. Compositing is done for selected parameters within Level II, Tier II, and Tier III testing procedures. See Table 2 below for the facility's compositing standards.

TABLE 2
COMPOSITE SAMPLING METHOD

WASTE TYPE	CONTAINER	SAMPLE EQUIPMENT	COMPOSITING PROCEDURE*
Liquid	Drum	Coliwasa or equivalent	Composite of up to 5 grab samples from no more than 30 drums
Liquid	Bulk Tank	Coliwasa or equivalent	Composite of 1 to 5 grab sample
Solid	Drum	Scoop/trowel	Composite of 1 to 5 grab sample
Solid	Bulk	Scoop/trowel	Composite of 1 to 5 grab sample well distributed to obtain representative samples
Sludge	Judgment required, use most appropriate	Judgment required, use most appropriate	Judgment required, use most appropriate

* Compositing is done for Level II and III above and Tier II and III parameters below. Grab samples of multiple generators may be composited if they are destined for the same waste management category (see C.9.1)~~method~~. Pre-acceptance, Level I and Tier I samples are not composited.

C.5.1.3 Analytical Testing:

The analytical testing parameter required for a Level I analysis is identified in the column titled "Analytical Method to use" in **Table 1**~~**Table 1**~~ of this WAP.

C.5.1.4 Evaluating the Physical and Analytical Results*:*

The facility compares the ~~Level I~~ physical examination and ~~analytical~~ results to the waste's WIP. If the Level I analysis identifies a discrepancy, using at a minimum the tolerance limits in **Table 1**~~**Table 1**~~, the facility takes the following actions.

1. Contact the generator/broker to resolve the discrepancy or resolve the discrepancy internally.
2. Accept the waste under a new WIP completed by the generator and approved under section 3.1.2 of this WAP.
3. Reject the waste.

If the discrepancy is not resolved.

~~2.~~4. Follow section 10.0 WIP Discrepancies of this WAP.
~~3.~~5. Clearly mark or label the waste with the word "Quarantined".
~~4.~~6. The container must be placed and remain in a quarantine area until it is

accepted or removed from the facility.

C.5.1.5 Records:

The Level I analysis is documented using the Order Worksheet Form ~~Level I QA/QC report~~ (see Appendix C-2~~F~~ of this WAP). A record of all Level I analysis (~~and how discrepancies were resolved~~records produced in resolution of discrepancies) is maintained by the facility in accordance with section 17.0 Recordkeeping and Reporting~~17.0 Recordkeeping and Reporting~~ for each ~~container delivery~~ waste movement as part of the facility operating record.

C.5.2 Level II Analysis

The facility conducts a Level II analysis when there is a Level I discrepancy and the facility retains the waste. Waste subject to Level II analysis ~~must be labelled as quarantined~~will not be accepted until the discrepancy is resolved.

C.5.2.1 Representative Sampling:

The "Representative Sampling" for a Level II analysis is performed as using the same process for level I analysis (see~~described in~~ section C.5.1 Level I **Analysis**~~5.1 Level I Analysis~~ of this WAP).

C.5.2.2 Analytical Testing:

The analytical testing required for a Level II analysis are identified in the column titled "Analytical Method to use" in **Table 1**~~**Table 1**~~ of this WAP. ~~Methods M-11 and M-12 require testing by a laboratory certified or registered under NR 149.~~

C.5.2.3 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. The container must be placed and remain in a quarantine area until the discrepancy is resolved and it is accepted, or the discrepancy is not resolved and it is removed from the facility.
4. Requires a new WIP to be submitted by the generator or generator's agent when the discrepancy involve the waste's physical and/or analytical results not matching the waste's WIP.

C.5.2.4 Records:

The Level II analysis is documented using the Order Worksheet Form ~~Level II QA/QC report~~ (see Appendix ~~G~~C-2 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~~17.0 Recordkeeping and Reporting~~ for each container or bulk load subject to a level II analysis.

~~C.5.3 Level III Analysis~~

~~The facility conducts a Level III analysis for the contents of one out of every 500 non-bulk containers (having capacity of 119 gallons or less) and the contents of one out of every 50 bulk containers, including non-hazardous wastes, received by the facility.~~

- ~~The facility's used an inventory tracking system to identify every 500th non-bulk container and every 50th bulk container received by the facility in sequential order.~~
- ~~If the 500th non-bulk container or 50th bulk container 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 50th or 500th container is one on several similar 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 Level III container candidates~~:

- ~~Facility to describe~~ Documentation of waste stream information is completed on the WIP form and may be maintained in paper or electronic format. Each WIP is assigned a corresponding waste profile number. Wastes that are sampled are labeled and tracked via the chain of custody, also referred to as the Order Worksheet. The inbound manifests, one-time LDR notification, chain of custody, container label and the lab analysis form all reference the waste profile number such that the facility can cross-reference and track waste at the site. The Order Worksheet Form is uploaded into an electronic database that produces an electronic laboratory report that becomes part of the operating record. It includes sample data including sampler and date sampled, analytical data including parameters tested and analyst notes, customer data including customer name and profile. Once this form is completed, the data is uploaded into an electronic database and results may be pulled based on several possible search topics (e.g. customer name, profile number, etc.). In addition to data from the Order Worksheet Form, the manifest and LDR forms are also uploaded into the electronic database. At that time, a barcode label is assigned to containers designating the waste profile number which initiates on-site tracking via this cross-referencing system. The barcode labels are tied to the electronic data records. A unique drum number range is assigned to each line item of an inbound manifest. The barcode interfaces with other data associated with the specific shipment.

C.5.3.1 Physical Evaluation:

The "Physical Evaluation" is performed as described in section 5.1 Level I Analysis of this WAP.

C.5.3.2 Representative Sampling:

The "Representative Sampling" for a Level III analysis is performed as described in section 5.1 Level I Analysis of this WAP.

C.5.3.3 Analytical Testing:

The analytical testing required for a Level III analysis is identified in the column titled "Analytical Method to use" in **Table 1** of this WAP.

C.5.3.4 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. The container must be placed and remain in a quarantine area until it is accepted or removed from the facility.

C.5.3.5 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.

C.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 years[1].

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

[1] The facility recognized that Annual Analysis and Discrepancy Report may be used by WDNR when the facility seeks any license modification regarding this WAP and in reviewing an expiring license renewal application required in NR 670 Wis Adm Code.

~~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 appropriate or needed based on these analyses and evaluations, process improvements taken or to be 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.~~

C.5.5 Final Acceptance and Placement of Waste in Storage

Upon verification that the container and its waste contents through the waste screening process (i.e., Level I/II~~/III~~ analyses), 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~~72 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~~not accepted 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~~received 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 not accepted until the discrepancy is resolved or rejected.~~labelled for (and placed into) quarantine.~~

The facility inspects each container received for controls specified in subpart CC. Containers with ~~The facility complies with the following subchapter CC controls when~~ containerized hazardous waste ~~has an~~profiled by the generator to have an average volatile organic (VO) concentration of at least 500 parts per million by weight (ppmw) at the point of waste

origination must comply with the following subpart CC controls. Containers will not be accepted for storage or waste management until the subpart CC requirements are met. If the hazardous waste organic content has been reduced by a treatment process to the extent described in s. NR 664.1082 Wis. Adm. Code prior to placement in the waste management unit, then the unit is exempt from the air emission controls standards.

Containers that are <=26.4 gallons (.1 m^3)
Exempt from subchapter CC requirements.

Containers that are >26.4 gallons (.1 m^3) <= 121 gallons (.46 m^3) (Level 1 Controls)
Requires the hazardous waste container to be one of the following:

- An approved U.S. DOT container.
- Container equipped with a cover and closure devices for each opening that has no visible gaps or other openings.
- An open-top container with an organic vapor-suppressing barrier.

Containers that are > 121 gallons (.46 m^3) (Level 2 Controls)
Requires the hazardous waste container to be one of the following:

- An approved U.S. DOT container.
- A container that operates with no detectable organic emissions per Method 21 in Appendix A of 40 CFR 60.
- A demonstrated vapor-tight container per Method 27 in Appendix A of 40 CFR 60, as modified by s. NR 664.1086(8), Wis. Adm. Code.

Containers that are >26.4 gallons (.1 m^3) and waste stabilization is occurring within the container (Level 3 Controls)
Requires the hazardous waste container to be one of the following:

- Vented directly to a control device.
- Is located inside an enclosure that is vented through a closed-vent system to a control device.

When the facility claims that a VO waste container is exempt from subchapter CC controls, then the facility will comply with s. NR 664.1082(4) Wis. Adm. Code for each of those containers.

6.0 Waste Processing and Consolidation (see Attachment D)

Certain processing activities such as bulking, containerizing, consolidating, lab packing/repacking, 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].

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**~~7.1.6 Impermissible Dilution~~ of this WAP). The facility will not perform impermissible dilution when performing consolidation or processing. ~~The June 1, 1990, federal register (55 FR 22666/22667[3]) states the following:~~

> ~~*"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 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"*~~

The mixing (i.e., aggregation) of hazardous wastes ~~for treatment on an economic scale must~~ only occurs when the waste-constituents are legitimately amenable to the same type of treatment (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.

Water reactivity is also considered as part of determining the compatibility of a waste. Since many waste streams can contain some amount of water, waste material that is water reactive is considered incompatible with waste streams that are not water reactive.

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

[2] RO 11497: https://rcrapublic.epa.gov/files/11497.pdf
RO 12458: https://rcrapublic.epa.gov/files/12458.pdf
RO 13764: https://rcrapublic.epa.gov/files/13764.pdf

section 15.0 Test Methods~~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 the described waste and constituents to be consolidated appear to be 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/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 outer container that is free of any potentially incompatible materials, structurally sound, made of materials compatible with the wastes, and are leak proof when closed.

6.3 Containers and Tanks

Wastes are only consolidated into containers that are free of any potentially incompatible materials, structurally sound, made of materials compatible with the wastes, and are leak proof when closed. If the container was previously used or is not free of contamination, it is cleaned to eliminate any previous residues or contamination that may be incompatible. 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. This form also includes documentation of compatibility testing.

The facility uses the Lab Pack Contents form ~~(see Appendix B.2)~~ when lab packing smaller containers.

7.0 Treatment

The facility may conduct~~s~~ 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 often 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.~~a. ~~Secondary treatment residue: Bag house dust are subject to ch. NR 662 Wis. Adm. Code.~~

~~3.~~2. **Fuel Blending:**
   a. Primary treatment residue: Blended fuel. The fuel blended waste remains subject to ch. NR 664 Wis. Adm. Code.
   b. Secondary treatment residue: Tank or container heel.

~~4.~~3. **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 **Error! Reference source not found.**~~1.1 Definitions~~ of this WAP. Fuel blending is a form of hazardous waste treatment. The types of hazardous wastes and

nonhazardous wastes typically fuel blended for boilers and industrial furnaces (BIFs) are usually ~~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 (ss. 266.103(a)(5)(ii), 268.3, and facility specific conditions). BIFs may become subject to the incinerator standards of 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 therefor 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 Fuel Blending Criteria~~7.1.2 Fuel Blending Criteria~~ of this WAP

7.1.2 Fuel Blending Criteria

Hazardous waste that are used for fuel blending must meet all the following, for each waste stream prior to mixing or blending:

1. Not create an incompatibility issue when mixed.
2. Is not a D001 oxidizer.
3. Is not a D002 that is likely to ~~could~~ cause an exothermic reaction.
4. As per s. NR 668.03 Wis. Adm. Code the combustion of the hazardous waste codes listed in Appendix XI[3] 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:
    a. 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.
    b. The waste consists of organic, debris−like materials (e.g., wood, paper, plastic, cloth) contaminated with an inorganic metal−bearing hazardous waste.
    c. The waste has heating value of greater than or equal to 5,000 BTU per pound.
    d. 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.
    e. The waste is subject to federal or Wisconsin requirements necessitating reduction of organics, including biological agents.
    f. The waste contains greater than one percent total organic carbon (TOC).
5. Waste having a specified LDR treatment technology other than CMBST or DEACT must also meet that specified LDR treatment technology.
6. Be legitimately amenable to the same type of treatment (see section ~~6.~~ 7.1.6 Impermissible **Dilution**
7. ~~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 ~~8.~~ 7.1.6 Impermissible **Dilution**
9. ~~7.1.6 Impermissible **Dilution**~~ of this WAP).

[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.

10. 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.
11. 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 by this facility must meet the specifications required by the industrial furnace or boiler. All BIF's used by Tradebe are responsible for ensuring compliance with federal, state and local requirements that pertain to the use of fuels blended by Tradebe.

7.1.3 BIF Specifications

The facility's operating record identifies all the criteria and specifications ~~that must be meet~~ for fuel blended waste to be accepted at each BIF used by the facility. These criteria and specifications are maintained in the operating record for at least 3 years.

7.1.4 Meeting the BIF Specifications

~~After the wastes are fuel blended and b~~This facility performs analytical testing for hazardous and non hazardous waste that will be fuel blended off-site at another facility. Before ~~the fuel blended~~ hazardous waste that has been fuel blended at this facility 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 BIF Specifications of this WAP~~for each BIF. The analytical testing consists of testing a representative sample for heat content (i.e., BTUs per pound) and all the criteria and specifications established by the BIF. Documentation of this representative sampling and the analytical results ~~is~~are maintained ~~in the~~as part of 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. Methods M-11 and M-14 require testing by a laboratory certified under NR 149. Analytical testing for fuel blending is performed for both material that may be fuel blended at this facility and material that will be fuel blended off-site at another facility.

Table 2.0: Fuel Blending Pre-Acceptance Parameters*

Parameter	Hazardous waste that are used for fuel blending	Hazardous wastes that have been fuel blended
	Analytical Method to use	Analytical Method to use
Physical Evaluation	M-1	M-1

pH**	M-2	M-2
Ignitability/Flash Point***	M-3	M-3
Water Reactivity	M-4	
PCBs†	M-11	
Compatibility	M-13	
Heat Content (i.e., BTU)††	M-14	M-14
Percent Water/Moisture Content††	M-15	M-15
Total Halogens	M-16	M-16
Total Organic Carbon†††	M-17	
Any other parameter necessary to confirm that the waste meets the specifications required by the industrial furnace or boiler		

*No compositing allowed for Pre-acceptance testing.
**pH methods are conducted when the waste is a liquid.
***Ignitability/Flash Point is run on liquid waste that does not carry a D001 waste code.
†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.
††BTU value is established by either the Heat of Combustion method in Table C-1 (bomb calorimeter) or by calculation based on results from the Moisture Content method in Table C-1 (titration). The Heat of Combustion method is run in addition to the Moisture Content method when verification of the result from moisture content method is needed.
†††Additional Test Parameter only for Metal Bearing Waste (subject to 40 CFR 268.3(c)) destined for Fuel Blending with < 5000 BTU.

Table 3.1: Fuel Blending Tier I Fingerprint Parameters*

Parameter	Hazardous waste that are used for fuel blending Analytical Method to use	Hazardous wastes that have been fuel blended* Analytical Method to use
Physical Evaluation	M-1	M-1
pH**	M-2	M-2
Water Reactivity	M-4	
Compatibility	M-13	
Any other parameter necessary to confirm that the waste meets the specifications required by the industrial furnace or boiler		

*After a waste stream is accepted using Pre-acceptance analysis, each subsequent movement of the waste stream is subject to Tier I analysis. No compositing allowed for Tier I analysis.
**pH methods are conducted when the waste is a liquid.

Table 4.2: Fuel Blending Tier II Fingerprint Parameters*

Parameter	Hazardous waste that are used for fuel blending	Hazardous wastes that have been fuel blended*
	Analytical Method to use	Analytical Method to use
Ignitability/Flash Point**	M-3	M-3
Heat Content (i.e., BTU)***	M-14	
Percent Water/Moisture Content***	M-15	
Total Organic Carbon†	M-17	
Any other parameter necessary to confirm that the waste meets the specifications required by the industrial furnace or boiler		

*After Pre-acceptance, Tier II analysis is performed on randomly selected waste streams to verify the result matches the Pre-acceptance results and the WIP. Compositing is allowed when deemed appropriate by the chemist.

**Ignitability/Flash Point is run on liquid waste that does not carry a D001 waste code.

***BTU value is established by either the Heat of Combustion method in Table C-1 (bomb calorimeter) or by calculation based on results from the Moisture Content method in Table C-1 (titration). The Heat of Combustion method is run in addition to the Moisture Content method when verification of the result from moisture content method is needed. Compositing is allowed when deemed appropriate by the chemist.

†Additional Test Parameter only for Metal Bearing Waste (subject to 40 CFR 268.3(c)) destined for Fuel Blending with < 5000 BTU. Compositing is allowed when deemed appropriate by the chemist.

Table 5.3: Fuel Blending Tier III Fingerprint Parameters*

Parameter	Hazardous waste that are used for fuel blending	Hazardous wastes that have been fuel blended
	Analytical Method to use	Analytical Method to use
PCBs	M-11	
Any other parameter necessary to confirm that the waste meets the specifications required by the industrial furnace or boiler		

* After Pre-acceptance, Tier III analysis is performed on randomly selected waste streams to verify the result matches the Pre-acceptance results and the WIP. Compositing is allowed when deemed appropriate by the chemist.

~~***Table 2: Fuel Blending Analytical Requirements***~~

~~Parameter~~	~~Hazardous waste that are used for fuel blending~~		~~Hazardous wastes that have been fuel blended~~	
	~~Review Required~~	~~Analytical Method to use~~	~~Review Required~~	~~Analytical Method to use~~
~~Compatibility~~	~~Yes~~	~~M-13~~	~~No~~	
~~PCBs*~~	~~Yes~~	~~M-11~~	~~No~~	
~~Heat Content (i.e., BTU)~~	~~Yes~~	~~M-14~~	~~Yes~~	~~M-14~~
~~Percent Water~~	~~Yes~~	~~M-15~~	~~Yes~~	~~M-15~~
~~Total Halogens~~	~~Yes~~	~~M-16~~	~~Yes~~	~~M-16~~
~~Any other parameter necessary to confirm that the waste meets the specifications required by the industrial furnace or boiler~~	~~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 22666/22667[4]) 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 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*"

[4] https://tile.loc.gov/storage-services/service/ll/fedreg/fr055/fr055106/fr055106.pdf

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 Device[5]

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 remain~~s~~ subject to LDR treatment standards[6].

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

If the generator (i.e., facility customer) can assure by certification of LDR, 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,

[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.

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 on-site LDR notification form discussed above for generators and in other cases the LDR notification will be applicable to each waste shipment.

7.1.8 Recordkeeping

As part of the facility's operating record, the facility documents all the waste streams that are fuel blended at this facility. ~~used to make a fuel blended load~~ (~~such as~~including WIP number, manifest/line number, quantity) and all screening and analysis performed on waste prior to and after blending. ~~(see Appendix D)~~ For material that will be fuel blended off-site, the facility maintains records according to 17.0 Recordkeeping and Reporting.

7.2 Off-Site Stabilization

Waste materials accepted for stabilization are transferred for off-site treatment and disposal. The pre-acceptance and fingerprint parameters screen inbound material to meet the off-site treatment facilities' specifications. Note: TRADEBE does not perform stabilization as a treatment to satisfy the LDR treatment standards and the provisions of this WAP are for analysis to evaluate the viability of material for stabilization prior to transfer to an off-site treatment facility (TSDF).

7.2.1 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 off-site stabilization. The facility evaluates the information in the WIP to ensure the hazardous waste codes are permitted and that the waste meets the acceptance criteria for this treatment.

7.2.2 Off-Site Treatment Facility Specifications

The facility's operating record identifies the acceptance criteria and specifications for off-site treatment facilities used for stabilization. These criteria and specifications are maintained in the operating record for at least 3 years.

7.2.3 Analytical Testing

Table 3.0: Pre-Acceptance Parameters for Off-Site Stabilization*

	Hazardous waste screened for off-site stabilization

Parameter	Analytical Method to use
Physical Evaluation	M-1
pH***	M-2
Ignitability/Flash Point†	M-3
Water Reactivity	M-4
PCBs††	M-11
Compatibility	M-13
Hexavalent Chromium	M-18
% Acid	M-19
Total Chromium	M-20
Any other parameter necessary to confirm that the waste meets the specifications required by the off-site treatment facility	

*No compositing allowed for Pre-acceptance testing.
**Post treatment analytical is performed by the off-site treatment facility.
***pH methods are conducted when the waste is a liquid.
†Ignitability/Flash Point is run on liquid waste that does not carry a D001 waste code.
††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.

*Table 3.1: Tier I Fingerprint Parameters for Off-Site Stabilization**

Parameter	Hazardous waste screened for off-site stabilization Analytical Method to use
Physical Evaluation	M-1
pH***	M-2
Any other parameter necessary to confirm that the waste meets the specifications required by the off-site treatment facility	

*After a waste stream is accepted using Pre-acceptance analysis, each subsequent movement of the waste stream is subject to Tier I analysis. No compositing allowed for Tier I analysis.
**Post treatment analytical is performed by the off-site treatment facility.
***pH methods are conducted when the waste is a liquid.

*Table 3.2: Tier II Fingerprint Parameters for Off-Site Stabilization**

Parameter	Hazardous waste screened for off-site stabilization Analytical Method to use

PCBs***	M-11
Any other parameter necessary to confirm that the waste meets the specifications required by the off-site treatment facility	

*After Pre-acceptance, Tier II analysis is performed on randomly selected waste streams to verify the result matches the Pre-acceptance results and the WIP. Compositing is allowed when deemed appropriate by the chemist.
**Post treatment analytical is performed by the off-site treatment facility.
***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.

7.2.4 Impermissible Dilution

For waste that will be land disposed, the facility will not perform impermissible dilution when performing 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.

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 on-site LDR notification form discussed above for generators and in other cases the LDR notification will be applicable to each waste shipment.

7.2.5 Recordkeeping

As part of the facility's operating record, the facility documents all the waste streams that are shipped for off-site stabilization (including WIP number, manifest/line number, quantity) and all screening and analysis performed.

7.3 Aqueous Waste

Aqueous waste streams received have varying hazardous waste codes. The hazardous aqueous wastes accepted will be destined for off-site treatment/disposal. During on-site management the material may to subject to other management methods including neutralization or blending. Aqueous waste streams that are placed in the blending program will be subject to blending program pre-acceptance and fingerprint parameters. Aqueous waste streams may be directly transshipped off-site . This facility does not perform treatment on aqueous waste streams to satisfy the LDR treatment standards. Table 4.0 and 4.1 contain the pre-acceptance and fingerprint parameters for aqueous waste streams.

7.3.1 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 management as an aqueous waste. The facility evaluates the information in the WIP to ensure the hazardous waste codes are permitted and that the waste meets the acceptance criteria.

7.3.2 Off-Site Treatment Facility Specifications

The facility's operating record identifies the criteria and specifications for facilities that treat and/or dispose of aqueous waste. These criteria and specifications are maintained in the operating record for at least 3 years.

7.3.3 Analytical Testing

Table 4.0: Aqueous Waste Pre-acceptance Parameters

Parameter	Hazardous waste screened for off-site stabilization Analytical Method to use
Physical Evaluation	M-1
pH**	M-2
Ignitability/Flash Point**	M-3
Any other parameter necessary to confirm that the waste meets the specifications of off-site disposal or treatment facility	

Table 4.1: Aqueous Waste Tier I Fingerprint Parameters

Parameter	Hazardous waste screened for off-site stabilization Analytical Method to use
Physical Evaluation	M-1
pH**	M-2
Ignitability/Flash Point**	M-3
Any other parameter necessary to confirm that the waste meets the specifications of off-site disposal or treatment facility	

7.3.4 Impermissible Dilution

For waste that will be land disposed, the facility will not perform impermissible dilution when performing 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.

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 on-site LDR notification form discussed above for generators and in other cases the LDR notification will be applicable to each waste shipment.

7.3.5 Recordkeeping

As part of the facility's operating record, the facility documents the aqueous waste streams managed and shipped for off-site (including WIP number, manifest/line number, quantity) and all screening and analysis performed.

7.4 Corrosive Waste

Corrosive Waste Streams, D002 (acid and bases) that exhibit additional EPA Waste Codes may be accepted for on-site management. If the wastes are not acceptable for blending, they will be evaluated for alternative on-site or off-site treatment/storage/disposal. Corrosive materials that are placed in the blending program will be subject to blending program pre-acceptance and fingerprint parameters. Corrosive materials may be directly transshipped for off-site treatment or disposal. This facility does not perform treatment on corrosive streams to satisfy the LDR treatment standards. Table 5.0 and 5.1 describe the pre-acceptance and fingerprint parameters for corrosive waste streams.

7.3.2 Off-Site Treatment Facility Specifications

The facility's operating record identifies the criteria and specifications for facilities that treat and/or dispose of corrosive waste. These criteria and specifications are maintained in the operating record for at least 3 years.

7.4.1 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 management as a corrosive waste. The facility evaluates the information in the WIP to ensure the hazardous waste codes are permitted and that the waste meets the acceptance criteria.

7.4.3 Analytical Testing

Table 5.0: Corrosive Waste Pre-acceptance Parameters

	Hazardous waste screened

Parameter	for off-site stabilization Analytical Method to use
Physical Evaluation	M-1
pH**	M-2
Any other parameter necessary to confirm that the waste meets the specifications of off-site disposal or treatment facility	

Table 5.1: Corrosive Waste Tier I Fingerprint Parameters

Parameter	Hazardous waste screened for off-site stabilization Analytical Method to use
Physical Evaluation	M-1
pH**	M-2
Any other parameter necessary to confirm that the waste meets the specifications of off-site disposal or treatment facility	

7.4.4 Impermissible Dilution

For waste that will be land disposed, the facility will not perform impermissible dilution when performing 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.

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 on-site LDR notification form discussed above for generators and in other cases the LDR notification will be applicable to each waste shipment.

7.4.5 Recordkeeping

As part of the facility's operating record, the facility documents the corrosive waste streams managed and shipped for off-site (including WIP number, manifest/line number, quantity) and all screening and analysis performed.

8.0 Restricted Wastes

Examples of waste The facility does not accept the following waste:

1. Radioactive wastes.
2. Conventional or chemical ordnance.
3. Biological wastes.
4. Explosive wastes

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 are any of the following:
    a. ~~For bulk waste, variations greater than 10% in weight~~.
    ~~Facility to describe how bulk loads are weighed and how accurate tare weights are applied.~~no scale for bulk loads.
    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 based on the facilities professional judgement, 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 **Error! Reference source not found.**~~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~~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 **Error! Reference source not found.**~~5.0 Shipment Screening, Analysis, and Acceptance~~ to **Error! Reference source not found.**~~5.5 Final Acceptance and Placement of Waste in Storage~~ and section 10.0 WIP Discrepancies~~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 all of the following:

1. Attempt to resolve the discrepancy by calling the generator and requesting additional information.
2. Decide if the waste can be accepted by the facility 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.
3. If a decision is made to reject the waste, follow the procedures in the Rejection Policy in section and section 8.0 Restricted Wastes of this WAP.
4. If the waste is not rejected, perform the necessary analysis to fully ~~characterize~~screen the waste. In these instances pre-acceptance parameters for the proposed waste management method will be tested. ~~Refer to section 5.2 Level II Analysis of this WAP for the procedures associated with a Level II analysis.~~

5. ~~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.~~
6. 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 **Error! Reference source not found.**~~2.0 Waste Prequalification~~ of this WAP.
7. Maintains records that document proper completion of the above actions. Refer to section 17.0 Recordkeeping and Reporting~~17.0 Recordkeeping and Reporting~~ of this WAP for recordkeeping.

Additional information and requirements regarding discrepancies is provided in sections **Error! Reference source not found.**~~5.0 Shipment Screening, Analysis, and Acceptance~~ to **Error! Reference source not found.**~~5.5 Final Acceptance and Placement of Waste in Storage~~ and section 10.0 WIP Discrepancies~~10.0 WIP Discrepancies~~ of this WAP.

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"~~manifest notes rejections.
3. ~~3.~~2. Ensure that the rejected hazardous waste is safely and properly containerized
4. ~~4.~~3. Maintains records that document proper completion of the above actions. Refer to section 17.0 Recordkeeping and Reporting~~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 **Error! Reference source not found.**~~5.0 Shipment Screening, Analysis, and Acceptance~~ to **Error! Reference source not found.**~~5.5 Final Acceptance and Placement of Waste in Storage~~ and section 10.0 WIP Discrepancies~~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 recordkeepingsee below 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~~screenings ~~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 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 detailed in a sampling SOP 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 screening ~~Level I analysis~~ are documented utilizing the Order Worksheet ~~Level I QA/QC checklist~~ (see Appendix C-2~~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.~~ The Order Worksheet also serves as the ~~C~~chain-of-custody form~~s~~ (see Appendix C-2~~E of this section~~) ~~are~~ used for tracking screening samples ~~Level II and Level III samples~~ sent for on and off-site laboratory analyses and testing.

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~~Generator
2. Date of collection
3. Order number and ~~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., type of ~~Level I, II or III~~ analysis)

Samples sent to outside labs must be accompanied by instructions and chain of custody documentation ~~(see Appendix E of this section)~~.

Labels are affixed to the sample after the sample has been ~~inserted~~collected. ~~and t~~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 ~~Table 3~~ summarizes the analytical methods, 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 6: 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 visually 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 9045~~1~~	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: +/- 2 pH unit when the WIP does not have a pH range.
Ignitability/Flash Point	M-3	SW 846 1010A and SW 846 1030 ~~Liquids: ASTM D93-79, D 93-80, or D 3278-78. Solids: SW-846 method 1030 (or equivalent EPA approved method) spontaneously combust: SW-856 method 1050 (or equivalent EPA approved method)~~	Indicates the fire-producing potential of the waste and determines whether the waste is a D001 ignitable waste. Tolerance limits: +/- 10 degrees Fahrenheit when the WIP does not have an ignitability range.

Water Reactivity (results are recorded as compatibility)	M-4	In-house Method	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. When used as a blending criterion, water reactive material is considered incompatible since the blending process usually involves some amount of water. For that reason results of water reactivity testing are recorded as a compatibility results. Tolerance limits: Must match description in WIP. Wastes not profiled as D003 must have no reaction when exposed to water.
~~Reactive Sulfides Screen (Spot Test)~~Percent Ash	M-5	ASTM D4978	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. Tolerance limits: Must match description in WIP
~~Reactive Cyanides Screen (Spot Test)~~	~~M-6~~		~~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.~~ ~~Tolerance limits: Must match description in WIP~~
Oxidizer Screen	M-7	ASTM D4981-19	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. Tolerance limits: Must match description in WIP
Specific Gravity	M-8	ASTM D 287-00	Used in conjunction with other test data to determine probable characteristics of materials and their conformance to the WIP. Tolerance limits: +/- 10% of value reported value when the WIP does not have a range.
Percent ~~Suspended~~ Solids	M-9	EPA method 160.2	Used in conjunction with other test data to determine probable characteristics of materials and their conformance to the WIP. Performed as needed. Tolerance limits: +/- 10% of value reported when the WIP does not have a range.
Chlorine (Spot Test)	M-10		Indicates if the material is chlorinated. Information is used to check conformance to the WIP. Tolerance limits: Must match description in WIP
Polychlorinated Biphenyls Screen	M-11	SW-846 8082/ASTM Method D6160	Determines PCB content in order to verify WIP information and assess applicability under TSCA. Tolerance limits: Must match description in WIP. If a WIP states no PCBs, then an analysis should show the concentration as not detected.

~~TCLP~~	~~M-12~~	~~SW-846 test method 1311 for digestion~~	~~Used to determine the leachable concentration of the 40 constituents listed in s. NR 661.0024 Wis. Adm. Code.~~ ~~Tolerance limits: +/- 20% of value reported value when the WIP does not have a range.~~
Compatibility Testing	M-13	In-house Method ~~ASTM D5058~~ ~~ASTM D4981~~	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. Tolerance limits: Commingling of the wastes is not allowed if the mixture produce heat or pressure, fire or explosion, violent reaction, toxic dusts, mists, fumes, or gases, or flammable fumes or gases.
Heat Content	M-14	ASTM D240 ASTM D4809-13~~5468~~	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.~~
Percent Water/Moisture Content	M-15	Karl Fischer Volumetric Method ~~ASTM D6304-20 or SW-846 method 9000~~	Indicates if the waste meets the criteria for fuel blending. Tolerance limits: Meet the specifications required by the industrial furnace or boiler
Total Halogens	M-16	~~ASTM D4327-17 or SW-846 Method 9056A~~SW 846 5050	Indicates if the waste meets the criteria for fuel blending. Tolerance limits: Meet the specifications required by the industrial furnace or boiler
Total Organic Carbon	M-17	SW-846 Method 9060A	This method is used to determine the concentration of organic carbon in ground water, surface and saline waters, and domestic and industrial wastes. Tolerance limits: >1% for metal bearing waste with a BTU value < 5,000.
Hexavalent Chromium	M-18	Hach Method 8023 or EPA Method 8023	Method to determine if hexavalent chromium is present in order to determine proper treatment and/or disposal. Tolerance limits: within the specifications of the off-site treatment facility that will perform the stabilization.
% Acid	M-19	In-House Method	Percent acid is determined in acidic sample conditions to determine the concentration. Depending on the concentration along with other tests can determine samples for wastewater treatment, stabilization or offsite shipping. This validation is also for proper handling and storage or shipping. Tolerance limits: within the specifications of the off-site treatment facility that will perform the stabilization.

Total Metals including As, Ba, Cd, Cr, Pb, Hg, Se, and Ag.	M-20	SW 846 6010D	To identify and monitor a material's specific metal content to determine off-site treatment viability such as for stabilization. Tolerance limits: within the specifications of the off-site treatment facility that will perform the stabilization.

15.0 Test Methods

Standard operating procedures (SOPs) were developed based on standardized analytical test methods from Test Methods for Evaluating Solid Waste: Physical and Chemical Methods Compendium (SW-846); American Society for Testing and Materials (ASTM) methods, or an equivalent standard based in analytical chemistry and good laboratory practice. These SOPs describe in detail how each analysis is run. The SOPs are maintained at the facility.

~~The test methods used to confirm that the waste received by the facility conforms to the corresponding WIP are described below.~~ Multiphasic waste is homogenized prior to analysis such that ~~E~~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 as 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)~~

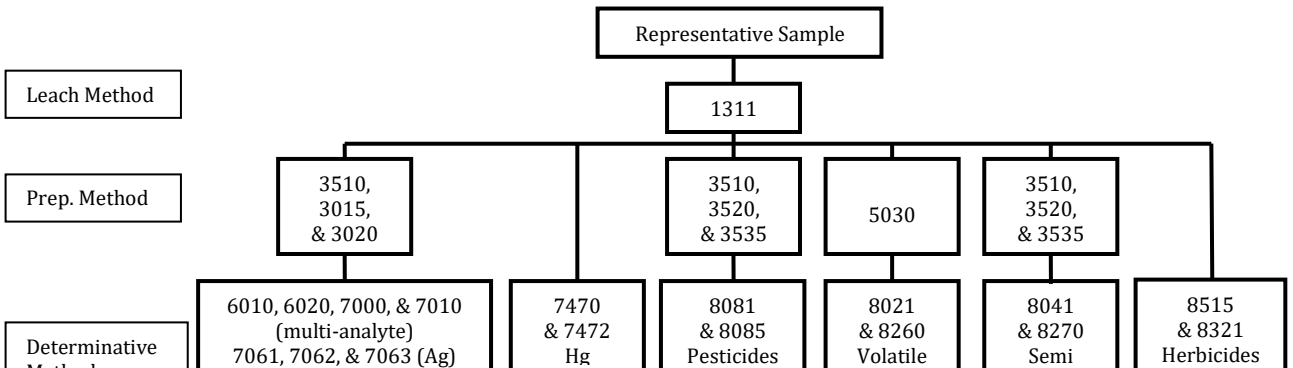
~~A small amount of the sample is placed in a test tube. Litmus paper is placed over the sample as heat is applied. A red coloration of the paper indicates the presence of chlorine. An additional test is done by placing a small amount of the material in a flame on a wire loop. A green color indicates 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.~~



~~**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.~~

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~~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 C-3~~I~~.

The facility subcontracts with an independent laboratory certified or registered under ch. NR 149 ~~for Level II and III~~when waste determinations or when the number or complexity of analyses causes the on-site laboratory to seek assistance. 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 (see Appendix ~~E~~C-2 of this WAP)
    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~~C-2 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.~~9. ~~Amended manifest report required in NR 664.0072(7)~~

~~11.~~10. Unmanifested waste reports required in NR 664.0076

~~12.~~11. ~~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 some~~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~~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.

TRADEBE
Environmental Services™

APPENDIX C-1

Sample Waste Information Profile

TRADEBE
Environmental Services, LLC

TRADEBE TREATMENT AND RECYCLING, LLC

GENERATOR WASTE STREAM PROFILE SHEET

Profile # _____

Process Code _____

Email completed profile sheet to your Sales/Customer Service Representative or usa.approvals@tradebe.com

Please see Instructions for help in completing the Waste Stream Profile Sheet

A. GENERATOR INFORMATION:

SITE ADDRESS

USE CONTINUATION IF SITE & MAILING ADDRESSES ARE DIFFERENT

Generator #: _____
Generator Name: _____
Generator Address: _____
City: _____ State: _____ Zip: _____
Contact Name: _____
Generator Phone: _____
Generator Fax: _____
Generator Email: _____
Generator USEPA/Federal ID # : _____

CUSTOMER INFORMATION:

Customer #: _____
Customer Name: _____
Customer Address: _____
City: _____ State: _____ Zip _____
Contact Name: _____
Customer Phone: _____
Customer Fax: _____
Customer Email: _____
Customer Service/Sales Rep: _____

If no ID number is the Generator a "Conditionally Exempt Very Small Quantity Generator?" ___ Yes ___ No

Generator NAICS Code: _____ Generator State ID # (If applicable): _____

Mailing Address if different than Site Address: *(Please use Profile Continuation page if additional information is supplied)*

Name: _____ Address: _____
City: _____ State: _____ Zip: _____

Please check if generator has "No Canada Disposal" policy _____Yes
Please check if generator has "No Landfill" policy _____Yes
Please list other disposal rescrictions: _____
Facility Restrictions, (If Any): _____

B. WASTE STREAM INFORMATION:

Generator's Waste Name: _____
Describe Process Generating Waste (Flowcharts, if applicable): _____

Is this waste exempt from RCRA regulation? _____Yes
If "yes" explain or cite regulation below: (Example: Hazardous secondary material, HHW, CESQG):

Is this waste from a CERCLA cleanup site? _____Yes
Waste determination was made by: __Testing __Generator Knowledge __SDS/MSDS __Sample __Other
(Attach analytical, SDS/MSDS, or other supporting documentation used for waste determination)

Does the Waste have any of the following characteristics? ___Yes *(if yes check all that apply)* ___No

___ Oxidizer	___ Dioxin or Suspect	___ Water Reactive	___ Air Reactive	___ Organic Peroxide
___ Hexachrome	___ Infectious Waste	___ Radioactive	___ Chelating Agent	___ Lachrymator
___ Explosive	___ Shock Sensitive	___ Polymerizer	___ Pyrophoric	___ Inhalation Hazard, Zone ___

C. GENERAL CHARACTERISTICS:

Color: _____ **Odor:** _____

Physical State @ 70 F	Phases	BTU/lb	pH
___ % liquid ___ aerosol	___ single layer	___ <3000(*Ex:* water)	__ <2 (Acid) __ 10.0-12.5
___ None ___ % solid ___ powder	___ double layer	___ 3,000-5,000	__ 2.0-4.0 __ >12.5 (Base)
___ Mild ___ % sludge ___ other	___ >2 layers	___ 5,000-10,000	__ 4.0-10.0 __ N/A
___ Strong ___ % debris	___ how many?	___ >10,000 (*Ex:* oil)	Viscosity _____ cP

Liquid Flashpoint: ___ <73 F ___ 73 to 99 F ___ 100 to 139 F ___ 140 to 200 F ___ >200 F ___ None

Boiling Point _____ Specific Gravity: _____ Total Halogens: _____ % Total Organic Carbon (TOC): _____ % VOC _____ %

D. CHEMICAL COMPOSITION: Total of Maximum concentration must be > or = to 100%.

(Please Note, no "Trade Names" "Proprietary Ingredients" "Formulas" or "Name Reagents" are acceptable). All TRI chemicals must be included.

Constituents	Min%	Max%	ppm	Constituents	Min%	Max%	ppm

(If there are additional chemicals to be added, please list on Profile Continuation Page)

Does the Waste contain any of the following?

Metal Pieces: ___ *Yes* ___ *No* *If yes, Describe Metal:* _____
Nitrocellulose: ___ *Yes* ___ *No* *Metal Powder or Flake:* ___ *Yes* ___ *No* *Sharps:* ___ *Yes* ___ *No*
Isocyanates: ___ *Yes* ___ *No* *Asbestos: (If yes, must be double bagged and wetted)* ___ *Yes* ___ *No*
Reactive cyanide: (If yes, indicate level in ppm) ___ *Yes* ___ *No* _____ *Range of reactive cyanide*
Reactive sulfide: (If yes, indicate level in ppm) ___ *Yes* ___ *No* _____ *Range of reactive sulfide*
PCBs: __ *None* __ *0-49 ppm* __ *50-499 ppm* __ *500+ ppm* ***(If waste contains PCBs, certification form is required)***

Does this Waste contain Benzene subject to Subpart FF Regulations? _____Yes
If waste contains benzene, it may be subject to Benzene Neshap rules. Please complete and submit Tradebe's Benzene NESHAP form.

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WASTE STREAM PROFILING INSTRUCTIONS: Page 1

Section A - Generator & Customer Information:

- Complete the required address information involved with this waste.
- If the location the waste will be picked-up is different from the generator's physical address, refer to the profile continuation p; 4343tradebe
- Generator's 12 digit alpha numeric EPA identification number.
  If generator does not have an EPA ID number, indicate if they are a Conditionally Exempt Small Quantity Generator
- Standardized Industrial Classification (SIC code) is US government system that assigns a code to businesses based on the type of business. Several waste streams are SIC specific and some require extra handling based on the waste stream origins. For assistance reference: http://www.sec.gov/info/edgar/siccodes.htm
- Generator State ID number, if applicable.
- "No Canada" or "No Landfill" policy. Indicate if the generator has any restrictions on the waste stream going for landfill or to Canada for disposal.

Section B – Waste Stream Information:

- *Generator's Waste Name - This is name the generator uses to identify their waste (i.e. paint clean up, cured resin,* landfill leachate, etc.). There are no requirements for the waste name, however, if it is an unused/expired product Tradebe recommends using the product name in this section.
- *Original process generating waste* – Detailed description of process generating waste.
- *Is this waste exempt from RCRA* regulations? – Some wastes, although they fit the description of hazardous waste, are exempt/excluded from RCRA regulation. If your waste is exempt mark it here and cite the exemption. Use continuation page if necessary.
- *Current method of disposal* – Identify the current method of disposal for this waste stream, if applicable.
- *Is this waste from a CERCLA cleanup site?* – Indicate if waste is from a Superfund or other government ordered cleanup
- *Waste determination was made by? – Indicate what information was used to determine if the waste was hazardous.* Acceptable methods of determination: Testing, generator knowledge, MSDS, sample, other (not inclusive list)
- *Does the waste have any of the following characteristics?* – Identify high-hazardous characteristics. Waste streams with these characteristics may pose an additional safety concerns and require special handling and packaging.

Section C – General Characteristics:

- *Color* – Color(s) of the waste.
- *Odor* – Odor of waste. Odorous waste streams will require special handling. Examples may include thiols, butyric acid, amines, mercaptan, sulfides, etc.
- *Physical State* – Indicate physical state and include each waste phases. (e.g. 90% liquid with 10% sludge).
- *Phases* – Indicate how many phases or layers this waste may have. (e.g. non-soluble oil and water is two phases).
- *BTU* – BTU is the heat energy contained in a waste. Substances like oil and flammable liquids have very high BTU and waste with high water have very low BTU. BTU can be an indication of organic content or a material's suitability for fuel blending.
- *pH* – pH measures the corrosivity of a waste. The pH scale goes from 0 (acidic) to 14 (basic) with pH 7 being neutral or non-corrosive material.
- *Flashpoint* – Flashpoint is the temperature at which a liquid will emit enough vapors to form an ignitable mixture with air. Flashpoint <140 F are DOT and RCRA flammable liquids.
- *Boiling Point* – Enter temperature at which the waste will boil.
- *Specific Gravity* – SG is the weight of a material relative to that same volume of water. Example: 1 gallon of water weighs 8.3lb, if a substance has an SG of 1.5 that means 1 gallon would weight 8.3 x 1.5 = 12.45lb
- *Total Halogens – Indicate the % of chlorine, fluorine, bromine, and iodine in the waste*
- *Total Organic Carbon* – This is the total amount of carbon in the waste derived from organic sources (Organic sources include: oil, gasoline, solvents, acetic (not an inclusive list)

Section D – Chemical Composition:

- *Constituents* – List all the constituents that make up this waste stream and their ranges. The constituents can be listed as a % range or at ppm levels.

  The composition on the profile must add up to 100% for Tradebe to remain in compliance. Inert ingredients, non-hazardous materials, & Trade Secret ingredients need to be identified. Uses of MSDS (Materials Safety Data Sheets) are helpful to identify constituents.

