

WRR Environmental Services WID 990 829 475

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April 19, 2013

Mike Ellenbecker
Waste and Materials Management Specialist
Wisconsin Department of Natural Resources
9531 Rayne Road, Suite IV
Sturtevant, WI 53177

Re: RCRA Permit
FPOR Renewal Application
EPA ID No. WID 990 829 475
WDNR FID No. 618 026 530

Dear Mr. Ellenbecker:

In response to your April 23, 2012 Call-in letter, enclosed are the following items from WRR Environmental Services Co., Inc. (WRR) for the RCRA permit renewal application:

1. Signed NR 670.011(4)(a) certification
2. EPA Part A form
3. Feasibility and Plan of Operation Report (FPOR)
4. WDNR licensing checklist
5. Plan review fee (check #121564 dated 4/12/13) in the amount of \$18,400
6. Environmental assessment which is Part 1 Section C of the FPOR
7. Copies of local approval requests and responses, Appendix A-4 of Part 1
8. Copy of the public meeting notice, Appendix A-5 of Part 1
9. A needs evaluation which is in Part 1 Section C
10. Compliance with Plans or Orders which is in Part 1 Section B
11. Corrective Action Plan and cost estimate which is in Part 1 Section D

Photographs are included in Part A. The 22" x 34" plan sheets and smaller size plan sheets are bound separately from the FPOR.

In addition to the hard copy of the application, enclosed is an electronic copy saved on a CD. Listed below is the distribution of the FPOR and above associated items.

Let me know if you have any questions.

Sincerely,




James L. Hager
President/CEO
WRR Environmental Services Company, Inc.

cc:

Jill Schoen (hard copy and e-copy)
Wisconsin Department of Natural Resources
1300 West Clairemont Avenue
Eau Claire, WI 54701

Jae Lee (e-copy)
U.S. Environmental Protection Agency
77 West Jackson Blvd., LR-8J
Chicago, IL 60604

LE Phillips Public Library (e-copy)
400 Eau Claire Street
Eau Claire, WI 54701

<p>SEND COMPLETED FORM TO: The Appropriate State or Regional Office.</p>	<p>United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM</p>		
<p>1. Reason for Submittal</p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p>Reason for Submittal:</p> <p><input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)</p> <p><input checked="" type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location)</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below)</p> <p><input type="checkbox"/> Site was a TSD facility and/or generator of $\geq 1,000$ kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in <u>one or more months</u> of the report year (or State equivalent LQG regulations)</p>		
<p>2. Site EPA ID Number</p>	<p>EPA ID Number <input type="text" value="W"/> <input type="text" value="I"/> <input type="text" value="D"/> <input type="text" value="9"/> <input type="text" value="9"/> <input type="text" value="0"/> <input type="text" value="8"/> <input type="text" value="2"/> <input type="text" value="9"/> <input type="text" value="4"/> <input type="text" value="7"/> <input type="text" value="5"/></p>		
<p>3. Site Name</p>	<p>Name: WRR ENVIRONMENTAL SERVICES CO., INC.</p>		
<p>4. Site Location Information</p>	<p>Street Address: 5200 RYDER ROAD</p> <p>City, Town, or Village: EAU CLAIRE County: EAU CLAIRE</p> <p>State: WI Country: US Zip Code: 54701</p>		
<p>5. Site Land Type</p>	<p><input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		
<p>6. NAICS Code(s) for the Site (at least 5-digit codes)</p>	<p>A. <input type="text" value="5"/> <input type="text" value="6"/> <input type="text" value="2"/> <input type="text" value="2"/> <input type="text" value="1"/> <input type="text" value="1"/> C. <input type="text" value="5"/> <input type="text" value="6"/> <input type="text" value="2"/> <input type="text" value="9"/> <input type="text" value="9"/> <input type="text" value="8"/></p> <p>B. <input type="text" value="5"/> <input type="text" value="6"/> <input type="text" value="2"/> <input type="text" value="2"/> <input type="text" value="1"/> <input type="text" value="9"/> D. <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="5"/> <input type="text" value="9"/> <input type="text" value="9"/> <input type="text" value="8"/></p>		
<p>7. Site Mailing Address</p>	<p>Street or P.O. Box: 5200 RYDER ROAD</p> <p>City, Town, or Village: EAU CLAIRE</p> <p>State: WI Country: US Zip Code: 54701</p>		
<p>8. Site Contact Person</p>	<p>First Name: JAMES MI: L Last: HAGER</p> <p>Title: PRESIDENT/CEO</p> <p>Street or P.O. Box: 5200 RYDER ROAD</p> <p>City, Town or Village: EAU CLAIRE</p> <p>State: WI Country: US Zip Code: 54701</p> <p>Email: wrrstaff@wrres.com</p> <p>Phone: 715-834-9624 Ext.: 8766 Fax: 715-836-8785</p>		
<p>9. Legal Owner and Operator of the Site</p>	<p>A. Name of Site's Legal Owner: CARIBOU CORPORATION Date Became Owner: 12/30/1999</p> <p>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> <p>Street or P.O. Box: 5200 RYDER ROAD</p> <p>City, Town, or Village: EAU CLAIRE Phone: 715-834-9624</p> <p>State: WI Country: US Zip Code: 54701</p> <p>B. Name of Site's Operator: WRR ENVIRONMENTAL SERVICES Date Became Operator: 07/07/1970</p> <p>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		

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; Complete all parts 1-10.

- Y N **1. Generator of Hazardous Waste**
 If "Yes", mark only one of the following – a, b, or c.
- a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.
- b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.
- c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities in 2-4.

- Y N **2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.
- Y N **3. United States Importer of Hazardous Waste**
- Y N **4. Mixed Waste (hazardous and radioactive) Generator**

- Y N **5. Transporter of Hazardous Waste**
 If "Yes", mark all that apply.
- a. Transporter
- b. Transfer Facility (at your site)

- Y N **6. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste Part B permit is required for these activities.

- Y N **7. Recycler of Hazardous Waste**

- Y N **8. 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

- Y N **9. Underground Injection Control**

- Y N **10. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

- Y N **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.**
- a. Batteries
- b. Pesticides
- c. Mercury containing equipment
- d. Lamps
- e. Other (specify) _____
- 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; Complete all parts 1-4.

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

❖ You can **ONLY** Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y N 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- a. College or University
- b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Y N 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. 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.

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated 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.

12. 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 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

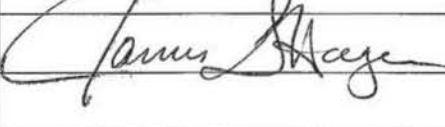
If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

A list of EPA hazardous waste codes managed at WRR Environmental Services (WRR) is attached as page 5 of 5.

The applicable waste codes are highlighted on this list.

14. 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. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	James L. Hager President/CEO	2/27/2014

EPA HAZARDOUS WASTE CODES

A list of all the hazardous waste codes is shown below. See the regulations for details.

CHARACTERISTICS OF HAZARDOUS WASTE (SEE 40 CFR 261.24) – DXXX

HAZARDOUS WASTE FROM NON-SPECIFIC SOURCES (SEE 40 CFR 261.31) – FXXX

HAZARDOUS WASTE FROM SPECIFIC SOURCES (SEE 40 CFR 261.32) - KXXX

DISCARDED COMMERCIAL CHEMICAL PRODUCTS, OFF-SPECIFICATION SPECIES, CONTAINER RESIDUALS, AND SPILL RESIDUES THEREOF – ACUTE HAZARDOUS WASTE (SEE 40 CFR 261.33) – PXXX

DISCARDED COMMERCIAL CHEMICAL PRODUCTS, OFF-SPECIFICATION SPECIES, CONTAINER RESIDUES, AND SPILL RESIDUES THEREOF – TOXIC WASTES (SEE 40 CFR 261.33) - UXXX

D001	F001	K001	K047	K123	P001	P050	P106	U001	U048	U095	U143	U189	U247
D002	F002	K002	K048	K124	P002	P051	P108	U002	U049	U096	U144	U190	U248
D003	F003	K003	K049	K125	P003	P054	P109	U003	U050	U097	U145	U191	U249
D004	F004	K004	K050	K126	P004	P056	P110	U004	U051	U098	U146	U192	U271
D005	F005	K005	K051	K131	P005	P057	P111	U005	U052	U099	U147	U193	U278
D006	F006	K006	K052	K132	P006	P058	P112	U006	U053	U101	U148	U194	U279
D007	F007	K007	K060	K136	P007	P059	P113	U007	U055	U102	U149	U196	U280
D008	F008	K008	K061	K141	P008	P060	P114	U008	U056	U103	U150	U197	U328
D009	F009	K009	K062	K142	P009	P062	P115	U009	U057	U105	U151	U200	U353
D010	F010	K010	K069	K143	P010	P063	P116	U010	U058	U106	U152	U201	U359
D011	F011	K011	K071	K144	P011	P064	P118	U011	U059	U107	U153	U202	U364
D012	F012	K013	K073	K145	P012	P065	P119	U012	U060	U108	U154	U203	U367
D013	F019	K014	K083	K147	P013	P066	P120	U014	U061	U109	U155	U204	U372
D014	F020	K015	K084	K148	P014	P067	P121	U015	U062	U110	U156	U205	U373
D015	F021	K016	K085	K149	P015	P068	P122	U016	U063	U111	U157	U206	U387
D016	F022	K017	K086	K150	P016	P069	P123	U017	U064	U112	U158	U207	U389
D017	F023	K018	K087	K151	P017	P070	P127	U018	U066	U113	U159	U208	U394
D018	F024	K019	K088	K156	P018	P071	P128	U019	U067	U114	U160	U209	U395
D019	F025	K020	K093	K157	P020	P072	P185	U020	U068	U115	U161	U210	U404
D020	F026	K021	K094	K158	P021	P073	P188	U021	U069	U116	U162	U211	U409
D021	F027	K022	K095	K159	P022	P074	P189	U022	U070	U117	U163	U213	U410
D022	F028	K023	K096	K161	P023	P075	P190	U023	U071	U118	U164	U214	U411
D023	F032	K024	K097	K169	P024	P076	P191	U024	U072	U119	U165	U215	
D024	F034	K025	K098	K170	P026	P077	P192	U025	U073	U120	U166	U216	
D025	F035	K026	K099	K171	P027	P078	P194	U026	U074	U121	U167	U217	
D026	F037	K027	K100	K172	P028	P081	P196	U027	U075	U122	U168	U218	
D027	F038	K028	K100	K174	P029	P082	P197	U028	U076	U123	U169	U219	
D028	F039	K029	K101	K175	P030	P084	P198	U029	U077	U124	U170	U220	
D029		K030	K102	K176	P031	P085	P199	U030	U078	U125	U171	U221	
D030		K031	K103	K177	P033	P087	P201	U031	U079	U126	U172	U222	
D031		K032	K104	K178	P034	P088	P202	U032	U080	U127	U173	U223	
D032		K033	K105	K181	P036	P089	P203	U033	U081	U128	U174	U225	
D033		K034	K106		P037	P092	P204	U034	U082	U129	U176	U226	
D034		K035	K107		P038	P093	P205	U035	U083	U130	U177	U227	
D035		K036	K108		P039	P094		U036	U084	U131	U178	U228	
D036		K037	K109		P040	P095		U037	U085	U132	U179	U234	
D037		K038	K110		P041	P096		U038	U086	U133	U180	U235	
D038		K039	K111		P042	P097		U039	U087	U134	U181	U236	
D039		K040	K112		P043	P098		U041	U088	U135	U182	U237	
D040		K041	K113		P044	P099		U042	U089	U136	U183	U238	
D041		K042	K114		P045	P101		U043	U090	U137	U184	U239	
D042		K043	K115		P046	P102		U044	U091	U138	U185	U240	
D043		K044	K116		P047	P103		U045	U092	U140	U186	U243	
		K045	K117		P048	P104		U046	U093	U141	U187	U244	
		K046	K118		P049	P105		U047	U094	U142	U188	U246	

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 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent). See <http://www.epa.gov/epawaste/hazard/dsw/statespf.htm> for a list of eligible states; **AND**
- ❖ You are or will be managing excluded HSM in compliance with 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent) **or** you 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.

1. Indicate reason for notification. Include dates where requested.

- Facility will begin managing excluded HSM as of _____ (mm/dd/yyyy).
- Facility is still managing excluded HSM/re-notifying as required by March 1 of each even-numbered year.
- Facility has stopped managing excluded HSM as of _____ (mm/dd/yyyy) and is notifying as required.

2. Description of excluded HSM activity. Please list the appropriate codes 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 (answer using codes listed in the Code List section of the instructions)	b. Waste code(s) for HSM	c. Estimated 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 (answer using codes listed in the Code List section of the instructions)

3. Facility has financial assurance pursuant to 40 CFR 261.4(a)(24)(vi). (Financial assurance is required for reclaimers and intermediate facilities managing excluded HSM under 40 CFR 261.4(a)(24) and (25))

Y N Does this facility have financial assurance pursuant to 40 CFR 261.4(a)(24)(vi)?