- *Does the waste contain any of the following?* – Indicate if the waste stream contains any of the constituents listed, these constituents may require special waste packaging and /or handling.
- *Does the waste contain benzene?* – If you answer "NO", skip the next question regarding the SIC codes. If "YES" indicate if any of the listed SIC codes cover the operations at your facility
- *Do any of the following Standard Industrial Code (SIC) codes cover the operations at your facility?* - The SIC codes listed may indicate the facility, operations and waste streams are regulated under the Clean Air Act 40 CFR Part 61 Subpart FF, National Emission Standards for Benzene Waste Operations.

  If the waste stream contains benzene and is generated from a facility operating under one of the listed SIC codes, to meet all regulatory requirements Tradebe MUST take extra steps in receiving, handling, processing and reporting the waste as a benzene NESHAP waste stream. During the review process of the waste stream profile a supplemental benzene NESHAP addendum form will be requested for completion prior to approval of the waste stream and will be required with each shipment there after.

- For assistance with the SIC code r*eference the SIC tab of this file, or to the website listed in Section A Instructions.*

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WASTE WATER ANALYSIS Profile # _____

For waste streams being managed through TTR NE's wastewater treatment operations only:

Phases: Oil _____ % Water _____ % Interface _____ % Sediments _____ % DNAPL _____ %

Petroleum Phase	Suspected Level	Actual Level	Aqueous Phase	Suspected Level	Actual Level	Aqueous Phase	Suspected Level	Actual Level
PCB			Copper			Cobalt		
Halogens			Cadmium			Mercury		
Solvents			Chromium			Arsenic		
Arsenic			Lead			Barium		
Cadmium			Nickel			Sulfides		
Chromium			Silver			Cyanides		
Lead			Zinc			Phenols		
			COD			Glycols		
			Iron			Selenium		

List Specific Solvents: _____

E. OTHER WASTE STREAM INFORMATION:

Is this waste a USED OIL per 40CFR PART 279? ___Yes ___No

If Yes, does the total halogen content exceed 1,000 ppm? ___Yes ___No

If Yes, can you identify the Chlorinated Constituent present in the oil? ___Yes ___No

If Yes, can you rebut the presumption that this material is a Hazardous Waste? ___Yes ___No

Is the Waste subject to RCRA 40 CFR 264 & 265 Subpart CC controls (Are Volatile Organic Compounds >500 PPM)? _____Yes

Does this waste contain any Hazardous Air Pollutants? (If so, Please list in Section D, Chemical Compostion) _____Yes

Does the Waste contain any Class I or Class II ozone-depleting substances? _____Yes

Does waste contain EPCRA 313 chemicals identified in 40 CFR 372.65? _____Yes

If yes list in Additional Information on Continuation Page.

Does this waste contain any Chemicals of Interest listed in *6 CFR Part 27 Appendix A* (Department of Homeland Security)? *If yes please list in Additional Information on Continuation Page.* _____Yes

F. RCRA CHARACTERIZATION:

Is this a USEPA Hazardous Waste as defined in 40 CFR 261.3? ___Yes ___No

Is this a Universal Waste per 40 CFR part 273? ___Yes ___No

Does treatment of this waste generate a F006 or F019 sludge? ___Yes ___No

Please list any characteristic codes (D001-D043): _____

Does the waste contain UHCs above treatment standards levels? (40 CFR 268.48, 268.7) ___Yes ___No

(Please provide UHC(s) Chemical Compostion (Section D)

Please list any applicable "F" Codes: _____

Please list any applicable "K" Codes: _____

Please list any applicable "U" codes: _____

Please list any applicable "P" codes: _____

Please list any state regulated codes: _____

G. SHIPPING VOLUME & FREQUENCY:

___ Bulk Liquid (tanker) _____Gallons _____ Bulk Solids(roll-off box, vacuum box, etc) _____Unibin/Flobin

___ Cubic Yard Boxes _____Totes_____ size in gallons ___Metal ___Plastic in Metal Cage

___ Skid/Pallet _____Other *(If other*, please describe): _____

___ Drums (Specify size) _85 _55 _30 _15 _5 ___Metal ___Plastic ___Fiberboard

Is waste a combination package (e.g. Drum with inner containers or skid with cases of consumer products) ___Yes ___No

Shipping Frequency: Number of Units _____Per ___Month ___Quarter ___Year ___One time

H. DOT SHIPPING INFORMATION

Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ___Yes ___No

Shipping Name per 49 CFR 172.101 Hazardous Materials Table: _____

Primary Hazard Class or Division: _____ UN/NA #: _____ Packing Group: _ I _ II _ III

Secondary Hazard Class or Division: _____ ERG #: _____

Technical descriptors if required: _____ RQ if required: _____

DOT Special Permit that may apply (*Include copy of permit*): _____ Inhalation Hazard: Zone _____

I. GENERATOR CERTIFICATION:

"My authorized signature certifies the information contained in the Profile and the attached is complete and accurate, so that are no omissions of characteristics, composition or properties existing and all known or suspected hazards have been disclosed and that all shipments/samples referencing the profile number assigned to the waste stream described herein shall in all respects be consistent with the description. I further certify that I will notify Tradebe by email/letter of any characterization/chemical/process changes to the waste stream contained in this Profile prior to shipping". If signature is not by the Generator it is by the Generators authorized agent..

Name (print): _____ Title: _____

Signature: _____ Date: _____

WASTE STREAM PROFILING INSTRUCTIONS: Page 2

- Waste Water Analysis- Complete this portion of section D only if the particular waste stream is destined for treatment at a TTR NE wastewater treatment facility.

Section E – Other Waste Stream Information:

- Is this waste a USED OIL per 40 CFR Part 279? – Indicate if this is a used oil.
  - If YES, does the total halogens exceed 1,000 ppm? – Indicate if the used oil contains total halogens exceeding 1,000 ppm.
  - If YES, can you identify the chlorinated constituent - Check YES if you know how the waste became contaminated with chlorine
  - If YES, can you rebut the presumption the material is a hazardous waste? – Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste listed in subpart D of part 261. Generators may rebut this presumption by demonstrating that the used oil does not contain hazardous waste. If this is the case a supplemental rebuttable presumption addendum form will be requested for completion prior to approval of the waste stream.
- Does this waste contain any Class I or Class II ozone-depleting substances? (e.g. CFCs and highly halogenated organic compounds).
- Does waste contain EPCRA 313 chemicals identified in 40 CFR 372.65?
  The Emergency Planning and Community Right-to-Know Act requires business to report any chemicals on their site that are found in the EPRA regulations
  http://www.epa.gov/ceppo/pubs/title3.pd
- Does this waste contain any 'Chemicals of Interest' listed in 6 CFR Part 27 Appendix A
  If you are viewing this with MS Excel there is an additional sheet (or tab) that contains the DHS Chemicals of Interest. If this is a paper copy, please reference this web site for the DHS Chemical of Interest list.
  http://www.dhs.gov/xlibrary/assets/chemsec_appendixa-chemicalofinterestlist.pd

Section F – RCRA Characterization:

- Is this a USEPA Hazardous Waste as defined in 40 CFR 261.3? – Waste carrying RCRA codes are considered USEPA hazardous waste.
- Is this a Universal Waste per 40 CFR Part 273? – Universal Waste, includes discarded hazardous waste batteries, some pesticides, mercury containing equipment, and lamps.
- List characteristic codes (D001 – D043) – List all D-Codes required by 40 CFR 261.21, 261.22, 261.23, and 261.24? Underlying Hazardous Constituents - For the Land Disposal Restriction Notification the EPA requires all waste carrying D-codes to also list the UHCs present in the waste. Review the list of UHC on Appendix I and check all that are present in the composition.
- List any applicable "F" or "K" codes – Is it a hazardous waste listed under 40 CFR 261.31.
- List any applicable "U" or "P" codes – Is it hazardous waste listed under discarded commercial chemical products, off-specification species, container residues, and spill residues per 40 CFR 261.33.
- List any state regulated codes – Some states require codes assigned by the state's waste management regulations. Include any such codes here.

Section G – Shipping Information:

- Indicate the shipping container, type, size, quantity and shipping frequency.

Section H – DOT Shipping Information:

- Is this a USDOT Hazardous Material? – Answer yes if your waste requires a proper shipping name, hazard class, and UN/NA number.
- Proper Shipping Name per 49 CFR 172.101 Hazardous Materials Table: Hazard Class, UN/NA identification number, packaging group – Review 49 CFR 172.101 and determine hazardous materials shipping description.
- Technical descriptors if required, RQ if required – Review 49 CFR 172.203(k) for explanation of when technical descriptors are required and indicate one or two descriptors as applicable. Review Table 1 to Appendix A in 172.101, Hazardous Substances Other Than Radionuclides, and indicate the RQ value if applicable.
- DOT Special Permit – Indicate DOT-SP required for transporter and include a copy of the special permit

Section I – Generator Certification:

- The generator must print their name, title, sign and date, verifying that the completed profile is accurate and that no omissions or characteristics, composition or properties exist and that all known or suspected hazards have been disclosed.

If you have additional questions on completing the profile or LDR, please contact your customer service representative.

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TRADEBE TREATMENT AND RECYCLING, LLC

Profile # _____

GENERATOR WASTE STREAM PROFILE ADDITIONAL INFORMATION SHEET

PLEASE PRINT IN INK OR TYPE

D. CHEMICAL COMPOSITION CONTINUATION: Total of Maximum concentration must be > or = to 100%.

Constituents	Min%	Max%	ppm	Constituents	Min%	Max%	ppm

G. R.C.R.A. CHARACTERIZATION CONTINUATION:

Additional characteristic codes (D001-D043): If waste carries a characteristic code, please check all applicable Underlying Hazardous Constituents in Appendix I: _____

List additional F or K codes: _____

List additional U or P codes:

Additional State codes if required: _____

ADDITIONAL INFORMATION

(Use this space to include any other information about this waste)

Tradebe
Land Disposal Restriction Notification Form
Manifest # for initial Shipment _____

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__ The waste described on waste stream profile _____ is not regulated under RCRA 40 CFR
__ The waste described on waste stream profile _____ does not meet the applicable treatment standards in 40 CFR 268 Subpart D (Does this waste stream carry any RCRA Codes?).
__ Analysis is included (if available)

TREATABILITY GROUP
__ Waste is a wastewater stream (Waste contains <1% Total Organic Carbon & <1% Total Suspended Solids)
__ Waste is a non-wastewater stream

CHARACTERISTIC WASTE

CODE	SUBCATEGORY/CONSTITUENTS
__ D001	Ignitable Wastes (TOC>10%)
__ D001*	Ignitable Wastes(TOC<10%) Managed in Non-CWA or Equivalent/Non-Class 1 SDWA System
__ D001	Ignitable Wastes(TOC<10%) Managed in a CWA or *Equivalent Class I SWDA System*
__ D002*	Corrosive Wastes Managed in Non-CWA or Equivalent/Non-Class 1 SDWA System
__ D002	Corrosive Wastes Managed in CWA or Equivalent/Class I SWDA System
__ D003	Reactive Sulfides based on 261.23(a)(5)
__ D003*	Other Reactive based on 261.23(a) (1)
__ D003*	Water Reactive based on 261.23(a) (2),(3),(4)
__ D003	Reactive Cyanides based on 261.23 (a) (5)
__ D004*	Arsenic
__ D005*	Barium
__ D006*	Cadmium
__ D006*	Cadmium Containing Batteries
__ D007*	Chromium
__ D008*	Lead
__ D008*	Lead Acid Batteries

CODE	SUBCAT/CONSTITUENTS
__ D009*	High Mercury-Organic >260ppm
__ D009*	High Mercury-Inorganic >260ppm
__ D009*	Low Mercury <260ppm
__ D009*	Mercury Wastewater
__ D010*	Selenium
__ D011*	Silver
__ D012*	Endrin
__ D013*	Lindane
__ D014*	Methoxychlor
__ D015*	Toxaphene
__ D016*	2,4-D
__ D017*	2,4,5-TP (Silvex)
__ D018*	Benzene
__ D019*	Carbon Tetrachloride
__ D020*	Chlordane
__ D021*	Chlorobenzene
__ D022*	Chloroform
__ D023*	o-Cresol
__ D024*	m-Cresol

CODE	SUBCAT/CONSTITUENTS
__ D025*	p-Cresol
__ D026*	Cresols (Total)
__ D027*	p-Dichlorobenzene
__ D028*	1,2-Dichloroethane
__ D029*	1,1-Dichloroethylene
__ D030*	2,4-Dinitrotoluene
__ D031*	Heptachlor
__ D032*	Hexachlorobenzene
__ D033*	Hexachlorobutadiene
__ D034*	Hexachloroethane
__ D035*	Methyl ethyl ketone
__ D036*	Nitrobenzene
__ D037*	Pentachlorophenol
__ D038*	Pyridine
__ D039*	Tetrachloroethylene
__ D040*	Trichloroethylene
__ D041*	2,4,5-Trichlorophenol
__ D042*	2,4,6-Trichlorophenol
__ D043*	Vinyl chloride

If the waste identified by an asterisk (*) contains any Underlying Hazardous Constituents see APPENDIX I per 268.7 (a)(1)

F001 - F005 LISTED WASTE
__ F001 __ F002 __ F003 __ F004 __ F005
CHECK REGULATED CONSTITUENTS FOR LISTED WASTE IDENTIFIED ABOVE (F001-F005)

__ Acetone	__ 2-Ethoxyethanol (F005 only)	__ Methyl Ethyl Ketone	__ 1,1,2-Trichloroethane
__ Benzene	__ o-Dichlorobenzene	__ Methyl Isobutyl Ketone	__ 1,1,2-Trichloro-1,2,2-trifluoroethane
__ N-Butyl Alcohol	__ Ethyl acetate	__ Nitrobenzene	__ Trichloroethylene
__ Carbon Disulfide	__ Ethyl benzene	__ Pyridine	__ Trichloromonofluoromethene
__ Carbon Tetrachloride	__ Ethyl ether	__ Tetrachloroethylene	__ Xylenes
__ Chlorobenzene	__ Isobutyl alcohol	__ Toluene	__ Chlorinated Flurocarbons (F001)
__ Cresols (o,m, or p iso)	__ Methanol	__ 2-Nitropropane (F005 only)	__ Contains any combination of ONLY the following: carbon disulfide, cyclohexanone, and methanol (F003/F005 only).
__ Cyclohexanone	__ Methylene Chloride	__ 1,1,1-Trichloroethane	

CODE	SUBCATEGORY/CONSTITUENTS
__ F025	Light Ends
__ F025	Spent filters / aids and dessicants
__ K006	Anhydrous
__ K006	Hydrated
__ K069	Low Lead
__ K069	High Lead
__ K071	Non wastewaters that are residues from RMERC
__ K071	Non wastewaters not residues from RMERC
__ K071	All K071 wastewaters
__ K106	Non wastewaters that contain >260ppm Hg
__ K106	Non wastewaters that contain <260ppm Hg from RMERC
__ K106	Other non wastewaters that contain <260ppm Hg
__ K106	All K106 wastewaters
__ K175	Non wastewaters
__ K175	All K175 wastewaters
__ P047	4,6-dinitro-o-cresol
__ P047	4,6-dinitro-o-cresol salts

CODE	SUBCATEGORY/CONSTITUENTS
__ P065	Non wastewaters, not incinerator or RMERC residues
__ P065	Non wastewaters from incinerator or RMERC residue w/ >260ppm Hg
__ P065	Non wastewaters from RMERC residue w/ <260ppm Hg
__ P065	Non wastewaters from incinerator residue w/ <260ppm Hg
__ P065	All mercury fulminate wastewaters
__ P092	Non wastewaters not incinerator or RMERC residues
__ P092	Non wastewaters incinerator or RMERC residues >260ppm Hg
__ P092	Non wastewaters from RMERC residue w/ <260ppm Hg
__ P092	Non wastewaters from incinerator residue w/ <260ppm Hg
__ P092	All phenyl mercuric acetate wastewaters
__ U151	Non wastewaters >260ppm Hg
__ U151	Non wastewaters from RMERC residues w/ <260ppm Hg
__ U151	Non wastewaters from not RMERC residues w/ <260ppm Hg
__ U151	All U151 (mercury) wastewaters
__ U240	2,4-D
__ U240	2,4-D salts and esters

OTHER WASTE CODES
List additional codes below (include continutation page if more space is required.

_____
_____
_____
_____
_____

rev Tradebe 5-21-2012

Tradebe LDR continuation page

Waste Stream Profile _____

LIST ALL OTHER WASTE CODES

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APPENDIX I - LDR - UNDERLYING HAZARDOUS CONSTITUENTS LISTING
IF THE WASTE CARRIES A CHARACTERISTIC CODE (D-CODE) YOU MUST CHECK ALL CHEMICALS THAT ARE PRESENT IN
IN THE WASTE STREAM PROFILE _____ **IN AMOUNTS GREATER THAN THE UNIVERSAL TREATMENT STANDARDS IN 40 CFR 268.48**

___ Acenaphthylene
___ Acenaphthene
___ Acetone
___ Acetonitrile
___ Acetophenone
___ 2-Acetylaminofluorene
___ Acrolein
___ Acrylamide
___ Acrylonitrile
___ Aldicarb sulfone
___ Aldrin
___ 4-Aminobiphenyl
___ Aniline
___ Anthracene
___ Aramite
___ alpha-BHC
___ beta-BHC
___ delta-BHC
___ gamma-BHC
___ Barban
___ Bendiocarb
___ Benomyl
___ Benzene
___ Benz(a)anthracene
___ Benzal chloride
___ Benzo(b)fluoranthene
___ Benzo(k)fluoranthene
___ Benzo(g,h,i)perylene
___ Benzo(a)pyrene
___ Bromodichloromethane
___ Bromomethane
___ 4-Bromophenyl phenyl ether
___ n-Butyl alcohol
___ Butylate
___ Butyl benzyl phthalate
___ 2-sec-Butyl-4,6-dinitrophenol
___ Carbaryl
___ Carbenzadim
___ Carbofuran
___ Carbofuran phenol
___ Carbon disulfide
___ Carbon tetrachloride
___ Carbosulfan
___ Chlordane
___ p-Chloroaniline
___ Chlorobenzene
___ Chlorobenzilate
___ 2-Chloro-1,3-butadiene
___ Chlorodibromomethane
___ Chloroethane
___ bis(2-Chloroethoxy)methane
___ bis(2-Chloroethyl)ether
___ Chloroform
___ bis(2-Chloroisopropyl)ether
___ p-Chloro-m-cresol
___ 2-Chloroethyl vinyl ether
___ Chloromethane
___ 2-Chloronaphthalene
___ 2-Chlorophenol
___ 3-Chloropropylene
___ Chrysene
___ o-Cresol
___ m-Cresol
___ p-Cresol
___ m-Cumenyl methylcarbamate
___ Cyclohexanone
___ o,p-DDD
___ p,p'-DDD
___ o,p-DDE
___ p,p'-DDE
___ DDT
___ p,p'-DDT
___ Dibenz(a,h)anthracene
___ Dibenz(a,e)pyrene
___ 1,2-Dibromo-3-chloropropane
___ 1,2-Dibromoethane
___ Ethylene dibromide
___ Dibromomethane
___ m-Dichlorobenzene
___ o-Dichlorobenzene
___ p-Dichlorobenzene
___ Dichlorodifluoromethane
___ 1,1-Dichloroethane
___ 1,2-Dichloroethane
___ 1,1-Dichloroethylene
___ trans-1,2-Dichloroethylene
___ 2,4-Dichlorophenol
___ 2,6-Dichlorophenol
___ 2,4-D
___ 1,2-Dichloropropane
___ cis-1,3-Dichloropropylene
___ trans-1,3-Dichloropropylene
___ Dieldrin
___ Diethyl phthalate
___ p-Dimethylaminoazobenzene
___ 2,4-Dimethyl phenol
___ Dimethyl phthalate
___ Di-n-butyl phthalate
___ 1,4-Dinitrobenzene
___ 4,6-Dinitro-o-cresol
___ 2,4-Dinitrophenol
___ 2,4-Dinitrotoluene
___ 2,6-Dinitrotoluene
___ Di-n-octyl phthalate
___ Di-n-propylnitrosamine
___ 1,4-Dioxane
___ Diphenylamine
___ Diphenylnitrosamine
___ 1,2-Diphenylhydrazine
___ Disulfoton
___ Dithiocarbamates
___ Endosulfan
___ Endosulfan II
___ Endosulfan sulfate
___ Endrin
___ Endrin aldehyde
___ EPTC
___ Ethyl acetate
___ Ethyl benzene
___ Ethyl cyanide
___ Ether
___ Ethyl methacrylate
___ Ethylene oxide
___ Famphur
___ Fluoranthene
___ Fluorene
___ Formetanate hydrochloride
___ Heptachlor
___ Heptochlor epoxide
___ heptochlorobenzene
___ Hexachlorobutadiene
___ Hexachlorocyclopentadiene
___ Hexachlorodibenzo-p-dioxins
___ HxCDD
___ Hexachlorodibenzofurans
___ HxCDF
___ Hexachloroethane
___ Indeno(1,2,3-c,d) pyrene
___ Iodomethane
___ Isobutyl alcohol
___ Isodrin
___ Isosafrole
___ Kepone
___ Methacrylonitrile
___ Methanol
___ Methapyrilene
___ Methiocarb
___ Methomyl
___ Methoxychlor
___ 3-Methylcholanthrene
___ 4,4-Methylene bis(2-chloroaniline)
___ Dichloromethane
___ MEK
___ Methyl Ethyl Ketone
___ Methylene Chloride
___ Methyl isobutyl ketone
___ Methyl methacrylate
___ Methyl methanesulfonate
___ Methyl parathion
___ Metolcarb
___ Mexacarbate
___ Molinate
___ Naphthalene
___ 2-Naphthylamine
___ o-Nitroaniline
___ Nitroaniline
___ Nitrobenzene
___ 5-Nitro-o-toluidine
___ Nitrophenol
___ p-Nitrophenol
___ N-Nitrosodiethylamine
___ N-Nitrosodimethylamine
___ N-Nitroso-di-n-butylamine
___ N-Nitrosomethylethylamine
___ N-Nitrosomorpholine
___ N-Nitrosopiperidine
___ N-Nitrosopyrrolidine
___ Oxamyl
___ Parathion
___ PCB
___ Pebulate
___ Pentachlorobenzene
___ PeCDD
___ PeCDF
___ Pentachloroethane
___ Pentachloronitrobenzene
___ Pentachlorophenol
___ Phenacetin
___ Phenanthrene
___ Phenol
___ Phorate
___ Phthalic acid
___ Phthalic anhydride
___ Physostigmine
___ Physostigmine salicylate
___ Promecarb
___ Pronamide
___ Propham
___ Propoxur
___ Prosulfocarb
___ Pyrene
___ Pyridine
___ Safrole
___ 2,4,5-TP
___ 1,2,4,5-Tetrachlorobenzene
___ TCDD
___ TCDF
___ 1,1,1,2-Tetrachloroethane
___ 1,1,2,2-Tetrachloroethane
___ Tetrachloroethylene
___ 2,3,4,6-Tetrachlorophenol
___ Thiodicarb
___ Thiophanate-methyl
___ Toluene
___ Toxaphene
___ Triallate
___ Bromoform
___ 1,2,4-Trichlorobenzene
___ 1,1,1-Trichloroethane
___ 1,1,2-Trichloroethane
___ Trichloroethylene
___ Trichlorofluoromethane
___ 2,4,5-Trichlorophenol
___ 2,4,6-Trichlorophenol
___ 2,4,5-Trichlorophenoxyacetic acid
___ 1,2,3-Trichloropropane
___ 1,1,2-Trichloro-1,2,2-trifluoroethane
___ Triethylamine
___ tris-(2,3-Dibromopropyl) phosphate
___ Vinyl chloride
___ Xylenes
___ Antimony
___ Arsenic
___ Barium
___ Beryllium
___ Cadmium
___ Chromium
___ Cyanides (total)
___ Cyanides
___ Fluoride
___ Lead
___ Mercury (non waste water from retort)
___ Mercury (all others)
___ Nickel
___ Selenium
___ Silver
___ Sulfide
___ Thallium
___ Vanadium
___ Zinc

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TRADEBE ENVIRONMENTAL SERVICES, LLC **Profile #** _____

GENERATOR LAB PACK & CYLINDER PROFILE SHEET

Fax or email completed profile sheet to: **TTR Fax: 219-397-6411** **TTR NE: 203-238-6744** usa.approvals@tradebe.com

A. GENERATOR INFORMATION:

MAILING OR SITE ADDRESS:

Generator #: _____
Generator Name: _____
Generator Address: _____
City: _____ State: _____ Zip: _____
Contact Name: _____
Generator Phone: _____
Generator Fax: _____
Generator Email: _____
Generator USEPA/Federal ID # : _____

CUSTOMER INFORMATION:

Customer #: _____
Customer Name: _____
Customer Address: _____
City: _____ State: _____ Zip: _____
Contact Name: _____
Customer Phone: _____
Customer Fax: _____
Customer Email: _____
Customer Service/Sales Rep: _____

SITE ADDRESS (if different from mailing address):

Site Name (if different from generator): _____
Pick-up Address: _____
Additional Location Identification: _____
City: _____ State: ____ Zip: _____
USEPA/Federal ID # (if different than generator's) : _____
Contact Name: _____
Contact Phone: _____
Contact Fax: _____

If no ID number is the Generator a "Conditionally Exempt Small Quantity Generator?" ___Yes___No
Generator NAICS (or SIC) Code: _____ Generator State ID # (if applicable): _____
Please check if generator has "No Canada Disposal" policy ___Yes___No
Please check if generator has "No Landfill" policy ___Yes___No

B. INFORMATION:

Generator's Waste Name: *Lab Packs and / or Cylinders*
Type of Facility (i.e. university, paint mfg...etc): _____
Number of lab pack pieces? _____
Number of cylinders? _____
**Any cylinders included in this shipment will not be managed under the lab pack exemption 40 cfr 268.42(c)*

Does this lab pack contain Benzene? ___Yes___No
If yes, check all NAICS codes that cover operations at your facility ___Yes___No

__21112 __324110 __324199 __325110 __325120 __325130 __325180 __325194 __325199 __325211 __325212 __325220 __325311 __325312 __325314
__325320 __325411 __325412 __325413 __325414 __325510 __325520 __325611 __325612 __325613 __325620 __325910 __325920 __325998 __331110
__562211 __924110

If waste contains benzene and falls under one of the above NAICS codes, Tradebe's benzene NESHAP form is required for each shipment

Is the Waste subject to RCRA 40 CFR Subpart CC controls (Are Volatile Organic Compounds >500ppmw)? ___Yes___No
Does the Waste contain any Class I or Class II ozone-depleting substances? ___Yes___No
Does the waste contain polychlorinated biphenyls greater 49ppm and was not derived from a source greater than 50ppm? ___Yes___No
Does this waste exhibit explosive, shock sensitive, or temperature senstive properties? ___Yes___No
Does this waste contain any pathogens, etiological agents, or otherwise infectious materials? ___Yes___No
Does this waste contain any radioactive isotopes? ___Yes___No
Does this waste contain any material regulated by Drug Enforcement Agency? ___Yes___No

Lab packs and other combination packages may contain various EPA hazardous wastes, non-hazardous wastes, and/or non-regulated wastes as itemized on the Tradebe labpack inventory sheets. All materials are subject to the acceptance guide lines and permit requirements of Tradebe facilities.

C. GENERATOR CERTIFICATION:

I agree by affixing my authorized signature that I hereby certify that the above and attached description is complete and accurate and that no omissions of characteristics, composition or properties exist and that all known or suspected hazards have been disclosed. I also certify that each sample provided to Tradebe is representative of the waste material described above and give Tradebe permission and consent to make amendments and corrections and that I am an authorized agent of the Generator.

Name (print): _____ Title: _____
Signature: _____ Date: _____

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TRADEBE
Environmental Services, LLC™

TRADEBE ENVIRONMENTAL SERVICES, LLC **Profile #** _____

GENERATOR LAB PACK PROFILE ADDITIONAL INFORMATION SHEET

PLEASE PRINT IN INK OR TYPE

B. WASTE STREAM INFORMATION CONTINUATION

Exemption: The waste described on this profile sheet is exempt/excluded from RCRA regulation under:
(Cite regulation exempting waste from RCRA) _____

ADDITIONAL INFORMATION

(Use this space to include any other information about this waste)

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APPENDIX C-2

Order Worksheet

and

Chain of Custody

TRADEBE

Order Worksheet

Sample details			Batch Number
Customer			
Producer			
Material			
Customer Material			
Document Number			
Registered On		Receipted On	
Manifest		Waste profile	

Sample Test			
Test Name	Component	Limits	Result
Odor			
Physical State			
BTUs			
Halogens			
Flash Point			
pH			
% Water			
Barium			
Arsenic			
Selenium			
Lead			
PCBs, Total			



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Chromium			
Cadmium			
Mercury			
Silver			
Oxidation			
Compatibility			
%Acid			

Sampler Information		Signature
Sampled On		

Analyst Data		Signature
Analyzed On		
Analyzed By		
Comments		

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APPENDIX C-3

Quality Assurance

Project Plan

(QAPP)

APPENDIX C-3
QUALITY ASSURANCE QUALITY CONTROL PLAN

1.0 INTRODUCTION

The following is a Quality Assurance Quality Control Plan (QA/QC) for the Tradebe Treatment and Recycling of Wisconsin, LLC's (Tradebe) laboratory as required by s. NR 670.030(5) Wis. Adm. Code. Tradebe's laboratory is located at 5611 Hemlock Street Milwaukee Wisconsin. This plan has been prepared based on SW-846 Compendium: Project Quality Assurance and Quality Control[1]; as well as EPA guidance provided by Guidance for Quality Assurance Project Plans[2]

2.0 PROJECT MANAGEMENT

2.1 PROGRAM OBJECTIVES

Tradebe's laboratory QA/QC program is based upon needs defined by the nature of Tradebe's business; as the business changes, so will the QA/QC. These changes will be submitted to WDNR as they occur. As mentioned in the text of the Feasibility Plan of Operations Report (FPOR) application, the Tradebe facility is a commercial waste storage and treatment facility, and thus a variety of waste materials are to be managed at the facility. The facility operation involves storing, repacking and consolidation of waste material. All incoming waste undergoes a screening process as a quality control measure to verify that the generator has properly classified the waste. At a minimum, this screening will validate that the waste information profile contains the information which must be known to treat, store, or dispose of waste in accordance with the requirements of NR 664.0013(1)(a).

2.2 SCOPE OF PROGRAM

Tradebe's laboratory QA/QC program is designed to implement the quality control procedures necessary to ensure the sensitivity, accuracy and precision of the screening methods used in the waste analysis plan.

2.3 LABORATORY ORGANIZATION AND RESPONSIBILITY

The hierarchy of the program's organization at Tradebe's lab is shown in the following diagram:

Plant Manager
National Laboratory Director
Laboratory Chemist
Laboratory Technicians

1 https://www.epa.gov/sites/default/files/2015-10/documents/chap1_1.pdf
2 https://www.epa.gov/sites/default/files/2015-06/documents/g5-final.pdf

The National Laboratory Director (or other qualified personnel) is designated as the QA/QC Manager. This individual has broad authority to approve or disapprove project plans, specific analyses and the final reports. The National Laboratory Director is also responsible for reviewing and advising on all aspects of QA/QC including:

1) Specifying the analytical and QA/QC procedures to be used for analysis.

2) Making on-site evaluations and conducting audits to ensure effectiveness of QA/QC procedures, and

3) If problems are detected, making changes to ensure that the appropriate corrective measures are taken.

Each Laboratory Chemist or technician (or a qualified individual assigned by the Plant Manager) is responsible for data management. This includes:

1) Obtaining a completed waste information profile or equivalent for each waste stream analyzed by the laboratory. .

2) Receiving samples and verifying that incoming samples correspond to chain-of-custody sheets.

3) Following the laboratory QC and analytical procedures specified in the FPOR WAP, Attachment C.

4) Reviewing sample and QC data during the course of analysis, and if questionable data exists, determining which repeat samples or analyses are needed and reporting the issue to either the Plant Manager or National Laboratory Director.

5) Preparing standard solutions and performing instrument calibrations.

6) Proper maintenance of the instruments by either:
   a. Performing routine maintenance activities; and/or
   b. Having service conducted by qualified technicians.

7) Ensuring records are maintained for all incoming samples track samples through analysis. Report analytical results.

8) Preparing sample reporting forms and data forentry into a computer data base, if appropriate.

The Plant Manager, or qualified personnel, is responsible for ensuring the laboratory chemist and technicians successfully carry out the above activities. In addition, the National Laboratory Director and Plant Manager will be responsible for oversight of

sampling and laboratory activities. This includes:

1) Determining appropriate sampling procedures to be followed.

2) Ensuring that samples are collected and managed as specified in FPOR application, Attachment C.

3) Ensuring the sample documentation (chain-of-custody record) is correct and transmitting that information, along with the samples to the analytical laboratory.

4) Training and qualifying lab personnel in specified laboratory QC and analytical procedures.

5) Verifying that laboratory QC and analytical procedures are being followed as specified in the FPOR application, Attachment C.

6) Reviewing sample and QC data during the course of analysis, and if questionable data exists, determining which repeat samples or analyses are needed.

6) Assisting the chemists and technicians with preparing standard solutions and instrument calibrations.

7) Ensuring the instruments are properly maintained

2.4 DATA QUALITY OBJECTIVES

The data quality objectives (DQO) established by Tradebe for measurement data are Precision, Accuracy, Completeness, Representation and Comparability (PARCC) and are used to ensure that the data collected is sufficient and of adequate quality for the intended use. Specific objectives relative to this facility were established to accurately and consistently screen and evaluate waste streams. QC samples including a laboratory blank, matrix spike, and laboratory duplicate are run at a frequency based on the analytical method for that parameter.

2.2(a) Precision
Precision will be evaluated using duplicate analyses. Laboratory duplicates will be an indication of analytical variability. The number and level of effort for field and laboratory quality control checks is outlined in Section 11.0.

2.2(b) Accuracy
Accuracy refers to the difference between the measured and the true value of the parameter being measured. Precision is defined as the level of agreement among replicate measurements of the same characteristic. Accuracy and Precision are more completely defined in section 14.0, herein.

Accuracy will be evaluated by analyzing laboratory quality control samples and

blind QA/QC samples.

2.2(c) Completeness

The goal of completeness will be to generate the maximum possible amount of valid data. Four levels of evaluation of data acceptability will be considered. The highest degree of completeness will be the finding of all deliverables to be valid and acceptable. The next level will be the presence of flaws which are not drastic or do not require re-evaluation or the total rejection of the sample results. The next level of completeness will be flaws which bring the validity of a measurement into question (e.g. surrogate recoveries or duplicate results which are not of acceptable range) and will require re-evaluation of the sample which may include re-analysis. The lowest level of completeness is excessive failures to meet established acceptance criteria and subsequent rejection of the sample, re-sampling and re-analysis.

2.2(d) Representativeness

"Representativeness" expresses the degree to which sample data accurately represents the characteristics of the population, parameter variations at a sampling point, or environmental conditions. Representativeness is a qualitative parameter which is mostly concerned with the proper design of the sampling program. The Representativeness criterion is best satisfied by logical selection of sampling point and collection of a sufficient number of samples. The sampling program presented in Attachment C of the FPOR application was developed to ensure that samples will accurately reflect the makeup of the matrices of concern. 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 (see Attachment C for details). A representative sample is defined as a sample exhibiting average properties of the whole waste (NR 660.10(101) Wis. Adm. Code).

The COLIWASA method is used to check for layering, to determine the approximate percentage of each different layer (e.g., solid, sludge, aqueous liquid, oily liquid, light liquids) and to collect a sample which accurately represent each layer within the container. Using the COLIWASA method, representative samples will represent all phases, layers, and other varying components of the waste. Containers of solids and semi-solid should be examined with as 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 of that material.

Individual grab samples of multiple generators containers that have consistent physical evaluations and destined for the same waste management method will be composited prior to analysis to form a representative sample.

2.2(e) Comparability

"Comparability" is a qualitative parameter expressing the confidence with which one set of data can be compared with another. Sample data should be comparable with other measurement data of similar samples and sample conditions. This goal is achieved by using standard techniques to collect and analyze representative samples and reporting analytical results in appropriate units. Comparability is related to the other PARCC parameters because only when precision and accuracy are known can sets of data be compared with confidence. To ensure Comparability of data, samples will be analyzed by following approved USEPA analytical procedures. Samples will be collected following the procedures detailed in Attachment C of the FPOR application.

3.0 DATA GENERATION AND ACQUISITION

3.1 SAMPLING PROCEDURES

Waste samples will be collected following the procedure presented in Attachment C of the license.

3.2 SAMPLE CONTROL PROCEDURES/CHAIN OF CUSTODY

Sample control consists of maintaining sample integrity, documenting chain of custody and sampling activities, equipment preparation and decontamination, and collection and maintenance of retain samples. Sample control procedures are described in the following sections:

3.2(a) Maintenance of Sample Integrity

Representative samples are collected and placed in sixteen-ounce glass jars with screw caps. The sample jar is sealed and marked with a unique sample number that is associated with the container that was sampled. That sample number is also placed on the Chain of Custody Sheet (i.e. Order Worksheet). Laboratory personnel inspect the condition of the sample jar to ensure it is sealed and not leaking, and review the information associated with the sample to ensure it is accurate. The material will be re-sampled if there are any inconsistencies in the information or if the sample integrity appears to be compromised.

3.2(b) Documentation

Sampling procedures in the form of sampling SOPs are accessible to sample collectors. Sample collection is documented using the chain-of-custody form which is also used to document laboratory results. A chain of custody form accompanies each sample to the laboratory and is signed and dated by all persons who take custody of the sample. It also documents the sample identification number and information associated with shipping documents.

3.2(c) Equipment Decontamination/Preparation

To prevent possible sample contamination, where applicable, new sampling

equipment is used or the sampling equipment that comes in direct contact with the sample are cleaned prior to using the procedure outlined below:

1. Wash and scrub equipment in a series of three (3) detergent baths. Fresh detergent bath solution should be prepared daily or more frequently as determined by lab tech or qualified personnel.

2. Triple rinse sampling equipment using tap water and / or distilled water. Fresh water baths should be prepared daily or more frequently as determined by lab tech or qualified personnel.

3. Air, oven or paper towel dry sampling equipment.

3.2(d) Retain Samples

After the lab analysis, the final analytical report is generated. A portion of the sample is retained in a 20 ml glass jar with a screw cap and properly stored in a secure area for approximately two months. The retained samples are labeled to match the corresponding analytical report. Laboratory personnel are responsible for maintaining the integrity of the analytical files and retain samples.

3.3 CALIBRATION PROCEDURES AND FREQUENCY

All laboratory instruments are selected to meet specific requirements of analytical procedures to be used. These instruments are calibrated either according to the manufacturer's specification or the test method listed below in Table C-1.

Calibration standards are of the highest quality available, traceable to National Bureau of Standards (NBS) standards if possible and all equipment calibration data is retained in laboratory notebooks.

The calibration frequency varies depending on the type of instrument used. When in use, the bomb calorimeter is calibrated or standardized using standard benzoic acid tablets and standard chlorine in oil prior to use. The standard benzoic acid tablets are available from Parr Instrument Company, located in Moline, Illinois (Part number 3415) or other qualified organizations. The standard 2% chlorine in oil is from Alpha Resources, Inc., located in Stevensville, Michigan (Part number AR 2012) or other qualified organizations.

The Gas Chromatograph GC-ECD, is calibrated with a five-point calibration level (five level calibrations for GC/MS). At the beginning of each working day, a single point calibration confirmation standard is run. The results are documented and if there is any deviation from the control limit specification, a second standard is run. A second failure on the standard will require corrective action and running a new five level (five level for GC/MS) calibration. PCBs and other solvent standards are available from various laboratory suppliers.

The ICP and Mercury analyzer are calibrated prior to use with a four-point calibration level. At the beginning of each batch of samples, the instrument is warmed up for about half an hour, and then a calibration check standard will be run. If the standard recovery is within 80% to 120%, then samples can be analyzed. Otherwise, the intercept and slope will be updated using fresh standards. Every ten samples, a calibration check is rerun, and the intercept and slope will be updated again if the recovery is not within the range of 80% to 120%. The standards are from Leeman Lab, and they are plasma pure grade.

Calibration and standardization of pH meters are performed in accordance with SW 846 9040C. The pH meters are fully recalibrated (three points) twice daily and are checked with pH 7 buffer every ten samples. Buffer solutions are obtained from Hach Chemical Company, Ames, Iowa or other qualified organization.

3.4 ANALYTICAL PROTOCOL AND PROCEDURES

As mentioned in the text of the FPOR application, all incoming waste streams are screened for various parameters. The screening procedure used depends upon the type of waste. See FPOR application Attachment C for details.

Test methods are approved SW-846, American Society of Testing and Materials (ASTM) methods and sound analytical chemistry practices. Table C-1 below lists all parameters and corresponding test methods that are conducted on-site or by a third-party laboratory.

Table C-1: 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 9045	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: +/- 2 pH unit when the WIP does not have a pH range.
Ignitability/Flash Point	M-3	SW 846 1010A and SW 846 1030	Indicates the fire-producing potential of the waste and determines whether the waste is a D001 ignitable waste. Tolerance limits: +/- 10 degrees Fahrenheit when the WIP does not have an ignitability range.

Water Reactivity (results are recorded as compatibility)	M-4	In-house Method	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. When used as a blending criterion, water reactive material is considered incompatible since the blending process usually involves some amount of water. For that reason results of water reactivity testing are recorded as a compatibility results. Tolerance limits: Must match description in WIP. Wastes not profiled as D003 must have no reaction when exposed to water.
Percent Ash	M-5	ASTM D4978	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. Tolerance limits: Must match description in WIP
Oxidizer Screen	M-7	ASTM D4981-19	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. Tolerance limits: Must match description in WIP
Specific Gravity	M-8	ASTM D 287-00	Used in conjunction with other test data to determine probable characteristics of materials and their conformance to the WIP. Tolerance limits: +/- 10% of value reported value when the WIP does not have a range.
Percent Solids	M-9	EPA method 160.2	Used in conjunction with other test data to determine probable characteristics of materials and their conformance to the WIP. Performed as needed. Tolerance limits: +/- 10% of value reported when the WIP does not have a range.
Chlorine (Spot Test)	M-10		Indicates if the material is chlorinated. Information is used to check conformance to the WIP. Tolerance limits: Must match description in WIP
Polychlorinated Biphenyls Screen	M-11	SW-846 8082/ASTM Method D6160	Determines PCB content in order to verify WIP information and assess applicability under TSCA. Tolerance limits: Must match description in WIP. If a WIP states no PCBs, then an analysis should show the concentration as not detected.
TCLP	M-12	SW 846 test method 1311 for digestion	Used to determine the leachable concentration of the 40 constituents listed in s. NR 661.0024 Wis. Adm. Code. When needed, this test is performed by an outside, third-party laboratory. Tolerance limits: +/- 20% of value reported value when the WIP does not have a range.

Compatibility Testing	M-13	In-house Method	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. Tolerance limits: Commingling of the wastes is not allowed if the mixture produce heat or pressure, fire or explosion, violent reaction, toxic dusts, mists, fumes, or gases, or flammable fumes or gases.
Heat Content	M-14	ASTM D240 ASTM D4809-13	Indicates if the waste meets the minimum BTU value required for fuel blending.
Percent Water/Moisture Content	M-15	Karl Fischer Volumetric Method	Indicates if the waste meets the criteria for fuel blending. Tolerance limits: Meet the specifications required by the industrial furnace or boiler
Total Halogens	M-16	SW 846 5050	Indicates if the waste meets the criteria for fuel blending. Tolerance limits: Meet the specifications required by the industrial furnace or boiler
Total Organic Carbon	M-17	SW-846 Method 9060A	This method is used to determine the concentration of organic carbon in ground water, surface and saline waters, and domestic and industrial wastes. Tolerance limits: >1% for metal bearing waste with a BTU value < 5,000.
Hexavalent Chromium	M-18	Hach Method 8023 or EPA Method 8023	Method to determine if hexavalent chromium is present in order to determine proper treatment and/or disposal. Tolerance limits: within the specifications of the off-site treatment facility that will perform the stabilization.
% Acid	M-19	In-House Method	Percent acid is determined in acidic sample conditions to determine the concentration. Depending on the concentration along with other tests can determine samples for wastewater treatment, stabilization or offsite shipping. This validation is also for proper handling and storage or shipping. Tolerance limits: within the specifications of the off-site treatment facility that will perform the stabilization.
Total Metals including As, Ba, Cd, Cr, Pb, Hg, Se, and Ag.	M-20	SW 846 6010D	To identify and monitor a material's specific metal content to determine off-site treatment viability such as for stabilization. Tolerance limits: within the specifications of the off-site treatment facility that will perform the stabilization.

In addition to confirming the information in the WIP, the results of analytical screening will provide information for segregation of waste and verification of the D.O.T. hazard class.

Initially, materials should be classified in one or more of the following categories:

1. D001 - Ignitable
2. D002 - Corrosives
3. D003 - Reactive

Presented below is a description of each test protocol for the above categories.

Ignitable — A waste is an ignitable hazardous waste if it has a flash point below 140 degrees Fahrenheit.

Corrosives — A waste is considered to be a corrosive hazardous waste if it is aqueous and has a pH less than or equal to 2.0 or greater than or equal to 12.5.

pH paper or a pH meter will be used to determine the pH of the waste. Tradebe sets an internal standard that a sample with pH less than 4.0 or over 10 will be considered corrosive.

Reactive — A waste is considered reactive if, upon addition of water, it reacts violently, forms potentially explosive mixture, or generates toxic fumes, vapors, or gases. Testing for these parameters is presented below.**

Oxidizers — Oxidizers are present if upon acidification of the waste sample (10% water solution if solid) a color change is observed (white to purple) on a strip of potassium iodide when dipped into the waste solution.

**Before a waste can be blended, a compatibility test will be performed on the waste sample with similar characteristics to determine if the wastes are compatible upon mixing. Compatibility testing involves the mixing of similar sized aliquots of an individual sample with the material that already is stored and observing any physical changes. Examples of physical changes are gas evolution, temperature changes, polymerization or precipitation of solids. If any of the above physical changes are detected, the waste is incompatible and will be identified.

3.5 LABORATORY EQUIPMENT

Laboratory equipment available for analytical determination is as described below in Table C-2.

TABLE C-2
INVENTORY OF MAJOR LABORATORY EQUIPMENT

Hanna Instruments HI-903 Karl Fisher Titrator
Agilent 6890N GC FID/ECD
Perkin Elmer Optima 8300 Inductively Coupled Plasma Analyzer
Erdco Rapid Model RT-1 Flashpoint tester
Erdco Butane Fuel FT-14857

Mercury analyzer NIC RA-5
CEM MDS - MARS Microwave
Hanna Instruments Hl 2002 - edge® Dedicated pH/ORP Bench Meter
Hanna Instruments HI 10430 - Digital pH/Temperature Electrode
Parr 6200 Isoperibol Bomb Calorimeter
Parr 1108P Oxygen Combustion Bomb

4.0 ASSESSMENT AND OVERSIGHT

4.1 INTERNAL QUALITY CONTROL CHECKS

The Tradebe laboratory quality control check is accomplished by means of blind QA/QC samples and known QC check samples. A blind sample is submitted into the laboratory and analyzed for the various components of interest. The results are reported to National Laboratory Manager and the results are compared. Acceptance and control limit for the laboratory will be 80% to 120%.

4.2 PERFORMANCE AND SYSTEM AUDITS

The National Laboratory Manager, or personnel under his direction, have oversight of laboratory procedures. The laboratory Chemist certifies the analysis that were performed.

System audits are qualitative evaluations of all components of field and laboratory quality control measurement systems. They determine if the measurement systems are being used appropriately. This audit, performed by the National Laboratory Manager addresses data collection and management activities.

The performance audit which is also performed by the National Laboratory Manager, is a quantitative evaluation of the measurement systems of a program. It requires testing the measurement systems with samples of known characteristic behavior to evaluate precision and accuracy.

4.3 PREVENTATIVE MAINTENANCE

Both daily and weekly preventative maintenance tasks are performed according to the manufacturer's specifications to maintain instrumentation in proper working order. Validation of optimal instrument performance by acceptable calibration and tuning criteria further support satisfactory data quality. Records of preventative maintenance are kept in logbooks in the laboratory. Review of these logs and internal communication between trained lab personnel allow for discovery and correction of problems.

4.4 PROCEDURES TO ASSESS DATA PRECISION, ACCURACY AND COMPLETENESS

4.4(a) Precision

Precision measures the reproducibility of measurements under a given set of conditions. Specifically, it is a quantitative measure of the variability of a group of measurements compared to their average value.

Precision is usually stated in terms of standard deviation, but other estimates such as the coefficient of variation (relative standard deviation), range (maximum value minus minimum value) and relative range are common and may be used pending review of the data.

Sampling precision is determined by collecting duplicate samples. Analytical results from laboratory duplicate will provide data on overall measurement of precision.

Precision is determined from duplicate samples; it will be expressed as relative percent difference (% RPD).

$$RPD = \frac{\text{absolute } (x1 - x2) \times 100\%}{(x1 + x2)/2} = \text{Relative Percent Difference}$$

Where x1 = first observed value
x2 = second observed value

Field duplicates and laboratory duplicates are collected at a frequency as needed.

Blanks, Q/C standards, duplicates, matrix spikes and surrogate spikes are analyzed as needed each day. The acceptance criteria for RPD is 20%.

4.2 Accuracy

Accuracy measures the closeness of a measured value to a known or standard value. Accuracy can be reported in a variety of ways. The laboratory uses percent recovery as the reporting method for determining accuracy. The acceptance criteria for all Q/C standards, check standards, matrix spikes and surrogate spikes is 80% to 120% recovery.

Percent recovery will be defined as:

$$\text{Percent surrogate recovery} = \frac{\text{weight of surrogate detected in sample} \times 100\%}{\text{Weight of surrogate added to sample}}$$

With matrix spikes,

$$\text{Percent spike recovery} = \frac{\text{total analyte detected - analyte originally detected} \times 100\%}{\text{analyte added to sample}}$$

4.4 Completeness

Completeness is defined as the percentage of measurements made which are judged to be valid measurements. The Completeness goal is essentially the same for all data used which is, a sufficient amount of valid data is generated.

4.5 CORRECTIVE ACTION

When data quality objective are not met or there are inconsistencies or discrepancies in the data generated by the WAP, corrective action is implemented to identify the problem and its source. The National Laboratory Manager or his designee, is responsible for the initiation of and approval of corrective action and documentation of the corrective action is recorded in the laboratory file.

5.0 DATA VALIDATION AND REPORTING

5.1 DATA REDUCTION

A review of the appropriate data is outlined below. Once the data has been reviewed, a final data report form is prepared and maintained as part of the laboratory file. This report indicates the quality of the data and identifies any specific problem areas. The QA/QC standards for the following parameters are as follows:

PCB's (SW-846 8082, ASTM D 6160)

- Chain of Custody
- Lab Blank
- Calibration Check (QC Check)
- Surrogate Recovery
- Lab Duplicate

Halogen (SW-846 5050)

- Chain of Custody
- Standardization Data
- Lab Duplicate
- Quantitation Sheets

Metals (SW-846 6010D, 7470A, and 7471B)

- Chain of Custody
- Blanks
- Calibration (QC Check)
- Quantitation Sheets

BTU & Chlorine(SW-846 5050)

- Chain of Custody
- Standardization Data
- Quantitation Sheets

5.2 QUALITY ASSURANCE REPORTS TO MANAGEMENT

Periodic reports describing tasks are forwarded to the National Laboratory Manager. This periodic report will contain summaries of work in progress for laboratory actions, and any changes (and justifications) in the QA/QC plan. The reports address all field and laboratory analytical quality assurance, a discussion of any QA problems, recommended solutions, and outcome of any corrective action.

TRADEBE

Treatment and Recycling ™

ATTACHMENT D

WASTE MANAGEMENT ACTIVITIES

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D.1 STORAGE ACTIVITIES: NR 670.015(1)

Tradebe currently operates out of five (5) buildings located at 5611 West Hemlock Street, Milwaukee, Wisconsin. Each building is referred to as a container storage area (CSA or Area) that will be used for storage, shipping and receiving, or waste management activities described in this Attachment. The container storage areas are:

- Area 1 (aka North Drum Storage Warehouse)
- Area 2 (aka 2007 Warehouse Addition)
- Area 3 (aka Enclosure Building)
- Area 4 (aka 2009 Lab Pack Building)
- Area 5 (aka West Warehouse)

These storage areas are subject to Subpart CC of NR 664. The requirements of this subchapter are met by implementing the applicable Level 1 and 2 controls. In accordance with NR 670.027(1)(b) Subpart CC certification is provided as Appendix D-10.

Tradebe does not operate tank systems, surface impoundments, waste piles, incinerators, landfills, boilers, industrial furnaces, miscellaneous units, process vents, or drip pads subject to NR 670.016-NR 670.024 and NR 670.026. Currently there is no equipment on site subject to subpart BB. However, if Trabebe acquires such equipment for use at this facility, the requirement of NR 670.025 will be met.

D.1.1 Basic Design, Dimensions and Construction NR 670.015(1)(a)

All Areas listed above are constructed with roof, walls, doors, and concrete floors. Each Area has containment barriers in the form of berms. Berms are containment barriers ranging in height from 3-14 inches. Some with rounded tops, and some with square tops. Some containment barriers have ramps attached to allow movement of equipment across. All containment barriers are made of concrete and are sealed to the floor.

Each Area has a foam or foam and water fire suppression system operated by a central pump room.

On April 15, 2020 Tradebe was granted approval by Wisconsin DNR of a Class 1.1 License Modification that included Trabebe's modification of berms in Area 4 that separate section A and B and removal of the berm between section A and C (see Appendix D-12). The modification to the berm between sections A and B was for placement of 3 notches in the berm to allow the secondary containment calculation to be based on the containment area perimeter.

Area 1 (aka North Drum Storage Warehouse)

This Area is a licensed area within an existing building which consists of a 9,175 square feet area licensed storage and treatment and approximately 2,000 square feet of non-licensed areas for administrative offices (including the shipping and receiving office) and a reception area.

There are berms or containment barriers at each entryway/exit. A 4-hour rated fire wall has been constructed with two automatic fire doors and frames, one on the east side of the firewall the other on the west side of the firewall.

Dock 1 is located on the north side of this building and is the primary shipping and receiving dock. This 1,371 square foot dock is concrete construction sloped towards a containment sump. The sump is described in Section E.1.1 of Attachment E.

This building also has Dock 2 which located on the east wall. The primary function of this dock is shipping and receiving material in tanker trucks that use this dock to the enter the building. Loading and unloading activities from this dock take place inside the building.

As an integral part of the fire protection, the fire doors automatically close if excessive heat is detected, isolating the process/storage portions of the building from the laboratory and office area. The sewer inlet in the laboratory has been covered. An AFFF fire suppression system has been installed with individual sprinkler heads located throughout the ceiling of the warehouse.

There is a 40”x40”x73” 18-gauge double-walled safety cabinet located on the south wall of the warehouse specifically designed to store 4- 55-gallon drums of highly toxic, flammable (ignitable) materials.

Area 2 (aka 2007 Warehouse Addition)

This Area was added in 2007 as a 5,616 square foot licensed storage and treatment Area built as an addition to the Area 1 warehouse. This Area has two sections separated by a berm. Berms were installed at all doorways. The north wall of the addition has been constructed to provide a 4-hour fire separation from the existing building with a 3-hour roll up fire door. The west wall has been constructed as a 3-hour fire wall, and the south wall as a 1-hour fire wall. A wet fire sprinkling system with foam concentration has been installed with sprinkler heads throughout the warehouse.

The building is designed with 8” thick walls and reinforced concrete floors. The floor is free of cracks or gaps with concrete curbing at entrances. There are no sewer discharges located in any operational or storage areas of the building.

This building has Dock 3 which located on the east wall. The primary function of this dock is shipping and receiving material in tanker trucks that use the dock to the enter the building. Loading and unloading activities take place inside the building.

Area 3 (aka Enclosure Building)

Area 3 is a 1,530-square foot licensed storage and treatment Area constructed in 2013 to connect the Area 1 and Area 4 buildings. There is a loading dock, (Dock 5) on the north side of the building. Fire rated doors, a foam fire suppression system and fire extinguishers have been installed as well as explosion proof lighting and alarms. There is a concrete vault underneath this Area. Berms are at the interior entryway and exits. Dock 5 is not bermed but is sloped towards the vault.

This building has Loading Dock 5 which located on the north wall. The primary function of this dock is shipping and receiving material in tanker trucks that use the dock to the enter the building. Loading and unloading activities take place inside the building.

Area 4 (aka 2009 Lab Pack Building)

Area 4 was added in 2009 as a 6,760 square foot licensed waste storage and treatment area and includes approximately 2,000 square feet of additional non-licensed space used the laboratory and maintenance. A 2-hour rated fire wall with three automatic fire doors and frames exists on the north side of the warehouse. As an integral part of the fire wall, the fire doors automatically close if excessive heat is detected, isolating the storage portions of the building from the non-licensed area. A 2-hour rated fire wall is located on the east and west side of the building for proper separation requirements between the North Drum Storage Warehouse and the 2009 Lab Pack Building. A wet fire sprinkling system with foam concentration was installed with sprinkler heads throughout each section of the warehouse.

There are containment berms at each entryway/exit. Square topped berms are also used to separate this Area into sections. There are no sewer discharges located in any operational or storage areas of the building. Fire rated doors, a foam fire suppression system and fire extinguishers have been installed as well as explosion proof lighting and alarms.

This Area has Dock 4 which is an outdoor loading dock used for shipping and receiving. The dock is concrete construction and measures approximately 379 square feet. This dock has containment barriers on each side including one that separates it from the interior of Area 4. Spilled or leaked material within the containment barriers of this dock are managed according to D.2.5.e. In the absence of spilled or leaked material, precipitation that accumulates at this dock is allowed to evaporate.

Area 5 (aka West Warehouse)

This Area is a 4,565 square foot building renovated in 2016 for use as a licensed waste storage and treatment building. The building is designed with 12" thick walls and reinforced concrete floors. There are no sewer discharges located in any operational or storage areas of the building. There are containment berms at each entryway/exit.

The north, east and west walls are 2-hour fire rated, the south wall of the building is a 4-hour rated fire wall. There are 4 service/exit fire doors that are 3-hour rated and there are 2 overhead fire doors; one between the Enclosure building and the West Drum Storage Warehouse; and one between the Lab Pack Building and the West Drum Storage warehouse which are 3-hour rated.

As an integral part of the fire wall, the overhead fire door automatically closes isolating the building if excessive heat is detected. Five existing spaces, two offices, an electrical room, a boiler room and a restroom is isolated and surrounded by a 2-hour rated fire wall. Fire alarms,

fire horns/strobes, fire extinguishers and a wet fire sprinkling system with foam concentration will be installed with sprinkler heads throughout the building.

D.1.2 Prevent Contact w/Standing Liquids NR 670.015(1)(b)

All waste containers in each container storage area will be stored on pallets or an equivalent method (such as use of an IBC, or "tote" designed with floor separation) to effectively raise them off the floor and any residue that may accumulate on the floor or near the containers. Section D.2.5.b discusses how this is done to comply with NR 664.0175(2)(b).

D.1.3 Capacity of Containment Systems NR 670.015(1)(c)

Capacity of containment was determined as a function of number and volume of containers. See Appendix D-4 for details of secondary containment calculations. Containment systems comply with 664.0175 (see sections D.2.5a-f). Table D-1 below shows licensed volumes for container storage for each Area.

Table D-1

AREA	TOTAL CONTAINERS AND VOLUME of HAZ and non-HAZ	CALCULATED 10% CONTAINMENT (gal.)	ACTUAL CONTAINMENT CAPACITY (gal)
1	1,720 (94,600 gal.)	9,460	15,165
2	992 (54,560 gal.) non-Haz or non- flammable and non-ignitable Haz Section A=544 Section B=488	Section A-2,992 Section B-2,464 Total 5,456	Section A-4,981 Section B-4,835 Total 9,816
3	216 (11,880 gal.) Haz	6,000 (with vault, for largest tanker)	16,034
4	861* (47,335 gal.) No more than total of 345 Haz** (18,975 gal.) Section A= up to 261 Haz Section B= up to 36 Haz Section C= up to 48 Haz	4,733	12,067
5	836 (45,980 gal.) Haz	4,598	32,225
Maximum Combined TOTAL	4,625 total containers (254,375 gal.) with no more than 4,109 Haz (225,995 gal.)	30,447	85,306

*Includes 516 containers of non-Haz. If the 36 spaces for Haz in Section B are not used for Haz waste, those spaces can be used for non-Haz which then increases the total number of non-Haz containers allowed in this Area to 552.
** Combination of single and double stacked containers in sections A, B and C of Area 4.

D.1.4 Preventing and Managing Run-On NR 670.015(1)(d)

As noted previously in Section D.1.1, all container storage area at the facility are within enclosed buildings with roof and side walls, preventing exposure to precipitation. All container storage area entryways and exits, including truck docks (except Dock 5 which is sloped towards the containment vault underneath Area 3) have either containment ramps, berms or dikes to prevent migration of liquids in or out of the Area. Also, the container storage areas have raised entrances/exits, above ground level, to prevent run-on. Exterior doors remain closed when not in use to prevent unnecessary run-on.

If precipitation should inadvertently enter a hazardous waste storage area (e.g., due to roof leak, opened door etc.) Tradebe will correct the problem immediately and manage the accumulated precipitation in one or more of the following ways:

- Collect the material.
- Conduct analytical testing if needed.
- Deposit material into a waste container.
- Based on the analytical results or knowledge, send the material for disposal or treatment at an appropriate facility.

D.1.5 Analyze Liquids and Prevent Overflows NR 670.015(1)(e)

Accumulated liquids may be collected and managed based on worst case management options of the material stored in that Area. If necessary, accumulated liquids will be collected and analyzed using appropriate sampling techniques and analytical procedures described in the WAP. Those analytical results will be used to properly manage the accumulated liquids.

Overflow is prevented by timely action to address accumulated liquids. As per Attachment F, Tradebe conducts routine inspections of each container storage and dock areas. This allows for quick action as described below in section D.2.5.e to manage accumulated liquids and prevent overflow.

D.1.6 Storage Areas that don’t Contain Liquids NR 670.015(2)

All container storage areas at this facility are permitted to have containers with free liquids. When testing for free liquids, the paint filter test is used. The test method, procedure and documentation requirements for this test is described in the WAP (Attachment C).

The description of how each Area is designed and managed to drain, capture, remove, and prevent contact with liquids is provided in sections D.1.1, D.1.2 and D.2.5 of this Attachment.

D.2 CONTAINER STORAGE: NR 664.0170

D.2.1 Condition of Containers NR 664.0171

Inbound containers are inspected, and issues are corrected during the receiving and acceptance process described in Attachment C. Once in storage, containers are inspected daily per Attachment F for problems including negative integrity, signs of corrosion and other potential issues listed on Appendix F-1.

D.2.2 Compatibility of Waste w/Container NR 664.0172

For outbound shipments, compatibility of the waste with the container is determined using the Department of Transportation (DOT) compatibility chart in Appendix D-3. Inbound containers are inspected during the receiving and acceptance process described in Attachment C. If a container is compromised due to incompatibility of the waste with the container, it will be overpacked for storage and/or placed in a compatible container prior to outbound shipment.

D.2.3 Management of Containers NR 664.0173

Containers remain closed while not in use and are not managed in a way causing rupture or leakage. Should damage occur, immediate action is taken to repair, overpack or otherwise mitigate the damage.

Upon receipt, inbound material is placed within the boundaries of a containment area (in same rows as stored material) until the acceptance process is completed. Once accepted material is segregated and placed into designated storage areas.

Outbound material will be packaged within the boundaries of containment areas (in same rows as stored material) and labelled for outbound shipment. This material is shipped within 48 hours of being designated as outbound.

D.2.3.a Stacking Configurations

A. Containers shall be placed in the storage areas so that containers labels are readily visible from the aisle space. When elevated above eye-level, containers and labels will be made visible through easy and safe use of a ladder, scaffold, or other mechanism that is always readily available.

Shrink-wrapped containers will have shrink-wrapping removed when necessary to inspect inner labels and look for leaks. Then shrink-wrapped again for storage.

B. Licensee shall only store or stack containers in a stable manner so that the containers do not lean or tip. All pallets (and similar devices) and containers shall remain stable and of sound integrity.

C. Licensee shall not store or stack containers when the storage or stacking would compromise the stability or structural integrity of the container or pallets.

D. Licensee shall not stack containers on top of other containers more than three-high. When stacking containers:

a. Containers of equal or larger size shall be stored on any lower level.
b. Except for containers with a capacity of greater than twenty (20) gallons that are stacked on the top level, pallets shall be used to separate each level; and
c. Containers shall be centered, level and stable.

D.2.3.b Aisle Spacing NR 664.0035

Tradebe's Manager of Health and Safety, a former Fire Chief with 23 years of experience in firefighting, emergency response, and health and safety. His professional judgement is that 2.5 foot of aisle space is sufficient to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in case of emergency in any of the storage/treatment Area at this facility.

D.2.4 Inspections NR 664.0174

Inbound containers are inspected during the receiving and acceptance process described in Attachment C. Inspection of containers after acceptance is addressed in Attachment F.

D.2.5 Containment NR 664.0175

Each storage/treatment Area has containment walls around the perimeter and berms which separate them into distinct sections to prevent migrations of liquids.

D.2.5.a Containment System Base NR 664.0175(2)(a)

The floors of each storage/treatment area were cleaned and etched prior to being sealed. Expansion joints were also cleaned and filled (see Appendix D-1 for sealant specifications). Floors are free of cracks (see Attachment F for floor inspection details) and sufficiently impervious to contain leaks, spills, and accumulated precipitation until detected and removed.

D.2.5.b Containment to Drain and Remove Liquids NR 664.0175(2)(b)

As stated in D.1.2, all waste containers shall be stored on pallets or an equivalent method (such as use of an IBC, or "tote" designed with floor separation) to effectively raise them

off the floor and any residue that may accumulate on the floor or near the containers. In addition, all storage/treatment Areas have containment systems designed and operated to collect liquids resulting from spills, leaks or precipitation (see section D.2.5.e for discussion of manual removal of liquids and precipitation). In Area 3 the floor drains to a concrete vault underneath that provides additional secondary containment.

D.2.5.c Capacity NR 664.0175(2)(c)

Each containment Area has sufficient capacity to contain 10% of the capacity for that Area. The containment capacity for Area 3 is based on the volume of the largest container which could be a tanker with up to a 6,000-gallon capacity.

Table D-1 in section D.1.3 shows the containment capacities for each Area and Appendix D-4 shows how those containment capacities were calculated.

D.2.5.d Run-on NR 664.0175(2)(d)

The net containment volume of each Area is greater than the 10% containment volume required for the container capacity requested. Containment capacity for some Areas is twice the containment volume required based on container capacity. See Appendix D-4 for containment calculation details. This containment volume should be sufficient to capture any inadvertent run-on that may enter containment areas. However, Tradebe makes every effort to prevent run-on to the containment systems. As previously noted in Section D.1.4, all container storage areas at the facility are contained within enclosed buildings with roofs and side walls which prevent exposure to precipitation. Also, the container storage areas have raised entrances/exits to prevent run-on. Exterior doors remain closed when not in use to prevent unnecessary run-on.

D.2.5.e Spilled or Leaked Waste and Precipitation NR 664.0175(2)(e)

Within 24 hours of detection, Tradebe shall remove accumulated liquids from the containment areas, or, if it cannot, it shall notify the WDNR with an explanation, and remove the accumulated liquids as soon as possible to prevent overflow of the collection system.

Liquid is removed from the collection sump by vacuum tanks, hand pumps or other devices or methods. Uncontrolled spills with the potential to migrate out of the containers storage area where they are stored will cause activation of the Contingency Plan at Attachment G. Other spills of liquids, solids or slurries will be cleaned up by trained Tradebe personnel using a shovel or scoop or other devices or methods without activation of the contingency plan. The waste material collected will be placed into a compatible container. Any liquid collected in the bermed area is collected and can be added to a new or existing container if the material is compatible with the material in the receiving container.

If precipitation should inadvertently enter a hazardous waste storage area (e.g., due to roof leak, opened door etc.) Tradebe will correct the problem immediately and manage the accumulated precipitation.

The collected liquid is managed according to either knowledge and professional judgement of Tradebe Managers, or analytical results from a representative sample.

D.2.5.f Storage of Solids and Some F Codes NR 664.0175(3)&(4)

All containers containing hazardous and non-hazardous waste are stored in Areas that have containment systems described in Sections D.2.5.a-e, including wastes that do not contain free liquids or F Codes listed.

D.2.6 Special Requirements for Ignitable & Reactive Waste NR 664.0176

Area 2 and Area 4 are within 50 feet of the property line and therefore no ignitable or reactive waste will be stored in those Areas. Drawing TTRWI-0006 of Appendix R-5 shows the 50-foot set back relative to the container storage areas. Additionally, the Areas that are beyond the 50-foot setback, which can be used to store ignitable or reactive waste (Areas 1, 3 and 5), are also equipped with additional fire protection such as automatic fire doors and fire rated walls (see Area details in section D.1.1 above).

D.2.7 Special Requirements for Incompatible Wastes NR 664.0177

Inbound waste streams are screened as described in Attachment C prior to storage and/or management. Results of waste screening are used to ensure incompatible materials are segregated prior to storage and/or management. Compatible hazardous and non-hazardous materials may be stored on the same pallets and in the same Area.

Bulking or commingling of incompatible wastes is not anticipated due to screening activities performed prior to acceptance of the material (see Attachment C, WAP).

Containerized materials are managed so that potentially incompatible materials are segregated for storage and management. However, incompatibles that are received together may be temporarily stored together during the receiving process. Once accepted, incompatibles that were received together will be segregated. A shipment of material that is incompatible with the material from a different shipment, will be stored in different aisles during the receiving/acceptance process. Once accepted the incompatible materials will be segregated for storage.

Inspection for potential storage of incompatible waste without proper segregation is part of the weekly container storage areas inspections. See Appendix F-1 for details.

D.2.7.a General Requirements for ignitable, reactive and Incompatible Waste NR 664.0017(1-3)

The characteristics of a waste stream are first determined by evaluating data (i.e., Profiles, generator information, analysis with appropriate tests, manifests, or separate laboratory analysis) as described in Attachment C. Then, guidance provided by NR 664 Appendix V (see Appendix D-11), published references, professional judgement of Plant Management, and training are applied to determine how incompatible waste streams should be segregated.

Waste materials will be stored in a manner that prevents the generation of extreme heat, pressure, fire, explosions, or violent reactions; production of uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; damage to the structural integrity of the facility; or through other like means, threaten human health or the environment. This will be accomplished in part by segregating incompatibles materials with either impermeable berms, or other devices such as containment pallets. Prior to the placement of waste in an Area, section or containerized pallet, a determination is made as to whether the wastes previously held in that Area, sub-Area or containment pallet is compatible with the waste going in. If the waste going in is incompatible with the waste previously held, Tradebe shall inspect for residuals, cleans up any released material and, if necessary, triple rinses the affected area.

When Tradebe uses containment pallets the following will apply:

1. The containment pallets must be constructed of material compatible with the waste in containers.
2. The containment pallets must have sufficient volume to contain the larger of 100% of the largest container or 10% of the volume of all of the containers on pallets, unless a containment pallet is placed within an Area or section with secondary containment.
3. Stacking of containment pallets must be in accordance with manufacturer's specifications and section D.2.3.a.

D.2.8 Closure NR 664.178

Closure will be performed according to details in Attachment I.

D.2.9 Air Emission Standards NR 664.0179

The following procedures are relevant to all containers shipped to Tradebe for onsite storage and waste management prior to being shipped off-site for recycling, treatment and/or disposal.

NR 664.1086 specifies three (3) levels of air emission controls for containers depending on the size of the container, the types of wastes managed, and how the wastes are managed. These control levels and Tradebe's container management procedures are specified in this section.

Container Level 1 Standards (NR 664.1086(3))

Tradebe will manage containers with a design capacity greater than 0.1 m^3 (approximately 26 gallons) and less than or equal to 0.46 m^3 (approximately 119 gallons) to comply with Container Level 1 standards using one of the following control methods specified by NR 664.1086(4)(a):

1. A container that meets the applicable U.S. department of transportation (DOT) regulations on packaging hazardous materials for transportation (This will be Tradebe's primary method of complying with Container Level 1 standards).

2. A container equipped with a cover and closure devices that form a continuous barrier over the container openings 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 cover may be a separate cover installed on the container (e.g., a lid on a drum or a suitably secured tarp on a roll-off box) or may be an integral part of the container structural design (e.g., a “portable tank" or bulk cargo container equipped with a screw-type cap).

3. An open-top container in which an organic-vapor suppressing barrier is placed on or over the hazardous waste in the container such that no hazardous waste is exposed to the atmosphere. One example of such a barrier is application of a suitable organic vapor suppressing foam.

As required by NR 664.1086(3)(e), Tradebe maintains at the facility a copy of the procedure in the form of a receiving SOP which is used to determine those containers with capacity of 0.46 m^3 or greater, which do not meet applicable DOT regulations, are not managing hazardous waste in light material service. Elements of the procedures in that SOP are incorporated into the description of receiving procedures in Attachment C.

Container Level 2 Standards (NR 664.1086(4))

Tradebe will manage containers with a design capacity greater than 0.46 m^3 (approximately 119 gallons) that are "in light material service". Containers of this size are defined as "bulk containers" by the WAP. These containers include but are not limited to tank trucks, and roll-off boxes. Where applicable, Tradebe will comply with Container Level 2 standards using one of the following control methods specified by NR 664.1086(4)(a):

Containers subject to Container Level 2 standards at Tradebe will meet applicable US DOT hazardous material packaging regulations, as allowed by NR 664.1086(4)(a)(1). This will be Tradebe's primary method of complying with Container Level 2 standards.

Alternatively, Tradebe may choose to use a non-DOT specification packaging and perform organic vapor monitoring in accordance with Method 21 of 40 CFR Part 60, incorporated by reference in NR 660.11, or use a container that has been demonstrated within the preceding 12 months to be vapor-tight by using Method 27 of 40 CFR Part 60, Appendix A. This method of compliance with Container Level 2 standards will only be used in very limited cases where the container is not to be shipped off-site.

As stated in the WAP, containers received by Tradebe are inspected both for leaks and that they also meet the container Level 1 and 2 standards of NR 664.1086(3) & (4). Therefore, in accordance with NR 664.1086(3)(d) & (4)(d);

1. During the receiving process described in the WAP, containers are visually inspected including, its cover & closure devices for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover or closure devices are secured in the sealed position.

2. If a container used for managing hazardous waste remains at the facility for a period of >1year, Tradebe will visually inspect the container, its cover & closure devices initially and thereafter, at least once every 12 months. To check for visible cracks, holes, gaps, or other open spaces into the interior of the container when cover or closure device are secured in the sealed position.

3. If a defect is detected for a container, cover or closure device Tradebe will repair the container as soon as possible but no later than 5 calendar days after detection. If the container cannot be repaired in that time frame, the waste will be removed from that container.

D.2.10 Storage of Non-Hazardous Waste NR 502.07

In February 1991, Badger predecessor EOG Environmental was issued conditional approval as a solid waste transfer facility. The approval allows Tradebe to store and bulk up to a total of 1,940 containers of non-hazardous waste material for up to 30 days (see Appendix D-8b). Pursuant to NR 502.07(4); this FPOR serves as a Plan of Operation for a Large (greater than 100 tons per day) Solid Waste Transfer Facility subject to NR 502.07. An application titled “Expansion of Existing Solid Waste Transfer Facility” is being submitted to incorporate the solid waste license conditions into this hazardous waste license (see Appendix D-8a). The previous solid waste license FID 241389170/241384000 and Approval ID 03386 are included as Appendix D-8.

Tradebe will manage solid waste in the same manner and Areas as those described for hazardous waste in section D.1 above. Solid waste that is incompatible with hazardous or other solid waste will be segregated under provisions of D.2.7.

Solid waste will be subject to receiving and acceptance procedures specified in Attachment C, Inspection requirements specified in Attachment F, Closure requirements as specified in

Attachment I, and Waste Management activities as specified in this Attachment. Provisions of the General Description (Attachment B); Procedures to Prevent Hazards (Attachment E); Contingency Plan (Attachment G); Training (Attachment H); Insurance (Attachment J) and Drawings apply to hazardous and solid wastes.

Storage and containment capacities shown in Table D-1 and Appendix D-4 represent a combination of hazardous and solid wastes combined. Stacking configurations and aisle spacing stated in sections D.2.3.a and (b) also apply to solid waste as well as the provisions of section D.2.3.

D.2.11 Storage of PCB Waste NR 157; NR 289.53

Tradebe accepts PCB ballasts, capacitors, transformers, PCB contaminated soil, solvents and lab samples for storage and Transfer. PCB materials are received in various sized containers such as 5-gallon, 14-gallon, 20-gallon, 30-gallon and 55-gallon drums. Transformers are shipped in on pallets. Transformers are stored and sent off site for disposal to Superior Special Services located in phoenix, AZ.

PCB ballasts and capacitors are either stored, and shipped off site in their original containers; or bulked into cubic yard boxes and shipped off site to a landfill permitted to accept PCB waste. Contaminated soils and solvents are shipped off site in their original containers to a permitted PCB incinerator. PCB lab samples are lab packed into larger drums and also shipped to a permitted PCB incinerator.

PCB materials are shipped to off-site facilities within one year from receipt. The facility estimates it will receive between 6,000 and 8,000 pounds of PCB contaminated materials in any given year. However, there will be no more than 500 gallons stored at any one time. Warehouse storage areas utilized to store PCB's and PCB items for transfer to an ultimate disposal facility are clearly marked with a PCB label.

On February 9, 2006, Badger Disposal was issued an exemption from the requirements of NR s. 289.53 for storing and transferring PCB wastes. This FPOR renews that approval.

D.2.12 Fuel Blending Activities NR 289.53

On August 23, 1996 Badger Disposal of WI., Inc. (dba EOG Disposal, Inc.) received a Conditional Approval for Legitimate Recycling Exemption - Hazardous Waste Burned for Energy Recovery/Fuel Blending and Marketing Activities. On, June 14, 2006 Badger Disposal of WI., Inc. received a notice from the WIDNR that as of August 1, 2006, the recycling exemption in ch. NR 625 would no longer exist and that commercial fuel blending activities would be subject to full hazardous waste treatment facility requirements, including licensing, On July 10, 2006 Badger Disposal applied for a temporary authorization to continue its fuel blending activities. On August 15, 2006 Badger Disposal received a 6 month temporary authorization to continue its fuel blending activities. On February 6, 2007 another 6-month temporary

authorization approval for the fuel blending activities was received from the WIDNR. 0n July 26, 2007 a Hazardous Waste Treatment-Container Commercial License was issued to Badger Disposal. This FPOR renews that license.

Fuel blending is defined in Attachment C. Fuel blending activities are conducted in containment Areas that have the space, containment capacity, marking, segregation of incompatibles, and other systems in place to conduct this activity safely and compliantly.

The purpose of fuel blending activities is to collect and blend nonhazardous and hazardous wastes to create fuel that meets the specifications required by cement kilns, incinerators and other qualified industrial users. The first step in the fuel blending process is to determine that a generators waste stream is suitable for fuel blending. This is accomplished by the receiving and acceptance procedures in Attachment C.

Material that is acceptable for fuel blending will be accumulated and bulked into vacuum tanker trucks. Only empty tanker trucks are used for fuel blending activities. Each tanker is checked upon arrival, and if the tanker contains residue, it is sent back. Every tanker driver has a copy of the last hauled manifest with the trailer. Upon arrival at the facility, the waste codes from the last manifest in the tanker are compared to the waste codes for the containers to be pumped to insure compatibility.

Drums of material to be fuel blended are staged for pumping inside bermed areas. A third-party vendor will provide the necessary equipment for the material transfers. While Tradebe could obtain the equipment for these transfers, use of third-party equipment is preferred. If Tradebe provides its own equipment, it is with the intent to not exceed the 300-hour contact exemption standard of NR 664.1050(6). Therefore, if Tradebe employs its own equipment, Tradebe will document the hours of operation for fuel blending transfer to demonstrate the 300-hour contact exemption. (see Section F.5.4 for additional information).

Tradebe understands that per NR 664.1050(5), equipment that is in vacuum service is excluded from ss. NR 664.1052 to 664.1060 if it is identified as required in s. NR 664.1064 (7)(e). Therefore, should Tradebe acquire equipment for vacuum service, a list of the equipment with identifications numbers will be created and maintained.

Paint cans and pails are also shipped in various sized containers such as 30-gallon drums, 55-gallon drums and cubic yard boxes. The cans and pails are emptied into 55-gallon drums. If pumpable, the drums are shipped out in a fuel blend tanker. If not pumpable, they are shipped off-site in drums for fuel blending elsewhere at an approved facility.

D.3 OTHER WASTE MANAGEMENT ACTIVITIES

D.3.1 Bulking and Transfer

Bulking and transfer activities as defined in Attachment C are performed in containment Areas of the facility that have the space, containment capacity, marking, segregation of incompatibles, and other systems in place to conduct these activities safely and compliantly.

Bulking activities are conducted to create loads with more economical disposal and treatment options. Wastes that can be bulked are received in 5-gallon pails, 15–55-gallon drums, and cubic yard boxes referred to by Tradebe as "loose pack" waste streams. These loose packs are like materials with identical waste codes which are bulked into larger containers such as 55-gallon drums or totes. Once bulked, the drums and/or totes are either shipped off-site for disposal or if a candidate for fuel blending, pumped into an outgoing fuel blend tanker. After the drums are RCRA empty, they are crushed or sent off site for recycling. Empty cubic yard boxes are discarded. Oxidizers, toxic liquids/solids or poisons are not bulked.

Other materials that are bulked include solid rags and absorbents that are bulked into cubic yard boxes and shipped off site for fuel blending.

Batteries, PCB capacitors, ballasts, and PCB waste are also bulked from small containers to large containers for more economical disposal options. Paint in cans/pails and other containers are also received in various sizes. These containers are either emptied or placed whole into larger containers. If emptied contents are pumpable and meets fuel blending requirements of the WAP, this material may be used for fuel blending. If not pumpable but meeting fuel blending requirements of the WAP, the material is shipped off-site for fuel blending.

D.3.2 Lab Packing Activities

Lab-packing activities as defined in Attachment C are performed within containment Areas of the facility that have the space, containment capacity, marking, segregation of incompatibles, and other systems in place to conduct this activity safely and compliantly.

Lab packing operations take place in separate lab pack storage sections within each Area, with distinct boundaries marked with yellow painted lines. The hazard class of the material in each storage/repack area is clearly communicated using hazardous materials placards corresponding to the materials in that storage/repack area.

As lab packs are received in containers ranging in size from 5-55 gallons, as well as All-Pak boxes, that are placed in appropriately designated storage/repack areas. They are then depacked and repackaged into larger containers. Lab packs are only re-packed by facility Chemists. The Chemist reviews the inventory sheet and compares it to the actual contents of the lab pack, then, based upon his determination of what containers can be repacked together, the Chemist begins the repackaging. Containers in the lab packs are combined with other containers that have similar hazard classes in the lab packs without opening any of the containers. The contents of the containers in the lab packs are not combined with the contents any of the containers. Once a lab pack is full it is shipped off-site to a fully licensed TSDF.

D.3.3 Elementary Neutralization NR 670.001(3)(b)(5)

On January 11, 2016, Badger Disposal had an Elementary Neutralization installed. This Acid & Base Neutralization System meets the NR 660.10(29) definition of an elementary neutralization unit and meets the standards for the neutralization exemption under s. NR 670.001(3)(b)(5) and s. NR 664.00001(7)(f). This elementary neutralization operation has not been operated by Tradebe and the system equipment service has been disconnected. However, this system is still in place and Tradebe maintains this capability.

The Acid & Base Neutralization System is a pre-programmed batch processing system. The acid container is placed on a containment pallet and an inlet wand is inserted into the container as well a level sensor. The wand pump system automatically pumps approximately 100 gallons of waste into a process tank. After the acid is fed, the neutralization process begins. There is a separate containment pallet with a container of caustic waste which is fed into the system in a similar manner. The system then pumps in small amounts of the caustic waste and the waste is agitated until a neutral pH of 4-10 is achieved.

Once the neutralization process is completed, a vacuum tanker is dispatched, and the material is pumped into the tanker and shipped to a fully permitted Wastewater Treatment Plant.

D.3.4 RCRA Empty Drum Crushing NR 661.0007

Inbound RCRA empty containers and RCRA empty drums generated inhouse from fuel blending, bulking, neutralization and other waste management activities are crushed in the drum crusher currently located in Area 1. Inbound RCRA empty drums are inspected to verify that the containers are in fact RCRA empty. RCRA empty drums generated inhouse contain less than 2 inches of residual material.

TRADEBE
Environmental Services™

APPENDIX D-1

Floor and Joint

Sealants

filling cracks/joints

degussa.
creating essentials

SONOLASTIC® NP 1™

PRODUCT DATA

7 07920 **Joint Sealants**

Description

NP 1™ is a one-component, high-performance, nonpriming, gun-grade, elastomeric polyurethane sealant. It requires no mixing and typically requires no priming to bond to many materials, including concrete and masonry

Yield

See page 3 for charts

Packaging

300 ml (10.1 fl oz) cartridges, 30 cartridges per carton

20 fl oz (590 ml) ProPaks, 20 per carton

2 gallons (7.6 L) pails, available on special order only

For color availability in bulk packaging, call Customer Service

Color

White, off white, limestone, stone, tan, aluminum gray, hunter green, medium bronze, special bronze, redwood tan, and black

Shelf Life

Cartridges and ProPaks
1 year when properly stored

Pails
4 months when properly stored

Storage

Store in original, unopened containers away from heat and direct sunshine. Storing at elevated temperatures will reduce the shelf life

Features	Benefits
• Ready to use	Requires no mixing; reduces labor costs
• Joint movement capability ±25%	Provides excellent flexibility for keeping moving joints tight
• Easy to gun and tool	Speeds application and makes neater joints
• Available in cartridges, 20 ounce ProPaks, and in bulk	Reduces jobsite waste, lowers disposal costs
• Eleven standard colors	Matches common substrates
• No primer required for most construction materials	Lowers installation costs
• Weather resistant	Produces long-lasting weather tight seals
• Wide temperature application range	Suitable for all climates
• Compatible with nonrigid paints	May be painted
• UL listed	Passes 4 hour, 4 inch, fire and hose stream test when used with Ultra Block® or mineral wool
• Suitable for water immersion	Documented performance in wet areas
• Low VOC content	Meets VOC requirements in all 50 states

Where to Use

APPLICATION

- Expansion joints
- Curtain wall construction
- Panel walls
- Precast units
- Aluminum and wood window frames
- Fascia
- Parapets
- Structural components
- Vinyl siding
- Wastewater treatment plants
- Dams
- Spillways and storm drains
- Wetwells and manholes

LOCATION

- Interior and exterior
- Above grade
- Immersed in water

SUBSTRATE

- Concrete
- Masonry
- Aluminum
- Wood

How to Apply

Joint Preparation

1. The number of joints and the joint width should be designed for a maximum of ±25% movement.

2. The depth of the sealant should be 1/2 the width of the joint. The maximum depth is 1/2" (13 mm) and the minimum is 1/4" (6 mm). Refer to Table 1.

Sonneborn

Curing Time

The cure of NP 1™ varies with temperature and humidity. The following times assume 75° F (24° C), 50% relative humidity, and a joint 1/2" width by 1/4" depth (13 by 6 mm).

Skins: overnight or within 24 hours

Functional: within 3 days

Full cure: approximately 1 week

Immersion service: 21 days

For Best Performance

- Do not allow uncured NP 1™ to come into contact with alcohol based materials or solvents
- Do not apply polyurethane sealants in the vicinity of uncured silicone sealants or uncured Sonolastic® 150 or 150 Tint Base
- NP 1™ should not come in contact with oil based caulking, uncured silicone sealants, polysulfides, or fillers impregnated with oil, asphalt, or tar
- Protect unopened containers from heat and direct sunshine
- In cool or cold weather, store container at room temperature for at least 24 hours before using
- When NP 1™ is to be used in areas subject to continuous water immersion, cure for 21 days at 70° F (23° C) and 50% relative humidity. Allow longer cure times at lower temperatures and humidities. Always used Primer 733
- Do not use in swimming pool or other submerged conditions where the sealant will be exposed to strong oxidizers. Avoid submerged conditions where water temperatures will exceed 120° F (50° C)
- Do not apply over freshly treated wood. Treated wood must have weathered for at least 6 months
- Substrates such as copper, stainless, and galvanized typically require the use of a primer. Primer 733 or 755 is acceptable. For Kynar 500 based coatings use Primer 733 only. An adhesion test is recommended for any other questionable substrate
- Do not use as a cap, heel, or toe bead for exterior glazing. Refer to Sonolastic® 150 product data sheet (see Form No. 1017910)
- UV exposure may cause white NP 1™ to discolor. This does not affect sealant performance, where maintaining a true white appearance is critical, use Ultra (see Form No. 1017894) or Sonolastic® 150 (see Form No. 1017910) sealants
- NP 1™ can be applied below freezing temperatures only if substrates are completely dry, free of moisture, and clean. Contact Technical Service for more information
- Lower temperatures and humidities will extend curing times
- NP 1™ can be painted over provided it is fully cured and clean. When painting over any elastomeric sealant, use a paint that is also elastomeric. (If movement occurs, the paint will also move.)
- Make certain the most current versions of product data sheet and MSDS are being used; call Customer Service (1 800 433 9517) to verify the most current versions
- Proper application is the responsibility of the user. Field visits by Degussa personnel are for the purpose of making technical recommendations only and not for supervising or providing quality control on the jobsite

Health and Safety

NP 1™

Warning

NP 1™ contains Stoddard solvent and crystalline quartz silica

Risks

May cause skin, eye or respiratory irritation. May cause dermatitis and allergic responses. Potential skin and/or respiratory sensitizer. Ingestion may cause irritation. Reports associate repeated or prolonged occupational overexposure to solvents with permanent brain, nervous system, liver and kidney damage. INTENTIONAL MISUSE BY DELIBERATELY INHALING THE CONTENTS MAY BE HARMFUL OR FATAL

Precautions

Keep container closed. Use only with adequate ventilation. Prevent contact with skin, eyes and clothing. Wash thoroughly after handling. Avoid breathing vapors. DO NOT take internally. Use impervious gloves, eye protection and if the TLV is exceeded or used in a poorly ventilated area, use NIOSH/MSHA approved respiratory protection in accordance with applicable Federal, state and local regulations

First Aid

In case of eye contact, flush thoroughly with water for at least 15 minutes. SEEK IMMEDIATE MEDICAL ATTENTION. In case of skin contact, wash affected areas with soap and water. If irritation persists, SEEK MEDICAL ATTENTION. Remove and wash contaminated clothing. If inhalation causes physical discomfort, remove to fresh air. If discomfort persists or any breathing difficulty occurs or if swallowed, SEEK IMMEDIATE MEDICAL ATTENTION.