United States Environmental Protection Agency

HARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact	First Name: JAMES	MI: L	Last Name: HAGER
	Contact Title: PRESIDENT/CEO		
	Phone: 715-834-9624	Ext.: 8766	Email: WRRSTAFF@WRRES.COM
2. Facility Permit Contact Mailing Address	Street or P.O. Box: 5200 RYDER ROAD		
	City, Town, or Village: EAU CLAIRE		
	State: WI		
	Country: US	Zip Code: 54701	
3. Operator Mailing Address and Telephone Number	Street or P.O. Box: 5200 RYDER ROAD		
	City, Town, or Village: EAU CLAIRE		
	State: WI	Phone: 715-834-9624	
	Country: US	Zip Code: 54701	
4. Facility Existence Date	Facility Existence Date (mm/dd/yyyy): 07/07/1970		

5. Other Environmental Permits

A. Facility Type <i>(Enter code)</i>	B. Permit Number	C. Description
N	W 1 - 0 0 5 8 7 1 8 - 0 4	WPDES PERMIT
E	0 6 0 0 5	HW STORAGE - CONTAINERS (STATE)
E	0 3 1 6 1	HW STORAGE - TANKS (STATE)
E	1 0 7 1 5	HW TRANSPORTER - PCB - FULL SERVICE (STATE)
E	1 2 6 0 6	SW/RECYCLABLES TRANSPORTER (STATE)
E	6 1 8 0 2 6 5 3 0 - P 0 2	AIR OPERATING PERMIT (STATE)
E	4 4 0 1	SOLID WASTE PROCESSING FACILITY (STATE)
E	4 3 0 5	HW TREATMENT - MISCELLANEOUS (STATE)
E	4 3 0 5	HW TREATMENT - TANK (STATE)

6. Nature of Business: WRR Environmental Services (WRR) is a permitted treatment and storage facility focusing on solvent recovery. Additional serves provided are fuel blending, household hazardous waste collection, lab packing, emergency response services, wastewater treatment and laboratory services. WRR has limited chemical manufacturing occurring at the facility also.

7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

- A. PROCESS CODE** – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For “other” processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.
- B. PROCESS DESIGN CAPACITY** – For each code entered in Item 7.A; enter the capacity of the process.
 - 1. **AMOUNT** – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 - 2. **UNIT OF MEASURE** – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.
- C. PROCESS TOTAL NUMBER OF UNITS** – Enter the total number of units for each corresponding process code.

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity	Process Code	Process	Appropriate Unit of Measure for Process Design Capacity
Disposal			Treatment (Continued)		
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour
D80	Landfill	Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace	
Storage			T87	Smelting, Melting, or Refining Furnace	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Methane Reforming Furnace	
S03	Waste Pile	Cubic Yards or Cubic Meters	T90	Pulping Liquor Recovery Furnace	
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards	T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid	
S05	Drip Pad	Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards	T92	Halogen Acid Furnaces	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T93	Other Industrial Furnaces Listed in 40 CFR 260.10	
S99	Other Storage	Any Unit of Measure Listed Below	T94	Containment Building Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour
Treatment			Miscellaneous (Subpart X)		
T01	Tank Treatment	Gallons Per Day; Liters Per Day	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T02	Surface Impoundment	Gallons Per Day; Liters Per Day	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour	X99	Other Subpart X	Any Unit of Measure Listed Below
Unit of Measure		Unit of Measure Code	Unit of Measure		Unit of Measure Code
Gallons.....		G	Short Tons Per Hour.....		D
Gallons Per Hour.....		E	Short Tons Per Day.....		N
Gallons Per Day.....		U	Metric Tons Per Hour.....		W
Liters.....		L	Metric Tons Per Day.....		S
Liters Per Hour.....		H	Pounds Per Hour.....		J
Liters Per Day.....		V	Kilograms Per Hour.....		X
			Million BTU Per Hour.....		X
			Cubic Yards.....		Y
			Cubic Meters.....		C
			Acres.....		B
			Acre-feet.....		A
			Hectares.....		Q
			Hectare-meter.....		F
			BTU Per Hour.....		I

7. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 7 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only						
	(1) Amount (Specify)	(2) Unit of Measure											
X 1	S	0	2	533.788	G		001						
1 1	S	0	1	256,134	G		14						
1 2	S	0	2	423,550	G		41						
1 3													
1 4													
1 5													
1 6													
1 7													
1 8													
1 9													
1 0													
1 1													
1 2													
1 3													

Note: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the line sequentially, taking into account any lines that will be used for "other" process (i.e., D99, S99, T04, and X99) in Item 8.

8. Other Processes (Follow instructions from Item 7 for D99, S99, T04, and X99 process codes)

Line Number (Enter #s in sequence with Item 7)	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only						
	(1) Amount (Specify)	(2) Unit of Measure											
X 2	T	0	4	100.00	U		001						
X 3	X	9	9	THIN FILM EVAPORATOR (E-IV) 825	E		001						
X 4	X	9	9	FUELS BLDG PROCESSES 14,750	U		001						

9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5

- A. EPA HAZARDOUS WASTE NUMBER** – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 9.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.

2. PROCESS DESCRIPTION: If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
2. In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES													
	(1) PROCESS CODES (Enter Code)								(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))												
X	1	K	0	5	4	900	P	T	0	3	D	8	0								
X	2	D	0	0	2	400	P	T	0	3	D	8	0								
X	3	D	0	0	1	100	P	T	0	3	D	8	0								
X	4	D	0	0	2																Included With Above

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
	(1) PROCESS CODES (Enter Code)										(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))						
	1	F	0	0	1	75,000	T	S	0	1	S	0	2	X	9	9	
	2	F	0	0	2												INCLUDED WITH ABOVE
	3	F	0	0	3												INCLUDED WITH ABOVE
	4	F	0	0	5												INCLUDED WITH ABOVE
	5	D	0	0	1												INCLUDED WITH ABOVE
	6	D	0	0	4												INCLUDED WITH ABOVE
	7	D	0	0	5												INCLUDED WITH ABOVE
	8	D	0	0	6												INCLUDED WITH ABOVE
	9	D	0	0	7												INCLUDED WITH ABOVE
1	0	D	0	0	8												INCLUDED WITH ABOVE
1	1	D	0	0	9												INCLUDED WITH ABOVE
1	2	D	0	1	0												INCLUDED WITH ABOVE
1	3	D	0	1	1												INCLUDED WITH ABOVE
1	4	D	0	1	8												INCLUDED WITH ABOVE
1	5	D	0	1	9												INCLUDED WITH ABOVE
1	6	D	0	2	1												INCLUDED WITH ABOVE
1	7	D	0	2	2												INCLUDED WITH ABOVE
1	8	D	0	2	3												INCLUDED WITH ABOVE
1	9	D	0	2	4												INCLUDED WITH ABOVE
2	0	D	0	2	5												INCLUDED WITH ABOVE
2	1	D	0	2	6												INCLUDED WITH ABOVE
2	2	D	0	2	7												INCLUDED WITH ABOVE
2	3	D	0	2	8												INCLUDED WITH ABOVE
2	4	D	0	2	9												INCLUDED WITH ABOVE
2	5	D	0	3	8												INCLUDED WITH ABOVE
2	6	D	0	3	9												INCLUDED WITH ABOVE
2	7	D	0	4	0												INCLUDED WITH ABOVE
2	8	U	0	0	2												INCLUDED WITH ABOVE
2	9	U	0	3	1												INCLUDED WITH ABOVE
3	0	U	0	8	0												INCLUDED WITH ABOVE
3	1	U	1	1	2												INCLUDED WITH ABOVE
3	2	U	1	4	0												INCLUDED WITH ABOVE
3	3	U	1	5	4												INCLUDED WITH ABOVE
3	4	U	1	5	9												INCLUDED WITH ABOVE
3	5	U	1	6	1												INCLUDED WITH ABOVE
3	6	U	1	6	5												INCLUDED WITH ABOVE

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)					(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)				
0	1	U	2	1	0												INCLUDED WITH ABOVE
0	2	U	2	1	3												INCLUDED WITH ABOVE
0	3	U	2	2	0												INCLUDED WITH ABOVE
0	4	U	2	2	6												INCLUDED WITH ABOVE
0	5	U	2	2	8												INCLUDED WITH ABOVE
0	6	U	2	3	9												INCLUDED WITH ABOVE
0	7	F	0	3	4												INCLUDED WITH ABOVE
0	8	F	0	0	6	1	T	S	0	1							
0	9	F	0	1	2	1	T	S	0	1							
1	0	F	0	1	9	1	T	S	0	1							
1	1	F	0	2	4	1	T	S	0	1							
1	2	F	0	2	7	1	T	S	0	1							
1	3	F	0	3	5	1	T	S	0	1							
1	4	F	0	3	8	1	T	S	0	1							
1	5	F	0	3	9	1	T	S	0	1							
1	6	K	0	0	1	1	T	S	0	1							
1	7	K	0	0	2	1	T	S	0	1							
1	8	K	0	0	3	1	T	S	0	1							
1	9	K	0	0	4	1	T	S	0	1							
2	0	K	0	0	5	1	T	S	0	1							
2	1	K	0	0	6	1	T	S	0	1							
2	2	K	0	0	7	1	T	S	0	1							
2	3	K	0	0	8	1	T	S	0	1							
2	4	K	0	0	9	1	T	S	0	1							
2	5	K	0	1	0	1	T	S	0	1							
2	6	K	0	1	4	1	T	S	0	1							
2	7	K	0	1	5	1	T	S	0	1							
2	8	K	0	1	6	1	T	S	0	1							
2	9	K	0	1	7	1	T	S	0	1							
3	0	K	0	1	8	1	T	S	0	1							
3	1	K	0	1	9	1	T	S	0	1							
3	2	K	0	2	0	1	T	S	0	1							
3	3	K	0	2	1	1	T	S	0	1							
3	4	K	0	2	2	1	T	S	0	1							
3	5	K	0	2	3	1	T	S	0	1							
3	6	K	0	2	4	1	T	S	0	1							

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)																			
Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
								(1) PROCESS CODES (Enter Code)				(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)							
0	1	K	0	2	5	1	T	S	0	1									
0	2	K	0	2	6	1	T	S	0	1									
0	3	K	0	2	8	1	T	S	0	1									
0	4	K	0	2	8	1	T	S	0	1									
0	5	K	0	2	9	1	T	S	0	1									
0	6	K	0	3	0	1	T	S	0	1									
0	7	K	0	3	1	1	T	S	0	1									
0	8	K	0	3	2	1	T	S	0	1									
0	9	K	0	3	3	1	T	S	0	1									
1	0	K	0	3	4	1	T	S	0	1									
1	1	K	0	3	5	1	T	S	0	1									
1	2	K	0	3	6	1	T	S	0	1									
1	3	K	0	3	7	1	T	S	0	1									
1	4	K	0	3	8	1	T	S	0	1									
1	5	K	0	3	9	1	T	S	0	1									
1	6	K	0	4	0	1	T	S	0	1									
1	7	K	0	4	1	1	T	S	0	1									
1	8	K	0	4	2	1	T	S	0	1									
1	9	K	0	4	3	1	T	S	0	1									
2	0	K	0	6	0	1	T	S	0	1									
2	1	K	0	8	3	1	T	S	0	1									
2	2	K	0	8	5	1	T	S	0	1									
2	3	K	0	8	7	1	T	S	0	1									
2	4	K	0	9	3	1	T	S	0	1									
2	5	K	0	9	4	1	T	S	0	1									
2	6	K	0	9	5	1	T	S	0	1									
2	7	K	0	9	6	1	T	S	0	1									
2	8	K	0	9	7	1	T	S	0	1									
2	9	K	0	9	8	1	T	S	0	1									
3	0	K	0	9	9	1	T	S	0	1									
3	1	K	1	0	3	1	T	S	0	1									
3	2	K	1	0	4	1	T	S	0	1									
3	3	K	1	0	5	1	T	S	0	1									
3	4	K	1	0	7	1	T	S	0	1									
3	5	K	1	0	8	1	T	S	0	1									
3	6	K	1	0	9	1	T	S	0	1									

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
	(1) PROCESS CODES (Enter Code)								(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)										
0	1	K	1	1	0	1	T	S	0	1									
0	2	K	1	1	1	1	T	S	0	1									
0	3	K	1	1	2	1	T	S	0	1									
0	4	K	1	1	3	1	T	S	0	1									
0	5	K	1	1	4	1	T	S	0	1									
0	6	K	1	1	5	1	T	S	0	1									
0	7	K	1	1	6	1	T	S	0	1									
0	8	K	1	1	7	1	T	S	0	1									
0	9	K	1	1	8	1	T	S	0	1									
1	0	K	1	2	3	1	T	S	0	1									
1	1	K	1	2	4	1	T	S	0	1									
1	2	K	1	2	5	1	T	S	0	1									
1	3	K	1	2	6	1	T	S	0	1									
1	4	K	1	3	1	1	T	S	0	1									
1	5	K	1	3	2	1	T	S	0	1									
1	6	K	1	3	6	1	T	S	0	1									
1	7	P	0	0	1	1	T	S	0	1									
1	8	P	0	0	2	1	T	S	0	1									
1	9	P	0	0	3	1	T	S	0	1									
2	0	P	0	0	4	1	T	S	0	1									
2	1	P	0	0	5	1	T	S	0	1									
2	2	P	0	0	7	1	T	S	0	1									
2	3	P	0	0	8	1	T	S	0	1									
2	4	P	0	1	0	1	T	S	0	1									
2	5	P	0	1	1	1	T	S	0	1									
2	6	P	0	1	2	1	T	S	0	1									
2	7	P	0	1	3	1	T	S	0	1									
2	8	P	0	1	4	1	T	S	0	1									
2	9	P	0	1	5	1	T	S	0	1									
3	0	P	0	1	6	1	T	S	0	1									
3	1	P	0	1	7	1	T	S	0	1									
3	2	P	0	1	8	1	T	S	0	1									
3	3	P	0	2	0	1	T	S	0	1									
3	4	P	0	2	1	1	T	S	0	1									
3	5	P	0	2	2	1	T	S	0	1									
3	6	P	0	2	3	1	T	S	0	1									