Refer to Material Safety Data Sheet (MSDS) for further information

Proposition 65

This product contains materials listed by the State of California as known to cause cancer, birth defects and other reproductive harm

VOC Content

NP 1™ contains 43 g/l or 0.36 lbs/gal, less water and exempt solvents

For medical emergencies only, call ChemTrec (1 800-424-9300).

Degussa Building Systems
[illegible]
Shakopee, MN 55379
www.DegussaBuildingSystems.com
Customer Service 800 433 9517
Technical Service 800 243 4733

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Yield

LINEAR FEET PER GALLON*

JOINT DEPTH (INCHES)	JOINT WIDTH (INCHES) 1/4	3/8	1/2	5/8	3/4	7/8	1
1/4	308	205	154	123	–	–	–
3/8	–	–	–	82	68	58	51
1/2	–	–	–	–	51	44	38

*One gallon equals approximately 12 cartridges or 6 sausages

METERS PER LITER

JOINT DEPTH (MM)	JOINT WIDTH (MM) 6	10	13	16	19	22	25
6	24.8	16.5	12.4	9.9	–	–	–
10	–	–	–	6.6	5.5	4.7	4.1
13	–	–	–	–	4.1	3.5	3.0

TABLE 1

Joint Width and Sealant Depth

JOINT WIDTH, AT MIDPOINT, IN (MM)	SEALANT DEPTH IN (MM)
1/4 – 1/2 (6 – 13)	1/4 (6)
1/2 – 3/4 (13 – 19)	1/4 – 3/8 (6 – 10)
3/4 – 1 (19 – 25)	3/8 – 1/2 (10 – 13)
1 – 1 1/2 (25 – 38)	1/2 (13)

3 In deep joints, the sealant depth must be controlled by Closed-Cell Backer Rod or Soft Backer Rod. Where the joint depth does not permit the use of backer rod, a bondbreaker (polyethylene strip) must be used to prevent three point bonding.

4 To maintain the recommended sealant depth, install backer rod by compressing and rolling it into the joint channel without stretching it lengthwise. Closed-Cell Backer Rod should be about 1/8" (3 mm) larger in diameter than the width of the joint to allow for compression. Soft Backer Rod should be approximately 25% larger in diameter than the joint width. The sealant does not adhere to it, and no separate bondbreaker is required. Do not prime or puncture the backer-rod.

Surface Preparation

Surfaces must be structurally sound, fully cured, dry, clean, free of dirt, moisture, loose particles, oil, grease, asphalt, tar, paint, wax, rust, waterproofing or curing and parting compounds, and membrane materials.

CONCRETE, STONE, AND OTHER MASONRY

Clean by grinding, sandblasting, or wire brushing to expose a sound surface free of contamination and laitance.

WOOD

New and weathered wood must be clean and sound. Scrape away loose paint to bare wood. Any coating that cannot be removed must be tested to verify adhesion of sealant or to to determine an appropriate primer.

METAL

Remove scale, rust, and coatings from metal to expose a bright white surface. Remove protective coatings as well as any chemical residue or film. Aluminum window frames are frequently coated with a clear lacquer that must be removed before the application of NP 1™. Any coating that cannot be removed must be tested to verify adhesion of sealant or determine an appropriate primer. Remove any other protective coatings or finishes that could interfere with adhesion.

Priming

1 NP 1™ is generally considered a nonpriming sealant, but special circumstances or substrates may require a primer. It is the user's responsibility to check the adhesion of the cured sealant on typical test joints at the project site before and during application. Refer to product data sheet on Primer 733 or 766, and consult Technical Services for additional information.

2 For immersion applications, Primer 733 must be used.

3 Apply primer full strength with a brush or clean cloth. A light, uniform coating is sufficient for most surfaces. Porous surfaces require more primer, however, do not overapply.

4 Allow primer to dry before applying NP 1™. Depending on temperature and humidity, primer will be tack free in 15 – 120 minutes. Priming and sealing must be done on the same work day.

Application

1 NP 1™ comes ready to use. Apply by professional caulking gun. Do not open cartridges, sausages, or pails until preparatory work has been completed.

2 Fill joints from the deepest point to the surface by holding a properly sized nozzle against the back of the joint.

3 Dry tooling is recommended. DO NOT use soapy water when tooling. Tooling results in the correct bead shape, a neat joint, and maximum adhesion.

Clean Up

1 Immediately after use, clean equipment with Reducer 990 or xylene. Use proper precautions when handling solvents.

2 Remove cured sealant by cutting with a sharp-edged tool.

3 Remove thin films by abrading.

Technical Data

Composition

Sonolastic® NP 1™ is a one component moisture curing polyurethane.

Compliances

- ASTM C 920, Type S, Grade NS, Class 25, Use NT, M, A, G and I
- Federal Specification TT-S-00230C, Type II, Class A
- Corps of Engineers CRD-C 541, Type II, Class A
- Canadian Specification CAN/CGSB-19.13-M87, Classification MCG-2-25-A-N, No. 81026
- USDA compliant for use in meat and poultry areas
- Underwriters Laboratories Inc.® classified (fire resistance only)
- Canadian approval for use in establishments that handle food
- SWRI® structure validated
- ISO 11600 F 25LM

Typical Properties

PROPERTY	VALUE
Service temperature range, (°F) (°C)	-40 to 180 (-40 to 82)
Expected life	Up to 15 years
Shrinkage	None

Test Data

PROPERTY	RESULTS	TEST METHODS
Movement capability, %	±25	ASTM C 719
Tensile strength, psi (MPa)	350 (2.4)	ASTM D 412
Tear strength, pli	50	ASTM D 1004
Ultimate elongation at break, %	800	ASTM D 412
Rheological, (sag in vertical displacement) at 120° F (49° C)	No sag	ASTM C 639
Extrudability, 3 seconds	Passes	ASTM C 603
Hardness, Shore A		ASTM C 661
At standard conditions	25 – 30	
After heat aging (max. Shore A 50)	25	
Weight loss, after heat aging, %	3	ASTM C 792
Cracking and chalking, after heat aging	None	ASTM C 792
Tack-free time, hrs. (maximum 72 hrs)	Passes	ASTM C 679
Stain and color change	Passes (no visible stain)	ASTM C 510
Bond durability,* on glass, aluminum and concrete	Passes ±25% movement	ASTM C 719
Adhesion* in peel, pli (min. 5 pli)	30	ASTM C 794
Adhesion* in peel after UV radiation through glass (min. 5 pli)	Passes	ASTM C 794
Artificial weathering, Xenon arc, 2500 hours	Passes	ASTM C 793
Artificial weathering, Xenon arc, 3 000 hours	No surface cracking	ASTM G 26
Water immersion, 122° F (50° C)	Passes 10 weeks with movement cycling	ASTM C 1247

*Primed for water immersion tests only by ASTM C 920. Concrete and aluminum primed with 733, glass primed with 766.

Test results are typical values obtained under laboratory conditions. Reasonable variations can be expected.

white up walls

CHEMSEAL 1600-APU
ALIPHATIC POLYESTER URETHANE

Technical Data

DESCRIPTION: Chemseal 1600-APU is a two-component aliphatic polyester urethane enamel designed for exterior/interior surfaces. Its tough durable finish is unsurpassed for its ability to withstand impact and abrasion. Flexibility, superior hardness, adhesion and fast drying make it an ideal product for many industrial applications.

RECOMMENDED USES: For warehouses, storage areas, industrial and manufacturing plant floors – aisle ways - machinery and equipment - vehicles - exterior metal - auto service areas.

CHEMICAL RESISTANCE: Skydrol, MEK, hydraulic and brake fluid, gasoline and many other solvents and chemicals. For additional chemical resistance please consult the Parker Technical Department for your specific requirements.

PHYSICAL CHARACTERISTICS: Excellent flexibility and light stability. Good penetration for secure bond.

FINISH: Gloss

VOLUME SOLIDS: 50% ± 1% depending on color

FLASH POINT: Part A: 76° F Seta Flash
Part B: 76° F Seta Flash

SUGGESTED DRY FILM THICKNESS: 2-4 mils per coat

EXPECTED COVERAGE: 600-300 square feet per unit at suggested DFT

COLORS: Various

PACKAGING: 1 unit = ½ gallon Part A, Activator
1 gallon Part B, Base

SHIPPING WEIGHT: 1 unit = 15 lbs.

USDA APPROVAL: Yes

All technical advice, recommendations and services are rendered by the Seller gratis. They are based on technical data which the Seller believes to be reliable, and are intended for use by persons having skill and know-how, at their own discretion and risk. Seller assumes no responsibility for results obtained or damages incurred from their use by Buyer in whole or in part. Such recommendations, technical advice or services are not to be taken as a license to operate under or intended to suggest infringement of any existing patent.

Parker Coatings, Inc. - 2451 W. Mason St. - Green Bay, WI 54303 – 800-236-9676 920-494-9676
www.parkercoatings.com

CHEMSEAL 1600-APU
ALIPHATIC POLYESTER URETHANE

Application Data

SURFACE PREPARATION: General Surface Preparation Instructions: NEW CONCRETE - Remove all dust, dirt, grease and other foreign materials. For maximum adhesion acid etching is required. Surface must be thoroughly dry before application. METAL should be cleaned by solvent degreasing. WOOD should be free of dust, dirt, grease and other foreign materials. On TILE remove all wax or topcoat and clean thoroughly.

PRIMER: Probond 26-CP. Contact Parker Coatings' Technical Dept. for specific requirements.

MIXING: Mix Part A into Part B for 3 to 5 minutes. Allow approximately 5-10 minutes for induction time before application.

POT LIFE: 45 minutes - 1 hour at 70° F and 50% R.H.

APPLICATION TEMPERATURE: Do not apply when temperature is below 50° F. Temperature of substrate should be 50-70° F.

CURE TIME: Tack free - 1 hour. Recoat – 6-16 hours at 70° F. and 50% R.H.

APPLICATION: Apply by brush, roll or spray. If roll application is used, use a ¾" nap roller cover. Do not over roll or product gassing may occur. When spraying, consult the "Safety and Handling of Poly-Isocyanate Bulletin". Do not apply when excessive moisture is present.

CLEAN UP: Clean spills and tools immediately with P30T Thinner

CAUTION: It is recommended that the personnel observe good personal hygiene. Certain personnel may be sensitive to various types of resins which may cause dermatitis. Do not use in confined space or closed area without adequate ventilation. This product may be irritating to eyes and skin. Avoid contact with liquid components A and B and keep mortar from touching tool handles and clothes. Use coveralls, goggles, rubber gloves or protective cream. Always wash thoroughly with soap and warm water after use. Should accidental eye contact occur, wash thoroughly with water and consult a physician immediately. U.S. Department of Labor approved material data sheet is available.

LIMITED WARRANTY: The Manufacturer warrants this product to be free from defects in material and workmanship under normal use and service for a period of one year of the date of purchase. The Manufacturer's sole liability shall be limited to replacing this product if, within one year of the date of purchase, it is shown to be defective. THIS WARRANTY IS EXPRESSLY IN LIEU OF ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING THE WARRANTIES OF MERCHANTABILITY AND FITNESS OF PURPOSE. THE MANUFACTURER SHALL NOT BE LIABLE FOR INDIRECT, INCIDENTAL, CONSEQUENTIAL OR OTHER DAMAGES OF ANY KIND. This warranty shall not be extended, altered or varied except by a written instrument signed by the Manufacturer.

Enclosure trap (pit) inside

CHEMLINE 3600-HHC

HIGH HEAT AND CHEMICAL

Technical Data

DESCRIPTION: Chemline 3600-HHC is a monolithic liner for corrosion and abrasion resistance at high temperatures. It withstands temperatures up to 325 deg. F. and will cure at 70 deg. F. This durable liner has excellent adhesion to concrete or metal and should be used wherever performance is needed in aggressive chemical environments at high temperatures. Chemline 3600-HHC is the ideal liner for high temperature performance with low temperature cure.

RECOMMENDED USES: Clarifiers - Trough Walls - Pumps - Ventilating Systems - Foundations - Trenches - Chutes - Conveyors - Troughs - Tanks - Fourdrinier Pits - Cyclones - Scrubbers - Conveyor Tunnels - Acid Pits - Sandhoppers - Stacks - Dams - Bridges

CHEMICAL RESISTANCE:

Gasohol	100 deg. F.	Good, only slight discoloration after 4 months.
Lactic Acid	10% @ 100 deg. F.	Good, only slight discoloration after 4 months.
Paper Mill Liquor	150 deg. F.	Good, only slight discoloration after 8 months
Sodium Hydrx	10% @ 100 and 150 deg. F.	Good, only slight discoloration after 8 months.
Sulfuric Acid	5%, 25%, 50% @ 100 and 150 deg. F.	Good, only slight discoloration after 8 months.

For additional chemical resistance, please consult the Parker Technical Department for your specific requirements.

PHYSICAL CHARACTERISTICS:

Compressive strength, ASTM D695:	13,000 - 15,000 psi
Tensile strength, ASTM D938:	1,500 - 2,500 psi
Flexural strength, ASTM D790:	5,300 - 6,000 psi

FINISH: Smooth - Glossy

VOLUME SOLIDS: 100%

FLASH POINT: Not applicable

SUGGESTED THICKNESS: 1/8"

THEORETICAL COVERAGE: 11 sq. ft.* per batch at 1/8" thickness. *Material losses during mixing and application may vary and should be taken into consideration when estimating job requirements.

COLOR: Amber

PACKAGING: 1 unit - 3 batches

1 batch = 1 pint can (short filled) Part A, Activator
1/2 gallon can (short filled) Part B, Base
1 box, 16 pounds Part C, Aggregate

SHIPPING WEIGHT: 1 unit = 60 lbs.

USDA APPROVAL: Yes

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PARKER COATINGS, INC. - 2451 W. MASON ST. - GREEN BAY WI 54303
920-494-9676 800-236-9676

CHEMLINE 3600-HHC Application Data

SURFACE PREPARATION: NEW CONCRETE must have a minimum of 28 days cure, and no curing agents shall be used. Remove oil, grease or other loose foreign materials and contaminants. A good bonding tooth is necessary. To provide bonding tooth, prepare the surface by sandblasting, scarifying, shot blasting or acid etching. OLD CONCRETE, remove all powdery and weak concrete. Make sure all wax, dirt, grease and other contaminants have been removed. Once the concrete has been cleaned, one or more of the following methods shall be used to prepare concrete for proper bonding: Sandblasting with fine sand and reduced pressure, shot blasting, scarifying or acid etch. All surfaces must be dry before application. METAL SURFACES should be cleaned by solvent degreasing followed by abrasive blasting to near white SSPC-10-70 or NACE #2 with a 4 mil minimum anchor pattern or "tooth".

PRIMER: Mixture of 1 container Part A to 1 container Part B

MIXING: Empty the contents of Part A into Part B and stir thoroughly for approximately 2 minutes. Empty the mixture into a mixer or mortar box and slowly mix in Part C. Mix approximately 3 minutes.

POT LIFE: 15-20 minutes at 70 deg. F. and 50% R.H.

APPLICATION TEMPERATURE: Do not apply when surface temperature is below 50 deg. F. Material temperature should be 70 deg. F. to 85 deg. F. for at least 48 hours before application.

SERVICE TEMPERATURE: 325 deg. F. Dry heat

CURE TIME: Chemline 3600-HHC will harden in about 8 hours at 70 deg. F. Cure time is 72 hours at 70 deg. F. The higher the temperature, the faster the cure. For example, at 170 deg. F. Chemline would cure in approximately 4 hours. Maximum chemical resistance occurs after 7 days at 70 deg. F.

APPLICATION: Spread mixed mortar evenly over surface. Build up low spots to desired thickness, using margin trowel or steel finishing trowel. Finish each batch as you go. If using primer, Chemline must be applied before primer has hardened. Primer will harden in approximately 1 hour at 70 deg. F. If primer hardens before liner is applied, it must be whip blasted, removing all gloss before topcoating, and re-primed.

CLEAN UP: Cured or hardened Chemline is almost impossible to remove. Clean tools and equipment with P34T Thinner.

CAUTION: It is recommended that personnel observe good personal hygiene. Certain personnel may be sensitive to various types of resins which may cause dermatitis. Do not use in confined space or closed area without adequate ventilation. This product may be irritating to eyes and skin. Avoid contact with liquid components A and B, and keep mortar from touching tool handles and clothes. Use coveralls, goggles, rubber gloves or protective cream. Always wash thoroughly with soap and warm water after use. Should accidental eye contact occur, wash thoroughly with water and consult a physician immediately. U.S. Department of Labor approved material data sheet is available.

LIMITED WARRANTY: The Manufacturer warrants this product to be free from defects in material and workmanship under normal use and service for a period of one year of the date of purchase. The Manufacturer's sole liability shall be limited to replacing this product if, within one year of the date of purchase, it is shown to be defective. THIS WARRANTY IS EXPRESSLY IN LIEU OF ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING THE WARRANTIES OF MERCHANTABILITY AND FITNESS OF PURPOSE. THE MANUFACTURER SHALL NOT BE LIABLE FOR INDIRECT, INCIDENTAL, CONSEQUENTIAL OR OTHER DAMAGES OF ANY KIND. This warranty shall not be extended, altered or varied except by a written instrument signed by the Manufacturer.

Clear coat - floor & some walls
3 coats

CHEMSEAL 1015-WRU

Wear Resistant Urethane

Technical Data

DESCRIPTION: Chemseal 1015-WRU Wear Resistant Urethane is an amber colored sealer for use where the ultimate in chemical resistance, abrasion resistance and adhesion are required. This superb floor sealer withstands constant traffic from lift trucks and other abrasion that would destroy ordinary sealers. Chemseal 1015-WRU is ideal for very high traffic areas. It is a one package sealer that applies easily and dries quickly eliminating long down time.

RECOMMENDED USES: Interior concrete, tile, wood and metal. Ideal for warehouse floors, aisleways, manufacturing facilities, print shops, food processing plants and canneries.

CHEMICAL RESISTANCE: Excellent resistance to brake fluid, hydraulic fluid, antifreeze and gasoline.

PHYSICAL CHARACTERISTICS: Excellent mar and abrasion resistance. Excellent penetration. <18mg. loss on a CS-17 wheel, 1000g load, 1000 cycles.

FINISH: Gloss

VOLUME SOLIDS: 45%

FLASH POINT: 79° F.

SUGGESTED DRY FILM THICKNESS: 2-4 mils per coat. 2-3 coats may be required for gloss finish over more porous substrates.

EXPECTED COVERAGE: Penetrating first coat -- 170 square feet
Second coat -- 225 square feet
Third coat -- 250 square feet

COLOR: Amber

PACKAGING: 1 unit = 1 gallon
Available in quarts, gallons and five gallon pails (55 gallon drums upon request)

SHIPPING WEIGHT: 1 unit = 9 lbs.

USDA APPROVAL: Yes

All technical advice, recommendations and services are to be rendered by the Seller gratis. They are based on technical data which the Seller believes to be reliable, and are intended for use by persons having skill and know-how, at their own discretion and risk. Seller assumes no responsibility for results obtained or damages incurred from their use by Buyer in whole or in part. Such recommendation, technical advice or services are not to be taken as a license to operate under or intended to suggest infringement of any existing patent.

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www.parkercoatings.com

CHEMSEAL 1015-WRU Application Data

SURFACE PREPARATION: NEW CONCRETE: Remove all dust, dirt, grease and other foreign materials. For maximum adhesion, acid etching may be required. Surface texture should be similar to 100 grit sandpaper. Surface must be thoroughly dry before application of sealer. METAL SURFACES should be cleaned by solvent degreasing. WOOD SURFACES: Remove all dust, dirt, grease and other foreign materials.

PRIMER: Use three parts 1015-WRU/one part P31T

APPLICATION TEMPERATURE: Do not apply when surface temperature is below 50° F. Surface moisture content of concrete should be no greater than 18%.

CURE TIME: Eight hours light traffic - 36 hours heavy traffic, 70° F., 50% R.H. To recoat: Two to six hours between coats.

APPLICATION: One to three coats are recommended for this system, depending on porosity of surface and penetration. Apply with brush, spray or ⅜" roller. Do not over roll or product gassing could occur.

CLEAN UP: Clean up all spills and tools immediately with P32T Thinner or lacquer thinner.

CAUTION: It is recommended that the personnel observe good personal hygiene. Certain personnel may be sensitive to various types of resins that may cause dermatitis. Do not use in confined space or closed area without adequate ventilation. This product may be irritating to eyes and skin. Avoid contact with liquid components and keep liquid from touching tool handles and clothes. Use coveralls, goggles, rubber gloves or protective cream. Always wash thoroughly with soap and warm water after use. Should accidental eye contact occur, wash thoroughly with water and consult a physician immediately. US Department of Labor approved material data sheet for this coating is available upon request.

LIMITED WARRANTY: The Manufacturer warrants this product to be free from defects in material and workmanship under normal use and service for a period of one year of the date of purchase. The Manufacturer's sole liability shall be limited to replacing this product if, within one year of the date of purchase, it is shown to be defective. THIS WARRANTY IS EXPRESSLY IN LIEU OF ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING THE WARRANTIES OF MERCHANTABILITY AND FITNESS OF PURPOSE. THE MANUFACTURER SHALL NOT BE LIABLE FOR INDIRECT, INCIDENTAL, CONSEQUENTIAL OR OTHER DAMAGES OF ANY KIND. This warranty shall not be extended, altered or varied except by a written instrument signed by the Manufacturer.

TRADEBE
Environmental Services™

APPENDIX D-2

Containment Pallets

GLOBAL
globalindustrial.com a Systemax company

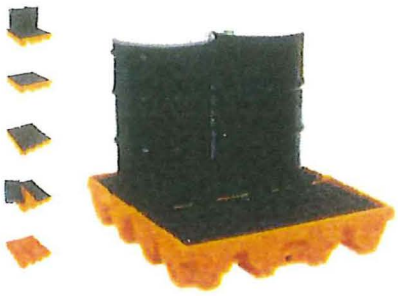
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Home Material Handling Drum & Barrel Spill Control-Drums Drum Spill Containment Platforms



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Eagle 1645 4 Drum Low Profile Spill Containment Pallet

Item #: T9F337472 Email Print

Sold By: globalindustrial.com

Usually ships same day.

14 reviews | Write a review

Price: $ 199.95

Quantity: 1

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Eagle 1689 Spill Containment Poly Pallet Ramp

Wesco® Drum Bung Plug Wrench 272005


Drum Dolly for 55 Gallon Drum - Steel Wheels 1000 Lb.

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Add $129.95


Eagle 1662 Oversized Drum Funnel with Screen for
Add $34.95


Eagle 1632 2 Drum Spill Containment Platform
Add $83.95

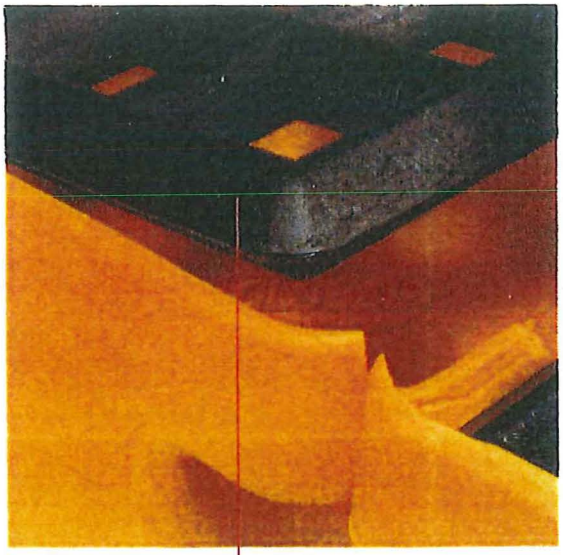
Product Information | Shipping & Return Policy | Customer Reviews | Product Q&A | Accessories

Eagle SPILL CONTAINMENT PALLET

Features high-density polyethylene construction for excellent chemical resistance. Will not rust or corrode. Grating is easily removed and has 1-3/4" square openings for effortless cleaning. Meets EPA requirements for secondary spill containment of hazardous materials. 40 CFR 264.175.

4 Drum Forkliftable Pallet with a 3/4" drain plug has 66 gallon spill capacity and a 8000 lb. load capacity. Compatible with our optional Spill Containment Ramp.

LENGTH INCHES	51-1/2
WIDTH INCHES	51-1/2
HEIGHT INCHES	8
CAPACITY DRUM	4
CAPACITY GALLONS	66
CAPACITY LBS	8000
COLOR FINISH	Yellow & Black
ASSEMBLY	Assembled
BRAND	Eagle Mfg
CONSTRUCTION	Polyethylene
DESCRIPTION	4 Drum Platform with Deck
MANUFACTURERS PART NUMBER	1645
WEIGHT LBS	65



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Eagle 1686 6 Drum Spill Containment Platform

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Eagle 1688 8 Drum Sp Containment Platform

Eagle 1689 Spill Containment Poly Palle Ramp



Eagle 1689 Spill Containment Poly Palle Ramp

Product Information

EAGLE SPILL CONTAINMENT PLATFORM

Features high-density polyethylene construction for excellent chemical resistance. Grating is easily removed and has 1-3/4" square openings for effortless cleaning. Meets EPA requirements for secondary spill containment of hazardous materials. 40 CFR 264.175. Low profile for easy access.

6 Drum Platform has 66 gallon spill capacity. Compatible with our optional Spill Containment Ramp.

LENGTH INCHES	77
WIDTH INCHES	51-1/2
HEIGHT INCHES	5-1/2
CAPACITY DRUM	6
CAPACITY GALLONS	66
CAPACITY LBS	8000
COLOR FINISH	Yellow
ASSEMBLY	Assembled
BRAND	Eagle Mfg
CONSTRUCTION	Polyethylene
DESCRIPTION	6 Drum Platform with Deck
MANUFACTURERS PART NUMBER	1686
WEIGHT LBS	88

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Eagle 1613 Spill Containment Sump Mobile (4)



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UltraTech Ultra-Spill® Economy Containment (1)



UltraTech Ultra-Spill Pallo Plus® Containment Palle (1)

Eagle 1688 8 Drum Spill Containment Platform - Yellow with No Drain

Item #: WR116146

★★★★★ (1)

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Eagle SPILL CONTAINMENT PLATFORM - YELLOW WITH NO DRAIN

Features high-density polyethylene construction for excellent chemical resistance. Grating is easily removed and has 1-3/4" square openings for effortless cleaning. Unit includes fork pockets for easy 2-way forklift maneuverability. Low profile for easy access. Meets EPA requirements for secondary spill containment of hazardous materials. 40 CFR 264.175. SPCC Compliant (Spill Prevention, Control, and Countermeasure Regulation).

8 Drum Platform has 90 gallon spill capacity. Compatible with our optional Spill Containment Ramp.

Product Specifications	
LENGTH INCHES	103
WIDTH INCHES	51-1/2
HEIGHT INCHES	6-1/2
CAPACITY DRUM	8
CAPACITY GALLONS	121
CAPACITY LBS	10,000
COLOR FINISH	Yellow
ASSEMBLY	Assembled
BRAND	Eagle Mfg
CONSTRUCTION	Polyethylene
DESCRIPTION	Drum Platform with Deck
DRAIN	No
MANUFACTURERS PART NUMBER	1688
WEIGHT LBS	112

TRADEBE
Environmental Services™

APPENDIX D-3

DOT Compatibility Chart

HAZARDOUS MATERIAL COMPATIBILITY CHART

Blank – Can be loaded together **X** – Cannot be loaded on the same trailer **O** – Cannot be loaded in the same trailer unless separated in a manner that would prevent commingling of the two materials.

Description of Hazardous Material	Placards	Notes	Class or Division	Placard Weight	1.4	1.5	1.6	2.1	2.2	3	4.1	4.2	4.3	5.1	5.2	6.1	7 *Labels White 1 & Yellow 2 only*	8
EXPLOSIVES			1.4	1001 LBS	X	X	X	O		O		O				O		O
VERY INSENSITIVE EXPLOSIVES		A	1.5	1001 LBS	X	X	X	X	X	X	X	X	X	X	X	X		X
EXTREMELY INSENSITIVE EXPLOSIVES			1.6	1001 LBS	X	X	X											
FLAMMABLE GASES			2.1	1001 LBS	O	X										O		
NON-TOXIC NON-FLAMMABLE GASES		B	2.2	1001 LBS		X												
FLAMMABLE LIQUIDS			3	1001 LBS	O	X										X		
FLAMMABLE SOLIDS			4.1	1001 LBS		X										X		O
SPONTANEOUSLY COMBUSTIBLE			4.2	1001 LBS	O	X										X		X
DANGEROUS WHEN WET			4.3	*ANY QTY*		X										X		O
OXIDIZERS		A	5.1	1001 LBS		X				O						X		O
ORGANIC PEROXIDES		F	5.2	*SEE NOTE F*		X										X		O
POISONOUS LIQUID PG I ZONE A		E	6.1	*ANY QTY*	O	X		O		X	X	X	X	X	X			X
6.1 OTHER THAN INHALATION HAZARD, ZONES A OR B		C E	6.1	1001 LBS														
RADIOACTIVE MATERIALS (White 1 & Yellow II Labels only)			7	NONE														
CORROSIVE MATERIAL			8	1001 LBS	O	X					O	X	O	O	O	X		
COMBUSTIBLE LIQUIDS		C G	3	IN BULK														
MISCELLANEOUS		C D	9	1001 LBS														

DANGEROUS PLACARD FOR MIXED LOADS

A freight container, trailer, vessel, etc., which contains two or more categories of Hazardous materials that require different placards, as specified in Table II, may be placarded with a DANGEROUS placard instead of separate placards. HOWEVER, when 2205 lbs gross weight or more of one category of material is loaded, the placard specified in Table II must be applied.



NOTES

A. Notwithstanding the requirements of the letter "X", ammonium nitrate (Oxidizer, Class 5.1, UN 1942) and ammonium nitrate fertilizer may be loaded or stored with Division 1.5 (Blasting Agents) materials.
B. For domestic transportation of any type of oxygen (Compressed•Liquid•Refrigerated Liquid), the oxygen placard may be used in place of NON-FLAMMABLE GAS placard.
C. No applicable segregation restrictions.
D. For domestic transportation, a Class 9 placard is not required. A bulk packaging containing Class 9 material must be, marked with the appropriate identification number displayed on a Class 9 placard, an orange panel or a white-square-on-point display configuration.
E. Packages with POISON or POISON INHALATION HAZARD labels may **NOT** be transported with any foodstuffs, feed or any other edible items, intended for humans or animals.
F. Placard ***ANY QUANTITY*** of 5.2, ORGANIC PEROXIDE< TYPE B< LIQUID< OR SOLID TEMPERATURE CONTROLLED
G. No placard is required for combustible liquids in non-bulk packages (119 gallons or less)

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APPENDIX D-4

Secondary Containment Calculations

Tradebe Treatment and Recycling of Wisconsin, LLC
Secondary Containment Calculations-Hazardous Non-Hazardous

Appendix E-1

Secondary Containment Calculations

FPOR Renewal Revised 9/2020

Revised per exisiting License approvals, include Haz and Non Haz, no fire suppression water

value in gallons

North Main Warehouse, Capacity = 1,720 containers		
Gross containment volume (includes ramp volume)		16,938
Volume occupied by pallets	(-)	1,773
Net Volume	=	15,165
Required contain (10% Max cap) 1,720x55x10%		9,460
		Net volume greater than Containment Requirement
2007 Addition "A", Capacity = 544 containers		
Gross containment volume (includes ramp volume)		5,531
Volume occupied by pallets	(-)	550
Net Volume	=	4,981
Required contain (10% Max cap) 544x55x10%		2,992
		Net volume greater than Containment Requirement
2007 Addition "B", Capacity = 448 containers		
Gross containment volume (includes ramp volume)		5,342
Volume occupied by pallets	(-)	507
Net Volume	=	4,835
Required contain (10% Max cap) 448x55x10%		2,464
		Net volume greater than Containment Requirement
2009 Lab Pack "A B C", Capacity = 861 containers		
Gross containment volume		14,166
Voume occupied berm	(-)	320
Volume occupied by pallets	(-)	1,779
Net Volume	=	12,067
Required contain (10% Max cap) 861x55x10%		4,736
261 (A)+ 552 (B Haz & NH) +48 (C)		Net volume greater than Containment Requirement
Enclosure Room, Capacity = 216 containers		
Gross containment volume		16,574
Volume occupied by pallets	(-)	540
Net Volume	=	16,034
Required contain (10% Max cap) 216x55x10%		6,000
		Net volume greater than Containment Requirement
West Warehouse, Capacity = 832 containers		
Gross containment volume		39,670
Volume occupied by pallets	(-)	7,445
Net Volume	=	32,225
Required contain (10% Max cap) 832x55x10%		4,598
		Net volume greater than Containment Requirement

NOTE: refer to each storage location calculation worksheets and drawing TTRWI-G8 & G9; and pallet supporting documentation

Appendix E

Appendix E-1
Scondary Containment Calculations

Tradebe (Badger) licsened for		6	(modification to 2007 FPOR)
		20	cu yd roll offs
		120	cuyds
convert cu yd to cu ft			
	x	27	cu ft / cu yd
		3240	cu ft roll offs
convert cu ft to gals			
	x	7.48	gals/ cu ft
		24235.2	gals - 6, 20 cf yd roll offs
convert gals to drums			
	/	55	gals / drum
		440.64	**drums** for 6 20 cuyd roll offfs

Tradebe will use 440 drums to be reallocated to exisiting container storage areas

TRADEBE
NORTH DRUM STORAGE WAREHOUSE
SECONDARY CONTAINMENT CALCULATIONS

DETERMINE CONTAINMENT VOLUME REQUIRED Revised 9/2020

Largest Container vs. 10% Volume of Containers Calculation (NR 664.0175):

	(Gallons)	Comments
Largest Container in Area	**6,000**	Tanker
or 10% of all Containers	**55**	Drums
Total Quantity of Containers	**1,720**	Drums (max stated capacity for area)
Total Volume of Containers	94,600	Largest container x quantity of containers
10% of Volume of Containers	**9,460**	Per NR 664.0175
Containment Volume Req'd	**9,460**	Greater than 10% of Total Quantity of Containers

Gross Perimeter Area Calculation:

	(Square FT)	Comments
Gross Perimeter Area	9,175	Measured in AutoCAD from Survey Dwg.

Gross Perimeter Volume Calculation:

	(Square FT)	Comments
Gross Perimeter Area	9,175	Measured in AutoCAD from Survey Dwg.
	(Feet)	
Low Curb Elevation	100.32	Lowest Point of curb at overflow
Ave. Base Elevation	100.07	Average floor elevation around perimeter and center
Height	0.25	Low Curb minus Ave. Base Elev.
	(Cubic FT)	
Gross Perimeter Volume	2,293.8	Height x Area
Conversion	7.481	Gallon/Cubic FT
	(Gallons)	
Gross Perimeter Volume	**17,160**	

Ramp Area Calculation:

	(Square FT)	Comments
Ramp Area L	58.4	West Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area M	115.4	Dock #1 Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area N	5.5	West Office Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area O	6.1	South Office Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area P	51.6	East Dock #2 Ramp Measured in AutoCAD from Survey Dwg.

TRADEBE
NORTH DRUM STORAGE WAREHOUSE
SECONDARY CONTAINMENT CALCULATIONS

Gross Volume Calculation (Subtracting Ramps):

	(Cubic FT)	Comments
Volume of Ramp L	7.3	0.5 x Height x Ramp Area L
Volume of Ramp M	14.4	0.5 x Height x Ramp Area M
Volume of Ramp N	0.7	0.5 x Height x Ramp Area N
Volume of Ramp O	0.8	0.5 x Height x Ramp Area O
Volume of Ramp P	6.5	0.5 x Height x Ramp Area P
Total Volume of Ramps	29.6	Sum of Volume of Ramps
Gross Perimeter Volume	2,293.8	From Gross Perimeter Volume Calculation
Gross Volume	2,264.1	Gross Perimeter Volume minus Volume of Ramps
Conversion	7.481	Gallon/Cubic FT
Gross Volume	**16,938**	

DETERMINE NET CONTAINMENT VOLUME PROVIDED

Volume Occupied by Wooden Pallets:

Wooden Pallets = W		Comments
Wooden Pallet Volume	12.5	Gallons - Calculated on separate attachment
Quantity of Pallet Spaces	197	Per Dwg. TTRWI-006
Height of Containment Dike	3.0	Inches
Height of Typ. Pallet	4.875	Inches - Wooden Pallet - See attachment
Est. Volume of Pallet within Dike	7.7	Gallons = Height ratio x Volume per pallet
Total Pallet Vol. within Dike	**1,515**	Gallons = Volume of single pallet x quantity

Volume Occupied by Containment Pallets:

Containment Pallets = C 6 place		Comments
Containment Pallet Volume	112.0	Gallons - For 6 drum capacity pallet
Quantity of Pallet Spaces	1	Per Dwg. TTRWI-006
Height of Containment Dike	3.0	Inches
Height of Typ. Pallet	6.5	Inches - Containment Pallet - See attachment
Est. Volume of Pallet within Dike	51.7	Gallons = Height ratio x Volume per pallet
Total Pallet Vol. within Dike	**52**	Gallons = Volume of single pallet x quantity

Containment Pallets = C 8 place		Comments
Containment Pallet Volume	149.0	Gallons - For 8 drum capacity pallet
Quantity of Pallet Spaces	3	Per Dwg. TTRWI-006
Height of Containment Dike	3.0	Inches
Height of Typ. Pallet	6.5	Inches - Containment Pallet - See attachment
Est. Volume of Pallet within Dike	68.8	Gallons = Height ratio x Volume per pallet
Total Pallet Vol. within Dike	**206**	Gallons = Volume of single pallet x quantity

Net Volume Calculation (Subtracting Pallets):

	(Gallons)	Comments
Gross Volume (minus berms/ramps)	16,938	From Page 2
Total Vol. of pallets	1,773	From Calculations above
Net Volume	**15,165**	=Gross Vol. - Total Vol. pallets
Required Containment Vol. (10%)	**9,460**	From Page 1

TRADEBE
2007 WAREHOUSE ADDITION - SECTION B
SECONDARY CONTAINMENT CALCULATIONS

DETERMINE CONTAINMENT VOLUME REQUIRED Revised 9/2020

Largest Container vs. 10% Volume of Containers Calculation (NR 664.0175):

	(Gallons)	Comments
Largest Container in Area	**55**	Drums
Total Quantity of Containers	448	Drums
Total Volume of Containers	24,640	Largest container x quantity of containers
10% of Volume of Containers	**2,464**	Per NR 664.0175
Containment Volume Req'd	**2,464**	Greater than single largest container

Max area 992-544 (Sec A) 448 (Sec B, floor= 224, (448 dbl stack)

Gross Perimeter Area Calculation:

	(Square FT)	Comments
Gross Perimeter Area	2,784	Measured in AutoCAD from Survey Dwg.

Gross Perimeter Volume Calculation:

	(Square FT)	Comments
Gross Perimeter Area	2,784	Measured in AutoCAD from Survey Dwg.
	(Feet)	
Low Curb Elevation	100.36	Lowest Point of curb at overflow
Ave. Base Elevation	100.1	Average elevation around perimeter and center
Height	0.26	Low Curb minus Ave. Base Elev.
	(Cubic FT)	
Gross Perimeter Volume	723.8	Height x Area
Conversion	7.481	Gallon/Cubic FT
	(Gallons)	
Gross Perimeter Volume	**5,415**	

Ramp Area Calculation:

	(Square FT)	Comments
Ramp Area U	17.1	West Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area V	58.5	East Ramp Measured in AutoCAD from Survey Dwg.

TRADEBE
2007 WAREHOUSE ADDITION - SECTION B
SECONDARY CONTAINMENT CALCULATIONS

Gross Volume Calculation (Subtracting Ramps):

	(Cubic FT)	Comments
Volume of Ramp U	2.2	0.5 x Height x Ramp Area U
Volume of Ramp V	7.6	0.5 x Height x Ramp Area V
Total Volume of Ramps	9.8	Sum of Volume of Ramps
Gross Perimeter Volume	723.8	From Gross Perimeter Volume Calculation
Gross Volume	714.0	Gross Perimeter Volume minus Volume of Ramps
Conversion	7.481	Gallon/Cubic FT
	(Gallons)	
Gross Volume	**5,342**	

DETERMINE NET CONTAINMENT VOLUME PROVIDED

Volume Occupied by Wooden Pallets:

Wooden Pallets = W		Comments
Wooden Pallet Volume	12.5	Gallons - Calculated on separate attachment
Quantity of Pallet Spaces	56	Per Dwg. TTRWI-006.1
Height of Containment Dike	3.1	Inches
Height of Typ. Pallet	4.875	Inches - Wooden Pallet - See attachment
Est. Volume of Pallet within Dike	8.0	Gallons = Height ratio x Volume per pallet
Total Pallet Vol. within Dike	**448**	Gallons = Volume of single pallet x quantity

Volume of Neutralization Containment:

Neutralization Containment		Comments
Neutraliz. Tank Volume	479.0	Gallons - (64 C.F.) Calculated on separate attachment
Height of Containment Dike	3.1	Inches
Height of Neutraliz. Tank	25.5	Inches - See attachment
Vol. of Neutraliz. Tank in Dike	**58.6**	Gallons = Height ratio x Total Volume

Neutralization Tank to be removed from facility

Net Volume Calculation (Subtracting Pallets):

	(Gallons)	Comments
Gross Volume	5,342	From Page 2
Total Vol. of pallets/ Neutr. Tank	507	From Calculations above
Net Volume	**4,835**	=Gross Vol. - Total Vol. pallets
Required Containment Vol.	**2464.0**	From Page 1

TRADEBE
2007 WAREHOUSE ADDITION - SECTION B
SECONDARY CONTAINMENT CALCULATIONS

Tanker Truck Bulking Containment Capacity

	(Gallons)	Comments
Net Containment Volume	4,835	From Above "Net Volume Calculation"
Small Compartment Truck	3,000	Industry Specifications
Excess Containment Capacity	**1,835**	=Gross Vol. - Total Vol. pallets

Tanker Truck Bulking Process - Section B

		Comments
Small Compartment Truck	3,000	Industry Specifications
	55	gallons per drum
	54.5	Drums pumped into tanker compartment
	1,835	Excess containment capacity (10% of 18,350 of haz waste)
	18,350	Hazardous Waste Liquid volume associated with excess capacity
	55	gallons per drum
	333.6	Hazardous Waste Drums - associated w/excess capacity
	54	Drums pumped, (rounded down)
	388	Max drums in Section B at start of pumping (rounded down)*
		Max drum value less than area drum capacity

*Assumes all drums Section B Hazardous Waste; space available for tank truck to back into building and maintaining proper aisle spacing.

TRADEBE
2007 WAREHOUSE ADDITION - SECTION A
SECONDARY CONTAINMENT CALCULATIONS

DETERMINE CONTAINMENT VOLUME REQUIRED Revised 9/2020

Section A

Largest Container vs. 10% Volume of Containers Calculation (NR 664.0175):

	(Gallons)	Comments
Largest Container in Area	**55**	Drums
Total Quantity of Containers	544	Drums
Total Volume of Containers	29,920	Largest container x quantity of containers
10% of Volume of Containers	**2,992**	Per NR 664.0175
Containment Volume Req'd	**2,992**	Greater than single largest container

272 x 2 = 544 Max area 992-544 (Sec A) 440 (Sec B, floor= 224, (448 dbl stack)

Gross Perimeter Area Calculation:

	(Square FT)	Comments
Gross Perimeter Area	2,832	Measured in AutoCAD from Survey Dwg.

Gross Perimeter Volume Calculation:

	(Square FT)	Comments
Gross Perimeter Area	2,832	Measured in AutoCAD from Survey Dwg.
	(Feet)	
Low Curb Elevation	100.348	Lowest Point of curb at overflow
Ave. Base Elevation	100.085	Average elevation around perimeter and center
Height	0.263	Low Curb minus Ave. Base Elev.
	(Cubic FT)	
Gross Perimeter Volume	744.8	Height x Area
Conversion	7.481	Gallon/Cubic FT
	(Gallons)	
Gross Perimeter Volume	**5,572**	

Ramp Area Calculation:

	(Square FT)	Comments
Ramp Area R	22.7	North Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area S	3.5	South Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area T	15.1	East Ramp Measured in AutoCAD from Survey Dwg.

TRADEBE
2007 WAREHOUSE ADDITION - SECTION A
SECONDARY CONTAINMENT CALCULATIONS

Gross Volume Calculation (Subtracting Ramps):

	(Cubic FT)	Comments
Volume of Ramp R	3.0	0.5 x Height x Ramp Area R
Volume of Ramp S	0.5	0.5 x Height x Ramp Area S
Volume of Ramp T	2.0	0.5 x Height x Ramp Area T
Total Volume of Ramps	5.4	Sum of Volume of Ramps
Gross Perimeter Volume	744.8	From Gross Perimeter Volume Calculation
Gross Volume	739.4	Gross Perimeter Volume minus Volume of Ramps
Conversion	7.481	Gallon/Cubic FT
	(Gallons)	
Gross Volume	**5,531**	

DETERMINE NET CONTAINMENT VOLUME PROVIDED

Volume Occupied by Wooden Pallets:

Wooden Pallets = W		Comments
Wooden Pallet Volume	12.5	Gallons - Calculated on separate attachment
Quantity of Pallet Spaces	68	Per Dwg. TTRWI-006
Height of Containment Dike	3.2	Inches
Height of Typ. Pallet	4.875	Inches - Wooden Pallet - See attachment
Est. Volume of Pallet within Dike	8.1	Gallons = Height ratio x Volume per pallet
Total Pallet Vol. within Dike	**550**	Gallons = Volume of single pallet x quantity

Net Volume Calculation (Subtracting Pallets):

	(Gallons)	Comments
Gross Volume	5,531	From Page 2
Total Vol. of pallets	550	From Calculations above
Net Volume	**4,981**	=Gross Vol. - Total Vol. pallets
Required Containment Vol.	**2,992**	From Page 1

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2009 LAB PACK SECTIONS A, B C

SECONDARY CONTAINMENT CALCULATIONS

DETERMINE CONTAINMENT VOLUME Revised 9/2020

Largest Container vs. 10% Volume of Containers Calculation (NR 664.0175):

Section A	(Gallons)	Comments
Largest Container in Area	**55**	Drums
Total Quantity of Containers	261	Drums (192 + 69 double stack)
Total Volume of Containers	14,355	Largest container x quantity of containers
10% of Volume of Containers	**1,436**	Per NR 664.0175
Containment Volume Req'd	**1,436**	Greater than single largest container

Section B	(Gallons)	Comments
Largest Container in Area	**55**	Drums
Total Quantity of Containers	552	Drums
Total Volume of Containers	30,360	Largest container x quantity of containers
10% of Volume of Containers	**3,036**	Per NR 664.0175
Containment Volume Req'd	**3,036**	Greater than single largest container

Section C	(Gallons)	Comments
Largest Container in Area	**55**	Drums
Total Quantity of Containers	48	Drums
Total Volume of Containers	2,640	Largest container x quantity of containers
10% of Volume of Containers	**264**	Per NR 664.0175
Containment Volume Req'd	**264**	Greater than single largest container
Total Continment Volume Required Sections A, B & C	**4,736**	

Gross Perimeter Area Calculation:

Section A	(Square FT)	Comments
Gross Perimeter Area	2,957	Measured in AutoCAD from Survey Dwg.
Section B	(Square FT)	Comments
Gross Perimeter Area	3,433	Measured in AutoCAD from Survey Dwg.
Section C	(Square FT)	Comments
Gross Perimeter Area	373	Measured in AutoCAD from Survey Dwg.
Gross Perimeter Area	**6,763**	Measured in AutoCAD from Survey Dwg.

Gross Perimeter Volume Calculation:

	(Square FT)	Comments
Gross Perimeter Area	**6,763**	Measured in AutoCAD from Survey Dwg.
	(Feet)	
Low Curb Elevation	101.51	Lowest Point of curb at overflow
Ave. Base Elevation	101.23	Average elevation around perimeter and center
Height	0.28	Low Curb minus Ave. Base Elev.
Gross Perimeter Volume	1,893.6	Height x Area (Cubic FT)
Conversion	7.481	Gallon/Cubic FT
Gross Perimeter Volume	**14,166**	**(Gallons)**

Ramp Area Calculation:

Section A	(Square FT)	Comments
Ramp Area E	22.7	Northwest Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area F	25.3	Northeast Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area G	37.0	Southwest Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area H	38	Southeast Ramp Measured in AutoCAD from Survey Dwg.
	(Cubic FT)	Comments
Volume of Ramp E	3.2	0.5 x Height x Ramp Area E
Volume of Ramp F	3.5	0.5 x Height x Ramp Area F
Volume of Ramp G	5.2	0.5 x Height x Ramp Area G
Volume of Ramp H	5.3	0.5 x Height x Ramp Area H
Total Volume of Ramps	**17.2**	Sum of Volume of Ramps (Cu Ft)

Section B	(Square FT)	Comments
Ramp Area D	38.7	West Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area I	37.9	Northwest Ramp Measured in AutoCAD from Survey Dwg.
Ramp Area J	39.0	Northeast Ramp Measured in AutoCAD from Survey Dwg.
	(Cubic FT)	Comments
Volume of Ramp D	5.4	0.5 x Height x Ramp Area D
Volume of Ramp I	5.3	0.5 x Height x Ramp Area I
Volume of Ramp J	5.5	0.5 x Height x Ramp Area J
Total Volume of Ramps	**16.2**	Sum of Volume of Ramps

No Ramps in Section C

Ramp Totals	(Cubic FT)	Comments
Section A	17.2	Sum of Volume of Ramps
Section B	16.2	Sum of Volume of Ramps
Ramp Volume total	33.4	Sum of Volume of Ramps (Cu Ft)
Conversion	7.481	Gallon/Cubic FT
Total	**250.1**	Gallons displaced by ramps

Volume Occupied by Berm

Section A/B	(Square FT)	Comments
Section A/B	33.6	Sq Ft (Per Drawing A3.1 (5" x 80'))
Section A/B	0.28	Height of Berms
Section A /B	9.4	Sum of Volume of Ramps
Conversion	7.481	Gallon/Cubic FT
Total	**70.4**	Gallons displaced by ramps

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2009 LAB PACK SECTIONS A, B C

SECONDARY CONTAINMENT CALCULATIONS

Volume Occupied by Wooden Pallets:

Section A		
Wooden Pallets = W		Comments
Wooden Pallet Volume	12.5	Gallons - Calculated on separate attachment
Quantity of Pallet Spaces	30	Per Dwg. TTRWI-006
Height of Containment Dike	3.4	Inches
Height of Typ. Pallet	4.875	Inches - Wooden Pallet - See attachment
Est. Volume of Pallet within Dike	8.6	Gallons = Height ratio x Volume per pallet
Total Pallet Vol. within Dike	**258**	Gallons = Volume of single pallet x quantity

Section B		
Wooden Pallets = W		Comments
Wooden Pallet Volume	12.5	Gallons - Calculated on separate attachment
Quantity of Pallet Spaces	69	Per Dwg. TTRWI-006
Height of Containment Dike	3.4	Inches
Height of Typ. Pallet	4.875	Inches - Wooden Pallet - See attachment
Est. Volume of Pallet within Dike	8.6	Gallons = Height ratio x Volume per pallet
Total Pallet Vol. within Dike	**594**	Gallons = Volume of single pallet x quantity

Section C		Worse case option no Wood Pallets 4 Containment Pallets
Wooden Pallets = W		Comments
Wooden Pallet Volume	12.5	Gallons - Calculated on separate attachment
Quantity of Pallet Spaces	0	Per Dwg. TTRWI-006
Height of Containment Dike	3.4	Inches
Height of Typ. Pallet	4.875	Inches - Wooden Pallet - See attachment
Est. Volume of Pallet within Dike	8.6	Gallons = Height ratio x Volume per pallet
Total Pallet Vol. within Dike	**0**	Gallons = Volume of single pallet x quantity

Volume Occupied by Containment Pallets:

Containment Pallets = C		Comments
Containment Pallet Volume	112.0	Gallons - For 6 drum capacity pallet
Quantity of Pallet Spaces	16	Per Dwg. TTRWI-006 (12 Section A, 4 Section C) Detail 1
Height of Containment Dike	3.4	Inches
Height of Typ. Pallet	6.5	Inches - Containment Pallet - See attachment
Est. Volume of Pallet within Dike	57.9	Gallons = Height ratio x Volume per pallet
Total Pallet Vol. within Dike	**926**	Gallons = Volume of single pallet x quantity

Pallets Displacement		Comments
Section A	258.5	Wood Pallet displacement
Section B	594.5	Wood Pallet displacement
Section C	0.0	Wood Pallet displacement
Section A	926.3	Containment Pallet displacement
	1,779.2	Pallet Displacement

Net Volume Calculation (Subtracting Pallets):

	(Gallons)	Comments
Gross Volume capacity	14166.3	From Ramp / Berm Displacement calculations
	320.5	Volume of Ramps/Berm
	1779.2	Pallet Displacement
Net Volume	**12,066.6**	**Gallons capacity Sections A, B and C**
Required Containment Vol.	4,735.5	From Page 1

TRADEBE
ENCLOSURE BUILDING
SECONDARY CONTAINMENT CALCULATIONS

DETERMINE CONTAINMENT VOLUME REQUIRED Revised 9/2020

Largest Container vs. 10% Volume of Containers Calculation (NR 664.0175):

	(Gallons)	Comments
Largest Container in Area	**6,000**	Tanker
or 10% of all Containers	**55**	Drums
Total Quantity of Containers	216	Drums
Total Volume of Containers	11,880	Largest container x quantity of containers
10% of Volume of Containers	**1,188**	Per NR 664.0175
Containment Volume Req'd	**6,000**	Largest container used for worse case*

* refer to drawing TTRWI-0006A3 for capacity scenarios

DETERMINE GROSS CONTAINMENT VOLUME PROVIDED

Gross Area Calculation:

	(Feet)	Comments
	(Square FT)	
Measured Area	1,530	Measured in AutoCAD from Survey Dwg.

Gross Volume Calculation:

	(Square FT)	Comments
Measured Area	1,530	Measured in AutoCAD from Survey Dwg.
	(Feet)	
Perimeter Elevation	101.26	Lowest Point used from survey (conservative)
Elevation at Pit Cover	100.76	Highest Point used from survey (conservative)
Height	0.5	High Point minus Low Point
	(Cubic FT)	
Volume	255	1/3 Height x Area (Volume of a cone)
Conversion	7.481	Gallon/Cubic FT
	(Gallons)	
Gross Volume	1,908	Does not include valut volume of **14,666** gal. per BC&A Architects
Gross Volume Including Vault	**16,574**	Gross volume + vault volume (from BC&A Architects)

TRADEBE
ENCLOSURE BUILDING
SECONDARY CONTAINMENT CALCULATIONS

DETERMINE NET CONTAINMENT VOLUME PROVIDED

Wooden Pallets = W		Comments
Wooden Pallet Volume	12.5	Gallons - Calculated on separate attachment
Quantity of Pallet Spaces	27	Per Dwg. TTRWI-006
Quantity of Drums	108	Per Dwg. TTRWI-006
Vol. of Pallets within Dike	**338**	Gallons = Volume of single pallet x quantity
Height of Containment Dike	6.0	Inches
Height of Typ. Pallet	4.875	Inches - Wooden Pallet - See attachment
Height of Drums within Dike	1.125	Inches - Height of drum affecting containment volume
Typ. Total Drum Height	33	Inches
Volume of Drum within Dike	1.9	Gallons
Total Drum Vol. within Dike	**203**	Gallons = Volume of single drum x quantity
Total Drum & Pallet Vol.	**540**	Gallons of Drums and Wooden Pallets

Net Volume Calculation (Subtracting Pallets and Drums):

Containers:

	(Gallons)	Comments
Gross Volume	16,574	From Page 2
Total Vol. of pallets & drums	540	From Calculations above
Net Volume	**16,034**	=Gross Vol. - Total Vol. pallets & drums
Required Containment Vol.	**6,000**	From Page 1

TRADEBE
WEST DRUM WAREHOUSE
SECONDARY CONTAINMENT CALCULATIONS

DETERMINE CONTAINMENT VOLUME REQUIRED Revised 9/2020

Largest Container vs. 10% Volume of Containers Calculation (NR 664.0175):

	(Gallons)	Comments
Largest Container in Area	**55**	Drums
Total Quantity of Containers	836	Drums TTRWI-006. indicates 832 which is current configuration
Total Volume of Containers	45,980	Largest container x quantity of containers
10% of Volume of Containers	**4,598**	Per NR 664.0175
Containment Volume Req'd	**4,598**	Greater than single largest container

DETERMINE GROSS CONTAINMENT VOLUME PROVIDED

Gross Perimeter Area Calculation:

	(Square FT)	Comments
Gross Perimeter Area	4,565	Measured in AutoCAD from Survey Dwg.

Gross Perimeter Volume Calculation:

	(Square FT)	Comments
Gross Perimeter Area	4,565	Measured in AutoCAD from Survey Dwg.
	(Feet)	
Low Curb Elevation	102.417	Lowest Point of curb at overflow
Ave. Base Elevation	101.25	Average floor elevation around perimeter and center
Height	1.167	Low Curb minus Ave. Base Elev.
	(Cubic FT)	
Gross Perimeter Volume	5,327.4	Height x Area
Conversion	7.481	Gallon/Cubic FT
	(Gallons)	
Gross Perimeter Volume	**39,854**	

Ramp & Step Area Calculation:

	(Square FT)	Comments
Step Area A	2.5	North Step Measured in AutoCAD from Survey Dwg.
Step Area B	3.0	South Step Measured in AutoCAD from Survey Dwg.
Ramp Area A	36.7	South Ramp Measured in AutoCAD from Survey Dwg.

TRADEBE
WEST DRUM WAREHOUSE
SECONDARY CONTAINMENT CALCULATIONS

Gross Volume Calculation (Subtracting Steps & Ramp):

	(Cubic FT)	Comments
Volume of Step Area A	1.5	0.5 x Height x Step Area A
Volume of Step Area B	1.8	0.5 x Height x Step Area B
Volume of Ramp Area A	21.4	0.5 x Height x Ramp Area A
Total Vol. of Steps/Ramps	24.6	Sum of Volume of Steps / Ramps
Gross Perimeter Volume	5,327.4	From Gross Perimeter Volume Calculation
Gross Volume	5,302.7	Gross Perimeter Volume minus Volume of Steps / Ramps
Conversion	7.481	Gallon/Cubic FT
	(Gallons)	
Gross Volume	**39,670**	

DETERMINE NET CONTAINMENT VOLUME PROVIDED

Volume Occupied by Wooden Pallets & Drums:

Wooden Pallets = W		Comments
Wooden Pallet Volume	12.5	Gallons - Calculated on separate attachment
Quantity of Pallet Spaces	92	Per Dwg. TTRWI-006
Quantity of Drums	368	Per Dwg. TTRWI-006
Vol. of Pallets within Dike	**1,150**	Gallons = Volume of single pallet x quantity
Height of Containment Dike	14.0	Inches
Height of Typ. Pallet	4.875	Inches - Wooden Pallet - See attachment
Height of Drums within Dike	9.129	Inches - Height of drum affecting containment volume
Typ. Total Drum Height	33	Inches
Volume of Drum within Dike	15.2	Gallons
Total Drum Vol. within Dike	**5,599**	Gallons = Volume of single drum x quantity
Total Drum & Pallet Vol.	**6,749**	Gallons of Drums and Wooden Pallets

Volume Occupied by Containment Pallets & Drums:

Containment Pallets = C 4		Comments
Containment Pallet Volume	26.0	Gallons - Cont. Pallet displaced volume-capacity
Quantity of Pallet Spaces	4	Per Dwg. TTRWI-006
Quantity of Drums	16	Per Dwg. TTRWI-006
Vol. of Pallets within Dike	**104**	Gallons = Volume of single pallet x quantity
Height of Containment Dike	14.0	Inches
Height of Typ. Pallet	8	Inches - Containment Pallet - See attachment
Height of Drums within Dike	6	Inches - Height of drum affecting containment volume
Typ. Total Drum Height	33	Inches
Volume of Drum within Dike	10.0	Gallons
Total Drum Vol. within Dike	**160**	Gallons = Volume of single drum x quantity
Total Drum & Pallet Vol.	**264**	Gallons of Drums and Containment Pallets

TRADEBE
WEST DRUM WAREHOUSE
SECONDARY CONTAINMENT CALCULATIONS

Containment Pallets = C 8		Comments
Containment Pallet Volume	28.0	Gallons - Cont. Pallet displaced volume-capacity
Quantity of Pallet Spaces	4	Per Dwg. TTRWI-006
Quantity of Drums	32	Per Dwg. TTRWI-006
Vol. of Pallets within Dike	**112**	Gallons = Volume of single pallet x quantity
Height of Containment Dike	14.0	Inches
Height of Typ. Pallet	8	Inches - Containment Pallet - See attachment
Height of Drums within Dike	6	Inches - Height of drum affecting containment volume
Typ. Total Drum Height	33	Inches
Volume of Drum within Dike	10.0	Gallons
Total Drum Vol. within Dike	**320**	Gallons = Volume of single drum x quantity
Total Drum & Pallet Vol.	**432**	Gallons of Drums and Containment Pallets

Net Volume Calculation (Subtracting Pallets and Drums):

	(Gallons)	Comments
Gross Volume	39,670	From Page 2
Total Vol. of pallets & drums	7,445	From Calculations above
Net Volume	**32,225**	=Gross Vol. - Total Vol. pallets & drums
Required Containment Vol.	**4,598**	From Page 1

Containment pallet displacement volume calculations

Global Industrial sheets for 4, 6 and 8 drums containment pallets -see supporting documentat

4 place

l	51.5	
w	51.5	
h	8	
cu in	21218	
cu in/cu ft	1728	
cu ft	12.28	
gals/cuft	7.48	
gals displaced	92	
gals capacity	66	
	26	**containment gallons displaced**

6 place

l	77	
w	51.5	
h	6.5	
cu in	25775.75	
cu in/cu ft	1728	
cu ft	14.92	
gals/cuft	7.48	
gals displaced	112	
gals capacity	66	
	46	**containment gallons displaced**

8 place

l	103	
w	51.5	
h	6.5	
cu in	34479.25	
cu in/cu ft	1728	
cu ft	19.95	
gals/cuft	7.48	
gals displaced	149	
gals capacity	121	
	28	**containment gallons displaced**

:ion

2/20/2020

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APPENDIX D-5

PCB Storage Exemption

December 13, 2005

Ms. Sandra Miller, CHMM
Waste Management Specialist
State of Wisconsin Department of Natural Resources
2300 N. Martin Luther King Jr. Drive
P.O. Box 12436
Milwaukee, WI 53212-0436

RE: Hazardous Waste Inspection – Notice of Noncompliance November 15, 2005

Dear Ms. Miller,

This letter is in response to the Notice of Noncompliance dated November 15, 2005. We have reviewed the concerns raised in your notice and have taken steps to respond to those concerns. The following is the requested information regarding the storage of PCB waste.

Badger Disposal accepts for storage and transfer PCB ballasts, capacitors, transformers as well as PCB contaminated soil, solvents and lab samples. PCB materials are received in various sized containers such as 5 gallon, 14 gallon, 20 gallon, 30 gallon and 55 gallon drums. Transformers are shipped in on pallets. Transformers are stored and sent off site for disposal to Superior Special Services located in Phoenix, AZ.

PCB ballasts and capacitors are either stored and shipped off site in their original containers or bulked into cubic yard boxes and shipped off site to EQ Environmental Services in Detroit, MI. Contaminated soils and solvents are shipped off site in their original containers to Onyx in Port Arthur, TX. PCB lab samples are lab packed into larger drums and shipped to Onyx in Port Arthur, TX.

PCB materials are shipped to off site facilities within one year from receipt. We estimate receipt of between 6,000 and 8,000 pounds of PCB contaminated materials in any given year. Warehouse storage areas utilized to store PCB's and PCB items for transfer to an ultimate disposal facility are clearly marked.

Sincerely,
Badger Disposal of WI., Incorporated

Henry J. Krier
President

WISCONSIN
DEPT. OF NATURAL RESOURCES

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8716
TTY 414-263-8713

February 9, 2006

Mr. Henry Krier
Badger Disposal of Wisconsin, Inc.
5611 W. Hemlock Street
Milwaukee, WI 53223

File Ref: FID# 241684000
SW/APP

Subject: Exemption for PCB Storage and Transfer Operations

Dear Mr. Krier:

The Department has received and reviewed the information provided in your December 13, 2005 letter regarding the storage and transfer of PCB wastes. The information was submitted in response to a notice of noncompliance issued by the Department on November 15, 2005. Additional information was provided by Ms. Kandylee Schmit during a December 28, 2005 telephone conversation.

Based on the information provided, the department is issuing a conditional exemption under s. 289.53, Wisconsin Statutes, from the commercial PCB storage and treatment facility feasibility report, plan of operation, licensing and financial responsibility requirements. If you expand or modify your business in other areas which involve the storage and processing of PCBs, a license under s. 289.53, Wisconsin Statutes, may be required.

If you have any questions, please contact Sandy Miller of my staff at 414-263-8675.

Sincerely,

Franklin Schultz
Waste Management Team Supervisor
Southeast Region

c: SER File

BEFORE THE STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

CONDITIONAL EXEMPTION FOR THE
BADGER DISPOSAL OF WISCONSIN, INC.
PCB STORAGE AND TRANSFER FACILITY

FINDINGS OF FACT

The Department finds that:

1. Badger Disposal of Wisconsin, Inc. operates a PCB storage and transfer operation at their facility located at 5611 W. Hemlock Street in the City of Milwaukee, Milwaukee County, Wisconsin. Operations include the storage and shipment of PCBs, such as ballasts, capacitors, transformers and PCB contaminated wastes. Management of the PCB waste consists of storing the materials in their original containers or bulking the materials into cubic yard boxes before they are shipped off-site.

2. The Department has issued the following current licenses to Badger Disposal of Wisconsin, Inc.: PCB full service contractor transportation license #12685; hazardous waste container storage facility license #6026; solid waste processing facility license #3415; solid waste transfer facility license #3386; and, solid waste transporter license #14579.

3. On November 11, 2005, the management of PCB wastes was discussed during a hazardous waste compliance inspection at Badger Disposal of Wisconsin, Inc.

4. On November 15, 2005, the Department issued a Notice of Noncompliance to Badger Disposal of Wisconsin, Inc. and requested information regarding the management of PCB wastes.

5. In a letter dated December 13, 2005, Badger Disposal of Wisconsin, Inc. supplied information regarding the management of PCB wastes.

6. On December 28, 2005, additional information regarding the PCB storage operations was provided by Ms. Kandylee Schmit, compliance officer for Badger Disposal of Wisconsin, Inc. by telephone.

7. On February 6, 2006, a draft of the conditional exemption was e-mailed to Ms. Schmit.

8. On February 8, 2006, Ms. Schmit stated in an e-mail that no comments would be made on the draft conditional exemption.

9. The conditions set forth below are needed to ensure that the storage and transfer facility will meet the requirements of s. 299.45, Wisconsin Statutes, and ch. NR 157, Wisconsin Administrative Code.

CONCLUSIONS OF LAW

1. The Department has promulgated ch. NR 157, Wisconsin Administrative Code, establishing minimum standards for management of PCBs and products containing PCBs under the authority of s. 299.45, Wisconsin Statutes.

2. The Department has authority to issue exemptions with special conditions in accordance with s. 289.53, Wisconsin Statutes.

3. Under s. 289.53, Wisconsin Statutes, the Department has authority to grant exemptions from the provisions of s. 289.53, Wisconsin Statutes.

4. In accordance with the foregoing, the Department has authority under 289.53, Wisconsin Statutes, and ch. NR 157, Wisconsin Administrative Code, to issue the following conditional exemption.

CONDITIONAL GRANT OF EXEMPTION

The Department hereby grants an exemption from the requirements of s. 289.53, Wisconsin Statutes, to Badger Disposal of Wisconsin, Inc. for storing and transferring PCB wastes at the Badger Disposal of Wisconsin, Inc. facility in Milwaukee, Wisconsin, subject to compliance with the provisions of ch. NR 157, Wisconsin Administrative Code and the following conditions:

1. Storage and active management of the PCB waste shall occur within the licensed hazardous waste storage area to assure adequate secondary containment.

2. Badger Disposal shall maintain operating records for the PCB containers stored and transferred on-site. The quantity of PCB waste stored on-site shall count towards the maximum inventory of solid waste which can be stored under the solid waste processing license #3415.

3. Badger Disposal shall maintain adequate aisle space in the storage area so the containers and pallets can be inspected.

4. Inspection records which include the inspection results and any maintenance, cleanup and disposal actions shall be maintained by Badger Disposal.

5. Badger Disposal shall notify the Department before implementing any revisions or changes to their PCB storage and transfer operations.

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

NOTICE OF APPEAL RIGHTS

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

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

This notice is provided pursuant to s. 227.48(2), Wisconsin Stats.

DEPARTMENT OF NATURAL RESOURCES
For the Secretary

Franklin Schultz — Date: 02/15/06
Waste Management Team Supervisor
Southeast Region

Sandra Miller — Date: 02/15/06
Waste Management Specialist
Southeast Region

TRADEBE
Environmental Services™

APPENDIX D-6

Hazardous Waste Treatment

Facility License

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE FACILITY LICENSE

License Number: 4395
HAZARDOUS WASTE FACILITY LICENSE
Hazardous Waste Treatment - Container
Licensee Name: TRADEBE TREATMENT AND RECYCLING OF WI LLC
Effective Date: October 01, 2021
Expiration Date: September 30, 2022

Facility Information
FID: 241384000
EPA ID: WID988580056

TRADEBE TREATMENT AND RECYCLING OF WI LLC
5611 W Hemlock St
Milwaukee WI 53223-4711
Milwaukee County (41)
DNR Region: SE

THIS LICENSE IS SUBJECT TO AND CONDITIONED UPON COMPLIANCE WITH THE LICENSEE'S FEASIBILITY DETERMINATION AND PLAN OF OPERATION APPROVAL AND ALL SUBSEQUENT PLAN APPROVAL MODIFICATIONS

WASTE TYPES ARE LIMITED TO THOSE LISTED ON THE PART-A APPLICATION

This license authorizes the licensee to operate the hazardous waste facility described above during the term hereof except as modified by the Department. This license is subject to and conditioned upon compliance with chapter 291, Wis. Stats., and chapters NR 660-679, Wis. Adm. Code (hazardous waste), any plan approval and modifications thereof, and any special order and modifications thereof issued by the Department. Any exemptions from the requirements of chapters NR 660-679, Wis. Adm. Code, issued for the facility are listed above and on attached documents.

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APPENDIX D-7

Hazardous Waste

Storage License

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE FACILITY LICENSE

License Number: 6026
HAZARDOUS WASTE FACILITY LICENSE
Hazardous Waste Storage - Container
Licensee Name: TRADEBE TREATMENT AND RECYCLING OF WI LLC
Effective Date: October 01, 2021
Expiration Date: September 30, 2022

Facility Information
FID: 241384000
EPA ID: WID988580056

TRADEBE TREATMENT AND RECYCLING OF WI LLC
5611 W Hemlock St
Milwaukee WI 53223-4711
Milwaukee County (41)
DNR Region: SE

THIS LICENSE IS SUBJECT TO AND CONDITIONED UPON COMPLIANCE WITH THE LICENSEE'S FEASIBILITY DETERMINATION AND PLAN OF OPERATION APPROVAL AND ALL SUBSEQUENT PLAN APPROVAL MODIFICATIONS

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TRADEBE
Environmental Services™

APPENDIX D-8

Solid Waste Transfer Facility License

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
SOLID WASTE FACILITY OPERATION LICENSE

License Number: 3386
SOLID WASTE FACILITY OPERATION LICENSE
Solid Waste Transfer - Non-exempt (between 50 and 100 tons/day)
Licensee Name: TRADEBE TREATMENT AND RECYCLING OF WI LLC
Effective Date: October 01, 2021
Expiration Date: September 30, 2022

Facility Information
FID: 241384000

TRADEBE TREATMENT AND RECYCLING OF WI LLC
5611 W Hemlock St
Milwaukee WI 53223-4711
Milwaukee County (41)
DNR Region: SE

This license authorizes the licensee to operate the solid waste facility described above during the term hereof except as modified by the Department. This license is subject to and conditioned upon compliance with the provisions of chapter 289, Wis. Stats., and chapters NR 500-590, Wis. Adm. Code, any plan approval and modifications thereof, and any special order and modifications thereof issued by the Department. Any exemptions from the requirements of chapters NR 500-590, Wis. Adm. Code, issued for the facility are listed above.

TRADEBE
Environmental Services™

APPENDIX D-9

Drum Crusher Specifications

International Baler Corp.

A Subsidiary of Waste Technology Corp.

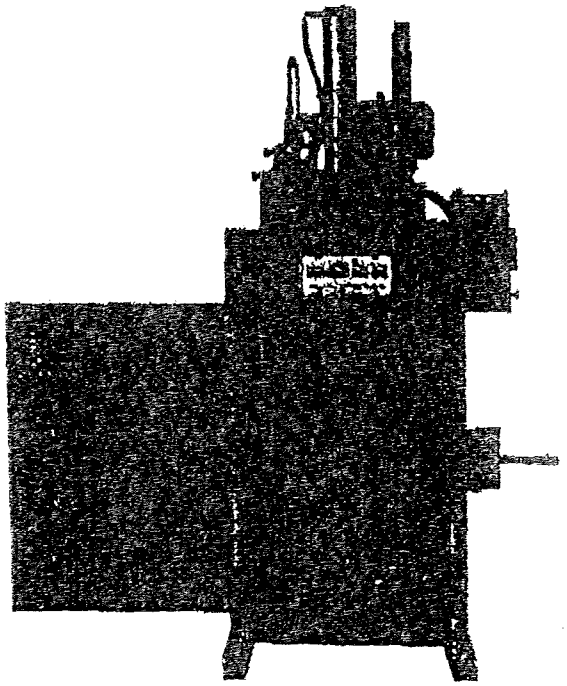
DC-55

VERTICAL DRUM CRUSHER

Reduce scrap disposal and cartage cost

STANDARD FEATURES ON MODEL DC-55

- 55-gallon drum capacity.
- Reduces 55-gallon drums to approximately 8".
- Designed for maximum safety, all moving parts are completely encased.
- Electric safety switches protect the operator. The drum crusher will not operate if the doors are open. During the compacting cycle, if the operator opens the doors, the motor cuts off immediately.
- Rugged heavy-duty scrap metal baler type construction.
- Safety valves insure machine safety from operator abuse.
- Easy to use push button controls.

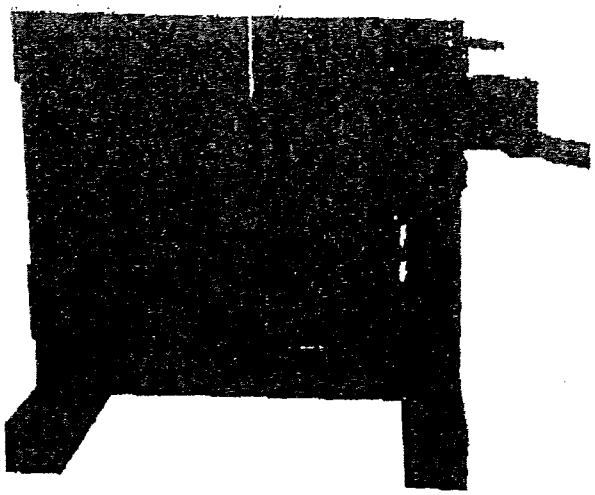


Drum Crusher

saves time, money, space & shipping costs.

Drum Crusher is simple and safe to operate . . .

DC-55 is automatic: Operator places drum in flattener - closes and locks the doors - presses start button then walks away - ram descends - flattens the barrel - returns automatically to open position - motor shuts off.

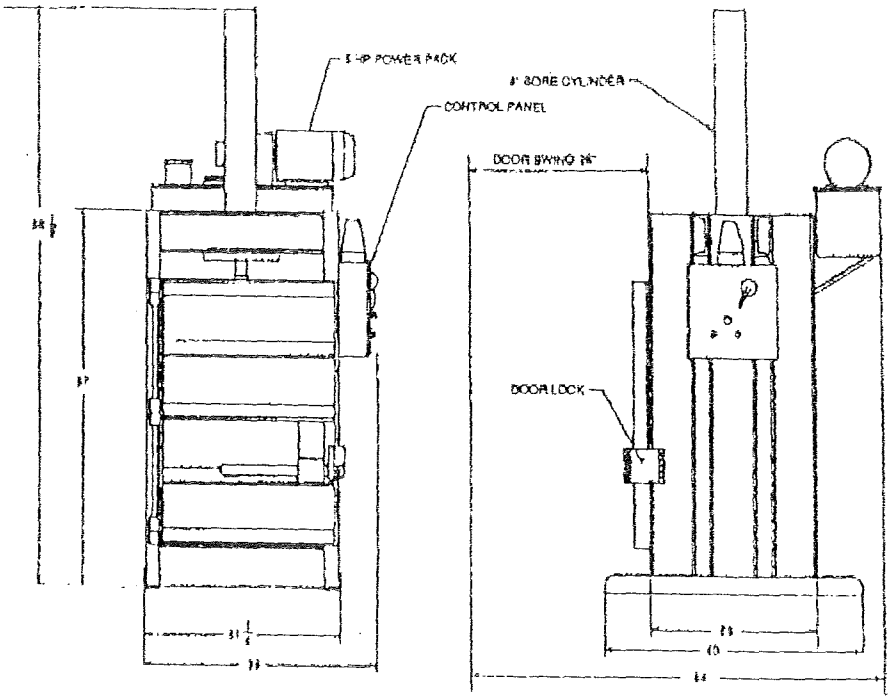


International Baler Corp.

A Sub. of Waste Technology Corp.

5400 Rio Grande Avenue / Jacksonville / Florida 32205
Call Toll-Free: 1-800-231-9286 / In Florida: (904) 358-3812

DIMENSIONS



SPECIFICATIONS

INTERNATIONAL BALER MODEL DC-55 DRUM CRUSHER

STRUCTURAL

Constructed of structural and plate steel, fully welded

Bale chamber: 26" wide by 25 1/2" deep by 40" high. Constructed of 7" - 9.8 lb. channel

Hydraulic cylinder support: 6" - 13.0 lb. channel

Single door heavily reinforced with safety latch

Heavy-duty platen guide system to prevent platen racking

HYDRAULIC

Manifold hydraulic system with gear-type pump

Hydraulic system pressure: 2050 PSI

Overall platen force: 25,750 lbs.

JIC standard hydraulics

4" heavy-duty cylinder with 2 1/2" chrome-plated rod - 32" stroke

Cycle time: 29 seconds

ELECTRICAL

5 HP electric motor TEFC

Safety interlock switches

Fully-assembled and pre-wired for easy installation

Pushbutton control voltage: 110 Volts

STANDARD VOLTAGES: 230 or 460, 3 Phase, 60 Hertz

DRUM CRUSHER

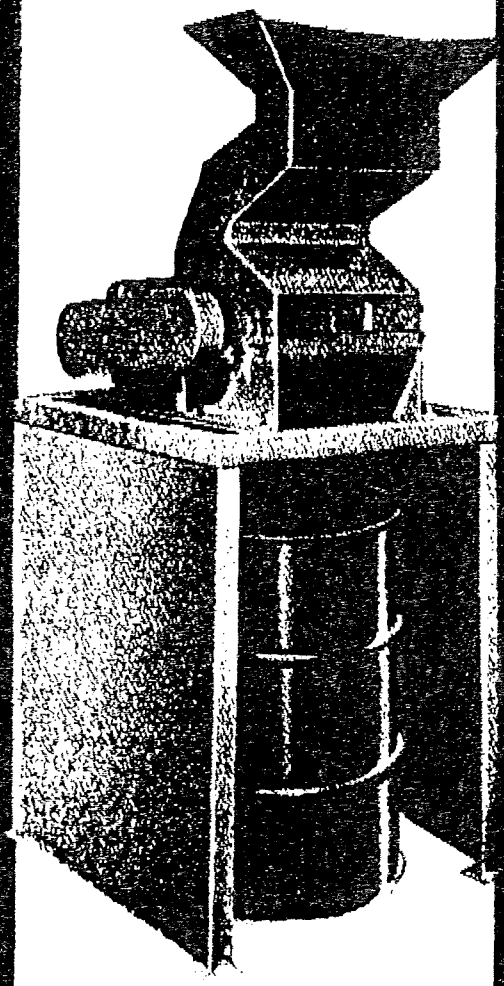
Improves Housekeeping & Plant Safety

Saves Time, Money, Space & Shipping Costs

International Baler Corp.
A Sub. of Waste Technology Corp.

PLASTIC

S PRODUCT



Shreds brittle plastic containers. Destroys container and product identity. Eliminates fraudulent use of products.

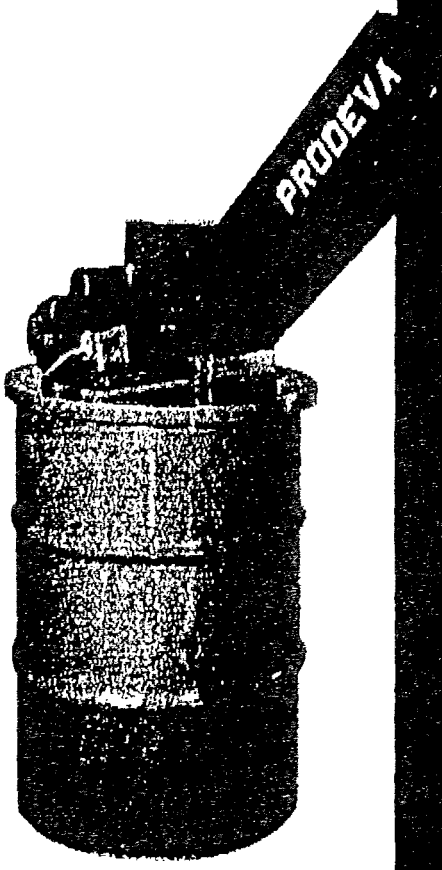
Saves Money, Time, Labor and Space

Used by Cosmetic, Pharmaceutical and Electronic Manufacturers.

Safety Engineered

GLASS

ES VOLUM



Crushes glass bottles and jugs up to 1 gallon size. Crushes 600 bottles per hour. Crushing unit Fits over a 30 or 55 gallon drum. Saves up to 80% waste removal and handling costs.

Saves Money, Time, Labor and Space

Used by Bottlers, Recycling Centers, Cafeterias, Restaurants, Taverns, Municipalities and Institutions.

Safety Engineered

TRADEBE
Environmental Services™

APPENDIX D-10

Subpart CC Certification

TRADEBE
Environmental Services™

September 17, 2024

Mr. Douglas W. Coenen
Hazardous Waste Specialist
Hazardous Waste & Mining Section
State of Wisconsin Department of Natural Resources
PO Box 7021
101 S Webster Street
Madison, Wisconsin 53707

RE: Subpart CC Certification
Tradebe Treatment and Recycling of Wisconsin, LLC
USEPA I.D. Number WID 988580056

Dear Mr. Coenen:

The following container storage areas located at 5611 West Hemlock Street, Milwaukee, Wisconsin are subject to Subpart CC of ch.NR 664. The requirements of this subchapter are met by implementing the applicable Level 1 and 2 controls.

- Area 1 (fka North Drum Storage Warehouse)
- Area 2 (fka 2007 Warehouse Addition)
- Area 3 (fka Enclosure Building)
- Area 4 (fka 2009 Lab Pack Building)
- Area 5 (fka West Warehouse)

In accordance with Wisconsin Department of Natural Resources regulation, NR 670.027{1)(b), Tradebe certifies the applicable requirements of this subchapter are met.

Respectfully,
Tradebe Treatment and Recycling of Wisconsin, LLC



Tita Lagrimas
VP of Regulatory Affairs and Sustainability

Cc: Phil Grogan, Tradebe
Kendall Moore, Moore Consultant

TRADEBE
Environmental Services™

APPENDIX D-11

EXAMPLES OF POTENTIALLY INCOMPATIBLE WASTE

Chapter NR 664

APPENDIX V

EXAMPLES OF POTENTIALLY INCOMPATIBLE WASTE

Many hazardous wastes, when mixed with other waste or materials at a hazardous waste facility, can produce effects which are harmful to human health and the environment, such as (1) heat or pressure, (2) fire or explosion, (3) violent reaction, (4) toxic dusts, mists, fumes or gases or (5) flammable fumes or gases.

Below are examples of potentially incompatible wastes, waste components, and materials, along with the harmful consequences which result from mixing materials in one group with materials in another group. The list is intended as a guide to owners or operators of treatment, storage and disposal facilities, and to enforcement and license granting officials, to indicate the need for special precautions when managing these potentially incompatible waste materials or components.

This list is not intended to be exhaustive. An owner or operator shall, as the rules require, adequately analyze that person's wastes in order to avoid creating uncontrolled substances or reactions of the type listed below, whether they are listed below or not.

It is possible for potentially incompatible wastes to be mixed in a way that precludes a reaction (e.g., adding acid to water rather than water to acid) , neutralizes them (e.g., a strong acid mixed with a strong base) or controls substances produced (e.g., by generating flammable gases in a closed tank equipped so that ignition cannot occur, and burning the gases in an incinerator).

In the lists below, the mixing of a Group A material with a Group B material may have the potential consequence as noted.

Group 1–A	Group 1–B
Acetylene sludge	Acid sludge
Alkaline caustic liquids	Acid and water
Alkaline cleaner	Battery acid
Alkaline corrosive liquids	Chemical cleaners
Alkaline corrosive battery fluid	Electrolyte, acid
Caustic wastewater	Etching acid liquid or solvent
Lime sludge and other corrosive alkalies	
Lime wastewater	Pickling liquor and other corrosive acids
Lime and water	Spent acid
Spent caustic	Spent mixed acid
	Spent sulfuric acid

Potential consequences: Heat generation; violent reaction.

Group 2–A	Group 2–B
Aluminum	Any waste in Group 1–A or 1–B
Beryllium	
Calcium	
Lithium	
Magnesium	
Potassium	
Sodium	
Zinc powder	
Other reactive metals and metal hydrides	

Potential consequences: Fire or explosion; generation of flammable hydrogen gas.

Group 3–A	Group 3–B
Alcohols	Any concentrated waste in Group 1–A or 1–B
Water	Calcium
	Lithium
	Metal hydrides
	Potassium
	SO_2Cl_2, $SOCl_2$, PCl_3, CH_3SiCl_3
	Other water–reactive waste

Potential consequences: Fire, explosion or heat generation; generation of flammable or toxic gases.

Group 4–A	Group 4–B
Alcohols	Concentrated Group 1–A or 1–B wastes
Aldehydes	Group 2–A wastes
Halogenated hydrocarbons	
Nitrated hydrocarbons	
Unsaturated hydrocarbons	
Other reactive organic compounds and solvents	

Potential consequences: Fire, explosion or violent reaction.

Group 5–A	Group 5–B
Spent cyanide and sulfide solutions	Group 1–B wastes

Potential consequences: Generation of toxic hydrogen cyanide or hydrogen sulfide gas.

Group 6–A	Group 6–B
Chlorates	Acetic acid and other organic acids
Chlorine	Concentrated mineral acids
Chlorites	Group 2–A wastes
Chromic acid	Group 4–A wastes
Hypochlorites	Other flammable and combustible wastes
Nitrates	
Nitric acid, fuming	
Perchlorates	
Permanganates	
Peroxides	
Other strong oxidizers	

Potential consequences: Fire, explosion or violent reaction.

Note: The source of this appendix is "Law, Regulations, and Guidelines for Handling of Hazardous Waste", California department of health, February 1975.

TRADEBE
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APPENDIX D-12

Class 1 Modification Approval

for

Berm Notches

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

April 15, 2020

File Ref: FID 241384000
MILWAUKEE
HW / CORR

Ms. Tita LaGrimas
Tradebe Treatment and Recycling of Wisconsin
5611 West Hemlock St.
Milwaukee, WI 53223

SUBJECT: Class 1.1 (Department Approval Required) License Modification Determination (Conditional Approval)
Modification Request dated March 19, 2020
Tradebe Treatment and Recycling of Wisconsin, L.L.C.
EPA ID# WID988580056
DNR license numbers 6026 and 4395

Dear Ms. LaGrimas:

The department has completed its review of a Class 1.1 (department approval required) License Modification Request, dated March 19, 2020, for Tradebe Treatment and Recycling of Wisconsin, L.L.C. located at 5611 West Hemlock Street, Milwaukee, WI, DNR license/identification numbers 6026 and 4395. The submittal was received by the department electronically on March 19, 2020, and via hard copy on March 23, 2020, and generally proposes to revise the following areas of the current-approved FPOR: Section 7, secondary containment calculations, and the contingency plan. This submittal replaced the previous Class 1.1 License Modification Request dated October 8, 2019, receipt of which had been acknowledged in a department letter dated October 9, 2019.