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)																			
Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
								(1) PROCESS CODES (Enter Code)						(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)					
0	1	P	0	2	4	1	T	S	0	1									
0	2	P	0	2	6	1	T	S	0	1									
0	3	P	0	2	7	1	T	S	0	1									
0	4	P	0	2	8	1	T	S	0	1									
0	5	P	0	2	9	1	T	S	0	1									
0	6	P	0	3	0	1	T	S	0	1									
0	7	P	0	3	1	1	T	S	0	1									
0	8	P	0	3	3	1	T	S	0	1									
0	9	P	0	3	4	1	T	S	0	1									
1	0	P	0	3	6	1	T	S	0	1									
1	1	P	0	3	7	1	T	S	0	1									
1	2	P	0	3	8	1	T	S	0	1									
1	3	P	0	3	9	1	T	S	0	1									
1	4	P	0	4	0	1	T	S	0	1									
1	5	P	0	4	1	1	T	S	0	1									
1	6	P	0	4	3	1	T	S	0	1									
1	7	P	0	4	4	1	T	S	0	1									
1	8	P	0	4	5	1	T	S	0	1									
1	9	P	0	4	6	1	T	S	0	1									
2	0	P	0	4	7	1	T	S	0	1									
2	1	P	0	4	9	1	T	S	0	1									
2	2	P	0	5	0	1	T	S	0	1									
2	3	P	0	5	1	1	T	S	0	1									
2	4	P	0	5	4	1	T	S	0	1									
2	5	P	0	5	6	1	T	S	0	1									
2	6	P	0	5	7	1	T	S	0	1									
2	7	P	0	5	8	1	T	S	0	1									
2	8	P	0	5	9	1	T	S	0	1									
2	9	P	0	6	0	1	T	S	0	1									
3	0	P	0	6	2	1	T	S	0	1									
3	1	P	0	6	3	1	T	S	0	1									
3	2	P	0	6	4	1	T	S	0	1									
3	3	P	0	6	6	1	T	S	0	1									
3	4	P	0	6	7	1	T	S	0	1									
3	5	P	0	6	8	1	T	S	0	1									
3	6	P	0	6	9	1	T	S	0	1									

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
	(1) PROCESS CODES (Enter Code)								(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)										
0	1	P	0	7	0	1	T	S	0	1									
0	2	P	0	7	1	1	T	S	0	1									
0	3	P	0	7	2	1	T	S	0	1									
0	4	P	0	7	3	1	T	S	0	1									
0	5	P	0	7	4	1	T	S	0	1									
0	6	P	0	7	5	1	T	S	0	1									
0	7	P	0	7	6	1	T	S	0	1									
0	8	P	0	7	7	1	T	S	0	1									
0	9	P	0	7	8	1	T	S	0	1									
1	0	P	0	8	2	1	T	S	0	1									
1	1	P	0	8	4	1	T	S	0	1									
1	2	P	0	8	5	1	T	S	0	1									
1	3	P	0	8	7	1	T	S	0	1									
1	4	P	0	8	8	1	T	S	0	1									
1	5	P	0	8	9	1	T	S	0	1									
1	6	P	0	9	2	1	T	S	0	1									
1	7	P	0	9	3	1	T	S	0	1									
1	8	P	0	9	4	1	T	S	0	1									
1	9	P	0	9	5	1	T	S	0	1									
2	0	P	0	9	6	1	T	S	0	1									
2	1	P	0	9	7	1	T	S	0	1									
2	2	P	0	9	8	1	T	S	0	1									
2	3	P	0	9	9	1	T	S	0	1									
2	4	P	1	0	1	1	T	S	0	1									
2	5	P	1	0	2	1	T	S	0	1									
2	6	P	1	0	3	1	T	S	0	1									
2	7	P	1	0	4	1	T	S	0	1									
2	8	P	1	0	5	1	T	S	0	1									
2	9	P	1	0	6	1	T	S	0	1									
3	0	P	1	0	8	1	T	S	0	1									
3	1	P	1	0	8	1	T	S	0	1									
3	2	P	1	0	9	1	T	S	0	1									
3	3	P	1	1	0	1	T	S	0	1									
3	4	P	1	1	1	1	T	S	0	1									
3	5	P	1	1	3	1	T	S	0	1									
3	6	P	1	1	4	1	T	S	0	1									

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
	(1) PROCESS CODES (Enter Code)								(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)										
0	1	P	1	1	5	1	T	S	0	1									
0	2	P	1	1	6	1	T	S	0	1									
0	3	P	1	1	8	1	T	S	0	1									
0	4	P	1	1	9	1	T	S	0	1									
0	5	P	1	2	0	1	T	S	0	1									
0	6	P	1	2	1	1	T	S	0	1									
0	7	P	1	2	2	1	T	S	0	1									
0	8	P	1	2	3	1	T	S	0	1									
0	9	U	0	0	1	1	T	S	0	1									
1	0	U	0	0	3	1	T	S	0	1									
1	1	U	0	0	4	1	T	S	0	1									
1	2	U	0	0	6	1	T	S	0	1									
1	3	U	0	0	7	1	T	S	0	1									
1	4	U	0	0	8	1	T	S	0	1									
1	5	U	0	0	9	1	T	S	0	1									
1	6	U	0	1	0	1	T	S	0	1									
1	7	U	0	1	1	1	T	S	0	1									
1	8	U	0	1	1	1	T	S	0	1									
1	9	U	0	1	2	1	T	S	0	1									
2	0	U	0	1	4	1	T	S	0	1									
2	1	U	0	1	5	1	T	S	0	1									
2	2	U	0	1	6	1	T	S	0	1									
2	3	U	0	1	7	1	T	S	0	1									
2	4	U	0	1	8	1	T	S	0	1									
2	5	U	0	1	9	1	T	S	0	1									
2	6	U	0	2	1	1	T	S	0	1									
2	7	U	0	2	2	1	T	S	0	1									
2	8	U	0	2	4	1	T	S	0	1									
2	9	U	0	2	5	1	T	S	0	1									
3	0	U	0	2	6	1	T	S	0	1									
3	1	U	0	2	7	1	T	S	0	1									
3	2	U	0	2	8	1	T	S	0	1									
3	3	U	0	2	9	1	T	S	0	1									
3	4	U	0	3	0	1	T	S	0	1									
3	5	U	0	3	2	1	T	S	0	1									
3	6	U	0	3	4	1	T	S	0	1									

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)																			
Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
								(1) PROCESS CODES (Enter Code)						(2) PROCESS DESCRIPTION (if code is not entered in 9.D.1)					
0	1	U	0	3	5	1	T	S	0	1									
0	2	U	0	3	6	1	T	S	0	1									
0	3	U	0	3	7	1	T	S	0	1									
0	4	U	0	3	8	1	T	S	0	1									
0	5	U	0	3	9	1	T	S	0	1									
0	6	U	0	4	1	1	T	S	0	1									
0	7	U	0	4	2	1	T	S	0	1									
0	8	U	0	4	3	1	T	S	0	1									
0	9	U	0	4	4	1	T	S	0	1									
1	0	U	0	4	6	1	T	S	0	1									
1	1	U	0	4	7	1	T	S	0	1									
1	2	U	0	4	8	1	T	S	0	1									
1	3	U	0	4	9	1	T	S	0	1									
1	4	U	0	5	0	1	T	S	0	1									
1	5	U	0	5	1	1	T	S	0	1									
1	6	U	0	5	2	1	T	S	0	1									
1	7	U	0	5	3	1	T	S	0	1									
1	8	U	0	5	7	1	T	S	0	1									
1	9	U	0	5	8	1	T	S	0	1									
2	0	U	0	5	9	1	T	S	0	1									
2	1	U	0	6	0	1	T	S	0	1									
2	2	U	0	6	1	1	T	S	0	1									
2	3	U	0	6	2	1	T	S	0	1									
2	4	U	0	6	3	1	T	S	0	1									
2	5	U	0	6	4	1	T	S	0	1									
2	6	U	0	6	6	1	T	S	0	1									
2	7	U	0	6	7	1	T	S	0	1									
2	8	U	0	6	8	1	T	S	0	1									
2	9	U	0	6	9	1	T	S	0	1									
3	0	U	0	7	0	1	T	S	0	1									
3	1	U	0	7	1	1	T	S	0	1									
3	2	U	0	7	2	1	T	S	0	1									
3	3	U	0	7	3	1	T	S	0	1									
3	4	U	0	7	5	1	T	S	0	1									
3	5	U	0	7	6	1	T	S	0	1									
3	6	U	0	7	7	1	T	S	0	1									

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)														
Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES						
								(1) PROCESS CODES (Enter Code)					(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)	
0	1	U	0	7	8	1	T	S	0	1				
0	2	U	0	7	9	1	T	S	0	1				
0	3	U	0	8	1	1	T	S	0	1				
0	4	U	0	8	2	1	T	S	0	1				
0	5	U	0	8	3	1	T	S	0	1				
0	6	U	0	8	4	1	T	S	0	1				
0	7	U	0	8	5	1	T	S	0	1				
0	8	U	0	8	6	1	T	S	0	1				
0	9	U	0	8	7	1	T	S	0	1				
1	0	U	0	8	8	1	T	S	0	1				
1	1	U	0	8	9	1	T	S	0	1				
1	2	U	0	9	0	1	T	S	0	1				
1	3	U	0	9	1	1	T	S	0	1				
1	4	U	0	9	3	1	T	S	0	1				
1	5	U	0	9	4	1	T	S	0	1				
1	6	U	0	9	5	1	T	S	0	1				
1	7	U	0	9	7	1	T	S	0	1				
1	8	U	0	9	8	1	T	S	0	1				
1	9	U	0	9	9	1	T	S	0	1				
2	0	U	1	0	1	1	T	S	0	1				
2	1	U	1	0	2	1	T	S	0	1				
2	2	U	1	0	3	1	T	S	0	1				
2	3	U	1	0	5	1	T	S	0	1				
2	4	U	1	0	6	1	T	S	0	1				
2	5	U	1	0	7	1	T	S	0	1				
2	6	U	1	0	8	1	T	S	0	1				
2	7	U	1	0	9	1	T	S	0	1				
2	8	U	1	1	1	1	T	S	0	1				
2	9	U	1	1	4	1	T	S	0	1				
3	0	U	1	1	6	1	T	S	0	1				
3	1	U	1	1	8	1	T	S	0	1				
3	2	U	1	4	1	1	T	S	0	1				
3	3	U	1	4	2	1	T	S	0	1				
3	4	U	1	4	3	1	T	S	0	1				
3	5	U	1	4	4	1	T	S	0	1				
3	6	U	1	4	5	1	T	S	0	1				

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES												
	(1) PROCESS CODES (Enter Code)								(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)											
0	1	U	1	4	6	1	T	S	0	1										
0	2	U	1	4	7	1	T	S	0	1										
0	3	U	1	4	8	1	T	S	0	1										
0	4	U	1	4	9	1	T	S	0	1										
0	5	U	1	5	0	1	T	S	0	1										
0	6	U	1	5	1	1	T	S	0	1										
0	7	U	1	5	5	1	T	S	0	1										
0	8	U	1	5	7	1	T	S	0	1										
0	9	U	1	5	8	1	T	S	0	1										
1	0	U	1	6	2	1	T	S	0	1										
1	1	U	1	6	3	1	T	S	0	1										
1	2	U	1	6	4	1	T	S	0	1										
1	3	U	1	6	6	1	T	S	0	1										
1	4	U	1	6	7	1	T	S	0	1										
1	5	U	1	6	8	1	T	S	0	1										
1	6	U	1	6	9	1	T	S	0	1										
1	7	U	1	7	0	1	T	S	0	1										
1	8	U	1	7	2	1	T	S	0	1										
1	9	U	1	7	3	1	T	S	0	1										
2	0	U	1	7	4	1	T	S	0	1										
2	1	U	1	7	6	1	T	S	0	1										
2	2	U	1	7	7	1	T	S	0	1										
2	3	U	1	7	8	1	T	S	0	1										
2	4	U	1	7	9	1	T	S	0	1										
2	5	U	1	8	0	1	T	S	0	1										
2	6	U	1	8	1	1	T	S	0	1										
2	7	U	1	8	2	1	T	S	0	1										
2	8	U	1	8	3	1	T	S	0	1										
2	9	U	1	8	4	1	T	S	0	1										
3	0	U	1	8	5	1	T	S	0	1										
3	1	U	1	8	7	1	T	S	0	1										
3	2	U	1	8	8	1	T	S	0	1										
3	3	U	1	9	0	1	T	S	0	1										
3	4	U	1	9	1	1	T	S	0	1										
3	5	U	1	9	2	1	T	S	0	1										
3	6	U	1	9	3	1	T	S	0	1										

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES													
	(1) PROCESS CODES (Enter Code)										(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)										
0	1	U	1	9	6	1	T	S	0	1											
0	2	U	1	9	7	1	T	S	0	1											
0	3	U	2	0	0	1	T	S	0	1											
0	4	U	2	0	1	1	T	S	0	1											
0	5	U	2	0	2	1	T	S	0	1											
0	6	U	2	0	3	1	T	S	0	1											
0	7	U	2	0	4	1	T	S	0	1											
0	8	U	2	0	7	1	T	S	0	1											
0	9	U	2	0	8	1	T	S	0	1											
1	0	U	2	0	9	1	T	S	0	1											
1	1	U	2	1	1	1	T	S	0	1											
1	2	U	2	1	4	1	T	S	0	1											
1	3	U	2	1	5	1	T	S	0	1											
1	4	U	2	1	6	1	T	S	0	1											
1	5	U	2	1	7	1	T	S	0	1											
1	6	U	2	1	8	1	T	S	0	1											
1	7	U	2	1	9	1	T	S	0	1											
1	8	U	2	2	1	1	T	S	0	1											
1	9	U	2	2	2	1	T	S	0	1											
2	0	U	2	2	7	1	T	S	0	1											
2	1	U	2	3	5	1	T	S	0	1											
2	2	U	2	3	6	1	T	S	0	1											
2	3	U	2	3	7	1	T	S	0	1											
2	4	U	2	3	8	1	T	S	0	1											
2	5	U	2	4	0	1	T	S	0	1											
2	6	U	2	4	3	1	T	S	0	1											
2	7	U	2	4	4	1	T	S	0	1											
2	8	U	2	4	6	1	T	S	0	1											
2	9	U	2	4	7	1	T	S	0	1											
3	0	K	0	4	8	4000	T	S	0	1	S	0	2	X	9	9					
3	1	K	0	4	9	4000	T	S	0	1	S	0	2	X	9	9					
3	2	K	0	5	0	4000	T	S	0	1	S	0	2	X	9	9					
3	3	K	0	5	1	4000	T	S	0	1	S	0	2	X	9	9					
3	4	K	0	5	2	4000	T	S	0	1	S	0	2	X	9	9					
3	5	U	1	2	2	1	T	S	0	1	S	0	2	X	9	9					

10. 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.

11. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

12. 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).

13. Comments

WRR Environmental Services (WRR) stores hazardous waste in both bulk tanks and containers. A total of 41 waste tanks are located in three dike systems. These tanks are noted in item 7 - line 2. Fourteen hazardous waste container storage areas are used to manage containerized waste before it is processed or shipped for treatment at another facility. These areas are noted in item 7 - line 1.

WRR utilizes two miscellaneous units to manage waste. The first miscellaneous unit is a thin film evaporator, designated as the E-IV, that can be used to treat wastewater in addition to recycle solvents for reuse. Because the processing of wastewater, in most cases, is not considered legitimate recycling, this unit falls under the performance standards of a miscellaneous unit. This unit is listed in item 8 - line 3.

The second miscellaneous unit is located within the fuels building and is a blender/mixer unit called a Hydrapulper. The purpose of this unit is to mix and suspend solids into a fuels stream used by cement kilns as a supplemental fuel. This unit is listed in item 8 - line 4.

The facility map required in item 10 is attached to this Feasibility and Plan of Operation Report and is called Drawing A-1.

WID990829475

Item 12 - Photographs



Photo taken 9/16/08

Exterior of Dock 6 looking west. Dock 6 houses product storage, parts and one of the fourteen hazardous waste container storage areas.

Rev 02/20/2014

000025

WID990829475

Item 12 - Photographs



Photo taken April 9, 2013

Item 7 – Line 1:

Exterior of the DOT Room, looking east. The DOT Room is a hazardous waste container storage area located within the Dock 6 building.

Rev 02/20/2014

000026

WID990829475

Item 12 - Photographs



Photo taken 9/16/08

Item 7 – Line 1:

Seen here is an exterior view looking south of Dock 3 receiving area in the E1 warehouse building. Dock 3 is a hazardous waste storage area for containers.

The E1 process building houses one of the fourteen hazardous waste container storage areas.

Rev 02/20/2014

000027

WID990829475

Item 12 - Photographs



Photo taken April 9, 2013

Item 7 – Line 1:

Interior of the Dock 3 receiving area looking south.

Dock 3 is a hazardous waste storage area for containers.

The E1 warehouse building houses one of 14 hazardous waste container storage areas.

Rev 02/20/2014

000028

WID990829475
Item 12 - Photographs



Photo taken April 9, 2013
Looking west at east side of the E-II Warehouse Building

Two tanker bays allow for the loading and unloading of bulk hazardous waste.



Photos taken April 9, 2013
Exterior view of Dock 4 of E-II Warehouse Building looking southwest.

WID990829475

Item 12 - Photographs



Exterior view of Dock 5 of E-II Warehouse Building looking northwest.

Item 7 – Line 1:

Docks 1, 4 and 5 are one of the 11 hazardous waste container storage areas.

WRR is planning to modify the approach to Docks 4 and 5 of the E-II Warehouse Building so that the tractor trailers match up closer in elevation to the floor of the docks. At the same time, spill containment will be added to this area the fourteenth hazardous waste container storage area for tankers filled with hazardous waste.



Photos taken April 9, 2013

Dock 4, North Pump Up, in E-II Warehouse Building Interior View

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WID990829475

Item 12 - Photographs



Dock 1 area in E-II Warehouse Building



Photo taken April 9, 2013

Item 7 – Line 1:

Eight of the hazardous waste storage areas are individual storage sheds.

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WID990829475
Item 12 - Photographs



Photos taken April 9, 2013

Item 7 – Line 1:

Exterior and interior views of one of the 8 hazardous waste container storage sheds. The shed, P-10, is used to store corrosive wastes.

Rev 02/20/2014

000032



Photo taken 10/3/08

Item 7 – Line 2

Arial view of the E1 Sludge Tank Farm looking northwest. The E1 Sludge Tank Farm houses 17 of the 41 hazardous waste storage tanks. The E1 Sludge Tank Farm also houses two product tanks.

WID990829475

Item 12 - Photographs



Photo taken 10/2/08

Item 7 – Line 2:

Aerial view of the E1 South Sludge Tank Farm looking north. The E1 South Sludge Tank Farm holds 8 of the 41 hazardous waste storage tanks.

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WID990829475
Item 12 - Photographs



Photo taken 10/2/08

Item 7 – Line 2

Arial view of the EII Sludge Tank Farm looking northeast. The EII Sludge Tank Farm houses 16 of the 41 hazardous waste storage tanks.

WID990829475

Item 12 - Photographs



Photo taken April 9, 2013

This is a dual tanker loading and unloading pad located at the northeast corner of the E-II Processing Building. It is used for both product loading and unloading and for hazardous waste loading.

Rev 02/20/2014

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WID990829475

Item 12 - Photographs



Photo taken 9/16/08

Item 8 – Line 3:

Thin film evaporator designated as E-IV. The thin film evaporator is used to process wastewater as well as reclaim solvents for reuse. The E-IV is classified as an miscellaneous unit due to the wastewater processing.

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WID990829475

Item 12 - Photographs



Photo taken 11/5/10

Item 8 – Line 4:

A barrel punch, right side of the photo, and a barrel crusher, left side of the photo, located inside the fuels building. The fuels building houses multiple units used to produce a supplement fuel for cement kilns. The fuels building is a permanent total enclosure (PTE).

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Photo taken 11/5/10

Item 8 – Line 4:

A blending unit called a hydrapulper is located inside the fuels building. The fuels building houses multiple units used to produce a supplement fuel for cement kilns. The fuels building is a permanent total enclosure (PTE).



Photo taken 11/5/10

Item 8 – Line 4:

A small can press is located inside the fuels building. The fuels building houses multiple units used to produce a supplement fuel for cement kilns. The fuels building is a permanent total enclosure (PTE).



Photo taken 02/27/2014

Household Hazardous Waste (HHW or leansweep) room hazardous waste container storage area facing southwest.

The cleansweep room is used during household hazardous waste collection events as well as a hazardous waste container storage area. Drums from cleansweep events and lab packs are depacked and repacked in this area for shipment off-site.

Angle iron containment can be seen at both entrances to the room.

Drums storing liquid waste collected during cleansweep events are stored over a drum containment device.

WID990829475

Item 12 - Photographs



Photo taken 02/27/2014

Household Hazardous Waste (HHW or Cleansweep) room hazardous waste container storage area facing northeast.

Rev 02/20/2014

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WRR Environmental Services, Co, Inc.
Eau Claire, Wisconsin

Part I

Section A – General Requirements

A-6 Summary of pre-application meeting [NR 670.014\(2\)\(v\)](#)

WRR Environmental Services (WRR) hosted a pre-application public informational meeting on March 13, 2013 at the Seymour Town Hall, 6500 Tower Drive, Eau Claire, WI. The public meeting was intended to inform the community of the RCRA relicensing application and to solicit questions from the community.

Information pertaining to the meeting is in Appendix A-5 which contains the newspaper affidavit of publication of the public notice, a letter to municipal clerks, an email summarizing who attended the meeting and that comments were all favorable, a copy of the meeting sign-in sheet, copies of public notices broadcast on the radio and as posted at WRR, and a copy of the Power Point presented at the meeting. No written comments or materials were received. No one from the public attended the meeting.¹

A-10 General description of facility [NR 670.014\(2\)\(a\)](#)

WRR Environmental Services (WRR) operates a licensed RCRA facility on an 8.2 acre site located at 5200 Ryder Road, Eau Claire Wisconsin. WRR has been assigned U.S. EPA ID Number WID990829475. The WRR site is in the southeast quarter of the southwest quarter of Section 3, Township 26N, Range 9W, Town of Washington, Eau Claire County, Wisconsin. Additional businesses under the WRR corporate umbrella include Automotive and Industrial Services (AIS) and RESCO, an emergency response and remediation company.

WRR is currently zoned I1 – Non-sewered Industrial. No change in the zoning classification is requested or anticipated.

Activities conducted at the site include solvent recycling, fuel blending, and bulk and container storage. The facility does not dispose of hazardous or nonhazardous waste on-site.

General access to the facility is from Hwy 93 onto Lorch Avenue, onto the frontage road, Ryder Road. All roads are capable of bearing loads up to 30,000 pounds per axle. All roads within the facility are 4-inch thick bituminous pavement (blacktop). All loading and unloading dock areas are constructed with 4 to 8 inches of reinforced concrete cement.

The facility consists of the following buildings, structures and areas:

- The WRR office building houses the on-site laboratory and F4 fractionation room in addition to the administrative offices, a maintenance building and household hazardous waste collection area. More information on the household hazardous waste collection area is provided in Appendix 1A-2.
- The Dock 6/Dock 7 warehouse complex consisting of product storage and a hazardous waste storage area noted as the DOT Room.
- EI process building holds equipment for thin film evaporation, fractionation and blending. The warehouse in the EI building stores nonflammable hazardous and nonhazardous waste and nonflammable product. The EI process building also holds a

¹ Item 14

Rotary Drum Vacuum Filtration (RDVF) unit and a decanter centrifuge. These two pieces of equipment are inactive. The RDVF is planned to have partial closure completed on it. Per s. [NR 664.0112\(4\)\(a\)](#) Wis. Admin. Code, WRR will inform the WDNR of the intent to undergo the partial closure of the RDVF. The decanter centrifuge has never been a hazardous waste management unit. Prior to using the decanter centrifuge for processing hazardous waste, WRR will submit a license modification request, per s. NR 670.042, Wis. Adm. Code, to the Department. The license modification request will provide a description of compliance with applicable sections of ch. NR 664 Wis. Adm. Code, and specific feasibility and plan of operation report information specified in applicable sections of NR670, Wis. Adm. Code.

- The boiler building contains two operating boilers and a nitrogen generator.
- The EII building complex houses several interconnected areas:
 - The processing area holds equipment for thin film evaporation, dehydration, fractionation, blending and manufacturing.
 - Docks 4, 5 and 1 provide receiving and storage for both hazardous and nonhazardous waste.
 - The Tanker Pit provides an area for loading/ unloading waste tankers and cleaning tankers and totes.
 - The Fuels Building houses equipment for the management waste destined for the supplemental fuels program.

On June 22, 2007, a fire at WRR destroyed several licensed hazardous waste management units formally located in the EII building complex, including the E-II and E-III thin film evaporators, Dry Cleaner Filter Recycling Unit, Process Tanks JJ and KK and an ash containment storage building. These units have been removed from the site and are considered closed, as are the EI South and the Offsite Warehouse areas, for purposes of this renewal application.

- Building A warehouses consumable items required to operate the facility. Examples of the items housed in this warehouse are pumps, hoses and absorbents. Hazardous waste is not stored in this building.
- Electrical and chiller room provides a central location for utilities.
- Emergency generator to provide a source of electrical power in the event of a power outage.
- Eight hazardous waste container storage pads.
- Nine pads for the storage of containerized nonhazardous waste materials or product.
- 12,000 gallon sump to collect precipitation and provide containment for sudden releases.
- 360,000 gallon water reservoir to collect precipitation from the facility. This water is the source for the fire suppression system in the EII building complex.
- Point discharge. WRR has one off-site point discharge. It is for the Wisconsin Pollutant Discharge Elimination System (WPDES) permit. The location is shown on Figure A.1. The effluent discharges from a pipe to a ditch south of the remediation building. The

flow continues in the ditch to the west property line where the discharge enters an adsorption area on the neighboring county property.²

- Above ground storage tanks for both hazardous waste and product.
- Areas within the fenced property include:
 - Areas to receive and stage bulk transports and trailers.
 - Areas provided for bulk loading and unloading
 - Areas to hold empty nonplacarded tankers and trailers.

In addition to solvent recycling, fuel blending, and bulk and container storage, WRR provides contract manufacturing services to several customers. These activities do not use hazardous waste as a feedstock into the process.

The manufacture of a dry film lubricant, a solvent based on renewable raw materials, and lactic acid occurs in the EII building complex. The manufacture of a fiber board release agent occurs in the EI process building.

WRR is a registered Distilled Spirits Plant (DSP-WI-28) and holds an operating permit (OP-WI-12) from the Alcohol and Tobacco Tax and Trade Bureau for the processing of Specially Denatured Alcohol (SDA) formulations. The processing equipment for the SDA formulations is housed in the EII building complex.³

A-11 Procedures, structures and equipment used in unloading/loading to prevent hazards [NR 670.014\(2\)\(h\)1.](#)

Loading and unloading operations have long been recognized as plant operations with a large potential for hazardous material accidents and releases. This is due to the combination of high traffic volume in the unloading/loading areas, the problem of providing secondary containment and safety shut-offs, the probability of personnel exposure and the constant connection/disconnection between the transport vehicle and the fixed piping.

The unloading/loading facilities at WRR can be grouped into two main categories:

Tanker Truck – Tankers can deliver or be loaded with bulk hazardous waste liquids.

Containers – Van trailers can be unloaded/loaded with containers ranging in size from one gallon or less to standard 55 gallon drums to cubic yard boxes and totes. Shipments of small containers are palletized or packed into open topped drums or cubic yard boxes.