The term "Class 1.1" is used to refer to the type of Class 1 license modifications that require prior department approval as identified by footnote 1 in Appendix I of ch. NR 670, Wis. Adm Code, as referenced in s. NR 670.042(1)(b), Wis. Admin. Code.

This conditional approval, and the license modification request dated March 19, 2020, must be kept in the operating record along with the current-approved FPOR and all other license modification approvals.

As previously communicated, the department expects Tradebe to promptly revise and resubmit its FPOR to facilitate the 10-year license renewal process established in s. NR 670.010(8), Wis. Adm. Code. This action was previously discussed in the department's letters dated January 7, 2019, July 8, 2019, and August 23, 2019, and in the department's email to Tradebe dated February 11, 2020.

Please feel free to contact Doug Coenen with any questions or concerns at douglas.coenen@wisconsin.gov. or 608-264-9258.

Sincerely,

Andrea Keller, Program Manager
Hazardous Waste Prevention & Management Section
Waste and Materials Management Program

cc: Douglas Coenen, WDNR
Catherine Baerwald, WDNR
Robert Vaughn, Tradebe
Philip Grogan, Tradebe
Lawrence Criswell, Tradebe
Jae Lee, U.S EPA Region 5

BEFORE THE STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

CLASS 1.1 (Department Approval Required) LICENSE MODIFICATION
FINAL DETERMINATION (CONDITIONAL APPROVAL)

Tradebe Treatment and Recycling of Wisconsin, L.L.C.
5611 West Hemlock Street, Milwaukee, WI
EPA ID# WID988580056
DNR license number 6026 and 4395
FID 241384000

GENERAL INFORMATION

Tradebe Treatment and Recycling of Wisconsin, L.L.C., located in Milwaukee, WI (Tradebe), is a licensed hazardous waste storage and treatment facility, authorized under department license #4395 for treatment and #6026 for storage. Container storage of hazardous waste is approved in various quantities within five storage buildings. Hazardous waste treatment in the form of fuels blending is also approved. Other waste management activities include lab packing, bulking, transfer, elementary neutralization, and non-hazardous waste handling.

The department issued a final determination to approve Tradebe's feasibility and plan of operation report (FPOR) on June 29, 2007. Several modifications to the facility's license and FPOR have been approved since.

Tradebe submitted a Class 1 license modification in a letter dated August 15, 2019, to establish, on a temporary basis, a reduced maximum storage capacity for its 2009 Lab Pack Building storage area in order to ensure that secondary containment requirements in ch. NR 664, Wis. Adm. Code were met. This change was acknowledged by the department in a letter dated August 20, 2019.

In a Class 1.1 License Modification Request dated October 8, 2019, Tradebe proposed changes to its FPOR to re-address secondary containment requirements. Class 1.1 License Modifications require department approval as established in s. NR 670.042(1)(b), Wis. Adm. Code.

After review and comment by the department, Tradebe replaced the October 8, 2019, submittal with a revised Class 1.1 License Modification Request dated March 19, 2020. This modification included Tradebe's certification and a P.E certification, and proposed the following changes:

- Section 7 of the FPOR, addressing modified container stacking requirements and entity name change, and to correct inaccurate values (e.g., maximum container storage, secondary containment capacity).
- Secondary containment calculations within the FPOR's Appendix H (Preparedness and Prevention Plan), to consider the container volumes for hazardous wastes and non-hazardous wastes.
- New Drawings 16412-G6.2 and 6412-G8.2.
- The facility's Contingency Plan, to address emergency response actions to contain fire suppression water.

Tradebe's license modification did not propose any changes to previously-approved maximum hazardous waste storage limits. These limits remain in place.

FINDINGS OF FACT

The Department finds that:

1. In its final determination dated June 29, 2007, the department issued a conditional approval of Tradebe's hazardous waste feasibility and plan of operation report (FPOR) as part of the 10-year license renewal process established in ss. NR 670.010(1) and NR 670.010(8), Wis. Adm. Code. At that time, licensed operations were occurring in the North Drum Storage Warehouse, which has been designated by Tradebe as Area 1.

2. Approvals to modify the license and FPOR have seen issued by the department since the June 29, 2007, final determination. Significant approvals involving the allocation of approved storage capacity to new facility areas include the following:

    a. December 20, 2007, regarding the 2007 Warehouse Building Addition (Area 2).
    b. June 16, 2010, regarding the 2009 Lab Pack Building (Area 3).
    c. November 20, 2014, regarding the Enclosure Building (Area 4).
    d. April 12, 2017, regarding the West Drum Storage Warehouse (Area 5).

    Additional approvals to modify the license and FPOR have seen issued by the department since June 29, 2007, for requested changes such as the updates to the facility's contingency plan, updates to the facility's closure cost estimates, changes to the facility's lab certification needs, and a change in ownership.

3. The following is a summary of key communications leading to Tradebe's Class 1.1 License Modification Request dated March 19, 2020.
    a. In an email dated May 9, 2019, Tradebe informed the department that it had identified possible discrepancies in secondary containment calculations previously developed by Badger Disposal, the facility's former permittee.
    b. In a letter dated July 8, 2019, the department required Tradebe to submit a license modification request to address secondary containment design and associated calculations and the maximum storage capacity for each section of the 2009 Lab Pack Building.
    c. In an email dated August 6, 2019, Tradebe informed the department of its plan to temporarily reduce storage quantities in the 2009 Lab Pack Building.
    d. In a letter dated August 15, 2019, Tradebe requested the department's consideration of a Class 1 modification to temporarily reduce the total maximum volume of containers stored in the 2009 Lab Pack Building. This letter also informed the department that it had conducted containment berm alterations to this area's secondary containment system. These alterations included three notches in the curb between Sections A and B and removal of the curb between Sections A and C. The reduction in maximum storage volume was acknowledged as a Class 1 license modification by the department in a letter dated August 20, 2019.
    e. In a letter dated August 23, 2019, the department provided technical comments after preliminary review of Tradebe's August 15, 2019, submittal. The August 23, 2019 letter also recommended submittal of a license modification request regarding berm alterations.
    f. In letters dated September 23, 2019, and September 26, 2029, Tradebe requested consideration of its suggested approach to addressing secondary containment issues. In an email dated September 26, 2019, the department summarized discussions regarding this approach and the need for a license modification regarding the berm alterations.
    g. In a letter dated October 8, 2019, Tradebe submitted a Class 1.1 License Modification Request, receipt of which was acknowledged by the department in a letter dated October 9, 2019. After a series of emails with various supplemental submittals from Tradebe and department feedback on these submittals, the department recommended in an email dated March 5, 2020, that a revised Class 1.1 License Modification Request be developed and submitted.

4. Tradebe submitted a revised Class1.1 License Modification Request dated March 19, 2020. This submittal replaced the Class 1.1 License Modification Request dated October 8, 2019. The $400 review fee had been

received on October 28, 2019 for the October 8, 2019 request and is deemed to apply to the updated March 19, 2020, submittal.

5. Tradebe submitted additional information in an email dated April 10, 2020. This was submitted in response to questions from the department transmitted to Tradebe via e-mail on March 31, 2020, and included a request to modify Condition 24 of the approval dated June 29, 2007 regarding the double-stacking of containers

CONCLUSIONS OF LAW

1. The department has promulgated chs. NR 660 to 679, Wis. Adm. Code, establishing minimum requirements for hazardous waste management under the authority of ch. 291, Wis. Stats.

2. The department has authority pursuant to s. 289.30(6), Wis. Stats., and s. NR 670.042, Wis. Adm. Code, to approve modifications to a license, or to a feasibility report and plan of operation.

3. In accordance with s. NR 670.042, Wis. Adm. Code, the department concludes that the revisions proposed in Tradebe's request dated March 19, 2020, requires approval by the department through a Class 1.1 (prior department approval required) license modification.

DETERMINATION AND CONDITIONS OF APPROVAL

Based on the foregoing Findings of Fact and Conclusions of Law, the department hereby conditionally approves the modifications to the FPOR contained in Tradebe's Class 1.1 modification request dated March 19, 2020, under s. NR 670.042, Wis. Adm. Code, and s. 289.30(6), Wis. Stats., and in accordance with the conditions set forth as follows.

General Conditions

1. The facility shall be operated in accordance with the approved Feasibility and Plan of Operation Report (FPOR), the requirements of ch. 291, Wis. Stats., chs. NR 660 to 670, Wis. Adm. Code, and the conditions of this approval, the final determination and approval dated June 29, 2007, and subsequent approvals. The approval conditions, Wisconsin Statutes or the Wisconsin Administrative Code shall take precedence over any discrepancies with less stringent provisions in the FPOR.

2. All approval conditions established in the approval dated June 29, 2007 and all subsequent approvals shall remain in effect unless specifically rescinded, modified or replaced herein.

3. The Department has the right to modify this approval and to require additional information at any time. Nothing in this conditional approval shall relieve the owner or operator of the legal obligation to comply with applicable federal, state and local requirements. Except as expressly provided herein, no other terms or conditions of the FPOR approval or license, or any approved modifications thereto, are affected by this determination.

4. Any submittal made in response to or as required by this approval, or prior approvals, shall include a cover letter that makes specific reference to the applicable condition number and approval date.

5. Within 120 days of this approval, Tradebe shall provide the department with documentation that a notice of this modification was mailed to all persons on the facility mailing list, as specified in s. NR 670.410 (3) (a) 9. and the appropriate units of state and local government, as specified in s. NR 670.410 (3) (a) 10., as required within 90 days of this approval by s. NR 670.042(1)(a)2, Wis. Adm. Code.

Conditions Related to Operations

6. This approval does not in any way modify the maximum hazardous waste storage quantities established for each licensed storage area in previous approvals, except that the temporary storage quantity limits established in the department's Class 1 license modification acknowledgement letter dated August 20, 2019, shall no longer be in effect.

7. The total volume of containers holding waste and other materials, as measured by their maximum capacities, shall not exceed the "Total Volume of Containers" specified for each storage area in the revised secondary containment calculations, bearing the revision date of March 19, 2020. Containers that do not contain free liquids need not be considered in this determination, as established in s. NR 664.0175(2)(c), Wis. Adm. Code, provided they are labelled as such.

8. Wastes shall be separated and segregated such that any potential leakage or spillage will not combine with other incompatible wastes or materials.

9. Condition 24 of the approval dated June 29, 2007, shall be rescinded and replaced by the following new condition:

   When double-stacking containers:
   a. containers of equal or larger size shall be stored on the lower level, unless the containers stored on the bottom level are designed, maintained and arranged to safely and securely support the containers stored on the upper level;
   b. containers on the upper level shall be centered, level and stable; and
   c. all pallets and containers shall remain stable and in sound integrity.

10. Tradebe shall:
    a. deploy storm sewer drain covers and booms to prevent fire suppression water and liquids from entering drainage systems and off-site areas; and
    b. perform weekly inspections to verify that storm sewer drain covers and booms, as required by the facility's Contingency Plan, are readily available, are maintained in sufficient quantities and types, and are in good condition. Documentation of these inspections shall be maintained in the operating record along with all other weekly inspection documentation.

11. Tradebe shall notify the department of any activation of a fire suppression system in any hazardous waste handling or storage area. For the purposes of s. NR 664.0056(9), Wis. Adm. Code, this shall be considered an incident that requires implementing the contingency plan which triggers the 15-day reporting requirement.

NOTICE OF APPEAL RIGHTS

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

Sections 227.52 and 227.53, Wis. Stats., establish criteria for filing petitions for judicial review. You have 30 days after the decision is mailed or otherwise served by the department to file your petition with the appropriate circuit court and serve the petition on the department. The petition shall name the Department of Natural Resources as the respondent.

Dated: April 15, 2020
WISCONSIN DEPARTMENT OF NATURAL RESOURCES
For the Secretary



Andrea Keller, Program Manager
Hazardous Waste Prevention & Management Section
Waste and Materials Management Program



Douglas Coenen, P.E., Waste Management Specialist
Hazardous Waste Prevention & Management Section
Waste and Materials Management Program

TRADEBE
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ATTACHMENT E

PROCEDURES to PREVENT HAZARDS

ATTACHMENT E
PROCEDURES to PREVENT HAZARDS
NR 670.014(2)(h)
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ATTACHMENT E
PROCEDURES to PREVENT HAZARDS
NR 670.014(2)(h)

E.1 Procedures to Prevent Hazard NR 670.014(2)(h)

These procedures, structures, and equipment have been developed to serve as effective preventative action procedures to minimize hazards to human health and the environment from fire, explosion, emission, or discharge of hazardous materials and wastes to the air, soil, surface water, or groundwater.

E.1.1 Prevent Hazards During Unloading Operations NR 670.014(2)(h)(1)

The following steps/measures are designed to prevent hazards during the unloading process. Roadway vehicles are kept off site until confirmation of the vehicle's scheduled activity at the facility. This is accomplished by scheduling deliveries and reviewing hazardous waste shipping papers prior to entry to ensure the vehicle contains a load intended for this Tradebe facility (see WAP for receiving details).

There are 5 truck docks used for shipping and receiving (see Attachment R for truck dock locations). Truck docks 2, 3 and 5 are within the enclosed buildings. Truck dock 4 is outdoors and has a berm system providing containment. Low levels of precipitation that collect in the berm system are allowed to evaporate. If a significant amount of precipitation accumulates with potential to overflow into Area 4 the precipitation will be collected. Dock 1 is sloped towards the building with a sump at the bottom that will collect material should a spill occur. During a rain event, this sump will also collect precipitation. The sump is inspected (see Attachment F) for signs of accumulated liquid. If liquid accumulated in the sump is determined to be the result of a spill or release from a waste shipment, the accumulated liquid is collected and treated as a waste.

The sump is equipped with a pump so that when precipitation accumulates in the sump it can be pumped into the public sewer system. After a rain event, the accumulated liquid in the sump is inspected for signs of spilled waste material. If there are no signs of spilled waste, the accumulated liquid is pumped into the public sewer system. If, after a rain event, the accumulated liquid shows signs of a spill (e.g. an oil sheen), the accumulated liquid is collected and treated as a waste.

Once confirmed as a scheduled delivery, the vehicle is directed, under the guidance of facility personnel, to the designated unloading dock. A Tradebe employee assists the vehicle operator to position his/her vehicle in the loading dock and ensures the driver chocks tires before offloading begins. The engine of the roadway vehicle is turned off during unloading unless the vacuum pump is needed. Once in position, a Tradebe employee performs the unloading operations.

The unloading process starts with a preliminary examination of the shipment to determine if leaks, improper packaging, or other issues are detected that must be addressed prior to unloading. (See WAP for details of receiving and acceptance procedures including procedures to determine if leaks, improper packaging or other issues are detected).

Equipment necessary to respond to an emergency or spill is maintained in the receiving area. An emergency telephone and/or two-way radios are also easily accessible. Berms as described in Attachment D, separate the loading dock from other areas of plant. Berms are concrete construction, epoxy sealed to the floors, with rounded tops to allow movement of wheeled vehicles and equipment over them.

To prevent damage to the drum's outer integrity, forklifts with drum grabbers are used when individual drums need to be moved.

No Smoking signs are conspicuously placed throughout the unloading area and vigorously enforced by Tradebe management and employees.

E.1.2 Prevent Run-off NR 670.014(2)(h)(2)

Tradebe's hazardous waste handling/storage areas meet the secondary containment requirements of NR 664.0175 to prevent runoff from hazardous waste handling areas to the environment (see section D.2.5 for details).

Regular inspections are performed according to Attachment F to quickly detect spills, leaks or accumulation of liquids in storage areas and once detected, these releases are addressed according to section D.2.5.e and/or sections 4.5 or 4.6 of Attachment G.

E.1.3 Prevent Contamination of Water Supplies NR 670.014(2)(h)(3)

In addition to the protective measures provided in Attachment D and the section above, potentially hazardous discharges to the sewer system are prevented by eliminating sewer system drains in storage and work areas. Therefore, there are no floor drains in containment areas. There are only sanitary sewer drains which are located in office areas and rest rooms. There is however, one floor drain in the laboratory which has been covered in a manner to prevent spilled material from entering.

In the event of an emergency, procedures described in section 4.3 of Attachment G would prevent release of fire suppression water. These include covering uncovered storm drains using storm drain covers located near each storm drain and using absorbent booms located in storage units to deploy along the property fence line.

As stated in section D.2.5.e, uncontrolled spills with the potential to migrate out of container storage areas will cause activation of the Contingency Plan provided as Attachment G.

E.1.4 Mitigate the Effect of Equipment Failure and Power Outage NR 670.014(2)(h)(4)

Preventative maintenance and inspection of equipment associated with the operation of the storage facility including the emergency equipment, containment structures, security systems, etc. occurs on a routine basis to prevent the failure of equipment. Attachment F describes the procedures and schedule for inspecting equipment and the container storage areas at the facility.

Tradebe utilizes plant personnel and third-party vendors to manage the operating conditions of the equipment. The plant personnel or third-party vendors ensure that the facility's equipment is in operational condition.

Equipment or power failures are not critical to preventing the release of hazardous materials because this Tradebe facility does not utilize electrically powered equipment that is critical to hazardous waste processing. However, in the event of a prolonged power outage, Tradebe will utilize portable gasoline/diesel generators to supply power for the facility for operational purposes such as heating, lighting etc. These generators will be either purchased or rented when needed.

The Facility communication systems use mobile phones and two-way radios as a back-up to ensure uninterrupted communications for the facility.

E.1.5 Prevent Personnel Exposure NR 670.014(2)(h)(5)

Each employee, contractor, vendor or visitor to this facility receives a safety briefing and is trained, and required to use, the personal protective equipment necessary for their job function. For employees, this requirement is emphasized as part of both an initial and subsequent refresher personnel training programs which satisfy the Occupational Safety and Health standards of 29 CFR Part 1910 (see Attachment H).

In addition to procedures already discussed to prevent spills and releases, each employee, contractor, vendor or visitor to this facility undergoes training to work safely in designated areas and perform designated activities. See Attachment H for training requirements. If an employee determines that a particular task does not comply with safe operating practices, he/she is trained to notify their immediate supervisor as to the nature of the concern and the corrective action suggested to perform the task safely.

Facility personnel are provided with the appropriate safety equipment for each working task/area. Supervisors monitor personnel to ensure use of proper equipment and procedures. In addition, all personnel are trained to monitor their fellow co-workers to ensure the proper use of personal protective equipment and safety protocols.

Tasks in each working area are assessed periodically by the Supervisors, the Plant Manager and/or the Regional Health and Safety Manager to determine appropriate safety equipment. Each individual is trained and responsible for obtaining and ensuring proper fit of each piece of safety equipment necessary to perform their tasks. Employees are trained to look for defects in equipment and if the employee notices a defect, he/she is trained to replace the equipment and/or notify the appropriate personnel to facilitate timely repair/replacement.

A report of failing to adhere to safety procedures, by a co-worker, supervisor or manager, including the failure to use proper personal protective equipment, can result in mandatory re-training and possible disciplinary action.

Tradebe maintains an on-site inventory of safety and respiratory equipment used in handling waste materials. These items are inspected weekly, please refer to Attachment F for inspection information.

E.1.6 Prevent Releases to the Atmosphere NR 670.014(2)(h)(6)

The waste handling requirements which are incorporated as provisions of this FPOR will be instituted by Tradebe to prevent releases to the atmosphere. Those provisions include:

- Review and approval of waste profiles to identify and properly classify waste to ensure properly handling (see WAP).
- Tradebe's receiving and acceptance process verifies the material received matches the profile (see WAP).
- Employee training to identify potential hazards and minimize the risk of accident or mishandling (see Attachment H).
- Leaking or damaged containers are not offloaded unless properly overpacked or otherwise made safe for processing (see Attachment D).
- Spill cleanup and countermeasure procedures that are conducted immediately by trained Tradebe personnel (see Attachment D and G).
- An inspection program designed to identify potential flaws, problems or issues that would lead to a release (see Attachment F).
- Adherence to Subpart CC air emission standards (see Attachment D section D.2.9).

In addition to the items above that are described in Attachments C, D and F, these additional actions are used to prevent releases to the atmosphere:

- Unattended open waste containers are not allowed and therefore only permitted to be open for a maximum of 15 minutes after last use.
- Containers are opened for sampling and waste management then immediately closed afterwards.
- PPE, spent sampling equipment, spill cleanup debris and other spill related material are stored containers with lids which remain closed when not in use.

TRADEBE
Treatment and Recycling ™

ATTACHMENT F

GENERAL INSPECTION REQUIREMENTS

ATTACHMENT F
GENERAL INSPECTION REQUIREMENTS
NR 670.014(2)(e)
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Appendix F-1 Inspection Schedule
Appendix F-2 Inspection Log

ATTACHMENT F
GENERAL INSPECTION REQUIREMENTS
NR 670.014(2)(e)

The Tradebe Treatment and Recycling of Wisconsin, LLC (Tradebe) Inspection Schedule program is established based on the requirements of NR 670.014(2)(e). The General Inspection requirements as listed in NR664.0015 are outlined below.

F.1 INSPECTION SCHEDULE: NR 664.0015(1)

Tradebe will conduct inspections of the active facility equipment for malfunctions, deterioration, operator errors, and discharges that may cause or lead to a release of hazardous waste to the environment or pose a threat to human health.

F.1.1 Inspection of Subpart BB Pumps Used in Light Service NR 664.1052

Equipment used during fuel blending which is subject to Subpart BB will either; (1) be provided by third party vendors who remove the equipment after use or; (2) Tradebe will maintain information about the equipment to comply with NR 664.1052 or; (3) Tradebe will record the hours the equipment is in use to demonstrate qualification for the <300 hours of use exemption (NR 664.1050(6)).

F.2 WRITTEN SCHEDULE: NR 664.0015(2)(a)

Appendix F-1 of this Attachment provides a written inspection schedule for container storage areas, monitoring equipment, safety and emergency equipment; security devices; and operating and structural equipment important to preventing, detecting or responding to potential environmental or human health hazards. Appendix F-1 includes a list of Areas and equipment to be inspected.

F.3 LOCATION OF INSPECTION SCHEDULE NR 664.0015(2)(b)

The written inspection schedule shall be maintained at the facility in either hard copy or electronic format.

F.4 TYPES OF PROBLEMS NR 664.0015(2)(c)

The written inspection schedule includes numerous types of potential problems that will be looked for during the inspections. The list of potential problems include any condition that could lead to a release, or negatively impact waste management activities. Minimally, this list includes but is not limited to, malfunctions, deteriorations, leaks, erosion etc. The extensive list of potential problems is provided in the inspection schedule in Appendix F-1.

F.5 FREQUENCY OF INSPECTION NR 664.0015(2)(d)

The inspections will be conducted often enough to identify problems within a timeframe that

allows sufficient time to protect human health and the environment.

The frequency of inspections for the facility is based on the number of operational days that Tradebe personnel are present during the week. The frequency for each area of inspection is based on the rate of possible deterioration of a particular area or the probability that an environmental or human health incident would occur if deterioration, malfunction, or operator error, were to occur (see section F.5 below). The inspection schedule has been established in accordance with NR 664.015.

Turn-over and routine movement of material allows for inspection of areas of the facility where stored material may prevent inspection.

F.5.1 Container Storage Areas NR 664.0174 (also see D.2.4)

The container storage areas (CSA) will be inspected daily in accordance with the inspection schedule which includes inspection for leaking or deteriorating containers as well as problems with containment systems. Corrective actions compliant with NR 664.0015(3) and 664.0171 will be taken to address deterioration or leaks.

F.6 REMEDY of DETERIORATION or MALFUNCTIONS NR 664.0015(3)

Tradebe stresses the importance of the inspection program to employees conducting these activities. Equipment or structures that are discovered through inspection to have defects, malfunctions or deterioration will have those findings addressed in a time frame necessary to prevent harm to human health and the environment. In the event a release, hazard, or event impacting human health occurs, or if the environmental incident has already occurred, then remedial action will be initiated immediately.

If an inspection reveals that non-emergency corrective actions are needed, these corrective actions will be completed as soon as possible to preclude damage and/or to reduce the need for emergency repairs. If problems or potential hazards detected during inspections cannot be corrected quickly or the potential exist for wastes to migrate from the container storage area where the waste is stored, the Contingency Plan will be implemented, and DNR will be contacted according to provisions of the Contingency Plan.

If a hazard is imminent or has already occurred, and found during the course of an inspection, or any time between inspections, corrective actions will begin immediately. Equipment or structures that are discovered through inspection to have defects, malfunctions or deterioration will corrected in a time frame necessary to prevent harm to human health and the environment.

In the event of an emergency involving the release of a hazardous constituent to the environment, all efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area. Remedial action is further defined in the Contingency Plan found at Attachment G.

As noted in Attachment D, Section D.2.1, damaged, leaking or otherwise defective containers received by the facility will be transferred to a container in good condition or overpacked.

During the review and inspection process performed during the receiving and acceptance processes, Tradebe maintains right to reject shipments that are not properly shipped, and/or packaged.

F.7 INSPECTION RECORDS NR 664.0015(4)

The Inspection Schedule and associated Inspection Log sheets are kept at the facility. Completed Inspection Logs (e.g., Daily, Weekly, Semi-Annual) are maintained for each of the container storage areas for a minimum of three (3) years to comply with NR 664.0015(4).

The inspection log sheets document the date and time of the inspection, the name of the inspector, a notation of the observations made, and the inspector's comments which include notes of the inspector's findings and any repairs or other remedial actions needed and/or taken. See Appendix F-2 for examples of the forms used to document inspections.

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APPENDIX F-1

Inspection Schedule

SUMMARY OF INSPECTION CHECKS

Area/Equipment	Checklist Items	Type of Concerns	Minimum Frequency
Safety Equipment	Five Minute Emergency Air Packs	Air Supply, Condition	Weekly
	Organic Vapor Air Filter Respirators	Cleanliness, Cartridge Low Supply	As Needed, Weekly
	Safety Glasses / Safety Goggles	Scratched, Low Supply	As Needed, Weekly
	Steel Toe Boots	Condition, Low Supply	As Needed, Weekly
	Safety Gloves	Condition, Low Supply	Weekly
	Tyvek Coveralls	Worn, Torn, Low Supply	As Needed, Weekly
	Uniforms	Worn, Cleanliness	Weekly
	Rain Slickers	Torn, Low Supply	As Needed, Weekly
	Eyewash Stations	Leaks, Low Pressure, Cleanliness, Accessibility	Weekly
	Safety Shower First Aid Stations	Leaks, Low Pressure, Low Supplies	Weekly
Emergency Equipment	Emergency Lighting	Condition, Operable	Weekly
	Absorbent Materials	Supply, Dampness	Weekly
	Brooms and Shovels	Condition, Supply	Weekly
	Fire Blankets	Condition	Weekly
	Portable Fire Extinguishers	Charged, Properly Located	Weekly
	Electrical Pumps	Cleanliness, Operable	Weekly
Container Storage Areas	General Housekeeping	Aisle Space, Open Lids, Leaks, Corrosion	Daily
	Containment Integrity	Cracks, Deterioration	Weekly
	Absorbent Materials	Low Supply, Dampness	Daily
Security	Facility Fencing	Damage, Vandalism	Daily
	Warning Signs	Damaged, Missing	Daily
	Access Gates	Damaged, Motor Control	Daily
	Alarm System	Sensors, Alarms	Daily
Communication	Two-Way Radios	Transmitter & Receiver, Battery Charger	Daily
	Internal Telephone Communications	Operable	Daily

SUMMARY OF INSPECTION CHECKS

(Continued)

Area/Equipment	Checklist Items	Type of Concerns	Minimum Frequency
Emergency Equipment	Emergency Lighting	Condition, Operable	Weekly
	Absorbent Materials	Supply, Dampness	Weekly
	Brooms and Shovels	Condition, Supply	Weekly
	Fire Blankets	Condition	Weekly
	Portable Fire Extinguishers	Charged, Properly Located	Weekly
	Electrical Pumps	Cleanliness, Operable	Weekly
Operating Equipment	Forklifts	Cleanliness, Greased, Guards in Place	Daily
	Forklift Attachments	Cleanliness, Greased, Guards in Place	Daily
	Aerosol Tool	Cleanliness	As Needed, Weekly
	Sampling Equipment	Cleanliness, Supply	As Needed, Weekly
Repacking Areas	General Housekeeping	Cleanliness, Vermiculate Supply	Daily
	Containment Areas	Cracks, Deterioration, Dampness	Daily
	Container Storage Area	Cleanliness, Aisle Space, Open Lids, Leaks, Corrosion, Placards	Daily
Security	Facility Fencing	Damage, Vandalism	Monthly
	Warning Signs	Damage, Missing	Monthly
	Access Gate	Damaged, Motor Control	Monthly
	Alarm System	Sensors, Alarms	Monthly
	Surveillance System	Operable	Monthly
Tanker Loading Area	Overhead Fan	Turned on, at 60Hz or >	Daily & When tankers are scheduled
	Tanker	Integrity, Cracks	Daily & When tankers are scheduled
	Pumps	Corrosion, deterioration clogging, leaks	Daily & When tankers are scheduled
	Filters	Condition, Deterioration	Daily & When tankers are scheduled
	Piping	Leaks, Deterioration	Daily & When tankers are scheduled
	Grounding Clamps	Loose, Damaged	Daily & When tankers are scheduled
	Containment Integrity Hoses	Leaks, Cracks, Integrity	Daily & When tankers are scheduled
	Close after pumping complete	Sample ports, hatches Valves	Daily & When tankers are scheduled

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APPENDIX F-2

Inspection Log

Sheets

TRADEBE -WI INSPECTION LOG FOR: NORTH DRUM STORAGE WAREHOUSE (Area 1)

Week of Inspection: _____

Day of the Week	Time of Inspection	Name of Inspector
Monday		
Tuesday		
Wednesday		
Thursday		
Friday		

Check Item	M	T	W	T	F	
General Housekeeping:						**Comments**
Cleanliness						
Aisle Space						
Open Lids						
Leaks						
Corrosion						
Vermiculate Supply						
Placarding						

Containment Integrity						**Comments**
Cracks						
Deterioration						
Dampness						

Absorbent Materials						**Comments**
Low Supply						
Dampness						

Brooms and Shovels						**Comments**
Condition						
Supply						

Unloading/ Loading Docks						**Comments**
Cleanliness						
Containment						
Integrity						

Containers						**Comments**
Labelled						
Condition						

TRADEBE -WI INSPECTION LOG FOR: 2007 WAREHOUSE ADDITION (Area 2)

Week of Inspection: _____

Day of the Week	Time of Inspection	Name of Inspector
Monday		
Tuesday		
Wednesday		
Thursday		
Friday		

Check Item	M	T	W	T	F	
General Housekeeping:						**Comments**
Cleanliness						
Aisle Space						
Open Lids						
Leaks						
Corrosion						
Vermiculate Supply						
Placarding						

Containment Integrity						**Comments**
Cracks						
Deterioration						
Dampness						

Absorbent Materials						**Comments**
Low Supply						
Dampness						

Brooms and Shovels						**Comments**
Condition						
Supply						

Unloading/ Loading Docks						**Comments**
Cleanliness						
Containment						
Integrity						

Containers						**Comments**
Labelled						
Condition						

TRADEBE -WI INSPECTION LOG FOR: 2009 LAB PACK BUILDING (Area 4) / ENCLOSURE BUILDING (Area 3)

Week of Inspection: _____

Day of the Week	Time of Inspection	Name of Inspector
Monday		
Tuesday		
Wednesday		
Thursday		
Friday		

Check Item	M	T	W	T	F	
General Housekeeping:						**Comments**
Cleanliness						
Aisle Space						
Open Lids						
Leaks						
Corrosion						
Vermiculate Supply						
Placarding						

Containment Integrity						**Comments**
Cracks						
Deterioration						
Dampness						

Absorbent Materials						**Comments**
Low Supply						
Dampness						

Brooms and Shovels						**Comments**
Condition						
Supply						

Unloading/ Loading Docks						**Comments**
Cleanliness						
Containment						
Integrity						

Containers						**Comments**
Labelled						
Condition						

TRADEBE -WI INSPECTION LOG FOR: 2009 LAB PACK BUILDING (Area 4) / ENCLOSURE BUILDING (Area 3)

Week of Inspection: _____

Day of the Week	Time of Inspection	Name of Inspector
Monday		
Tuesday		
Wednesday		
Thursday		
Friday		

Check Item	M	T	W	T	F	
General Housekeeping:						**Comments**
Cleanliness						
Aisle Space						
Open Lids						
Leaks						
Corrosion						
Vermiculate Supply						
Placarding						

Containment Integrity						**Comments**
Cracks						
Deterioration						
Dampness						

Absorbent Materials						**Comments**
Low Supply						
Dampness						

Brooms and Shovels						**Comments**
Condition						
Supply						

Unloading/ Loading Docks						**Comments**
Cleanliness						
Containment						
Integrity						

Containers						**Comments**
Labelled						
Condition						

TRADEBE -WI INSPECTION LOG FOR: WEST DRUM STORAGE WAREHOUSE (Area 5)

Week of Inspection: _____

Day of the Week	Time of Inspection	Name of Inspector
Monday		
Tuesday		
Wednesday		
Thursday		
Friday		

Check Item	M	T	W	T	F	
General Housekeeping:						**Comments**
Cleanliness						
Aisle Space						
Open Lids						
Leaks						
Corrosion						
Vermiculate Supply						
Placarding						

Containment Integrity						**Comments**
Cracks						
Deterioration						
Dampness						

Absorbent Materials						**Comments**
Low Supply						
Dampness						

Brooms and Shovels						**Comments**
Condition						
Supply						

Unloading/ Loading Docks						**Comments**
Cleanliness						
Containment						
Integrity						

Containers						**Comments**
Labelled						
Condition						

TRADEBE -WI OPERATING EQUIPMENT INSPECTION LOG

Week of Inspection: _____

Time of Inspection: _____ **Name of Inspector:** _____

Mon:____ Tues:____ Wed: ____ Thurs: _____ Fri: _____

Check Item	**M**	**T**	**W**	**T**	**F**	
Forklifts						**Comments**
Cleanliness						
Greased						
Guards in Place						

Forklift Attachments						**Comments**
Cleanliness						
Greased						
Guards in Place						

Drum Crusher						**Comments**
Cleanliness						
No Leaks						
Guards in Place						
Safety Switch Operable						

Sampling Equipment						**Comments**
Cleanliness						
Supply						

Overhead Doors						**Comments**
Operable						
Locks Working						

Loading Dock Ramp						**Comments**
Condition						
Operable						

TRADEBE -WI SAFETY EQUIPMENT INSPECTION LOG

Month of Inspection: _____

TIME of Inspection: Time Date **Name of Inspector:**

Week 1: _____ _____

Week 2: _____ _____

Week 3: _____ _____

Week 4: _____ _____

Check Item	**WK 1**	**WK 2**	**WK3**	**WK4**	
Five Minutes Emergency Air Packs					**Comments**
Operable					
Condition					

Organic Vapor Air Filter					**Comments**
Respirator Condition					
Cleanliness Cartridges					

Safety Glasses/Goggles					**Comments**
Scratched					
Low Supply					

Steel Toe Boots					**Comments**
Low Supply					
Condition					

Safety Gloves					**Comments**
Condition					
Low Supply					

Tyvek Coveralls					**Comments**
Worn					
Low Supply					

Uniforms					**Comments**
Cleanliness					
Worn					

Spill Kits					**Comments**
Low Supply					

TRADEBE -WI EMERGENCY EQUIPMENT INSPECTION LOG

Month of Inspection: _____

TIME of Inspection:	Time	Date	**Name of Inspector**
Week 1:			
Week 2:			
Week 3:			
Week 4:			

Check Item	**WK 1**	**WK 2**	**WK3**	**WK4**	
Emergency Lighting					**Comments**
Operable					
Condition					

Fire Blankets					**Comments**
Condition					
Stored Properly					

Eyewash Stations					**Comments**
Leaking					
Accessibility					

First Aid Stations					**Comments**
Low Supply					

Portable Fire Extinguishers					**Comments**
Charged					
Properly Located					

TRADEBE -WI SECURITY AND COMMUNICATION SYSTEM INSPECTION LOG

Month of Inspection: _____

Time of Inspection: _____ **Name of Inspector:** _____

Date of Inspection: _____

Check Item		
SECURITY:		
Facility Fencing		**Comments**
Damage		
Vandalism		

Warning Signs		**Comments**
Damaged		
Missing		

Access Gate		**Comments**
Damaged		
Motor Control		

Alarm System		**Comments**
Sensors		
Alarms		

Fire Alarm System		**Comments**
Sensors		
Alarms		
Pull Boxes		

Surveillance System		**Comments**
Operable		

COMMUNICATION:		
Two Way Radios		**Comments**
Transmitter		
Receiver		
Battery Charger		

Internal Telephone Communications		**Comments**
Operable		

TRADEBE -WI SECURITY INSPECTION LOG FOR: TANKER TRUCK LOADING AREA

Name of Inspector: _____

Date : _____ Time: _____

Overhead Fan Turned On	**Y**	**N**	
Fan at 60Hz or greater	**Y**	**N**	

Tanker			**Comments**
Integrity	**Y**	**N**	
Cracks	**Y**	**N**	

Pumps			**Comments**
Corrosion	**Y**	**N**	
Deterioration	**Y**	**N**	
Clogging	**Y**	**N**	
Leaks	**Y**	**N**	

Filters			**Comments**
Condition	**Y**	**N**	
Adequate Supply	**Y**	**N**	

Piping			**Comments**
Leaks	**Y**	**N**	
Deterioration	**Y**	**N**	

Grounding Clamps			**Comments**
Loose	**Y**	**N**	
Damaged	**Y**	**N**	

Containment Integrity			**Comments**
Leaks	**Y**	**N**	
Cracks	**Y**	**N**	
Cleanliness	**Y**	**N**	

Hoses			**Comments**
Leaks	**Y**	**N**	
Cracks	**Y**	**N**	
Integrity	**Y**	**N**	

Close after pumping complete			**Comments**
Sample ports	**Y**	**N**	
hatches	**Y**	**N**	
Valves	**Y**	**N**	

TRADEBE
Treatment and Recycling

ATTACHMENT G
CONTINGENCY PLAN

TRADEBE TREATMENT AND RECYCLING
OF WISCONSIN, LLC.

5611 W. HEMLOCK STREET
MILWAUKEE, WISCONSIN
(FID 241384000)

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Section 1
INTRODUCTION

1.1 Background

The purpose of the existing facility is hazardous materials and solid waste storage and waste management. Typical types of hazardous waste received at the facility includes combustible waste, waste oil, paint waste, solvent waste, and other organic and inorganic materials. The materials received at this facility are primarily generated by commercial, institutional and industrial companies. The function performed by this facility is primarily the transfer of hazardous and non-hazardous wastes in order to gain access to secondary markets. Some of the organic materials are recycled for re-refining or energy recovery as a fuel for industrial furnaces. Both liquid and solid materials are managed at this location. The facility also accepts lab packs for repackaging to allow for the cost- effective re-direction of these materials for the purpose of beneficial use.

1.2 Purpose and Scope

The information contained herein is submitted by Tradebe, formally known an as Badger Disposal of Wisconsin, LLC., in accordance with the requirements for a contingency plan, as contained in Chapter NR 670.014(2)(g), Wisconsin Administrative Code. The purpose of this contingency plan is to prevent or minimize hazards to human health or the environment from fires, explosions, or unplanned releases of hazardous waste or hazardous waste constituents to air, land, or water. The provisions of this plan will be carried out immediately in the event of a fire, explosion, or release of hazardous waste or waste constituents which could threaten human health or the environment.

This contingency plan will also be implemented whenever hazardous conditions exist, or an actual event occurs. Hazardous conditions refer to any situation involving an imminent hazardous event including probable spillage, leakage, or release of a hazardous substance onto land, water, or the atmosphere that could create a danger to the public health or safety (which includes employees) because of its quantity, strength, and toxicity; its mobility in the environment; and its persistence. Routine cleanup operations may be performed by operating personnel without implementing this contingency plan, as outlined in Section 2.

This Contingency Plan has been developed in accordance with NR 662.261. This regulation requires a facility to development a Quick Reference Guide, (i.e., the Guide). For a copy of the Guide please refer to Appendix A. The Guide is to promptly provide emergency responders responding to an incident at the facility, with information on the types of hazardous waste- identified in layman's terms-stored at the facility. The Guide must also indicate the locations for storage locations of the hazardous waste and an estimate of the maximum amount of hazardous waste at the facility. The Guide must also indicate the facility's emergency coordinator's name and 24-hour phone number. The aforementioned information is to be listed on a single page. Attached to the Guide, a facility must provide a facility drawing that indicates the hazardous waste storage areas and building entrances to

gain access to the hazardous waste. A second map that is to be attached to the Guide is to provide an area overview that emergency responders can use to quickly determine the locations of businesses and residential areas that could need to be evacuated in the event of an incident at the facility. To be included on one of the maps are the locations of fire hydrants around the facility. The facility is to provide the flow rate for the fire hydrants. Tradebe was advised by the City of Milwaukee, that the fire hydrant by the facility flow rate is 1,560 gallons per minute; this is based on August 2015 flow testing.

1.3 SPCC Plan

Tradebe recently amended their SPCC plan on July 29, 2016. The SPCC Plan is a stand-alone document for oil spill prevention at the facility. However, this Contingency Plan will also serve as the Contingency Plan for oil spills.

Section 2
IMPLEMENTATION CRITERIA

The decision to implement this Contingency Plan depends upon whether an imminent or actual incident could threaten human health or the environment. Routine cleanups that pose no real threat to human health or the environment will be addressed by operating personnel. The purpose of this section is to guide the emergency coordinators, through decision-making criteria, in making this decision. Emergencies may occur at any time as a result of natural forces, trespassing, accidents, hazardous substance spills, or other situations that disrupt essential operations. Table 1 summarizes the type and nature of emergency situations that would require implementation of the contingency plan. If any of the criteria listed in Table 1 occur, then the contingency plan will be implemented. If a site emergency is initiated, the emergency coordinator will follow the procedures contained herein.

TABLE 1
CONTINGENCY PLAN IMPLEMENTATION CRITERIA

Emergency Type	Emergency Nature
Fire and/or Explosion	* A fire causes the release of toxic fumes, particulates, or smoke. * The fire is sufficiently large or uncontrolled to warrant outside assistance. * The fire could possibly spread to off-site areas. * Use of water or water and chemical fire suppressant could result in contaminated runoff reaching stormwater drainage system, or the adjacent properties. * Imminent danger exists of an explosion that could cause a safety hazard because of flying fragments or shock waves. * An imminent danger of explosion exists. * An explosion has occurred. * Fires that cannot be easily extinguished
Spills or Material Release	* The spill could release flammable liquids or vapors in sufficient quantities to cause a fire or gas explosion hazard. * The spill could release toxic particulates, liquids, or fumes in sufficient quantities or in a manner that is hazardous to human health. * The spill increases the potential for groundwater contamination. * The spill cannot be contained on-site and therefore results in off-site soil contamination and/or ground or surface water pollution. * Spills that can or have the potential to reach soil or an area without pavement. * Spills, releases, or incidents where assistance is needed from federal, state or local authorities.
Natural Disaster	* A tornado affecting the facility has occurred. * An earthquake affecting the facility has occurred. * Severe thunderstorms have occurred and caused release of hazardous wastes.

TABLE 2
LISTING OF EMERGENCY COORDINATORS

Priority of Notification	Title	Employee Name / Address	Business Phone Number	Mobile Number	Home Phone Number
1	Primary Emergency Coordinator	Daniel Schiro 1614 E Royall Pl Apt B, Milwaukee, WI 53202	414.760.9175	414.236.1080	414.236.1080
2	Alternate Emergency Coordinator	Phil Grogan 3048 S Delaware Ave Milwaukee, WI 53207	414.760.9175	414.232.1915	414.232.1915
3	24-Hour Emergency Line	Phil Grogan	414.760.9175	414.232.1915	414.232.1915

NOTE:
One emergency coordinator will always be available, either on site or on call 24 hours a day. In the event that more than one emergency coordinator is on site at the time of an emergency, the chain of command will follow the priority of notification.

Section 3
COORDINATION OF EMERGENCY SERVICES

3.1 Emergency Coordinator

A list of Emergency Coordinators is provided in Table 2. In the event of an emergency, the Emergency Coordinator has the authority to commit resources to an emergency. In accordance with s. NR 664.0055, Wisconsin Administrative Code, at least one person with the responsibility of coordinating all emergency response measures will be present when the facility is in operation or on call and available to respond to an emergency by reaching the facility in a short period of time. Persons acting as the Emergency Coordinator have received training on and a familiar with this Contingency Plan. The Emergency Coordinator (or designee) will perform the following tasks:

- Assess extent of the emergency.
- Contact appropriate emergency support agencies and emergency response contractor if needed.
- Designate someone in charge at incident area to temporarily supervise immediate control action, radio report to coordinator for an update on conditions, and notify all personnel.
- Take precautions to prevent spreading of fire or other emergency conditions to other hazardous waste or waste disposal areas.
- Evacuate non-Tradebe personnel and non-essential Tradebe personnel from incident area particularly during operating hours.
- Assemble all personnel at a designated area for instructions and roll call. Direct company personnel in responding to fire or explosion, if appropriate, and wait for outside emergency personnel and assist in their efforts.
- Prevent additional traffic from entering incident area.
- Clear road(s) for emergency vehicles and equipment.
- Check waste inventory summary located in the Operations Manager's office for information to identify the nature of wastes in the incident area, and to determine potential hazards, such as toxic, irritating, or asphyxiating gases generated as a result of fire or explosion.
- Determine the need to evacuate the site based on evaluation of the following:

  (1) Determine the areal extent of the incident.

(2) Evaluate the nature of wastes involved, (including the potential for generation of hazardous gases).

(3) Provide an estimate of the time required and equipment needed to bring the incident under control.

(4) Address any other special conditions or factors that may have a bearing on the severity of the incident.

(5) In the event of fire, consider smoke visibility or toxic fume hazard in off-site areas, and notify Milwaukee County Fire Department personnel for action, if necessary.

(6) For occurrences requiring local traffic control, contact the Milwaukee County Sheriff's Department to coordinate evacuation activities, if necessary.

(7) If the emergency involves a spill or release, contact the following agencies:

(a) The State of Wisconsin Division of Emergency Government Spill Hotline (800-943-0003)

(b) The National Response Center (800-424-8802)

(c) The Wisconsin DNR-Southeast District Office – Spill Coordinator (414-263-8685)

(d) The Milwaukee Metropolitan Sewerage District (414-282-7200)

(e) The Milwaukee County Division of Emergency Management (414-278-4709)

(8) Report the following:
(a) Name and telephone number of the reporter
(b) Name and address of Tradebe
(c) Date, time and type of incident
(d) Name and quantity of material involved, to the extent known
(e) Estimate of total quantity discharged, source of discharge description of all affected material (Air, Water, Soil etc.)
(f) Cause of discharge
(g) The extent of injuries, if any – evacuation required
(h) Possible hazards to human health, or the environment, <u>outside the facility</u>

NOTE Information required for agency reports will be documented on the Tradebe Incident Form or a form similar in content, please refer to Appendix B for a copy of the incident report form.

- Immediately after the incident, make an assessment to determine the need for recycling, recovery, and/or disposal of recovered waste, contaminated soil or surface waters, or any other material that results from a release, fire, or explosion at the facility (assume materials are hazardous). Obtain a sample of wastes involved in the incident for possible chemical analysis so that the cause of the incident can be definitely determined.

- The Emergency Coordinator will evaluate the nature of materials (such as fire suppressants, neutralizing agents, waste residuals) in the affected area of the facility to determine if special cleanup efforts must be initiated before operation is resumed. The evaluation will include a determination as to whether the released materials would be incompatible with incoming wastes. If special fire suppressants have been used, the emergency coordinator (or site chemist) will consult with the manufacturer or check the product label (if adequately detailed) to determine any potential incompatibility.

- The Emergency Coordinator will ensure that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

- Tradebe will notify the appropriate state and local authorities that the facility is in compliance with this section before operations are resumed in the affected area(s) of the facility.

- Tradebe will note in the operating record the time, date, and details of any incident that requires implementing the Contingency Plan. Within 15 days after the incident, a written report will be submitted on the incident to the Wisconsin Department of Natural Resources Director. The report will include the following:

  (1) Name, address, and telephone number of Tradebe.

  (2) Date, time, and type of incident (e.g., fire, explosion).

  (3) Name and quantity of material(s) involved.

  (4) The extent of injuries, if any.

  (5) An assessment of actual or potential hazards to human health or the environment, where this is applicable.

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

(7) A narrative describing the known or suspected causes of the incident and a statement describing the measures taken to investigate the cause. The narrative will also describe any necessary measures which have been or will be taken to prevent incidents in the future.

(8) Any amendments to the contingency plan.

3.2 Coordination Agreements with Local Authorities

The facility maintains close ties with local police and fire departments and health care facilities. Refer to Table 3 for a list of local emergency contacts. Numerous contacts have been made and are maintained throughout the year by Tradebe, such as emergency planning, fire prevention, and security personnel with various outside agencies. Copies of the Contingency Plan have been submitted to the appropriate local authorities to familiarize them with operations and emergency procedures (Appendix C). Any amendments to the Contingency Plan will also be supplied to the appropriate local authorities to familiarize them with any additional operations and emergency procedures.

Fire Department
The City of Milwaukee Fire Department personnel are offered annual inspection and familiarization tours of the Tradebe Facility and work closely with Tradebe personnel in establishing and maintaining effective prevention and protection programs. If the fire department declines the offer for annual inspection, that decline will be documented. The interaction will include identification of the properties of hazardous waste handled at the facility, the associated hazards, and the fire control techniques, as well as a review of the contingency plan.

Tradebe has been advised that the City of Milwaukee Fire Department serves as the County and Regional Response Team.

Police Department
The Tradebe Emergency Coordinator will interact with the City of Milwaukee Police Department and the Milwaukee County Sheriff to establish effective working relationships in dealing with potential emergency situations.

Medical Services
The Tradebe Emergency Staff will maintain close contact with ambulance squads and emergency medical personnel to ensure a thorough understanding of site hazards, building layouts, and emergency medical procedures. Diagnosis and treatment procedures for chemicals (including hazardous wastes) at Tradebe will be maintained at the site.

TABLE 3 **EMERGENCY RESPONSE CONTACTS AND TELEPHONE NUMBERS**	
Local Emergency Response Contacts	
City of Milwaukee Police Department	911
City of Milwaukee Fire Department	911
Milwaukee County Sheriff	911
State of Wisconsin Division of Emergency Government	800-943-0003
State Patrol	262-785-4710
EMS	911
Local Hospital Emergency Numbers	
Franciscan Wheaton St. Joseph's Hospital	414-447-2000

Section 4
EMERGENCY RESPONSE PROCEDURES

4.1 Notification

Should an emergency situation arise, the Emergency Coordinator, or the designee, will be notified immediately. If any employee in the active hazardous waste disposal area or waste reception area encounters an emergency situation that they believe is a threat to the health or safety of themselves or others, the individual employee is authorized to alert others. The Emergency Coordinator or employee will alert others to the problem by radio, use of an air horn, cell phone or other voice communication and to evacuate the area immediately.

4.2 General Emergency Action Procedure

During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous wastes at the facility. These measures include, where applicable, stopping facility operations, collecting and containing released waste, and removing or isolating containers. If the facility stops operations in response to an emergency, the Emergency Coordinator or designee will then monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, as appropriate. The specific emergency action procedures followed are to control potential releases to air, soil, and water.

4.3 Fire/Explosion Action Procedure

Upon discovery or being advised of a fire or explosion at or outside of the Tradebe facility, the Emergency Coordinator will contact the Milwaukee Fire Department personnel. All untrained personnel will be required to leave the area. In addition, the Emergency Coordinator will direct cleanup operations, determine the level of personnel protective equipment needed, and decide on the appropriate cleanup materials. The Emergency Coordinator is also responsible for the following:

- Determining a life-threatening potential
- Determining a property-threatening potential
- Determining an environmental impact potential

Depending on the availability of data, these assessments are accomplished through careful review of waste shipping manifests, detailed chemical analysis data, or "fingerprint" chemical analysis data.

On-site firefighting equipment that will be used to control fires/explosions at the Tradebe facility will include the following:

- Fire blankets
- Hand-held fire extinguishers located throughout the facility
- Portable fire extinguishers
- Automatic Aqueous Film Forming Foam (AFFF) fire suppression system

Upon discovery of a fire/explosion, individuals will initiate the fire/explosion action procedure as described below.

FIRE/EXPLOSION ACTION PROCEDURE

1. Notify Emergency Coordinator or designee.

   Emergency Coordinator: Dan Schiro
   Cell Telephone: 414-236-1080
   Home Telephone: 414-236-1080

   The Emergency Coordinator listed in this plan has the authority and responsibility to take all reasonable measures to ensure that fires, explosions and releases with the potential to cause a fire or explosion do not occur, recur, or spread to other wastes at the facility. Upon discovery of any fire or explosion at or outside the facility, the Emergency Coordinator will immediately, contact the City of Milwaukee Fire Department, by dialing 911.

   The Emergency coordinator will inform the Fire Department of the current situation, including the need for ambulances or other emergency equipment, should any injuries have occurred as a result of the fire or explosion. The Emergency Coordinator will designate a person to wait at the street entrance to the facility to direct emergency personnel to area of the incident when they arrive. The Emergency Coordinator or designee then subsequently notifies the Tradebe Emergency Response Contractor.

2. Control access to area. Clear all nonessential personnel from area.

3. Extinguish fire with hand-held fire extinguishers, if possible, or take other immediate action to mitigate the emergency until the local Fire Department arrives.

4. Take all reasonable measures necessary to ensure that subsequent fires, explosions, or releases do not occur or spread to other areas. These measures may include, but are not limited to, the possible removal of unaffected drums of waste from the area and dowsing adjacent areas with water.

   These measures will also include the following actions to prevent fire

suppression water from being released as a result of fire-fighting actions:

a. If uncovered storm drains are present, placement of storm drain system seals over stormwater drain inlets to prevent the runoff of water to and out of the stormwater drains and
b. placement of absorbent booms along the southeast and southwest fence line.

Drain covers are located near the respective storm drains are readily available for deployment.

Booms are maintained in storage units that located away from the building but accessible by plant personnel for deployment in the event of an incident.

5. In response to a fire or explosion that may release hazardous materials, the Emergency Coordinator will direct activities to monitor for leaks, pressure build-up, gas generation, or for ruptured pipes or valves or other equipment, as appropriate.

6. If a fire or explosion causes the release of hazardous materials, the appropriate action procedure for spilled or released material will be followed, as described in Subsection 4.5.

7. The Emergency Coordinator will deploy additional personnel and equipment as required.

8. The Emergency Coordinator will document the event.

4.4 Fire/Explosion Residual Cleanup Procedure

Cleanup of fire residuals involving hazardous wastes is aimed at collecting as much of the hazardous waste as possible for recycling, recovery, and/or disposal as quickly as possible. Several techniques are available for on-site cleanup, and their use will be determined at the time of the incident, taking into account the extent of the cleanup. Procedures may require the use of sorbents, portable pumps, etc. Similarly, the type of personal protective equipment depends upon the type of material(s) involved.

All waste generated from post-fire cleanups involving hazardous waste will be placed in containers, sampled, and disposed accordingly. Any equipment used in cleaning fire residuals involving hazardous waste will be decontaminated prior to use elsewhere. Any collectable liquid generated from decontamination procedures will be tested and drummed for proper disposal.

Any residual liquid remaining from a fire at the facility will be cleaned up as described in the spill or material release section.

4.5 Spill or Material Release Action Procedure

In the event of an emergency involving a hazardous waste spill, the following general procedure will be used for a rapid and safe response and to maintain control of the situation.

- If an employee discovers a hazardous waste spill or a vapor release, or any other evidence of a potential hazard, the employee will immediately notify the area supervisor.
- The area supervisor will notify the Emergency Coordinator or designee.

When a spill or release occurs at the Tradebe facility, the Emergency Coordinator will contact the necessary personnel to contain and clean up the spill or release. Team members will be responsible for controlling the cause of the incident and for neutralizing or otherwise rendering the waste or waste constituents harmless so that others may enter the area to make repairs. Team members will also be well trained in spill control methods and equipment. This may include the use of the Emergency Response Vendors who are properly trained in spill cleanup procedures. Maintenance personnel and other specialized employees may assist in the cleanup after the emergency situation has subsided. In addition, the Emergency Coordinator will direct all cleanup operations, determine the level of personal protective equipment needed, and decide on the appropriate cleanup materials and procedures.

The Emergency Coordinator will be responsible for the following:

- Identifying the spilled material
- Estimating the quantity of material spilled
- Determining the life-threatening potential
- Determining the property-threatening potential
- Determining the environmental impact potential

Depending on the availability of data, these assessments will be accomplished through careful review of waste shipping manifests, detailed chemical analysis data, or "fingerprint" chemical analysis data. If appropriate, chemical analysis will be performed on the spilled/ released material.

Upon discovery of a spill/release, individuals will initiate the action procedure as described below.

SPILL/RELEASE ACTION PROCEDURE

1. Report the incident to the Emergency Coordinator or designee.

   Emergency Coordinator: Dan Schiro
   Cell Telephone: 414-236-1080
   Home Telephone: 414-236-1080

   The Emergency Coordinator or designee may subsequently notify the Emergency Response Vendor.

2. Protect personnel.

   Keep non-essential personnel away from area of spill; evacuate if necessary. Remove unaffected items from area only if ignition does not present a fire hazard.

3. Confine danger.

   Stop spill at source or contain, if possible. Shut off or cap valves to contain as much run-off and spill as possible. If a truck is affected, every effort will be made to prevent the material from entering sewers. This will be accomplished by damming, diking, or channeling with sand, dirt, or sorbent booms. If a leak is uncontrollable in a tanker, the remaining contents of the tanker will be transferred to appropriate storage tanks or drums. Cordon off the area with caution tape or other appropriate markings to limit entry and provide notification of the potential hazard.

4. Eliminate ignition sources.

   Eliminate all sources of heat, open flame, sparks, and friction. Use non-sparking tools for spill cleanup. Refer to the appropriate action procedure if a significant fire or explosion risk exists.

5. Spill Response.

   Only trained personnel will report to the scene and address the spill. Appropriate protective equipment and respiratory protection will be donned, and contaminant levels and spill neutralization needs will be assessed. The Emergency Coordinator may also contact the Emergency Response Vendor.

6. Handle wastes.

   Properly package and label spilled materials absorbed by sorbents. Remove

spilled materials and rinse water accumulated in containment areas via a portable vacuum unit. The contents will be discharged to the appropriate storage tank or drums. Absorb residual materials in the containment area with the appropriate sorbent, properly package and label materials.

7. Verify cleanup.

   At the completion of the cleanup effort, the Emergency Coordinator will verify complete spill collection and neutralization as well as the absence of hazardous airborne contaminants. The emergency coordinator will ensure that no incompatible waste is treated, stored, or disposed until cleanup is completed.

8. Decontaminate equipment.

   Decontaminate spill response materials and return them to their proper locations. Adjust the inventory of the spilled materials to account for materials expended in the spill cleanup.

9. Report spill.

   In the event of a release to the environment (i.e. soil, groundwater, sewer system air) or a spill that leaves the property, the following government agencies will be contacted immediately (within 24 hours of the incident) by the Emergency Coordinator or their alternate:

   1) National Response Center Phone: 800-424-8802

   2) Wisconsin Emergency Government (24 Hours)
      2400 Wright Street
      Madison, WI 53704
      Phone: 800-943-0003

   3) Wisconsin DNR – Southeast District Office – Spill Coordinator Phone: 414-263-8685

   4) Milwaukee Metropolitan Sewerage District Phone: 414-282-7200

   5) Milwaukee County Division of Emergency Management Phone: 414-278-4709

   6) City of Milwaukee Fire Department Hazardous Material Response Team Phone: 911

4.6 Spill or Material Release Cleanup Procedure

On-site spill cleanup is aimed at recovering as much of the spilled material as possible for recovery, recycling, and/or disposal as quickly as possible. Several techniques are available for on-site cleanup. Choice of a cleanup method will be determined at the time of the incident, taking into account the extent of the spill. Cleanup methods include the following:

- Using sorbents, which are spill scavengers and cleanup agents, to absorb the spilled product is the most common method for handling spills or residual product left from a major spill. Application of the sorbents can be in the form of direct application where the sorbent is placed directly on the product, or it can be in pillows, large bats, or booms which can absorb a large amount of liquid and make recovery, recycling, and/or disposal easier. Three classes of sorbents are natural products (straw, sawdust, clays, and vermiculite), modified natural products (expanded perlite, cloth rags, charcoal, silicone- coated sawdust, surfactant-treated asbestos), and synthetic products (imbiber beads, imbiber bead blankets, and foam products). When using sorbents, it is necessary to recycle and/or dispose of spent products properly, unless recoverable sorbents are used.

- When selecting a sorbent material, important considerations are its capability to absorb all spilled product, its availability in sufficient quantities; and whether or not it is chemically inert and will not react with the spilled product to form toxic or otherwise hazardous substances. For corrosive materials, lime or other neutralizers are practicable.

- Direct suction pumping into drums using pumps which are driven by explosion proof motors or pneumatic operation. Consider applying a blanket of firefighting foam (AFFF) to control vapors.

4.7 Civil Unrest Action Procedure

This procedure will be followed should the Tradebe facility be subject to civil disturbance. The Emergency Coordinator will initiate the following actions:

- Call security to notify them of possible disturbances. If necessary, notify the facility Plant Manager who may call an immediate conference to determine an appropriate plan of action.

- If necessary, issue instructions to secure all entrances with security officers or managers to control access or egress from the buildings by either demonstrators or Tradebe employees.

- If necessary, the Security Coordinator will notify local law enforcement

agencies, but they should be summoned to take action only as a last resort. An agreement has been made as to the conditions under which outside authorities are summoned, and Tradebe management is aware of the planned police action.

- If appropriate, make a reasonable attempt to have the demonstrators approached by a Tradebe manager (with due regard for the manager's safety) to inform demonstrators that Tradebe does not permit such activity on its premises, and in a restrained and courteous manner, request that they leave.

- If necessary, prepare a restraining order as soon as possible.

4.8 Natural Disaster Action Procedure

This procedure will be followed in the event of an emergency caused by severe weather, such as tornadoes and high-intensity thunderstorms, earthquakes, or flooding.
The Emergency Coordinator will direct and control the following remedial actions if they can be accomplished without unduly endangering the lives of Tradebe personnel:

- Visually inspect area to ascertain structural integrity.

- Close windows and doors.

- Instruct employees to proceed to designated safety areas.

Even in the event of a tornado warning, this portion of the plan will be implemented.

4.9 Storage and Treatment of Recovered Materials

Immediately after an emergency, the Emergency Coordinator will arrange for the analysis and characterization of representative samples of all recovered wastes, contaminated soils, and waters. Arrangements for any necessary recycling, treatment, or disposal will be completed within 90 days of the conclusion of the emergency. Accumulated materials will be containerized to the extent practicable for transportation. If large quantities of a hazardous waste are generated during the emergency cleanup operations, bulk trucks will be used to transport this waste as it is pumped, or made ready for storage, recycling, treatment, or disposal.

4.10 Incompatible Wastes

The Emergency Coordinator will ensure that wastes that may be incompatible with released materials are isolated from the spill area. Isolation will be accomplished by moving the waste to other accumulation areas, or by constructing dikes, berms, or ditches as appropriate. Wastes that are potentially incompatible with the released material will not be treated, stored, or accumulated in the affected area until cleanup procedures are complete.

Concurrently, the Emergency Coordinator will ensure that released materials are not placed in containers or tanks that previously held materials that may be incompatible with the released material unless adequate decontamination has occurred.

Section 5
EMERGENCY EQUIPMENT

All emergency equipment is kept at the facility in an easily accessible location. Table 5 provides a list of emergency and decontamination equipment along with a list of places where it can be found at the facility. An Emergency Equipment Layout is provided as Appendix R-4 (see drawing TTRWI-0005). This drawing shows the location of safety and emergency equipment in a layout of the facility. Table 4 outlines personal protective equipment which is used by facility personnel.

After an emergency event, or as needed during the emergency event, all emergency equipment and supplies listed in Table 5 will be decontaminated or replaced. All safety equipment will be inspected and evaluated for readiness before operations are resumed in the affected areas.

Emergency spill control equipment is located in easily accessible areas within the buildings. This equipment includes the following:

1. Bags of clay and vermiculite
2. Shovels
3. Push brooms
4. Long-handled squeegees
5. Fire extinguishers
6. Portable liquid vacuum units
7. Empty, 55-gallon drums
8. Sets of non-sparking tools
9. Sorbent booms
10. Personal protective equipment (clothing, boots, gloves)
11. Storm Drain covers.

TABLE 4
EMERGENCY AND DECONTAMINATION

Type of Equipment	Location	Use
Hand-held fire extinguishers	Warehouse entrances and exists.	To put out a larger than 3-foot diameter fire and easily moved
Eye wash	Entrance to the warehouse	To flush splashed materials from eyes or face
Safety showers	Entrance to the warehouse	To wash off material that may be splashed on an employee
Hand-held air horn	Every Entrance	To sound alarm for emergencies
Two-way radios	All areas of the warehouse and Facility grounds.	To notify and instruct in the case of an emergency
First aid stations	Laboratory and Every Entrance.	To handle non-serious injuries
Alarm actuators	All entrances and exits throughout the	For security and for emergencies
Zorbal, sand, and/or other absorbent	Throughout the warehouse.	To contain and cleanup spilled materials
Fire blankets	Throughout the warehouse.	To control and/or extinguish fires or put out flames
Emergency stretchers	In the warehouse.	To remove injured personnel

TABLE 5
PERSONAL PROTECTIVE EQUIPMENT

Type of Equipment	Location	Use
Organic vapor air filter respirators	On supply shelves outside of the office.	To minimize employee exposure
Safety glasses	Office.	To protect the eyes
Safety goggles	Office.	To protect the eyes
Safety boots	Throughout the warehouse.	To protect the feet
Safety gloves	Supply shelves outside of the office.	To protect the hands
Tyvek® coveralls	Supply shelves outside of the office.	To protect the body
Uniforms	Office.	To protect the body

Section 6
BUILDING EVACUATION PLAN AND EVACUATION DRILL PROGRAM

6.1 Evacuation Plan

In the event of a facility emergency, all Tradebe personnel (with the exception of the Emergency Response crew members as required) will evacuate the site. A general site evacuation will be announced by activating the alarm system (i.e., air horn). Further instruction will be provided at the time of evacuation by the appropriate supervisory staff.

The evacuation routes for the existing Tradebe facility are posted throughout the facility and illustrated on Figure 2. The drawing shows the primary and alternate routes by which to leave the site. Personnel at the site who are to be evacuated will leave by the primary route unless directed to use an alternate route.

6.2 Evacuation Drill Program

Unannounced evacuation drills will be conducted annually and will be coordinated by the Emergency Coordinator in conjunction with facility managers. Designated individuals will observe each drill and a summary report will be given to the Plant Manager for analysis and corrective actions.

The drills provide valuable information about the site's evacuation capability and give managers a chance to test evacuation procedures under controlled conditions. Based on the outcome of the drills, managers will adjust and improve department emergency procedures as needed.

Department managers will carry out the following during the planning and action stages of an evacuation drill, and during actual evacuations in emergency situations:

1. Planning Stage.

    - Ensure that all employees fully understand all aspects of the department evacuation plan.

    - Establish primary (closest exit) and alternate evacuation routes and assembly points; include same in the department emergency plan folder. Appoint a department evacuation leader and alternate.

    - Assign employees to assist the handicapped, if applicable.

    - Compile shutdown procedures, if applicable.

- Advise employees to take with them their personal belongings, such as purses, briefcases, outerwear, and car keys, during the drill.

2. Action Stage.

- Assume responsibility for all personnel (including guests, visitors, contractors, etc.) in the work area, and advise them during an evacuation that they must accompany other department employees to the assembly area.

- Ensure that the evacuation leader or alternate checks restrooms, locker rooms, break rooms, conference rooms, etc., in proximity to the department.

- Ensure that all personnel in or near the department area evacuate by the primary or alternate exit route. Contractors will also participate in the drills.

6.3 Shutdown Procedures

Managers will assign employees in advance to be responsible for shutdown procedures where necessary. To safely shut down a department area, designated employee(s) will do the following:

- Switch off all operating electrical equipment, unless shutting it off damages the equipment and leaving it running will not worsen the emergency.

- Return chemicals in use to original containers, if applicable, and close or cover open containers.

- Shut down supplied gases and chemicals, if practical, by turning off at the last rigid pipe connection in the department.

When equipment shutdown might cause serious production problems or damage equipment, managers are allowed to assign certain employees to remain in the building and not participate in the drills. Such drill exemptions will be established in advance with that employee before the drill takes place, but those employees will fully understand the evacuation procedures and be ready to evacuate under actual emergency situations. Drill exemptions will be kept to an absolute minimum.

Section 7
REQUIRED REPORTS

Tradebe will note in the operating record, the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days, Tradebe will submit a written report to the licensing authorities. The report will include the following:

- Name, address, and telephone number of the owner or operator.
- Name, address, and telephone number of the facility.
- Date, time, and type of incident.
- Name and quantity of material(s) involved.
- The extent of injuries, if any.
- An assessment of actual or potential hazards to human health or the environment, where applicable.
- An estimate of the quantity and disposition of recovered material that resulted from the incident.
- A narrative describing the known or suspected causes of the incident and a statement describing the measures taken to investigate the cause. The narrative will also describe any necessary measures which have been, or will be, taken to prevent incidents in the future.
- Any amendments to the contingency plan.

Information required for agency reports will be documented on the Tradebe Incident Form or a form similar in content, please refer to Appendix B for a copy of the incident report form.

Section 8
CONTINGENCY PLAN AMENDMENTS

This contingency plan will be amended whenever the following occur:

- The facility license is revised.
- Experience with a real emergency dictates a change in the plan if needed.
- The facility changes its design, construction, operation, maintenance, or other circumstances in a way that significantly changes the potential for fires, explosions, or releases of wastes or waste constituents, or changes the response necessary in an emergency.
- The list of emergency equipment changes significantly.
- Personnel changes are made to the roles of Primary Emergency Coordinator and Alternate Emergency Coordinator

TRADEBE
Environmental Services™

APPENDIX G-1

Contingency Plan Quick Reference Guide

Quick Reference Guide

Tradebe Treatment and Recycling of Wisconsin, LLC

5611 West Hemlock Street

Milwaukee, WI

Plant Location	Type/Name of Hazardous Waste	Harard	Estimated Max Quantity		Unique Special Treatment Waste
			drums	gals	
Area 1	Flammable Liquids/Solids/Gas	Fire	1152	63,360	Isocyanates, Cylinders
Area 2 - Section A	Bases, Class 9, Toxic	Chemical burns	272	14,960	
Area 2 - Section B	Acids, Class 9, Toxic	Chemical burns	228	12,540	
Area 3	Flammable Liquids/Solids	Fire	216	11,880	
Area 4 - Section A	Oxidizers, Corrosives, Toxic,	Fire, Chemical burns	261	14,355	
Area 4 - Section B	Acids,	Chemical burns	36	1,980	
Area 4 - Section C	Oxidizers	Fire, Chemical burns	48	2,640	
Area 5	Toxics, Flammables - Lab packs	Fire	832	45,760	cyanides, aerosols, dangerous when wet,

Facility Emergnecy Coordinator : **24-Hr Phone**

Name: Dan Schiro 414.236.1080

Facility Maps:

Site Map TTRWI-0001

Area Map: TTRWI-0011

7/7/2024

Attachment G, Contingency Plan Appendix A

TRADEBE
Treatment and Recycling ™

APPENDIX B

INCIDENT REPORT FORM

TRADEBE
Environmental Services, LLC ™

Incident Report Form

Incident Number		**Date Report Initiated:**		
Employee's Name:				
Position:		**Facility Location:**		
Date of Incident:		**Time of Incident:**		☐ **AM** ☐ **PM**

Check all that apply.

☐ **INVOLVED PARTY**	☐ **WITNESS**	☐ **NEAR MISS**	☐ **INJURY**	☐ **FIRE**
☐ **SPILL/ RELEASE**	☐ **POTENTIAL HAZARD**	☐ **VEHICLE EQUIPMENT**	☐ **PROPERTY DAMAGE**	

IF INCIDENT INVOLVES **INJURY** COMPLETE INJURY FORM EHS-F004

IF INCIDENT INVOLVES **SPILL/RELEASE** COMPLETE SPILL FORM EHS-F002

IF INCIDENT INVOLVES **PROPERTY DAMAGE** COMPLETE PROPERTY DAMAGE FORM EHS-F003

What Happened? (Complete on the back if necessary)

PPE Used (List All)

Signature **Date**

TRADEBE
Environmental Services, LLC ™

SPILL or RELEASE REPORT (Form EHS-F002)

Incident Number: _____

Date: _____ Time: _____ Duration of Release #: _____

Material Spilled: _____ Gallons Spilled: _____

Profile Number of Material: _____ Process Code: _____

Drum Number: _____ Container Size: _____ Container Type: _____

Did the spill or released material leave the property (this includes internal ditches, drains, external drains/sewers, etc.)? Y / N

If yes, where did the spill or released material go to: _____

SHADED AREA TO BE COMPLETED BY EH&S ONLY

WPG: _____ Pounds Spilled: _____ CAS #:_____

RQ of Material: _____ Reportable: **YES/NO**

Agencies Notified	Date & Time	Report Number	Initials
1._____	_____	_____	_____
2._____	_____	_____	_____
3._____	_____	_____	_____
4._____	_____	_____	_____

Department: Area _____ Tank _____ or Process: _____ Shift: _____

Employee Name: _____ Title:_____

Location of Incident: _____

Task performing when spill or release occurred: _____

INSIDE BUILDING or **OUTSIDE** (**Circle**), if outside then:

Weather: Clear /Cloudy / Rain / Snow / Mist (**Circle**)

Wind Speed and Direction: _____ Temperature: _____

Incident Type: (**Check all that apply**)

□ Hose Failure □ Tank Failure □ Pipeline Failure □ Temperature Extremes
□ Drum/Tote Leak □ Valve Failure Pump Seal □ Leaking Bottles □ Human Error
□ Other_____
(Describe in detail)

Incident Actions or Conditions: (**Check all that apply**)

□ Operating at unsafe speeds □ Horseplay □ Improper container handling □ Inadequate training
□ Defective equipment or tool □ Failure to use proper tool or equipment
□ Violation of safety rule/SOP □ Inadequate preventive maintenance
□ Failure to follow Operational Procedure □ Poor housekeeping
□ Other_____
(Describe in detail)

Incident Facts (**List all actions, failure of actions, conditions, etc. that led up to the incident**):

_____

_____

_____

_____

_____

_____

_____

Immediate Corrective Action Taken (**Emergency Response Actions**):

_____

_____

_____

_____

_____

_____

MATERIALS UTILIZED IN CLEAN UP/ CONTAINMENT

Oil Dry		**Wipes**	
Booms		**Fire Extinguisher**	
Overpak		**Neutralizer**	
Visqueen		**Saw Dust**	
Number of the Spill Kit Utilized			

Incident Scene (**Provide Rough Sketch or Insert Pictures Electronically**):

PROPERTY DAMAGE – LOSS REPORT

Incident Number:		**Date of Report:**	
Person Completing Report:		**Discovered By:**	
Date of Damage/Loss:		**Time of Damage/Loss**	
Injuries	☐ Yes ☐ No	**Fire:**	☐ Yes ☐ No
Police Called	☐ Yes ☐ No	**Police Report #**	
Vehicle ID		**Plate Number**	
Description of Loss/Damage			
Specific Location of Damage or Loss on Vehicle/Property			

Factors Contributing to Damage or Loss			
☐ Truck	☐ Equipment Failure	☐ Chemical Contact	☐ Car
☐ Horseplay	☐ Defective tool or equipment	☐ Weather Related (Wind, Hail, Rain, etc.)	
☐ Heat or Cold	☐ Electrical Contact	☐ Chemical Reaction	
☐ Improper material handling	☐ Moving, working, or operating at unsafe speeds		
☐ Inadequate preventive maintenance	☐ Failure to use proper procedure, tool, or equipment		

How did the Property Damage/Loss occur? (Describe in specific detail):

_____
_____
_____
_____
_____
_____
_____
_____

Immediate Corrective Action Taken (emergency response actions):

_____
_____
_____
_____
_____
_____

TRADEBE
Environmental Services, LLC ™

Tradebe Environmental Services, LLC
Injury Report

Incident Number _____

☐ **INJURY** ☐ **ILLNESS**

Facility Location: _____ Date Report Initiated: _____

Injured Employee's Name: _____

Date of Incident: _____ Time of Incident: _____ ☐ AM ☐ PM

CONTACT HEALTH AND SAFETY FOR ASSISTANCE

IF INCIDENT INVOLVES CHEMICAL EXPOSURE, SEND SDS AND/OR WASTE PROFILE TO TREATING FACILITY

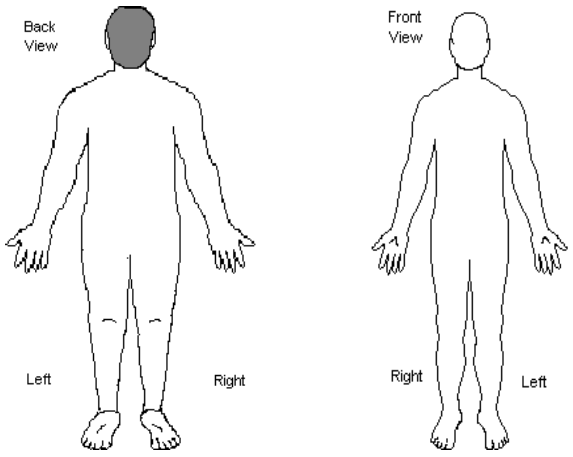
☐ **FIRST AID** ☐ **DOCTOR** ☐ **EMERGENCY ROOM**

Body part injured:

☐ Head	☐ Nose	☐ Shoulders L/ R	☐ Fingers	☐ Hips L / R	☐ Ankle L / R
☐ Face	☐ Mouth	☐ Arms L / R	☐ Chest	☐ Upper Back	☐ Leg L / R
☐ Eyes L / R	☐ Neck	☐ Hands L / R	☐ Abdomen	☐ Lower Back	☐ Foot L / R
☐ Other _____				☐ Groin	☐ Knee L / R

Nature of Injury/Illness:

☐ Sprain	☐ Strain	☐ Cut	☐ Ingestion	☐ Bruise	☐ Struck by Object
☐ Slip / Fall	☐ Break	☐ Lifting	☐ Inhalation	☐ Burn	☐ Chemical Contact
☐ Amputation	☐ Other: _____				



(Circle affected area)

Tradebe – Employee's Incident Statement

Check One: ☐ **Witness** ☐ **Involved or Injured Party** ☐ **Supervisor**

Incident Date:_____

Please complete all sections.

TYPE OF EVENT – Please Check:
Injury: ☐ **First Aid** ☐ **Medical Treatment**
Accident: ☐ **Property Damage** ☐ **Vehicle Equipment**
Incident: ☐ **Near Miss** ☐ **Potential Hazard** ☐ **Fire** ☐ **Spill**

Name: _____**DOB:**_____

Position:_____ **Date of Hire**_____

Address: _____**City:**_____

State: _____**Zip Code:** _____ **Phone #:** _____

What Happened? (Complete on the back if necessary)

_____

_____

_____

_____

Are you hurt or injured?

_____

_____

_____

What are your symptoms / area is injured or are you feeling discomfort?

_____

_____

_____

PPE Used (List All) _____

_____

_____

_____ _____

Signature **Date**

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Incident Number: _____

Medical Treatment Request/Refusal

(***Contact the Health and Safety Manager prior to being sent for any medical treatment for evaluation***)

Medical Treatment Request

I acknowledge that the company has offered me the Panel of Physician's below and I have selected the Physician _____ or one of his associates at _____ (clinic) for medical treatment for the incident which I have descried on my incident report dated _____.

I authorize release of medical documents related to this incident to Tradebe and to Tradebe's Workers Compensation insurance carrier.

Date: _____

Name: _____

Signature: _____

Designated Clinic and Hospital

Clinic hours:

☐ _____

Off hours treatment (if needed ASAP)

☐ _____

Medical Treatment Refusal

I acknowledge that Tradebe has offered me the opportunity to receive a medical evaluation regarding the incident I reported on _____. I am declining medical evaluation at this time.

If treatment is needed in the future, I understand that I must contact Health and Safety or other Tradebe Manager for approval.

I understand that I may be required to submit to a drug/alcohol screen even though I am refusing treatment.

Date: _____

Name: _____

Signature: _____

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ATTACHMENT H

TRAINING PROGRAM

ATTACHMENT H
TRAINING PROGRAM
NR 670.014(2)(L)
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ATTACHMENT H
TRAINING PROGRAM
NR 670.014(2)(L)

H.1 Training Program NR 670.014(2)(L)

As required by NR 664.0016, Attachment H contains an outline of both the introductory and continuing training programs to prepare personnel to operate and/or maintain the Tradebe facility in a safe and compliant manner. An outline of the training program is provided as Appendix H-1 to this Attachment. A brief description of how training will be designed to meet actual job tasks according to NR 664.0016(1)(c) is included as Appendix H-2.

H.1.1 Personnel training NR 664.0016(1)(a)

Tradebe personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of NR 664.0016(1)(a). Tradebe management will ensure that this program includes all the elements described in the document required under NR 664.0016(4)(c).

H.1.2 Training Program Director NR 664.0016(1)(b)

The training program shall be directed by the Corporate Training Manager who is trained in hazardous waste management procedures and will include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

The Tradebe Corporate Training Manager conducts routine reviews of the training programs and updates the training programs as necessary to ensure that all individuals are trained in accordance with the requirements of the training program. The Corporate Training Manager is responsible for ensuring that the course of instruction teaches facility personnel hazardous waste management procedures relevant to the positions they hold.

H.1.3 Minimum Requirements NR 664.0016(1)(c)

The training program has a minimum standard to train facility personnel to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems. When applicable, this will include:

(i) Procedures for using facility emergency equipment.
(ii) Communications/alarm systems.
(iii) Response to fires or explosions.
(iv) Response to ground-water contamination incidents; and
(v) Shutdown of operations.

To accomplish this, operational and some administrative employees will at a minimum receive the following training as outlined in Appendix H-2:

- Hazard Communication with Globally Harmonized System (GHS) and Material Safety Data Sheets (MSDS) online
- Incident Reporting in accordance with Tradebe's Contingency Plan
- Tradebe's Contingency Plan implementation and requirements
- Facility Tours
- RCRA Basic & Paperwork
- Environmental Health and Safety Scorecard
- DOT Hazardous Materials and Paperwork

H.1.4 Emergency Response Training NR 664.0016(1)(d)
Tradebe combines emergency response training and contingency plan training into one training module listed in Appendix H-2 as Contingency/Emergency Procedures. This training is structured to meet Occupational Safety and Health Administration (OSHA) rules 29 CFR 1910.120 (p) (8) and (q).

H.2 New Employee Training NR 664.0016(2)
Tradebe's new personnel or employees moving into a new position shall successfully complete a training program within 6 months after the date of their employment or date of a new assignment. The initial new employee training is followed by specific training in specialized topics as needed.

H.3 Annual Training Review NR 664.0016(3)
Tradebe personnel have an annual review of the training requirements. This review will be performed by the Corporate Training Manager, a member of the Training Department, or a Tradebe employee who is a subject expert as referenced in Appendix H-1. Training needs identified during the review are intended to be completed within one year, based on availability and scheduling.

H.4 Recordkeeping NR 664.0016(4)
Tradebe will maintain all the following documents and records at the facility (electronic and/or hard copies):

H.4.1 Job Titles NR 664.0016(4)(a) - The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job. The job titles may be similar to those used at other Tradebe facilities although some of those titles may not be filled at this location.

H.4.2 Job Descriptions NR 664.0016(4)(b) - A written job description for each position listed in H.4.1 above. This description may be consistent in its degree of specificity with descriptions for other similar positions within the company or bargaining unit although not all elements of the job description may apply to personnel at this facility. The job descriptions will include the requisite skill, education or other qualifications, and duties of employees assigned to each

position.

H.4.3 Written Description NR 664.0016(4)(c) - A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under H.4.1. A brief description is provided in Appendix H-2.

H.4.4 Records NR 664.0016(4)(d) - Records that document that the training or job experience required under H.4.1, 2 and 3 have been given to, and completed by, facility personnel.

H.5 Training Records Retention NR 664.0016(5)

Training records for current personnel shall be kept until closure of the facility. Training records on former employees shall be kept for at least 3 years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

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APPENDIX H-1

PERSONNEL TRAINING PROGRAM OUTLINE

APPENDIX H-1
PERSONNEL TRAINING PROGRAM OUTLINE

H.2 Personnel Training Outline NR 670.014(2)(L)

The Tradebe Personnel Training Program is designed in accordance with the regulatory requirements of WAC NR 670.014 and WAC NR 664.0016. Some training courses are provided as part of multiple training programs. Some training courses also satisfy requirements under multiple training categories.

H.2.1 Introductory Training NR 670.014(2)(L)

The introductory training program introduces new employees to hazardous waste management and familiarizes each employee with plant emergency procedures. This includes computer-based sessions, lectures, lesson examinations, a facility tour, and hands-on training. This training includes:

- Environmental Health & Safety Scorecard
- Incident Reporting
- Hearing Conservation
- Alcohol-free and Drug-free Workplace
- Hazard Communication with GHS and MSDS online
- DOT Hazardous Materials and Paperwork
- RCRA Basic & Paperwork
- Contingency Plan
- Facility tour
- Accident Prevention

H.2.2 Supplemental Introductory Training NR 670.014(2)(L)

Additional training sessions are utilized to address handling concerns associated with specific chemicals. Depending on where the employee works, this training may include:

- RCRA Overview
- RCRA Empty Containers
- Tradebe Operations Overview
- Storage Requirements
- Manifest Overview
- Hazardous Materials Handling
- Review of Current Federal/State Regulations
- Waste Characterization
- RCRA Hazardous waste
- Container Management

H.2.3 Specialized Training NR 670.014(2)(L)

Specialty training session is conducted as needed to educate facility personnel on various aspects of waste management or changes to the regulations that could impact the facility operations. This training includes:

- Topics in Waste Determination
- Topics in Waste Generation
- Manifest Discrepancy
- Land Disposal Restrictions

- Universal Waste Management

H.2.4 Continuing Training Program NR 670.014(2)(L)

Continuing training is provided using Tradebe's Annual Training (i.e., Refresher) program. This program is designed to meet job-specific training needs according to position description and job duties. This training may include:

- Contingency Planning and Emergency Response
- Decontamination
- Waste Characterization
- Hazardous Materials Handling
- Review of Current Federal/State Regulations
- Accident Prevention
- Hazard Communications
- Hearing Conservation
- Container Management
- RCRA Hazardous waste
- Stormwater Pollution Prevention
- Spill Control and Countermeasure
- Contingency Plan

H.2.4(a) Drills NR 670.014(2)(L)

Tradebe's Drill program is designed to evaluate employees on their emergency response reactions and the timelines of response. The drills are both announced ahead of time and unannounced. The response by individuals and departments are evaluated afterwards and recommendations for improvement developed.

H.2.5 Emergency Procedures Training NR 664.0016(c)

Comprehensive specialized training is provided so that selected individuals at the facility are adequately prepared to respond quickly and safely to various emergency situations. This training may be provided in both the introductory and continuing training programs. The programs include but not limited to:

Contingency Plan
Emergency Equipment use.
Addressing fires at incipient stage
Spill response.
Hazard Identification (DOT Hazard Classes)

H.2.5(a) Use, Inspect, Repair, and Replace Equipment NR 664.0016(c)(1)

- Accident Prevention
- Forklift use and maintenance
- Container Management

H.2.5(b) Automatic Waste Feed Cut-Off Systems NR 664.0016(c)(2)

Tradebe does not use automatic feed systems at this facility.

H.2.5(c) Communication or Alarm Systems NR 664.0016(c)(3)

- Contingency/Emergency Procedures

- Evacuation Procedures
- Incident Reporting
- Accident Prevention
- Hazard Communications
- Hazard Communication with GHS and MSDS online
- DOT Hazardous Materials and Paperwork

H.2.5(d) Response to Fires and Explosion NR 664.0016(c)(4)

- Contingency Planning and Emergency Response
- Hazardous Materials Handling
- Accident Prevention
- Contingency Plan

H.2.5(e) Response to Groundwater Incidents NR 664.0016(c)(5)

- Stormwater Pollution Prevention
- Spill Control and Countermeasure

H.2.5(f) Shutdown of Operations NR 664.0016(c)(6)

- Tradebe Operations Overview
- Contingency Planning and Emergency Response

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APPENDIX H-2

TRAINING DESIGN by JOB TASK

Appendix H-2
Training Design for Job Task
NR 670.014(2)(L)

H.3 Training by Job Task

TRADEBE training courses are structured and may include computer-based learning modules; lectures; demonstrations/practice sessions or open discussions. Additionally, field exercises provide hands-on activities to enhance employee comprehension and aid in the practical applications of learned skills to situational problem solving.

Employee competency is demonstrated through electronic or written examinations and plant supervisor's evaluation of practical skill applications (on-the-job performance). Written examinations used to evaluate TRADEBE employee competency are given by qualified instructor(s) selected by the Health and Safety Department or TRADEBE management.