Elements common to the safe receipt and unloading/loading of material at WRR consist of the following:

Approved Personnel - Only properly trained personnel are authorized to work on trailer and tanker unloading and loading operations. Personal protective equipment (PPE) is available

² Item# 9

³ Item# 72

to all personnel involved in unloading/loading operations. At all times that hazardous waste is being handled, all employees involved in the operation have access to an emergency communication device.

Traffic Patterns and Vehicle Movement – WRR provides adequate room to maneuver vehicles to prevent two vehicles from colliding or vehicles from hitting plant equipment. In-plant traffic controls include one-way routing through the facility to minimize cross traffic, posted speed limits and concrete bumper posts to protect fixed equipment.

Control of Ignition Sources – Much of the material received and processed at WRR is ignitable. Open flames, hot surfaces, electric and static electric discharges and other potential ignition sources are eliminated or minimized. For bulk loads, the elimination of these sources includes the use of WRR pumps and power to transfer the materials rather than using the internal combustion powered pumps on the transport vehicles. The transport's power unit is unhooked and removed from the facility before unloading/loading operations begin.

Electrostatic build-up is possible where flammable materials are being transferred, but proper bonding and grounding techniques can eliminate this problem. Grounding systems audibly alarm personnel if a proper ground has not been made. Tanks are grounded. Waste tanks are designed to be submerged filled by the bottom fill method or have dip legs to prevent the build-up of electrostatic charge from the free fall of material into the tank.

Unloading Equipment – Unloading/loading trailers is accomplished with a barrel cart, pallet jack or forklift operated by authorized personnel. Dock plates provide a stable transition between the trailer and dock. Spill kits are available for releases that may occur during trailer unloading/loading activities.

Unloading/Loading components for tanker shipments include the transfer pump, flexible hoses, check valves and hard lines. While hoses provide flexibility for the tanker/pump connection, they are vulnerable to material failure from wear and kinking. Quick connect gaskets also are vulnerable to wear. Personnel training, in the inspections and replacement of transfer components, is completed.

The following additional precautions are taken during bulk loading and unloading operations:

- Wheels must be chocked on tanker (semi) before unloading or loading.
- Before attempting to open the tanker cover caution is used to assure that there is not a buildup of pressure within the tanker.
- Before pumping operations begin, verification of the tanker's contents is made by the WRR laboratory.
- All hose couplers must be properly secured and drain pans placed under fittings on the tanker to catch any possible leaks.
- All pumping is stopped if leaks are discovered when pumping. All spills are cleaned up immediately before continued pumping. All contaminated debris is containerized and removed.
- The tanker is not left connected when the employee is not present.

- When the pumping operation is complete, the hoses and hard lines are cleared before disconnecting the tanker from the unloading/loading components.

Unloading and loading activities are done on concrete surfaces to provide an impervious surface.

A-12 Procedures, structures and equipment used to prevent runoff [NR 670.014\(2\)\(h\)2.](#)

Unloading/loading areas within the WRR facility are concrete. The areas adjoining the concrete unloading/loading areas are asphalt and provides additional protection from catastrophic releases the may occur in the unloading/loading areas. While asphalt does not provide adequate containment for storage areas, it does provide a protective barrier between the release and vulnerable areas outside of the facility. The note under [NR 706.03\(4\)](#) reads “asphalt and concrete, if intact and undamaged, are considered impervious surfaces. However, if hazardous substances are capable of penetrating asphalt or concrete due to cracks or holes, or repeated discharges, the surface would not be considered impervious”. Every effort is made to limit the time that the release is in contact with the asphalt.

Within the facility, asphalt covered areas slope to the south west corner of the facility where a 12,000 gallon concrete lined sump is located. Contents of the 12,000 gallon sump are pumped into a 360,000 gallon reservoir. A concrete gutter system, along the west and south sides of the RCRA licensed portion of the facility, directs liquids to the sump. All rainwater run-off from this portion of the WRR plant is drained and collected in the reservoir.

The three waste storage tank areas, E-I Sludge, E-I South, and E-II South, are not covered by a roof and are subject to the collection of precipitation. When a precipitation event occurs, water that accumulates in diked areas is sampled and analyzed. The method utilized has a detection limit of approximately 10 ppm. If a detect is observed, that water is transferred to a holding tank for eventual disposal. If there is not a detect, the water is pumped from the dikes to the blacktop which flows to the plant reservoir. The reservoir is monitored daily for the level of organic constituents, and twice monthly effluent samples are collected and sent to an outside certified laboratory for required testing.

Concrete and asphalt surfaces are maintained to prevent the existence of cracks or holes.

A-13 Procedures, structures and equipment used to prevent contamination of water supplies [NR 670.014\(2\)\(h\)3.](#)

The structures in place to prevent runoff, also protect the area ground and surface water from contamination of a sudden release from an unloading/loading area, waste storage areas or operations.

Contamination of water supplies is prevented by the following means:

- All container and tank storage areas have secondary containment
- All of the active plant area is paved
- Storm water from the active plant area is collected and analyzed before release.

Monitoring wells are in place to observe any degradation of ground water quality.

A-14 Procedures, structures and equipment used to mitigate the effects of equipment failure and power outages [NR 670.014\(2\)\(h\)4.](#)

In the event of a power outage, unloading/loading pumps would become inoperable. An anti-siphon hole on a tank's fill pipe prevents liquid from siphoning back into the tanker in the event of a power outage or pump failure. Check valves are used to prevent bottom filled tankers and tanks from siphoning back in the event of pump failure or power outage.

Processing operation will also stop at the same time. If there is a prolonged power outage, the waste feed line to and from the tanks will be manually shut off and all plant operations will be shut down. The maintenance personnel will check for malfunction and equipment failures, and the Eau Claire Energy Cooperative will be contacted immediately for information on how long the power will be off, and the likelihood of additional power interruptions.

Hard hat mounted lights provide illumination to hazardous waste operations in the event of a power outage.

A 300 kilowatt diesel fired emergency generator can supply power to pumps and processes in the event of a power outage.

A-15 Procedures, structures and equipment used to prevent undue exposure to personnel [NR 670.014\(2\)\(h\)5.](#)

Personal protective equipment (PPE) is provided to all personnel involved in hazardous waste operations. Clothing PPE includes:

- Plastic or rubber aprons
- Rubber Boots
- Short and long rubber gloves
- Uniforms
- Rain suits
- Chemical-resistant coveralls (tyvek or similar)
- Polyethylene gloves, nitrile gloves
- Leather gloves
- Level A and Level B Suits

Equipment PPE includes:

- Face Shields and extra protective eyeglasses
- Dust respirators
- Chemical cartridge respirators w/cartridges for organic vapors
- Ear protection
- Self-contained breathing apparatus (SCBA)

Eye wash stations and emergency showers are available to immediately flush contaminants from the eyes or body.

A-16 Procedures, structures and equipment used to prevent releases to the atmosphere
NR 670.014(2)(h)6.

The evaporative emissions from bulk unloading/loading activities is minimized by the use of the submerged loading and/or the use of emission control. During the submerged filling method, material enters the tanker or tank below the liquid surface level. Liquid turbulence is controlled significantly during submerged loading, resulting in much lower vapor generation than encountered during splash loading.

Waste tanks are equipped with conservation vents that allows for limited vapor expansion before allowing emissions from the tanks.

Containers are kept closed except when sampling, adding or removing waste.

Emissions from process vents are limited by the use of condensers or carbon absorption units.

There are four carbon adsorption units used to control emissions from the High Viscosity Processing System: CC-2, CC-3, CC-6, and CC-7. Each carbon canister unit is permitted under WRR's air operation permit. CC-2 and CC-3 operate in parallel controlling emissions from the dumpster that receives crushed barrels and barrel lids from the Fuels Building. A 2,550 cfm fan transfers emissions from the dumpster to these two carbon units. Each unit contains 1,140 pounds of non-regenerative activated carbon. Exhaust from CC-2 and CC-3 vents outside the Fuels Building.

CC-6 controls emissions from aerosol cans. The carbon unit is used in conjunction with an aerosol can processor. The CC-6 carbon unit is a built-in part of the aerosol can processor. The CC-6 carbon unit contains approximately 1.25 pounds of activated carbon. When in use, this system is located in the Fuels Building. It is not in continuous use. It vents to within the building.

Emissions from processes and activities inside the Fuels Building are controlled using CC-7. A 3,100 cfm fan transfers emissions from inside the building to CC-7. CC-7 is a two chamber unit with each chamber containing 2,700 pounds of activated carbon. Only one chamber is in use at a time. Operation of the CC-7 unit includes regeneration of the carbon using steam. Exhaust from CC-7 vents outside the Fuels Building.⁴

A-17 Traffic pattern, estimated volume and control; access road surfacing and load bearing capacity. NR 670.014(2)(j)

General access to the facility is from Hwy 93 onto Lorch Avenue, onto the frontage road, Ryder Road. Hwy 93/Lorch Avenue is a traffic light controlled intersection. Access from Ryder Road

⁴ Item# 73

to Lorch Avenue is a stop sign controlled intersection. All roads are paved and capable of bearing loads up to 30,000 pounds per axle. Seventy transports, consisting mainly of semi-trailers and bulk tankers, may deliver to and ship material from the WRR facility each week.

Before entering the facility, all delivery and pick-up transports must register at the plant office. The operation supervisor will direct the transport to the WRR scale or directly into the facility. Once inside the facility, the operation supervisor will direct the transport to a receiving location or a loading area. Map A.17 shows the traffic patterns to WRR and Figure A.17 shows the traffic flow through the facility.

All roads within the facility are 4-inch thick bituminous pavement (blacktop). In-plant traffic controls include one-way routing through the facility to minimize cross traffic, posted speed limits and concrete bumper posts to protect fixed equipment.

All loading and unloading dock areas are constructed with 4 to 8 inches of reinforced concrete.

A-18 and A-19 Chemical and physical analysis of waste to be handled at the facility. [NR 670.014\(2\)\(b\)](#)

Table A-1 contains the analyses carried out by the WRR laboratory. These include basic screening procedures that are used to indicate the expected type of treatment that is most suitable for that particular waste stream and to verify incoming waste shipments. These analytical procedures are designed to identify or screen a specific waste and are a rapid but effective means for establishing key decision parameters required for proper waste management, identification and verification.

Supplemental analyses may be performed as directed by the Vice President/Research & Development - Quality Control or Laboratory Manager or designee to supplement existing information for the waste stream, to further verify a waste stream or to further ensure that the appropriate waste management technique(s) can be utilized.

Table A-1: PARAMETERS ANALYZED AND RATIONALE

Parameter	Rationale
Specific Gravity (or liquid density)	Required for tank storage and transportation to estimate weight of drums.
Acidity, Alkalinity, corrosivity	PH value to determine corrosiveness.
Flash Point	Required for waste material classification, and wastewater.
Total Solids and Ash Content	Required for fuel blending.
Heat of Combustion	Required for fuel blending.
Chloride and Sulfur Content	Required for fuel blending.
Heavy Metals	Required for fuel blending, off-site incineration, and waste water.
Solvent Composition	Required for quality control and safety purposes in the solvent reclamation process.
Polychlorinated Biphenyls	Required to make sure waste materials are not contaminated

(PCBs) Screening Test	with PCBs.
Hazardous organic constituents in waste water	Required for offsite wastewater disposal.
Reactivity, waste compatibility	To avoid mixing incompatible waste materials.

A-20 Justification of a request for a waiver of preparedness and prevention requirements
[NR 670.014\(2\)\(f\)](#)

WRR does not request a waiver of the preparedness and prevention requirements under NR 664 Subchapter C – Preparedness and Prevention.

Design and operation of the facility [NR 664.0031](#)

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

Required Equipment [NR 664.0032](#)

WRR maintains the following equipment as required per s. NR 664.0032, Wis. Admin. Code.

Internal alarm system [NR 664.0032\(1\)](#)

WRR’s emergency notification system is a two button panel located on the North wall of the time clock room of the Main Office Building.

In the event of a fire, all personnel will hear a continuous siren sound.

In the event of severe weather, all personnel will hear a combination low and high pitched siren.

Communication devices [NR 664.0032\(2\)](#)

At all times that hazardous waste is being handled, all employees involved in the operation have access to an internal or external alarm or emergency communication device.

Fire control and spill containment equipment [NR 664.0032\(3\)](#) **and water supply for automatic sprinklers** [NR 664.0032\(4\)](#)

WRR maintains an inventory of 10 pound ABC fire extinguishers.

The EII building complex houses the EII production area, docks 1, 4, 5, tanker pit and fuels building. This building complex has a sprinkler fire system installed in accordance with the National Fire Protection Association Standard Numbers 13, 16, 20, and 72. It was designed and installed by Summit Fire Protection out of St. Paul, Minnesota.

The 1,500-gallon per minute fire pump driven by a 125 Hp electric motor will pump water from the plant water reservoir to the sprinkler systems in each area of the EII building complex. The

fire pump is housed in a separate building located between the plant reservoir and the turbo stripper building. Either a heat detection cable located in the ceiling of the buildings or explosion proof manual pull fire alarms will activate the system. The alarm is a combination horn and strobe unit located in each area of the EII complex. The fire system provides both a dry pipe pre-action sprinkler containing air under pressure, and a deluge water spray. Both have a foam system. The E-II building is zoned for fire detection within the tanker pit vs. the dock areas. When electric service to the facility is interrupted, a 300 kilowatt diesel fired emergency generator is available to provide power to the electric motor so that the fire pump can be operated.

Spill control equipment such as pads and booms are available for the containment and clean up of releases. Spill control kits located throughout the facility are inventoried. Reusable equipment, such as pumps, hoses and SCBA's, is decontaminated and tested prior to replacement into storage. Spent consumable items, such as spill containment materials, are packaged for disposal at a licensed facility. Consumable items are restocked on an as needed basis.

Testing and maintenance of equipment. [NR 664.0033](#)

The WRR emergency notification system is tested on a quarterly basis to insure proper operation.

Monthly inspections are completed on the fire extinguishers along with a yearly recertification. Both the fire pump flow and fire suppression foam system in the EII building complex is inspected annually.

The emergency generator is inspected monthly.

Spill control kits are inspected weekly for adequate inventory.

Access to communications [NR 664.0034](#)

Whenever hazardous waste is being handled, all personnel involved in the operation have immediate access to emergency communication via 2-way radio with other employees. WRR has a policy of maintaining two or more employees on the premises while the facility is operating.

Required aisle space [NR 664.0035](#)

On docks 1, 4 and 5 in the EII complex, no fork lifts are used. Adequate aisle space is left between every two rows of barrels to facilitate container sampling, and inspection. Barrels are to be placed in the rows with the labels facing out to allow inspection of them. Lines are painted on the floors of the container storage areas to show the edges of the aisle. Containers are not stored within the aisles.

If a leaking barrel is detected, a barrel cart is used to remove the leaking barrel. The barrel is then turned to prevent further leakage or overpacked, and the contents are pumped up when

laboratory testing has been completed and the material assigned to a process. Any leakage onto the concrete floor is cleaned up. Prior to storage, each container is sealed tight and labeled.

The containers in the storage pads are stored on pallets to minimize contact with precipitation and leaks, and are never stacked more than two drums high. In forklift handling areas, adequate aisle space is maintained to allow access. This reduces the risk of damaging containers by scraping or puncture. Waste drums containing ignitable wastes are stored in the E-II warehouse and drum storage pads which are at least 50 feet from the WRR property line.

Arrangements with local authorities [NR 664.0037](#)

WRR does not have any formal written agreement with emergency management agencies. However, WRR has familiarized hospitals, fire departments, and HAZMAT agencies with WRR by conducting plant tours and supplying information regarding the contingency plan. Sacred Heart Hospital serves as WRR's Medical Director.

A-21 Precautions to prevent ignition or reaction of waste [NR 670.014\(2\)\(i\)](#)

While much of the waste processed at WRR exhibits the characteristic of ignitability, WRR has instituted a rigorous analytical program to provide information concerning a waste's reactive or incompatible nature prior to treatment. Specifically, wastes are evaluated to discover applicable hazardous waste characteristics that may damage the treatment process and/or associated facilities/personnel.

During the profiling process, wastes may be subject to a compatibility evaluation. This evaluation makes use of the EPA Chemical Compatibility Chart (EPA-600/2-80-076 April 1980). This evaluation is used to classify wastes based on gross chemical composition for designation according to specific reactivity groups.

Incoming waste samples will be assessed through the use of process knowledge and laboratory compatibility screening with WRR streams for their potential reactivity characteristics. Any wastes identified as having a potential to liberate gases, heat or undergo hazardous polymerization are segregated from all other wastes. Depending on the extent of the hazard present, prior to shipment to an off-site facility incompatible wastes are stored in Pads 1, 8, 10 or in the E2 storage area.

A-22 to A-24 Ignitable wastes are protected from sources of ignition [NR 664.0017\(1\)](#)

WRR does accept ignitable wastes for storage and treatment. General precautions for handling ignitable wastes include the following:

- Non-spark tools are used to open and close the container openings.
- Explosion-proof electrical wiring and equipment are used to transfer in process areas.
- Control grounding is used in all liquid transferring operations.
- No smoking is allowed inside the facility.
- No welding is allowed in the ignitable material storage area.

“No Smoking” signs are posted at entrances into the facility.

A-25 Materials are handled to prevent reactions [NR 664.0017\(2\)](#) and [NR 664.0017\(3\)](#)

WRR’s profiling procedures and incoming material screening include precautions to be taken to identify reactions which do any of the following:

- Generate extreme heat or pressure, fire or explosions or violent reactions.
- Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment.
- Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions.
- Damage the structural integrity of the device or facility.
- Through other like means threaten human health or the environment.

Additional information is provided in Appendices as follows:

Appendix A-1 - History of WRR RCRA Licensing Activities

Appendix A-2 - Household Hazardous Waste

Appendix A-3 - Non Hazardous Waste Operations at WRR

Appendix A-4 - Local Approval Requests and Responses

Appendix A-5 - Public Meeting Notice

Appendix A-6 - Professional Engineed Certification for FPOR and Containment

Part 1
Section A – General Requirements

Appendix A-1
History of WRR RCRA Licensing Activities

WRR was initially issued a hazardous waste license on September 30, 1988. That operating license was effective for ten years. In September 1998 WRR submitted a renewal FPOR application. On August 14, 2003 the WDNR issued a conditional approval to WRR for the operation of a treatment and storage facility. A copy of this document follows this history of the licensing activities. Hazardous waste operating licenses were issued to WRR with effective dates of October 22, 2003.

Since 2003 there have been several plan modification approvals issued to WRR. A copy of each of the following modifications approvals follows the 2003 approval.

Date	Description of Plan Modification
January 15, 2004	Modification of waste codes and aisle space requirements, and correction of typographical errors on Part A of 2003 approval.
July 20, 2005	Modification by WRR of a point of contact, addition of water reactive and cyanide containing wastewater storage with waste code D003 in containers, and eliminate schedule to change out hazardous waste storage tanks.
January 7, 2008	Modification to replace hazardous waste storage tanks in the E-II South Sludge Tank Farm as a result of a June 22, 2007 fire.
November 5, 2008	Modification to close the ash containment building, modify manifesting procedures for rail shipments, replace the E-II Warehouse and the Fuels Buildings, revise the contingency plan, and modify tank locations in the E-II South Sludge Tank Farm.
February 18, 2009	Modification pertaining to aisle space issues and to change the location for storage of D003 hazardous waste.
February 4, 2010	Conditional approval of a six-month temporary authorization to commence startup testing of hazardous waste treatment in the high viscosity processing system (HVPS).
June 17, 2010	Approval of an extension for an additional six-month temporary authorization to continue testing of hazardous waste treatment in the HVPS.
January 10, 2011	Modification to treat waste in the miscellaneous HVPS.
October 14, 2011	Addition of waste code F034.
February 2, 2012	Omitting CC-1 and using CC-7 to control emissions from hydropulper.
February 14, 2012	Modifications to the container storage sheds.
June 6, 2012	Modification of Procedure T analysis for Fuels Building with the enlargement of the south wall damper.
August 6, 2012	New pipe and pump for the transfer of hazardous waste from Tank R to the tanker pit in the E-II Warehouse Building.
September 4, 2012	Upgrade of nitrogen supply line to hydropulper.
January 7, 2013	New piping to convey hazardous waste from E-I thin film to tanker truck, and from Tank FF to tanker dock area south of E-I Tank Farm.
February 20, 2013	Installation of a second pump and piping to transfer hazardous waste semisolids from containers into the hydropulper.
May 6, 2013	Relocation of carbon canisters CC-2 and CC-3 away from the north exterior wall of the Fuels Building to the west of the building.
October 7, 2013	Installation of a barrel de-header in the Fuels Building for opening hazardous waste drums. As of December 18, 2013 this equipment has not yet been installed, and thus is not shown on Figure 2J-2 HVPS.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Scott Humrickhouse, Regional Director

West Central Region Headquarters
1300 W. Clairemont Avenue
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August 14, 2003

Mr. Steven Stokke, VP Operations Support
WRR Environmental Services, Co., Inc.
5200 State Road 93
Eau Claire, WI 54701

HW/LIC
WID 990 829 475
FID 618 026 530
Eau Claire Co.

Subject: Hazardous Waste License Renewal: Determination to Approve a Feasibility Report and Plan of Operation Report for a Treatment and Storage Facility at WRR Environmental Services, Co., Inc., EPA ID # WID 990 829 475

Dear Mr. Stokke:

The Department has reviewed the Feasibility and Plan of Operation Report prepared by WRR Environmental Services, Co., Inc. (WRR) for the re-issuance of hazardous waste storage and treatment licenses. A preliminary determination to approve the report was issued by the Department on May 6, 2003. The Department has considered the comments received and a final approval of the feasibility and plan of operation report is enclosed. In addition, this letter confirms that the Department has determined that no environmental impact statement is required, the wetlands water quality standards of ch. NR 103, Wis. Adm. Code have been met and the needs requirements of s. 289.28, Stats. have been met.

On July 2, 2003, the Department received WRR's comments on Condition # 28 and Condition #33 of the Notice of Completeness and Preliminary Determination. Condition #28 limited the rotary drum vacuum filter (RDVF) unit to treatment of wastes carrying the waste codes K048, K049, K051, and K052. WRR commented that it is not necessary to limit the unit to treatment of specific waste streams. Review of the FPOR, section D-5, indicates that this unit can be used to high solids aqueous waste streams. The K-listed waste streams are listed as examples. A category of "other oily waste streams" is also listed. After considering this information, the Department agrees that limiting the use of this unit to specific waste streams is unnecessary and has modified Condition #28. A general description of "high solid aqueous" wastes will be used to describe the wastes that can be treated in this unit. Condition #33 required WRR to further define the degree and extent of contamination adjacent to Lowe's Creek, and install permanent monitoring wells. WRR commented that this condition was unnecessary as they continue to follow the September 2001 Action Plan approved as part of their Corrective Action program. After several discussions between WRR, US Environmental Protection Agency, and Department staff, it was determined that permanent monitoring wells, as defined in s. NR 141, Wis. Adm. Code, will need to be installed. Specifics on well locations have yet to be determined, and will be based on groundwater modeling results that should be available in September. The Department is including the language in the preliminary determination condition #33 as a condition of license issuance.

Currently, WRR has provided adequate proof of financial responsibility for closure in the amount of \$574,756.02.

Based on a review of the material submitted, it is the Department's determination that WRR provides for satisfactory hazardous waste treatment and storage, provided the facility complies with the Feasibility and Plan of Operation Report, the conditions of the approval and chapters NR 600 through 685, Wis. Adm. Code. Note that the Department retains the jurisdiction to either require the submittal of additional information or to modify this approval at any time if, in the Department's opinion, conditions warrant further modifications.

Please submit a complete hazardous waste operating license application within 30 days of the date of this letter. Section seven of the application requires annual operating license fees to be submitted along with the application. WRR has already paid annual operating license fees for license #3161 (commercial tank storage) and license # 6005 (commercial container storage) for 2003-2004. No additional fees will be required to re-issue these licenses. In addition to re-issuing the tank and container storage licenses, the Department intends on issuing three new operating licenses to WRR for storage in a containment building (ash storage building), treatment in tanks (fuel blend tanks, rotary drum vacuum filter), and treatment in miscellaneous units (dry cleaning filter reclamation unit, thin film evaporators). Per Table XII, s. NR 680.45, Wis. Adm. Code, the annual operating license fees are \$3,600 for the containment storage building, \$2,400 for treatment tanks, and \$2,400 for miscellaneous treatment units. Please submit fees totaling \$8,400 along with the license application. (Note: The Department intends on issuing these licenses with effective dates of October 1, 2003, or later, so that annual operating license fees will not be due again until next year.)

After the receipt of a complete application the Department will initiate a second 45-day public comment period.

NOTICE OF APPEAL RIGHTS

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

For judicial review of a decision pursuant to ss. 227.52 and 227.53, Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

If you have any questions regarding this determination, please contact Jill Schoen at 715-839-2788, or jill.schoen@dnr.state.wi.us.

Sincerely,



David Lundberg
Regional Waste Management Team Supervisor
West Central Region

cc: Pat Chabot/Dave Kollasch/File Copy - WA/3
Jill Schoen – WCR, Eau Claire
John Gaitskill, U.S. EPA Region 5, DRP-8J, 77 W. Jackson Blvd., Chicago, IL 60604

**BEFORE THE STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES**

**FINAL DETERMINATION
FEASIBILITY AND PLAN OF OPERATION REPORT**

**WRR ENVIRONMENTAL SERVICES, CO., INC.
EAU CLAIRE, WISCONSIN
EPA ID#: WID990829475
FID#: 618026530**

GENERAL FACILITY INFORMATION

Facility Name, Site Operator, and Address:

WRR Environmental Services, Co., Inc.
Mr. James L. Hager
5200 State Road 93
Eau Claire, WI 54701

Business Owner & Site Owner:

Caribou Corporation
5200 State Road 93
Eau Claire, WI 54701
715-834-9624

Facility Location:

Township 26 North, Range 9 West, Section 3, Town of Washington, Eau Claire County

Facility Contacts:

Mr. James L. Hager
President / CEO
5200 State Road 93
Eau Claire, WI 54701
715-834-9624

Consultant:

Ralph Basinski
Tetra Tech NUS, Inc.
661 Anderson Drive
Pittsburgh, PA 15220
412-921-8308

Storage Capacity:

Tank Storage Capacity	437,653 gallons
Container Storage Capacity	259,100 gallons
Containment Building Capacity	80 cubic yards

Treatment Capacities:

Dry Cleaning Filter Solvent Reclamation Unit	1,260 pounds per hour
Thin Film Evaporator (5 units)	4,365 gallons per hour (each)
Process Tanks (2 tanks)	7,500 gallons per day (each)
Rotary Drum Vacuum Filter	12,000 gallons per day

Facility Description:

WRR Environmental Services, Co., Inc. (WRR) provides services in the areas of solvent recycling, wastewater treatment, fuel blending, emergency spill response, remediation, community clean sweeps, and other hazardous waste treatment and storage activities for a variety of hazardous waste and non-hazardous waste generators throughout the Midwest and the Canadian Provinces of Ontario and Manitoba.

The property is located within the Town of Washington, Eau Claire County, Wisconsin, in an area zoned heavy industrial. The site is surrounded by areas zoned for industrial, light industrial, residential and forestry uses.