H.3.1 Operational and Administrative Employees NR 670.014(2)(L)

Operational Employees fill the following roles:

- Director of Operations
- Vice President of Regulatory Affairs
- Approvals Manager
- Director of Health and Safety
- Corporate Training Manager
- Plant Manager
- Assistant Plant Manager
- Operations Manager
- Technical Manager
- Receiving Manager
- Shipping Manager
- Laboratory Manager
- Receiving Supervisor
- Shipping Coordinator
- Lab Chemist
- Warehouse Technician
- Receiving Sampler
- Technical Services Chemist
- Truck Driver

Administrative employees fill the following roles:

- Transportation Coordinator
- Receiving Office Supervisor
- Receiving Clerk
- Administrative Assistant
- Account Manager

- Technical Services Specialist

H.3.2 Orientation Training by Job Title NR 670.014(2)(L)

TRADEBE conducts facility orientation training for all new employees. Orientation training is designed for the task each employee is assigned. There are two categories of job tasks: Operational and Administrative. Operational employees are directly involved in waste management activities. Administrative employees are not directly involved in waste management activities. The orientation training programs for these groups are as follows:

New Employee Introductory Training for Operational Employees:

- Alcohol-free and Drug-free Workplace
- Hazard Communication with GHS and MSDS online
- Forklift Safety
- Incident Reporting
- RCRA Basic Regulations and Paperwork
- DOT Hazardous Materials and Paperwork
- Spill Prevention and Stormwater Pollution Prevention Plan Training
- 40 Hr HAZWOPER

New Employee Introductory Training for Administrative Employees:

- Environmental Health & Safety Scorecard
- Incident Reporting
- Alcohol-free and Drug-free Workplace
- Hazard Communication with GHS and MSDS online
- DOT Hazardous Materials and Paperwork
- RCRA Basic & Paperwork
- Contingency Plan
- Facility tour

Additionally, new operational employees receive supplemental training specific to waste handling activities.

Supplemental Training for Operational Employees:

- RCRA Overview
- Waste Determination
- Universal Waste
- RCRA Empty Containers
- Waste Generation
- Treatment Technologies
- Tradebe Operations Overview
- Storage Requirements
- Manifest Overview
- Manifest Discrepancy
- Land Disposal Restrictions

- Contingency/Emergency Procedures
- Evacuation Procedures
- Facility tour

Specialized Job Specific Training*

Operational employees are provided with specialized training whenever appropriate. This training is available on as-need basis and is intended to provide in-depth, detailed training to personnel performing specialized tasks. Examples would be specialized equipment training for lab personnel, and Train the Trainer for Forklift Drivers. At a minimum the following employees receive specialized training:

- Plant Manager
- Assistant Plant Manager
- Operations Manager
- Technical Manager
- Receiving Manager
- Shipping Manager
- Laboratory Manager

Training topics include:

- Topics in Waste Determination
- Topics in Waste Generation
- Treatment Technologies
- Manifest Discrepancy
- Land Disposal Restrictions
- Universal Waste Management

*Courses listed here may be provided as available and also may be part of the refresher training program.

H.3.3 Refresher Training by Job Title NR 670.014(2)(L)

Refresher training is designed to meet the job tasks for both operational and administrative employees. The minimum refresher training for each category is listed below.

Refresher Training for Operational Employees:

- Contingency Planning and Emergency Response
- Decontamination
- Waste Characterization
- Hazardous Materials Handling
- Review of Current Federal Regulations
- Accident Prevention
- Hazard Communications
- Hearing Conservation
- Container Management
- RCRA Hazardous waste
- Stormwater Pollution Prevention
- Spill Control and Countermeasure

Refresher Training for Administrative Employees:

- Contingency Plan
- Accident Prevention
- Hazard Communications
- Hearing Conservation

H.3.4 Periodic Training and Drills by Job Title NR 670.014(2)(L)

TRADEBE Operational and Administrative personnel are provide with routine periodic training sessions and drills designed as Toolbox training sessions which are short lessons on a specific topic. These topics include regulatory requirements, safety tips, waste management topics etc. They may also be used to emphasize the Initial and Refresher training sessions or to alert personnel to regulatory, safety, and general plant concerns.

The Health and Safety Director or designated personnel also conduct periodic safety meetings to address current facility health and safety concerns and conditions. Subject matter presented is chosen by the Health and Safety Director and Operations Director based on the work activities at the facility. Meeting minutes are kept, and all attendees sign an attendance sheet.

Drills are conducted randomly, with and without warning to evaluate Tradebe personnel's ability to respond to emergencies and unforeseen circumstances in waste management.

H.3.5 Emergency Response Training by Job Title NR 670.014(2)(L)

Designated Operational and Administrative employees receive additional training so they can assist with emergency situations. At a minimum the following on-site employees receive that training:

- Approvals Manager
- Director of Health and Safety
- Plant Manager
- Assistant Plant Manager
- Operations Manager
- Technical Manager
- Receiving Manager
- Shipping Manager
- Laboratory Manager
- Account Manager

At a minimum, additional emergency response training will include:

- Contingency/Emergency Procedures
- Evacuation Procedures
- Contingency Planning and Emergency Response
- Decontamination
- Stormwater Pollution Prevention
- Spill Control and Countermeasure

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ATTACHMENT I

CLOSURE PLAN

ATTACHMENT I
CLOSURE PLAN
NR 670.014(2)(m-p)
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Section I. 1 INTRODUCTION

Tradebe Treatment and Recycling, LLC acquired the Badger Disposal of Wisconsin, LLC (Badger Disposal) operations in April 2017 and the facility operation name was changed to Tradebe Treatment and Recycling of Wisconsin, LLC (Tradebe). For historical license reference perspective, the Badger Disposal label has been retained for some of the information in this section.

The closure plan has been developed in accordance with NR 670.014(2)(m) and NR 664.0112 requirements.

I.1.1 Background

Tradebe has revised the renewal application for the site's Hazardous Waste Operating License, that was originally issued August 1, 2007. The Tradebe facility is located at 5611 West Hemlock Street, Milwaukee, Wisconsin. The Tradebe facility occupies approximately four (4) acres with a surrounding land best described with industrial and commercial activities. The facility includes the existing buildings and an undeveloped vacant parcel of approximately 2.4 acres that is situated outside the security fence, east of the facility's operational footprint (i.e., fence line). The location of the facility is shown on Figure 1, please refer to Appendix R-1 (Drawing TTRWI-0001).

I.1.2 Purpose and Scope

Tradebe operates five (5) container management areas utilized for the storage of hazardous waste. Tradebe does not conduct treatment or on-site disposal activities at the facility nor is hazardous waste maintained in waste piles or surface impounds.

The purpose of this Closure Plan is to describe the final closure activities that Tradebe will perform to close the Milwaukee facility, in accordance with NR 664.011. This Closure Plan describes the activities, tests, and performance standards for closing the Tradebe facility located on West Hemlock Street, Milwaukee Wisconsin

The scope of this document is limited to providing a Closure Plan for the hazardous waste container management units at the Tradebe Hazardous Waste Treatment and Storage Facility. The Closure Plan includes the following discussions:

- Descriptions of the facility and storage areas;
- The technical approach that will be used to accomplish closure of the storage areas;
- Analytical parameters and performance standards for determining closure, including the method that will be used to establish background levels;
- Methods for performing and documenting closure;
- Health and Safety issues related to closure activities;
- Estimated closure costs and financial assurance;
- Decontamination methods for personnel and for equipment used to handle contaminated materials during closure; and
- The documentation of closure activities.

Section I.2 GENERAL FACILITY INFORMATION

I.2.1 Facility Name, Location, and Contact

NAME: Tradebe Treatment and Recycling of Wisconsin, LLC

LOCATION: 5611 West Hemlock Street
Milwaukee, WI 53223

CONTACT: Philip Grogan
Plant Manager
414-760-9175

EPA ID: WID988580056

I.2.2 Site Description and Overview of Waste Management Units

The Tradebe facility includes the following hazardous waste management areas for containers of hazardous waste. The hazardous waste management areas contained in totally enclosed buildings, meaning the buildings have roofs and walls that prevents precipitation from entering the buildings. These buildings are also afforded concrete floors that have been coated to provide an impervious flooring system which prevents migration of constituents to the environment.

Area 1

The first container management area is known as the Area 1. This area, formally known as the North Warehouse, is being licensed to store a maximum of 1,720 55-gallon (94,600 gallons) drums of a combination of hazardous and non hazardous waste. The Area 1 waste management area consists of approximately 9,175 square feet, please refer to Drawing Number TTRWI-0008 in Attachment R.

Area 2

The second container management area is known as Area 2. The area was formally known as the 2007 Addition, and is being licensed to store a capacity of 992 55-gallon drums (27,500 gallons) of a combination of hazardous and non hazardous waste between Sections A and B in Area 2. Section A is 2,832 square feet and Section B is 2,784 square feet, for a total of 5,616 square feet, please refer to Drawing Number TTRWI-0008 in Attachment R.

Area 3

The third container management area is known as Area 3. The area was formally known as the Enclosure Building, and has the capacity to store a maximum of 216 drums (11,880 gallons) of a combination of hazardous and non hazardous waste. This area consists of approximately 1,530 square feet and has a concrete containment vault system conducted situated under the container storage floor, please refer to Drawing Number TTRWI-0008 in Attachment R.

Area 4

The fourth container management area is known as the Area 4. This area was formally known as the 2009 Lab pack Building and has the maximum capacity of 861 drums (47,335 gallons) of a combination of 345 (18,975) hazardous waste containers and 516 non hazardous waste containers. The hazardous waste can be stored in three distinct storage locations, identified as Sections A, B and C, based on the type of

waste to be stored. This area consists of approximately 6,760 square feet; please refer to Drawing Number TTRWI-0008 in Attachment R.

Area 5

The fifth container management area is known as the Area 5. This area was formally known as the West Warehouse and has the capacity to store 836 drums (45,980 gallons) of a combination of hazardous and non hazardous waste. This area consists of approximately 4,565 square feet; please refer to Drawing Number TTRWI-0008 in Attachment R.

I.2.3 Waste Characterization

The waste container information conducted by Tradebe at the time of receipt will allow for third party contractors to facilitate the removal of all the containers of hazardous waste from the container management areas as the initial steps of the facility closure activities. This initial step is possible as all waste received at the Tradebe facility is pre-approved which means that no unknown wastes are received or managed at the facility. Further, operational protocols described in Sections I.2 and I.5 as well as in the Waste Analysis Plan, refer to Attachment C, details the container receiving and management actions to confirm an inbound waste's identification. Waste containers are sampled and labeled prior to being placed into storage areas.

Hazardous Waste on-site will be sent off-site for recycling or treatment. Off-site treatment processes employed may include: stabilization, incineration or fuel blending, depending on the hazardous waste constituents.

As a result of the Tradebe management activities , at the time of closure, incidental amounts of wastes are expected at the facility. These wastes will be removed during implementation of the Closure Plan as described below.

I.2.4 Maximum Waste Inventory NR 664.0112(2)(c)

The closure activities consist of waste being removed from the facility. As required by Chapter NR 664.0112(2)(c), this Closure Plan includes an estimate of the maximum waste inventory of hazardous waste ever on-site during the active life of the facility. Based on the Badger Disposal historical information, the maximum hazardous waste inventory determined to be at the facility was 2,389 55-gallon equivalent drums (131,195 gallons) for the five (5) container storage areas, described

in Section I.2.2. Tradebe's inventory information indicates this level has not been surpassed therefore the Badger Disposal historical value will be used by Tradebe as the Maximum Waste Inventory for worse case disposal costs.

As described in Section 1, Attachment B and D, the WDNR approved Bulk Roll Off container storage area, with a capacity of 120 cubic yards of bulk hazardous waste, which has never been constructed at the facility. Therefore, the proposed Roll Off container management area was not included in the Closure Plan details.

Section I.3 CLOSURE PERFORMANCE STANDARDS

I.3.1 Objectives

Tradebe intends to Close the RCRA hazardous waste container management areas in a manner that satisfies the following requirements of Chapter NR 664.0111, of the Wisconsin Administrative Code:

- Minimizes the need for further maintenance.

- Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous wastes or hazardous constituents to the environment.

These requirements will be satisfied by documenting the following closure activities:

- Shipment of all hazardous waste containers from the facility to off-site licensed / permitted facilities.

- Concrete surfaces and other structures associated with the hazardous waste management systems or structures have been decontaminated. Confirmation of successful decontamination activities will utilize analysis of decontamination fluid samples that have met the performance standards described in this Closure Plan. Once these structures have been decontaminated, they -the structures- will be left in-place at the facility.

- Residues generated during facility decontamination and closure activities were managed as described in this Closure Plan.

The closure activities shall follow the approach presented in the following section.

I.3.2 Closure Approach

Closure decontamination activities will take place in stages beginning with the removal of all hazardous waste containers from the facility. Third party organizations will conduct the waste shipment activities. A third-party organization will also conduct the decontamination of the waste storage units, as well as performing the confirmation sampling activities, in concert with the independent Professional Engineer, for the container storage areas. Samples from decontamination rinsate solutions will be sent off site for analysis.

Final closure activities, the specific activity sequencing, and execution would be determined by personnel active in the facility closure activities.

In general, closure activities will consist of the following:

- Buildings, equipment and associated structures that have been in contact with hazardous waste constituents will be decontaminated.
- Decontamination will generally involve physical removal of any solids and then a high pressure (10,000 PSI) power-washing using separate cleaning and rinse solutions.
- Some structures, equipment and associated electrical components may be physically scraped, brushed, or hand-washed rather than power-washed due to the sensitivity of the equipment to power-washing actions.

Specific closure activities for the various hazardous waste management units are described in Section I.4 of this Closure Plan.

I.3.3 Performance Standards for Decontamination

The container management areas will be decontaminated by power-washing. Decontamination rinsate samples will be collected and analyzed as described in Section I.4. Laboratory results will be compared to the NR 668.40 Wastewater Concentration Limits. Decontamination shall be complete when these concentrations are achieved.

Table 1 contains a list of the constituents of concern for the container management areas. The final rinsate will be analyzed for these parameters. These parameters were chosen as they are associated with the hazardous waste container handling, and the

hazardous waste treatment (i.e., fuel blending) activity previously conducted at the facility.

I.3.4 Potentially Contaminated Equipment and Soils

I.3.4.1 Equipment

The Tradebe facility oversight and routine inspections at the facility requires the cleanup of work areas and responses to spills of hazardous wastes. Further, the management activities do not utilize hazardous waste processing equipment that would require decontamination activities not previously described in Section I.3.2. (physical scrapping, and rinsing). Should hazardous waste management activities at the facility change, this Closure Plan will be modified as at the part of the License Modification request submitted to the WDNR.

The Tradebe facility oversight of the operations restricts potential contamination of facility structural aspects. Spills release are address through the facility and decontamination of structural aspects have been addressed in Section I.3.2

I.3.4.2 Soils

Tradebe actions outlined in the Preparedness and Prevention actions in Attachment D and Contingency Plan actions in Attachment G details Tradebe actions to prevent releases of hazardous waste from exiting the facility and that released material is contained and clean up as part of Tradebe operations. The hazardous waste management activities at the Tradebe facility do not consist of outdoor hazardous waste management or disposal activities that would require subsurface or geological investigations. Tradebe will revise this closure plan in the event information or an incident would occur at the facility where constituents could not recover and could potentially contaminate facility geology.

Table 1 **CONSTITUENTS OF CONCERN**	
Parameter to Be Analyzed	**Applicable Waste Code**
Acetone	F001/F002/F003/F004/F005
Benzene	F001/F002/F003/F004/F005
n-Butyl Alcohol	F001/F002/F003/F004/F005
Carbon Disulfide	F001/F002/F003/F004/F005
Carbon Tetrachloride	F001/F002/F003/F004/F005
Chlorobenzene	F001/F002/F003/F004/F005
o-Cresol	F001/F002/F003/F004/F005
m-Cresol,	F001/F002/F003/F004/F005
p-Cresol	F001/F002/F003/F004/F005
Cresol-mixed isomers (Cresylic acid)(sum of o-m, and p-cresol concentrations)	F001/F002/F003/F004/F005
Cyclohexanone	F001/F002/F003/F004/F005
O- Dichlorobenzene	F001/F002/F003/F004/F005
Ethyl Acetate	F001/F002/F003/F004/F005
Ethyl benzene	F001/F002/F003/F004/F005
Ethyl Ether	F001/F002/F003/F004/F005
Isobutyl Alcohol	F001/F002/F003/F004/F005
Methanol	F001/F002/F003/F004/F005
Methylene Chloride	F001/F002/F003/F004/F005
MEK	F001/F002/F003/F004/F005
Methyl Isobutyl Ketone	F001/F002/F003/F004/F005
Nitrobenzene	F001/F002/F003/F004/F005
Pyridine	F001/F002/F003/F004/F005
Tetrachloroethylene	F001/F002/F003/F004/F005
Toluene	F001/F002/F003/F004/F005
1,1,1-Trichloroethane	F001/F002/F003/F004/F005
1,1,2-Trichloroethane	F001/F002/F003/F004/F005
1,1,2-Trichloro-1,2,2-trifluoroethane	F001/F002/F003/F004/F005
Trichloroethylene	F001/F002/F003/F004/F005
Trichloromono-fluoromethane	F001/F002/F003/F004/F005
Xylenes-Mixed Isomers	F001/F002/F003/F004/F005
Arsenic	D004
Barium	D005

Table 1 **CONSTITUENTS OF CONCERN (continued)**	
Parameter to Be Analyzed	**Applicable Waste Code**
Cadmium	F006/F007/F009/D006
Chromium	F006/F007/F009/D007
Lead	F006/F007/F009/D008
Mercury	D009
Selenium	D010
Silver	F006/F007/F009/D010
Cyanides (Total)	F006/F007/F009/D003
Cyanides (Amenable)	F006/F007/F009/D003
Nickel	F006/F007/F009

Notes:
(i) The analytical method for Volatile Organic Compounds will be SW8260B.
(ii) The analytical method for Semi Volatile Organic compounds will be SW8270C.
(iii) The analytical method for RCRA Metals will be Total Metal content.
(iv) Tradebe will also analyze for Total PCB's (sum of all PCB isomers or all Aroclors).

Section I.4 CLOSURE METHODS NR 664.0112(2)(d)

I.4.1 Hazardous Waste shipments

Shipments of the hazardous waste containers at the facility will be conducted by a third-party organization. The third-party organization personnel will conduct the shipping activities including: labeling containers with the receiving facility's labels; loading containers on the transport vehicles; and executing the shipping documents. Shipping documents will be used by the Professional Engineer in the Closure report

I.4.2 Decontamination of the Hazardous Waste Storage Units

Tradebe has consulted with an outside organization that specializes in the decontamination of equipment; property and structures. This organization's expertise was utilized in the development of the facility's closure plan.

The container management areas are located inside enclosed buildings - meaning the buildings have roofs and walls that prevents precipitation from entering the buildings that are constructed with cement block walls and concrete floors; the walls and floors have been coated to prevent migration of constituents from the containment area. These container management areas were primarily used for drum storage of hazardous liquids and solids; one (1) location was used for the fuel blending of

hazardous waste. There is also a "vault" unit in Area 3 that will require confined space entry procedures and the use of a vacuum to remove decontamination fluids.

Decontamination of the container management areas will consist of the following:

1. The concrete floors will be visually inspected prior to decontamination activities being commenced. As with the routine inspections conducted by Tradebe personnel, these third-party inspections will be conducted to confirm there are no floor imperfections that could allow decontamination fluids to migrate off the floor or wall surface. Should imperfections be identified, the imperfection will be addressed prior to that area's decontamination activities commencing.

   As previously stated, spills or residuals are to be immediately addressed by Tradebe during facility operations, therefore no residuals are anticipated. However, if the area inspection stated in Step 1, identifies solids, the concrete floor surface of this area(s) will be physically scraped to remove the material, and solid residues will be collected, containerized and managed as discussed in Subsection I.4.

2. Depending on the inspection results, the concrete floors will be -washed using an industrial-strength detergent using a high-pressure power wash / rinse system. The high-pressure power wash system applies the cleaning and rinse solution in utilizing the same equipment. The high-pressure wash process includes collection of the solutions via vacuum suction with discharge into tanker truck. The third-party decontamination organization advised that the unit's pressure can be adjusted and is capable of etching concrete surfaces. The use of the system has shown to conduct the decontamination efforts in a more controlled manner then conventional decontamination methods adding to the worker safety discussed in Section I.6 of this Attachment. The wash/rinse cycle will be repeated as needed, but at least once, to adequately decontaminate the areas. Aqueous residues generated during the decontamination of the area will be collected and managed as discussed in Subsection I.4.

3. After the high-pressure wash/rinse cycle has been completed, a visual inspection of the concrete floors will be performed. Samples of the final rinse solution applied to each container management area will be collected for analysis. The final rinse sample from each area as outlined in Table 2 will be sent to a third-party laboratory to be-analyzed as outlined in Subsection I.4.

4. After decontamination is completed, a visual inspection of each area will be completed to visually confirm successful decontamination efforts and to identify any cracks or imperfections that may be visible as a result of the decontamination

efforts. Any cracks in the concrete floor within the building will be filled with a concrete compatible material.

TABLE 2
SUMMARY OF RINSATE SAMPLE COLLECTION

Unit/Area	No. of Samples	Description
Area 1 Container Management Area Process/Storage Building	1 1	One sample of final rinse of the floor of the drum staging area (Fuel blending). One sample of final rinse of the floor of the drum storage area.
Area 2 Container Management Area Process/Storage Building (2 areas)	2	One sample of final rinse of the floors of the drum storage areas.
Area 3 Container Management Area Process/Storage Building	1	One samples of final rinse of the floors of the drum storage areas.
Area 4 Container Management Area Process/Storage Building (3 areas)	3	One Sample of final rinse of the floors for each of the drum storage areas.
Area 5 Container Management Area Process/Storage Building	1	One sample of final rinse of the floors of the drum storage area.
Minimum Total	9	

I.4.3 Residuals Management

Residues generated during decontamination of the storage areas will be collected and managed in accordance with state and federal regulations. Hazardous waste generator requirements will be followed until laboratory results for the decontamination residuals are available. Solid residues will be placed directly into drums or roll-off containers and properly labeled as decontamination generated materials.

Personal protective equipment (e.g., Tyvek® coveralls, disposable booties, etc.)(PPE) worn during the decontamination activities will be containerized, labeled and

transported off-site to a permitted TSD facility. The third-party decontamination vendor has provided an estimate for the generation of PPE.

Decontamination liquids, resulting from power-washing activities, will be collected by the wash/rinse applicator. The decontamination fluids will be removed via vacuum system and transferred to tanker transport vehicle.

For the Closure plan cost estimates, Tradebe has determined that filled transport tankers filled with the container management decontamination fluids will be sent off site when the trailer is filled and sent to a licensed / permitted TSDF. This eliminates the need to staged waste in temporary holding tanks.

All liquid residues generated from the decontamination activities may be temporarily staged in labeled containers and added to bulk loads of decontamination fluids.

Closure cost values for residuals and PPE have been estimated as being sent off site for incineration.

I.4.4 Confirmation Sampling

After completing the wash/rinse cycle, a sample of the final rinse water will be collected from each container storage area floor surface. The “Final Rinse” sample will be collected by allowing the final rinse water to pond up on the floor surface. Each floor sample will be labeled, placed in a cooler and kept chilled. “Final Rinse” Samples will be sent off site to a third-party laboratory for analysis. The final wash/rinsate samples will be laboratory-analyzed for hazardous constituents managed at the facility. The constituents of concern are listed in Table 1.

If the results of the wash/rinsate analyses indicate that the closure performance standards described in Section I.3 have been achieved, the areas will be considered successfully decontaminated. If results of the analyses indicate that the closure performance standards have not been achieved, the areas will be decontaminated and resampled as previously described.

Confirmation sampling activities will be observed and results used by the Professional Engineer for development of the Closure Report.

Section I. 5 QUALITY CONTROL

I.5.1 General

Qualified personnel will be selected for implementation of the closure plan. As previously discussed, Tradebe has consulted with an organization with the expertise in the decontamination of equipment and property. This organization's input on the decontamination method, and their success using the system was vital in the development of this Closure Plan.

Discussed in Section I.11, an independent Professional Engineer will be contracted to observe the facility work to ensure that it is completed in conformance with the approved Closure Plan. The Professional Engineer or their representative will be onsite during decontamination activities and will be provided information for the shipments of hazardous waste from the facility.

Section I.7 of this Closure Plan specifies the minimum health and safety requirements for facility closure activities. The decontamination organization providing the closure activities advised that their activities includes development of site safety plans and selection of their worker's personnel protection equipment, including activities for entry into the Area 3 Vault. The decontamination organization's health and safety plan will be submitted for WDNR review prior to commencement of closure activities as discussed in Section I.7.

I.5.2 Cleaning Practices

The high-pressure decontamination system is designed to minimize the loss of cleaning solution by collecting the fluids via vacuum operations. As additive measures, during washing and rinsing activities, care will be taken to control the dispersal of liquids. These control activities will include barriers will be placed at door openings or other locations to reduce the migration of liquids away from the area being decontaminated. Plastic sheeting may be used to protect sensitive equipment from water spray.

Flexibility will be allowed to sequence closure activities in the most efficient manner, consistent with the closure performance standards outlined in Section I.3. Care will be taken to avoid re-introduction of contaminated equipment, materials, or wash waters into areas already designated as clean.

I.5.3 Documentation

Activities conducted at the facility will be observed and documents collected by an independent Professional Engineer or their representative. Specific quality control tasks performed by the engineer will include the following:

- Review of the manifests used for the shipment of container waste from the storage areas and for decontamination residuals generated by the closure activities;
- Photographic documentation of decontamination activities;
- Assist in the collection of rinsate samples for confirmatory analyses:
- Coordination of sample analyses with analytical laboratory(s);
- Analytical data review and recommendations for additional cleaning, if necessary; and
- Review of site conditions before and after cleaning operations for the identification of actual or potential migration pathways of hazardous waste to the subsurface soils if concrete floor surfaces are identified.

All facility closure activities will be documented in writing, and work not meeting the requirements of the Closure Plan will be communicated to the independent Professional Engineer and Tradebe. Modifications to activities, which are performed to conform to the Closure Plan, will be documented and provided to the independent Professional Engineer.

Section I.6 HEALTH AND SAFETY

Prior to starting the closure activities, a site-specific Health and Safety plan (Safety Plan) for closure activities will be developed by each organization involved in the closure work to protect their workers while at the facility. These Safety Plans will be submitted to the WDNR for review at least thirty (30) days prior to beginning closure activities. The contracted organization will be responsible for implementing the plan, directing the training of their personnel, and for providing safety equipment and incidentals as required. At a minimum, the plan(s) will address the following:

- Chemical and physical hazard evaluation;

- Levels of protecti–n - personal protective clothing and respiratory protection for persons performing closure activities and criteria used to downgrade or upgrade protective equipment in response to environmental changes during closure;

- Air monitoring to ensure proper protective equipment for the conditions, including monitoring methods to be used;

- Confined Space Entry protocols (required for the decontamination of the Area 3 Vault)

- Standard operating safety procedures;

- Site control descriptions which delineate work zones, decontamination procedures for personnel and equipment, and site security measures;

- Contingency plan which includes contacts and procedures for dealing with emergencies;

- Medical evaluations and certifications; as well as

- Worker training and certifications.

These safety plans, at a minimum will focus on compliance with applicable federal, state, and local requirements. The following references, or equivalent documents, will be used to assist the contracted vendors in the development of the site-specific health and safety plans:

- "Standard Operating Safety Guides," USEPA, November 1984, Chapter 9

- "Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities," NIOSH/OSHA/USCG/EPA, October 1985

- U.S. Department of Labor, Occupational Safety and Health Standards and Regulations, including, but not limited to, 29 CFR 1910.120, 1910.132, 1910.133(a), 1910.134, 1910.135, 1910.136, 1910.1200, and 1926, Hazardous Waste Operations and Emergency Response.

Section I. 7 DECONTAMINATION NR 664.0114

Specific decontamination procedures are dependent on the equipment used. Outlined below is a brief summary of the decontamination procedures that will be employed by the organization hired on behalf of Tradebe to decontaminate the Milwaukee facility and personnel conducting the work. The specific details will not be available until remediation personnel have been selected and dispatched to the site. Decontamination of personnel and equipment will be documented by a qualified, independent Professional Engineer registered in the state of Wisconsin (or his representative). General decontamination procedures are described below.

I.7.1 Site Control

Access to the closure areas will be restricted to personnel involved in closure activities and to authorized Tradebe personnel. Caution tape and restricted entry signs identifying the closure areas will be installed at access points.

I.7.2 Personnel Decontamination

Personnel exiting a management area after contact with residual waste materials or accumulated rinsate will be decontaminated in methods consistent with 29 CFR 1910.120 protocols. The contractor will be responsible for ensuring that his personnel comply with the decontamination procedures specified in 29 CFR 1910.120. Personnel decontamination equipment and facilities will be located within a closure area. The exact location will be determined by the contractor, based on logistics. Containers for the accumulation of worn PPE will be available at the work areas.

I.7.3 Cleaning Equipment Decontamination

Cleaning equipment in contact with potentially contaminated structures or water will be decontaminated prior to exiting the facility. A review of site information by the decontamination organization has indicated that, with the limited equipment at the facility, decontamination of these items can be accomplished in its immediate area prior to commencing of floor decontamination activities.

Facility equipment associated with the handling of hazardous wastes will be decontaminated by physical methods (scraping, brushing, etc.) wherever possible, followed by at least three separate rinses. Water will be allowed to flow to a low point

within the immediate containment area for collection prior to being placed into a storage container. This final flush water will be vacuumed on to transport vehicles that will haul the floor decontamination water to a licensed /permitted TSDF.

I.7.4 Residuals Management

Residues and debris generated from decontamination of personnel and equipment will be managed in accordance with state and federal regulations. Solid residues, including discarded personal protective equipment, will be collected and placed into a labeled waste container. The third-party decontamination organization has identified that two (2) 55-gallon containers of PPE and decontamination material are estimated to be generated from the closure activities.

Section I.8 CLOSURE SCHEDULE NR 664.0112(2)(f)

The Tradebe Facility has an indefinite life because it is strictly a Hazardous Storage Facility. Tradebe has an expected life of at least fifty (50) years. The entire facility will operate until closure. Therefore, no partial closure is anticipated.

At least one hundred and eighty (180) days prior to beginning closure activities, Tradebe shall notify the WDNR in writing of its intent to close the facility. Section I.6 requires third party organizations must submit their respective health and safety plans to the WDNR thirty (30) days prior to commencement of facility closure activities. The following time estimates include health and safety plan submittals to the WDNR.

The duration of closure activities conducted at the facility is estimated to require ten (10) to twelve (12) weeks, assuming normal five (5) day work weeks. This time frame includes for the third-party organization(s) to conduct the waste shipments; decontamination of the hazardous waste container management areas, including shipment of decontaminated wastes; decontamination effort confirmation sampling; and receipt by the independent Professional Engineer of laboratory analysis and the time for the independent Professional Engineer to generate the Closure report.

A closure cost time contingency has been added to provide for possible additional re-cleaning of various units or equipment. The total time spent on closure activities is therefore estimated at twelve (12) to fourteen weeks (14) weeks.

The closure activity time estimate is increased by adding for the third-party health and safety plan submittals. The revised time for facility closure is now estimated between sixteen (16) and twenty (20) weeks.

The phasing and sequencing of work in specific areas is uncertain, and will depend on personnel logistics and scheduling once work has begun. Tradebe or its representative will provide progress updates and shall communicate various milestones to the WDNR as work proceeds. Tradebe will also inform the WDNR at least five (5) working days prior to the occurrence of key events during closure.

Section I.9 CLOSURE COST ESTIMATE NR 664.0142

A summary of the estimated costs for implementing this closure plan are contained in Appendix I.2 of this Attachment. These costs are based on the following:

- Cost for the disposal of the worst-case inventory of hazardous waste from the container management areas. Using the Badger Disposal worse case inventory value, Tradebe developed waste grouping based on by third party (i.e., non Tradebe owned) treatment technologies allocations. Cost for these technologies were used, along with third party waste transportation and decontamination activities as well as cost for the independent Professional Engineer’s services.

- Costs for Professional Engineering services during closure are based on KPRG, Inc.'s experience on similar projects.

- Costs for sampling services and analytical fees were provided by an outside laboratory.

- The unit costs for on-site cleaning tasks include the required labor, equipment, and materials for washing, rinsing, residuals handling, etc. were estimated by an independent third-party organization based on the presently defined scope and their experience with similar projects.

- A project administration cost has been applied to cover miscellaneous costs not associated with specific work tasks.

- The estimates of the volume or mass of bulk material generated from decontamination activities for off-site disposal are based on the subcontractor’s experience after review of the Tradebe facility information.

Tradebe’s Closure Cost estimate outline is provided in Attachment I.2

A copy of the current Tradebe Closure Cost Bond is contained in Appendix I.1 of this Attachment. Once the revised Closure Cost is reviewed and approved by the WDNR a revised Closure Bond will be submitted to the WDNR and a copy will be on file at the facility.

Section I.10 CERTIFICATION OF CLOSURE NR 664.0115

An independent Professional Engineer, registered in the state of Wisconsin, or a representative of the engineer, shall be present during critical closure activities.

When closure is completed, the independent Professional Engineer will document that the waste management areas have been closed in accordance with the specifications of the approved closure plan. The Professional Engineer will utilize hazardous waste manifests for shipments of waste from the facility, including waste in inventory; waste generated as a result of the closure activities; reports and or photo documentation from the third-party organization or taken by the Professional Engineer and from visual inspections he, the Professional Engineer, observed at the facility.

Within sixty (60) days of the completion of final closure, the owner or operator of Tradebe or a representative shall submit to the WDNR a certification that the hazardous waste management units or facility, as applicable, has been closed in accordance with the specifications in the approved closure plan. The certification shall be signed by the owner or operator and by the independent registered Professional Engineer.

Documentation supporting the independent Professional Engineer's certification shall be furnished to the WDNR. Within sixty (60) days of acceptance of the closure certification, the WNDR will notify Tradebe that the financial assurance requirements for closure under NR 664.0143(11) are no longer required.

Section I.11 FACILITY STATUS AFTER CLOSURE

After closure of the Tradebe facility, no further RCRA hazardous waste activity will be performed by Tradebe at this location. After all decontamination activities have been completed and site closure has been certified, the buildings and property may be used for commercial or industrial business activities.

TRADEBE
Environmental Services™

APPENDIX I-2

Closure Cost Bond

RIDER

To be attached to and form part of:

Bond Number K08898248

issued by the WESTCHESTER FIRE INSURANCE COMPANY

on behalf of TRADEBE TREATMENT AND RECYCLING OF WISCONSIN, LLC
(Principal)

and in favor of STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES
(Obligee)

Now therefore, it is agreed that in consideration of the premium charged, the attached bond shall be amended as follows:

The bond amount shall be amended:

FROM: $ 400,942.10

TO: $ 423,942.42

It is further understood and agreed that all other terms and conditions of this bond shall remain unchanged.

This Rider is to be Effective this 19th day of July, 2023.

Signed, Sealed & Dated this 19th day of July, 2023.

TRADEBE TREATMENT AND RECYCLING OF WISCONSIN, LLC
(Principal)

By: _____

WESTCHESTER FIRE INSURANCE COMPANY
(Surety)

By: _____
Corinne Chapman, Attorney-in-Fact

CHUBB

Power of Attorney

Federal Insurance Company | Vigilant Insurance Company | Pacific Indemnity Company
Westchester Fire Insurance Company | ACE American Insurance Company

Know All by These Presents, that **FEDERAL INSURANCE COMPANY**, an Indiana corporation, **VIGILANT INSURANCE COMPANY**, a New York corporation, **PACIFIC INDEMNITY COMPANY**, a Wisconsin corporation, **WESTCHESTER FIRE INSURANCE COMPANY** and **ACE AMERICAN INSURANCE COMPANY** corporations of the Commonwealth of Pennsylvania, do each hereby constitute and appoint Richard Casas, Corinne Chapman, Samantha Chierici, Jessica B. Dempsey, Derek J. Elston, Rachel Fore, Kristin L Hannigan, Jennifer L. Jakaitis, Nicholas Kertesz, Judith A. Lucky-Eftimov, James B. McTaggart, Nicholas Pantazis, Roger Paraison, Tara A. Reimer, Christina L. Sandoval, Bartlomiej Siepierski, Jean Torres, Christopher P. Troha, Aerie Walton, Susan A. Welsh, Sandra M. Winsted and Dartonya Wright of Chicago, Illinois ----------

each as their true and lawful Attorney-in-Fact to execute under such designation in their names and to affix their corporate seals to and deliver for and on their behalf as surety thereon or otherwise, bonds and undertakings and other writings obligatory in the nature thereof (other than bail bonds) given or executed in the course of business, and any instruments amending or altering the same, and consents to the modification or alteration of any instrument referred to in said bonds or obligations.

In Witness Whereof, said **FEDERAL INSURANCE COMPANY, VIGILANT INSURANCE COMPANY, PACIFIC INDEMNITY COMPANY, WESTCHESTER FIRE INSURANCE COMPANY** and **ACE AMERICAN INSURANCE COMPANY** have each executed and attested these presents and affixed their corporate seals on this **5th** day of **May, 2023.**

Dawn M. Chloros

Dawn M. Chloros, Assistant Secretary

Stephen M. Haney

Stephen M. Haney, Vice President

STATE OF NEW JERSEY
County of Hunterdon SS.

On this **5th** day of **May 2023** before me, a Notary Public of New Jersey, personally came Dawn M. Chloros and Stephen M. Haney, to me known to be Assistant Secretary and Vice President, respectively, of FEDERAL INSURANCE COMPANY, VIGILANT INSURANCE COMPANY, PACIFIC INDEMNITY COMPANY, WESTCHESTER FIRE INSURANCE COMPANY and ACE AMERICAN INSURANCE COMPANY, the companies which executed the foregoing Power of Attorney, and the said Dawn M. Chloros and Stephen M. Haney, being by me duly sworn, severally and each for herself and himself did depose and say that they are Assistant Secretary and Vice President, respectively, of FEDERAL INSURANCE COMPANY, VIGILANT INSURANCE COMPANY, PACIFIC INDEMNITY COMPANY, WESTCHESTER FIRE INSURANCE COMPANY and ACE AMERICAN INSURANCE COMPANY and know the corporate seals thereof, that the seals affixed to the foregoing Power of Attorney are such corporate seals and were thereto affixed by authority of said Companies; and that their signatures as such officers were duly affixed and subscribed by like authority.

Notarial Seal

ALBERT CONTURSI NOTARY PUBLIC NEW JERSEY

Albert Contursi
NOTARY PUBLIC OF NEW JERSEY
No 50202369
Commission Expires August 22,2027

Albert Contursi
Notary Public

CERTIFICATION

Resolutions adopted by the Boards of Directors of FEDERAL INSURANCE COMPANY, VIGILANT INSURANCE COMPANY, and PACIFIC INDEMNITY COMPANY on August 30, 2016; WESTCHESTER FIRE INSURANCE COMPANY on December 11, 2006; and ACE AMERICAN INSURANCE COMPANY on March 20, 2009:

"RESOLVED, that the following authorizations relate to the execution, for and on behalf of the Company, of bonds, undertakings, recognizances, contracts and other written commitments of the Company entered into in the ordinary course of business (each a "Written Commitment"):

(1) Each of the Chairman, the President and the Vice Presidents of the Company is hereby authorized to execute any Written Commitment for and on behalf of the Company, under the seal of the Company or otherwise.

(2) Each duly appointed attorney-in-fact of the Company is hereby authorized to execute any Written Commitment for and on behalf of the Company, under the seal of the Company or otherwise, to the extent that such action is authorized by the grant of powers provided for in such person's written appointment as such attorney-in-fact.

(3) Each of the Chairman, the President and the Vice Presidents of the Company is hereby authorized, for and on behalf of the Company, to appoint in writing any person the attorney-in-fact of the Company with full power and authority to execute, for and on behalf of the Company, under the seal of the Company or otherwise, such Written Commitments of the Company as may be specified in such written appointment, which specification may be by general type or class of Written Commitments or by specification of one or more particular Written Commitments.

(4) Each of the Chairman, the President and the Vice Presidents of the Company is hereby authorized, for and on behalf of the Company, to delegate in writing to any other officer of the Company the authority to execute, for and on behalf of the Company, under the Company's seal or otherwise, such Written Commitments of the Company as are specified in such written delegation, which specification may be by general type or class of Written Commitments or by specification of one or more particular Written Commitments.

(5) The signature of any officer or other person executing any Written Commitment or appointment or delegation pursuant to this Resolution, and the seal of the Company, may be affixed by facsimile on such Written Commitment or written appointment or delegation.

FURTHER RESOLVED, that the foregoing Resolution shall not be deemed to be an exclusive statement of the powers and authority of officers, employees and other persons to act for and on behalf of the Company, and such Resolution shall not limit or otherwise affect the exercise of any such power or authority otherwise validly granted or vested."

I, Dawn M. Chloros, Assistant Secretary of FEDERAL INSURANCE COMPANY, VIGILANT INSURANCE COMPANY, PACIFIC INDEMNITY COMPANY, WESTCHESTER FIRE INSURANCE COMPANY and ACE AMERICAN INSURANCE COMPANY (the "Companies") do hereby certify that

(i) the foregoing Resolutions adopted by the Board of Directors of the Companies are true, correct and in full force and effect,
(ii) the foregoing Power of Attorney is true, correct and in full force and effect.

Given under my hand and seals of said Companies at Whitehouse Station, NJ, this July 19th, 2023

Dawn M. Chloros

Dawn M. Chloros, Assistant Secretary

IN THE EVENT YOU WISH TO VERIFY THE AUTHENTICITY OF THIS BOND OR NOTIFY US OF ANY OTHER MATTER, PLEASE CONTACT US AT:
Telephone (908) 903-3493 Fax (908) 903-3656 e-mail: surety@chubb.com

TRADEBE
Environmental Services™

APPENDIX I-1

Closure Cost Estimate

TTRWI Closure Cost Estimate

(From USEPA's CostPro 6 in 2009$)

	Area 1	Area 2	Area 3	Area 4 Haz	Area 4 Non-Haz	Area 5	TOTAL
Permitted Drums (#)	1,720	992	216	345	516	836	4,625
Volume (gal)	94,600	54,560	11,880	18,975	28,380	45,980	254,375
Area (ft^2)	9,175	5,616	6,763	1,530	0	4,565	27,649
Removal of Waste (CS-03)	$6,164.83	$3,562.90	$782.84	$1,360.86	$1780.2	$2,999.61	$16,651.24
Decontamination (DC-01)	$27,430.52	$14,572.71	$4,011.30	$17,536.76	0	$11,887.93	$75,439.22
Sampling & Analysis (SA-02)	$1,803.54	$1,803.54	$901.77	$2,705.31	0	$901.77	$8,115.93
Transportation (TR-01)	$40,608.00	$23,688.00	$6,768.00	$10,152.00	$700.00	$20,304.00	$102,220.00
Treatment & Disposal ((TD-01)	$311,740.65	$180,003.99	$39,466.47	$64,649.15	$31,920.00	$151,664.20	$809,444.46
Subtotal of Closure Costs	$387,747.54	$223,631.14	$51,930.38	$96,404.08	$64,400.2	$187,757.51	1,011,67.85
% Engineering Expenses	10%	10%	10%	10%	10%	10%	10%
Engineering Expenses	$38,774.75	$22,363.11	$5,193.04	$9,640.41	$6,440.02	$18,775.75	$101,187.09
Certification of Closure (CS-07)	$3,973.87	$3,973.87	$3,973.87	$3,973.87	0	$3,973.87	$19,869,35
Subtotal	$430,496.16	$249,968.12	$61,097.29	$110,018.36	$70,840.22	$210,507.13	$1,132,927.29
% Contingency	20%	20%	20%	20%	20%	20%	20%
Contingency	$86,099.23	$49,993.62	$12,219.46	$22,003.67	$14,168.04	$42,101.43	$226,585.46
TOTAL CLOSURE COST	$516,595.40	$299,961.75	$73,316.75	$132,022.03	$85,008.26	$252,608.56	$1,359,512.74

TTRWI Inflation-Adjusted Closure Cost Estimate

Year	Implicit Price Deflator Factors for Gross Domestic Product*	Inflation-Adjusted Closure Cost Estimate
2009	88.556	$1,274,504.48
2010	89.632	$1,289,990.35
2011	91.481	$1,316,601.29
2012	93.185	$1,341,125.39
2013	94.771	$1,363,951.22
2014	96.421	$1,387,698.14
2015	97.316	$1,400,579.04
2016	98.241	$1,413,891.71
2017	100	$1,439,207.37
2018	102.291	$1,472,179.61
2019	104.008	$1,496,890.80
2020	105.381	$1,516,651.12
2021	110.213	$1,586,193.62
2022	117.973	$1,697,876.11
2023	122.273	$1,759,762.03
2024 Q1	124.212	$1,787,668.26
2024 Q2	124.916	$1,797,800.28

* From Bureau of Economic Analysis website
https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey&_gl=1*1cmfq0y*_ga*MTQyNzA5NDYzOS4xNzE1NjMwMDk4*_ga_J4698JNNFT*MTcyMjAwMDM2MS4yLjEuMTcyMjAwMDM4Ny4zNC4wLjA.#eyJhcHBpZCI6MTksInN0ZXBzIjpbMSwyLDMsM10sImRhdGEiOltbImNhdGVnb3JpZXMiLCJTdXJ2ZXkiXSxbIk5JUEFfVGFibGVfTGlzdCIsIjEzIl0sWyJGaXJzdF9ZZWFyIiwiMjAwOSJdLFsiTGFzdF9ZZWFyIiwiMjAyNCJdLFsiU2NhbGUiLCIwIl0sWyJTZXJpZXMiLCJBIl1dfQ==