Hazardous waste is accepted from off-site sources in DOT approved drums, DOT approved totes, gaylord boxes, roll off containers, and bulk tankers. Waste is sampled and analyzed according to WRR's Sampling and Analysis Plan, outlined in the FPOR. This information is used to determine how the waste will be processed, treated or disposed. Waste is stored in containers, tanks or a containment building prior to being recycled, treated, or shipped off-site to another licensed facility. Treatment processes conducted at the facility include solvent distillation and purification, wastewater treatment, dry cleaner filter processing, fuel blending and rotary drum filtration. Waste that is not suitable for recycling is blended to produce fuel or sent off-site for incineration. No disposal takes place onsite.

The following is a description of the types of wastes managed and the hazardous waste treatment and storage units at WRR:

Types of wastes handled at WRR. The hazardous wastes stored and treated at the WRR facility belong to the general category of used chemical solvents, waste oils, wastewater and solid wastes. A complete list of waste codes describing the types of hazardous waste handled at WRR is found in WRR's most recent Hazardous Waste Permit Application, Part A, dated February 13, 2003. WRR does not accept or treat reactive, radioactive or PCB containing wastes.

Storage in Tanks. Hazardous waste and residues from treatment processes are stored in tanks. A total of 45 tanks are licensed storage units. The total quantity of hazardous waste stored in tanks at any one time is administratively limited to 437,653 gallons. These tank units are located within three outdoor tank farms. Concrete diking provides secondary containment to contain at least 100% of the contents of one of the storage tanks and precipitation from a 25-year, 24-hour rain event.

Storage in Containers. WRR has designated 20 areas to store containers of hazardous waste. Each storage area is provided with secondary containment equal to, or greater than, 10% of the containerized hazardous waste stored in that area. Secondary containment is made up of concrete floors and curbing. The surface of the concrete is free of cracks and gaps and has been coated with a protective sealant.

Ash Storage Building. WRR stores hazardous waste ash received from off-site sources in a containment building. The ash is hazardous due to the toxicity characteristic for metals. The ash storage building is a completely enclosed building constructed with a concrete floor and side walls. The maximum waste inventory for the ash storage building is 80 cubic yards.

Dry cleaning filter solvent reclamation unit. The dry cleaning filter solvent reclamation unit is used to remove chlorinated solvents from solid media, such as filters or soil. Solid waste fed into the unit is shredded to reduce size and heated to drive off solvents. Solvent vapors are captured using an oil-vacuum scrubbing system and processed in a thin-film evaporator for further processing into a product or used as a fuel. Other residuals generated from this unit include carbon adsorbent, steel strips and filter paper.

Thin film evaporators. WRR recycles organic hazardous wastes in five thin-film evaporators in distillation units. Organic waste is pumped from storage tanks into the evaporators. The waste is pumped into the evaporator. The evaporator is placed under vacuum and heat is added resulting in the release of vapors. The recovered material may be further purified in fractionation columns and/or a molecular sieve.

Rotary drum vacuum filter. The rotary drum vacuum filter is used for the separation of solids from high solids aqueous waste streams. These waste streams treated in this unit are primarily generated from the petroleum refining industry and include dissolved air filtration sludge (K048), slop oil emulsions solids (K049), API separator sludge (K051) and tank bottom sludge from petroleum refining (K052).

Process Tanks / Fuel Blending Tanks. Waste that is not suitable to be recovered and reused may be processed to generate fuel. Two 1,000-gallon tanks are used to process waste materials into hazardous waste fuels. Hazardous waste received from off-site, and residue from on-site activities, is blended to produce fuels meeting certain specifications. The fuel is pumped from the process tanks to designated, licensed, storage tanks prior to being shipped off-site to be used as a supplemental fuel for cement kilns.

License History

WRR was initially issued a hazardous waste license on September 30, 1988. The initial operating license is effective for 10 years from the date of issuance. Since WRR has chosen to continue operating the hazardous waste storage and treatment facility at 5200 State Road 93, Eau Claire, Wisconsin, they are required by s. NR 680.45(6), Wis. Adm. Code, to submit a FPOR before the application for a new operating license is submitted. An initial FPOR was submitted in September 1998. A subsequent FPOR was submitted in December 2001. In response to the Department's August 9, 2002, incompleteness letter, WRR submitted additional information on February 13, 2003, April 4, 2003, and April 27, 2003. The FPOR submitted by WRR describes how the facility will conduct its operations in compliance with the applicable requirements of chs. NR 600-690, Wis. Adm. Code.

Other Facility Operations and Permits:

WRR is involved in other areas of waste management, including solvent recovery and reclamation,

wastewater treatment, emergency response, remediation and household hazardous waste collection programs.

WRR processes other materials that are not subject to hazardous waste storage licensing because the material is only handled through the 10-day transfer facility operation.

WRR holds several other permits from the Department. Wastewater discharged on-site is regulated per a Wisconsin Pollutant Discharge Elimination permit (permit number 0058718), storm water run-off from the facility is regulated per an Industrial Storm Water Permit (permit number S067857), and air emissions are limited per a Title V air permit. WRR also operates a Wisconsin Certified laboratory, # 618026530.

Closure:

The FPOR includes a detailed closure plan and closure cost estimates. The closure plan covers all hazardous waste management units subject to licensing. The plan includes the removal of the maximum allowable quantity of hazardous waste that can be maintained in storage, and decontamination of all storage and treatment units, surfaces and equipment that may have been in contact with the hazardous waste.

Financial Responsibility:

The total closure cost of the facility, including a 20% contingency, is estimated to be \$574,756.02. The facility is required to maintain a closure insurance policy or other financial assurance mechanism, in compliance with s. NR 685.07, Wis. Adm. Code, to cover the total closure cost cited above or any updated estimate.

The facility maintains a pollution liability insurance policy for sudden environmental releases of \$1,000,000 per occurrence and \$2,000,000 annual aggregate. WRR uses insurance to demonstrate financial responsibility for liability coverage. WRR is required to submit annual updates of the Hazardous Waste Facility Certificate of Liability Insurance.

Facility Air Emissions:

WRR is subject to chs. NR 631, 632 and 633, Wis. Adm. Code, that addresses air emissions from tanks and containers.

The State of Wisconsin is not currently authorized to implement ch. NR 633, Wis. Adm. Code. Federal regulations that are similar to ch. NR 633, Wis. Adm. Code are contained in 40 CFR sections 264.1080 to 264.1091 (subpart CC). A federal permit will not be needed, as WRR has documented that they are eligible for an exemption from subpart CC by certifying that they are in compliance with applicable Clean Air Act regulations.

Corrective Action:

WRR is subject to corrective action requirements in ch. NR 635, Wis. Adm. Code. Wisconsin currently has authority to implement corrective action programs within the state. Condition #32 and #33 address corrective action at this facility.

Needs:

WRR has provided hazardous waste management services to over 1000 clients in Wisconsin, and over 2200 customers throughout the Midwest for over 33 years. WRR processes in excess of 60 million pounds of waste annually through this facility. This includes a full range of materials from recyclable solvents and pesticides to non-hazardous contaminated soils. Presently, there are only two other facilities of this type in the state of Wisconsin, both of which are located in the southern portion of the state.

Wetlands:

The operation of WRR is not in close proximity to, and therefore is not expected to have any effect on wetlands.

Conclusion:

Based on a review of the FPOR submitted for WRR, the facility is in compliance with the applicable requirements of chs. NR 600 to 690, Wis. Adm. Code.

FINDINGS OF FACT

The Department of Natural Resources (Department) finds that:

1. WRR Environmental Services, Co., Inc. (WRR) is a hazardous waste storage and treatment facility located at 5200 Highway 93, Eau Claire, Wisconsin.
2. On March 7, 1988 the Department issued a conditional plan of operation approval allowing the storage of hazardous waste in containers and above ground storage tanks, and the treatment of hazardous waste in an incinerator at WRR.
3. The Department issued a storage and treatment license to WRR on September 23, 1988.
4. On April 24, 1992, the U.S. EPA authorized the State of Wisconsin to implement the RCRA Corrective Action program to address releases from solid waste management units at facilities required to have a hazardous waste operating license.
5. WRR submitted a report entitled "Feasibility Study and Plan of Operation, WRR Environmental Services, Inc., Eau Claire, Wisconsin, EPA ID No. WID990829475" dated September 1998. The Part A hazardous waste permit application, dated September 10, 1998, was submitted as part of the FPOR.
6. The Department issued a notice of incompleteness on the report on February 15, 2001.
7. The FPOR was resubmitted in December 2001, due to WRR's decision to close the hazardous waste incinerator.
8. The Department issued a notice of incompleteness on the report on August 9, 2002. Additional information was requested on March 4, 2003, and April 17, 2003.

9. The United States Environmental Protection Agency issued a letter, dated March 12, 2003, indicating that WRR will not be required to obtain a federal RCRA permit.
10. The following additional submittals were provided by WRR:
 - a. correspondence dated May 2002 to USEPA requesting a regulatory determination related to compliance with 40 CFR Part 265, subpart CC
 - b. correspondence dated July 12, 2002, and December 26, 2002 to USEPA providing information requested by EPA in a June 5, 2002 memo
 - c. response dated February 13, 2003 to the Department's August, 2002 notice of incompleteness
 - d. response dated April 4, 2003, to the Department's March 4, 2003 request for additional information
 - e. response dated April 28, 2003, to the Department's April 17, 2003 request for additional information
 - f. correspondence dated July 2, 2003, to the Department commenting on the Department's preliminary determination to approve the FPOR.
11. The Department considered the materials in the WRR files in the review of this proposal.

CONCLUSIONS OF LAW

1. The Department has promulgated chs. NR 600 through 690, Wis. Adm. Code, establishing minimum requirements for hazardous waste management under the authority of ch. 291, Wis. Stats.
2. The Department has the authority to conditionally approve a feasibility and plan of operation report if the conditions are necessary to comply with chs. NR 600 through 690, Wis. Adm. Code, pursuant to s. 289.30, Wis. Stats.
3. The conditions of approval set forth below are necessary to ensure compliance with chs. NR 600 through 690, Wis. Adm. Code.
4. Pursuant to ch. NR 680, Wis. Adm. Code, the Department has the authority to issue hazardous waste plan approvals and operating licenses.
5. The Department has authority pursuant to s. 291.37, Wis. Stats and s. NR 635.17, Wis. Adm. Code, to require corrective action to address releases from solid waste management units.
6. The Department has the authority to require a response under s. 160.23, Wis. Stats., and s. NR 140.24, Wis. Adm. Code, if a preventive action limit for a substance of health or welfare concern has been attained or exceeded at a point of standards application.
7. The Department has the authority to require a response under s. 160.25, Wis. Stats., and s. NR 140.26, Wis. Adm. Code, if an enforcement standard for a substance of health or welfare concern has been attained or exceeded at a point of standards application.
8. The Department has the authority to require monitoring under ss. NR 600.07, 635.17 and 670.09, Wis. Adm. Code.

DETERMINATION

In accordance with s. 289.28(3), Wis. Stats., the Department has determined there is a need for the facility to store and treat hazardous waste as approved. The Department has further determined that there is no need for an environmental impact report or environmental impact statement for this facility at this time, pursuant to s. 1.11, Stats., and ch. NR 150, Wis. Adm. Code, and that the existing facility conforms with wetlands water quality standards pursuant to ch. NR 103, Wis. Adm. Code.

Based on the Findings of Fact and Conclusions of Law, the Department preliminarily determines that WRR's hazardous waste treatment and storage facility feasibility and plan of operation report is hereby approved subject to compliance with ch. 291 Stats., and chs. NR 600 through NR 690, Wis. Adm. Code, and the following conditions:

CONDITIONS OF APPROVAL

WRR is subject to the following conditions:

1. WRR shall comply with this approval, the provisions of ch. 291, Wis. Stats., all applicable requirements of chs. NR 600 through 690, Wis. Adm. Code, any plan approval and modification thereof and any special order and modification thereof issued by the Department, except as otherwise authorized by the Department under ss. NR 680.50 or NR 680.51, Wis. Adm. Code. In the case of any discrepancies in the approval conditions, the Wisconsin Statutes or the Wisconsin Administrative Code shall take precedence over the FPOR.
2. This approval is specifically for storage and treatment of wastes identified in the most recent PART A application dated February 13, 2003, and to wastes specifically identified in the FPOR.

Note: This approval does not extend to the storage or treatment of unknown or miscellaneous hazardous waste, solid waste, universal waste, or waste oil managed as a hazardous waste. Wastes with similar characteristics or of a similar nature (i.e. listed for a similar reason or similar toxicological properties) can be stored or treated at the facility by receiving written approval from the Department following a plan modification request.

3. WRR may not treat, store, or dispose of hazardous waste in a modified or expanded portion of the facility until WRR has received written approval from the Department.
4. The facility shall be operated in accordance with the applicable general standards contained in s. NR 680.42, Wis. Adm. Code.
5. WRR shall immediately report all spills and discharges of hazardous waste outside of hazardous waste storage secondary containment structures at its facility, and implement any action necessary in accordance with the requirements of s. NR 706.05 and s. NR 630.22(2)(c), Wis. Adm. Code. Releases of hazardous waste or other hazardous substances within secondary containment structures shall be recorded in the facility operating records.

Storage Limitations.

5a. The **total** amount of hazardous waste stored on-site at any one time shall not exceed:

Tank Storage	437,653 gallons
Container Storage	259,100 gallons
Containment Building	80 cubic yards

6. The amount of hazardous waste stored in containers shall be limited to the following areas and quantities:

Building/ Storage Unit	Area and description	Maximum Cap. 55-gallon Drums/ Drum Equivalents	Licensed Cap. (Gallons) or Gallon Equivalents
E-I		2,261	122,815
E-I South		200	11,000
E-II	Area 1: Dock 1 (120 drums) Dock 5 (240 drums)	360	19,800
	Area 2: Off-site Warehouse	420	23,100
	Area 4: Dock 4 Upper Fuel Blend Room	780	42,900
	Area 5: Fuel Blend Storage Room	96	5280
Dock 6	DOT room, 3M staging area Note: this does not include the Dock 6 warehouse area	80	4,400
Barrel Storage Sheds (17 units)	P-1 to P-17	119 each	6,545 each

Note: Container storage area limitations are based on secondary containment capacity.

7. The quantity of hazardous waste stored in tanks at any one time is limited to a maximum of 437,653 gallons. Hazardous waste stored in tanks shall be limited to the following tanks units:

Tank Farm E-I

Tank	Capacity in Gallons
A	17,400
B	15,060
C	1,990
D	1,990
E	9,920
F	6,030
G	10,450
H	2,770
ZZ	17,530
Overflow	300

Tank	Capacity in Gallons
AA	11,960
BB	7,620
CC	2,960
DD	5,440
EE	11,000
FF	13,260
GG	9,930
BBB	1,000

Tank Farm E-II

Tank	Capacity in Gallons
J	11,000
K	9,900
L	13,340
M	5,750
N	13,340
O	10,070
P	9,930
Q	9,930
R	9,930
S	9,930
T	9,560
U	7,930

Tank	Capacity in Gallons
V	13,260
W	13,260
X	13,260
Y	13,260
Z	11,000
HH	6,300
Overflow	300

Tank Farm E-II South

Tank	Capacity in Gallons
QQ	14,770
BF	18,570
TT	14,830
UU	18,130
VV	13,260
WW	14,850
XX	13,260
YY	17,170
Overflow	500

8. The amount of ash stored in the containment building shall not exceed 80 cubic yards. The ash shall not contain free-flowing liquids as defined by the paint filter test, SW846, test method 9095B.
9. Treatment of hazardous waste shall be limited to the following units and capacities:
- | | |
|--|-------------------------------|
| Dry Cleaning Filter Solvent Reclamation Unit | 1,260 pounds per hour |
| Thin Film Evaporator (5 units) | 4,364 gallons per hour (each) |
| Process Tanks – Fuel Blend Tanks JJ & KK | 7,500 gallons per day (each) |
| Process Tank - Rotary Drum Vacuum Filter | 12,000 gallons per day |

Waste Analysis

10. WRR shall monitor and analyze the hazardous waste in accordance with the procedures described in the latest waste analysis plan.
11. At a minimum, all hazardous waste handlers who are taking waste samples shall be trained in proper U.S. EPA waste handling and sampling procedures such as those set forth in Exhibit C-3, Table 3 of the FPOR.

Containers

12. The total storage capacity for containers exceed the licensed capacity identified in the FPOR. WRR shall administratively limit the quantity of waste stored on-site in containers to a maximum of 259,100 gallons at any one time. Information related to the amount of waste on-site at any given time shall be recorded as part of the facility operating record.
13. Hazardous waste shall only be stored in licensed storage areas. The hazardous waste storage areas shall be clearly marked and shall be clearly delineated from transfer areas.
14. Temporary storage of hazardous waste being staged for off-site transport in unlicensed areas is limited to 24 hours.
15. The total quantity of materials, including hazardous waste, non-hazardous waste, and products stored within a licensed storage area, shall not exceed the total licensed storage capacity for that area.
16. Non-hazardous waste and products stored in licensed container storage areas must be compatible with the hazardous waste being stored.
17. Adequate aisle space in the container storage areas must be maintained to allow unobstructed movement of personnel, fire protection equipment and decontamination equipment in event of an emergency. At least 2 feet of aisle space, or aisle space equal to the width of a 55-gallon drum, must be maintained.
18. Container labels shall be visible for inspection on each container.
19. Hazardous waste shall only be stored in containers meeting U.S. DOT specifications, in accordance with the FPOR.
20. Hazardous waste stored in the E-I South storage building shall not contain free-flowing liquid, as defined by the paint filter tests, SW846 method 9095B.
- 20a. No hazardous waste shall be stored in the Dock # 6 Loading Dock Area / Warehouse until a statement certifying that the secondary containment in this area meets applicable standards in s. 640.13, Wis. Adm. Code is provided to the Department.

Tank Storage

21. The total tank storage capacity exceeds the licensed capacity identified in the FPOR. WRR shall administratively limit the quantity of waste stored on-site in tanks to a maximum of 459,100 gallons at any one time. Information related to the amount of waste on-site at any given time shall be recorded as part of the facility operating record.
22. WRR shall replace hazardous waste storage and process tanks on a schedule defined in Table D-4 of the FPOR.

Containment Building

23. The containment building shall be operated in a way to eliminate tracking of the ash outside of the building.

24. Waste stored in the containment building shall not contain free-flowing liquid, as defined by the paint filter test, SW846 method 9095B.
25. The height of the waste stored within the containment building shall not exceed the height of the concrete side walls.

Treatment Units

26. Hazardous waste treated in the dry cleaning filter recycling unit shall be limited to organic contaminated wastes.
27. The dry cleaning filter recycling unit shall be located on sealed concrete or other impervious surface that is free of gaps, and cracks.
28. Hazardous waste treated in the rotary drum vacuum filter shall be limited to high solids aqueous wastes. Note: Examples of waste treated in this unit include oily wastes, and waste streams from the petroleum refining industry, such as wastes carrying the following codes: K048, K049, K051, and K052.
29. The thin film evaporators will be operated in compliance with WRR's most recent Title V Air Permit and applicable modifications.

Secondary Containment

30. WRR shall ensure that all secondary containment structures identified in Table D-2 of the FPOR meet the applicable performance standards in ss. NR 645.09 (4), (5), (6), and (7) and 640.13, Wis. Adm. Code. At a minimum, the containment structures must be certified to meet the minimal standards set forth in ss. NR 645.09 and 640.13, including:
 - designed to be capable of detecting and collecting releases and accumulated liquid,
 - sloped or designed to drain and remove liquids resulting from leaks and spills,
 - designed with the appropriate secondary containment capacity,
 - constructed with chemical resistant water stops in all joints,
 - free of gaps and cracks, and
 - provided with an impermeable interior coating.

A certification statement must be maintained as part of the facility operating record.

Air Emissions

31. WRR shall comply with the conditions outlined in the Title V operating permit issued by the Department on December 19, 2000.

Note: As allowed in s. NR 632.09(13), Wis Adm, Code, WRR has elected to comply with the requirements within the December 19, 2000, Title V permit issued by the Department, to meet compliance with the requirements in ch. NR 632.

Corrective Action

32. WRR shall, by September 1, 2004, update and revise the document titled "Evaluation of Supplemental Corrective Measures and Plan of Activities" and provide this to the Department. This document shall be updated and revised no less frequently than every third year thereafter until the corrective actions are complete. The purpose of this document will continue to be to:

- a. summarize proposed activities to evaluate the effectiveness of the existing remediation efforts,
 - b. discuss alternative remedial technologies and possible enhancements to the existing remedial efforts,
 - c. propose long term supplemental corrective measure goals, and
 - d. recommend supplemental corrective measures and implementation schedules.
33. WRR shall, within 90 days of the date of this approval, provide to the Department a plan for further defining the degree and extent of contamination adjacent to Lowes Creek. This shall include a proposal for permanent groundwater monitoring wells and a sampling plan with parameters to be sampled and sampling frequency.

Administrative

34. A copy of this determination must be kept on-site with the most recent FPOR, the operating license, and all plan modifications, as part of the facility operating record.
35. A closure insurance policy or other financial assurance mechanism, in compliance with s. NR 685.07, Wis. Adm. Code, shall be maintained to cover the total closure cost of \$574,756.02, or any updated estimate.

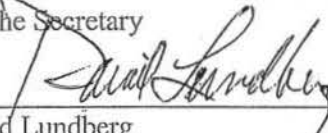
NOTICE OF APPEAL RIGHTS

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

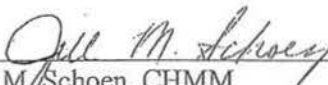
For judicial review of a decision pursuant to ss. 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed or otherwise served by the Department to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as respondent.

Dated: 8/14/03

Department of Natural Resources
For the Secretary



 David Lundberg
 Waste Management Team Supervisor
 West Central Region



 Jill M. Schoen, CHMM
 Waste Management Specialist
 West Central Region

cc: Pat Chabot – WA/3
Kollash/Central Files – WA/3

John Gaitskill– US EPA Region V
Joe Traynor - WCR



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Scott Humrickhouse, Regional Director

West Central Region Headquarters
1300 W. Clairemont Avenue
PO Box 4001
Eau Claire, Wisconsin 54702-4001
Telephone 715-839-3700
FAX 715-839-6076
TTY Access via relay - 711

January 13, 2004

WRR Environmental Services, Co., Inc.
Attn. Steve Stokke, VP Operations Support
5200 State Road 93
Eau Claire, WI 54701

HW/CME
WID990829475
FID #618026530
Eau Claire County

SUBJECT: Plan Modification, WRR Environmental Services, Co. Inc.
EPA ID # WID990829475
License #3161 (tank storage), #6005 (container storage), #4303
(containment building), #4304 (tank treatment), #4305 (treatment in
miscellaneous units)

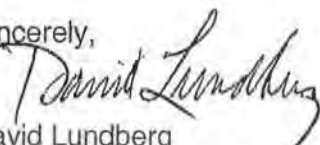
Dear Mr. Stokke:

The Department has reviewed WRR Environmental Services' (WRR) requests to modify the Feasibility and Plan of Operation Report, approved by the Department on August 14, 2003. These modifications were requested in letters to the Department dated October 31, 2003, December 10, 2003, and a revised Part A application dated November 18, 2003. The requested modifications include clarifying the applicability FPOR conditions #17 & #18 (required aisle space and visible labels in storage areas), and correcting typographical errors on the Part A application associated with waste codes F027, F037 and D035.

In order to incorporate these requested changes, the Department is issuing a license and plan modification determination. This letter serves notice that the Department has completed its review of the requests and is issuing a preliminary determination at this time.

You may submit written comments to the department regarding this preliminary determination within 10 business days of the date of this letter. A final determination may be issued thereafter based on comments we receive. If no written comments are received by the end of the comment period, then the preliminary determination will become a final determination. This plan modification must be kept with the feasibility and plan of operation report determination, the operating license, and all other plan modifications.

Sincerely,


David Lundberg
Waste Management Team Supervisor
West Central Region

c: WCR Casefile (J. Schoen)

Pat Chabot - WA/3

Preliminary and Final Determination

Findings of Fact

The Department of Natural Resources (Department) finds that:

1. WRR Environmental Services, Co., Inc. (WRR), owns and operates a hazardous waste storage and treatment facility located at 5200 State Road 93, Eau Claire, Wisconsin.
2. A conditional approval of the Feasibility and Plan of Operation Report (FPOR) for the storage and treatment operations was issued to WRR by the Department on August 14, 2003.
3. Hazardous waste operating licenses for the storage and treatment operations were issued by the Department with effective dates of October 22, 2003.
4. On October 31, 2003, WRR provided an updated Hazardous Waste Permit Application Part A to the Department to correct a typographical error. The revised Section XIV, Description of Wastes, corrected the process codes for hazardous waste numbers F037 and F027.
5. In an August 21, 1990 letter to USEPA, WRR requested a permit modification to include additional waste codes, including D035, to the list of acceptable wastes, as required to comply with the Toxicity Characteristic Rule. Addition of this waste code did not represent a change in process and was similar to waste codes already approved.
6. A revised Hazardous Waste Permit Application, Part A, dated November 18, 2003, was submitted adding the waste code D035, methyl ethyl ketone, which had been unintentionally omitted from the most recent Part A application approved by the Department.
7. On December 10, 2003, the Department received a request to modify Condition #17 of WRR's FPOR. The request asks the Department to modify the 2ft. aisle space requirement for the 17 container storage sheds, P-1 to P-17.
8. In a May 5, 1995 memo from the Department to George Anderson, WRR, the Department acknowledged that WRR had adequately demonstrated that aisle space was not needed in the storage sheds for emergency response purposes.
9. The correction of the typographical errors, addition of waste code similar to approved waste codes, and the clarification of the applicability of an administrative condition are Class 1 general plan of operation provisions, administrative and informational changes as defined in s. NR 680, Wis. Adm. Code, Appendix I.

CONCLUSIONS OF LAW

The Department concludes that:

1. The Department has promulgated chs. NR 600 through 690, Wis. Adm. Code, establishing minimum requirements for hazardous waste management under the authority of ch. 291, Stats.
2. In accordance with s. NR 680.07, Wis. Adm. Code, the Department concludes that the requested modifications require a class 1 license and plan modification.
3. Pursuant to s. 289.30(6), Stats. and s. NR 680.07(1), Wis. Adm. Code, the Department has the authority to approve a class 1 modification to a license and plan of operation.
4. The conditions of approval set forth below are necessary to ensure compliance with chs. NR 600 through 690, Wis. Adm. Code.

PRELIMINARY DETERMINATION

Based on the Findings of Fact and Conclusions of Law, the Department preliminarily determines that WRR's requests to modify the FPOR to correct typographical errors on the Part A application related to process codes for waste codes F027 and F037, add waste code D035 to list of wastes accepted, and modify the applicability of conditions #17 and #18 of the August 14, 2003 FPOR approval are approvable subject to compliance with ch. 291, Stats., chs. NR 600 through NR 690, Wis. Adm. Code and the following conditions:

1. A minimum of two feet of aisle space must be maintained in the following container storage areas to allow unobstructed movement of personnel, fire protection equipment and decontamination equipment in the event of an emergency: E-I, E-I South, E-II, and Dock 6.
2. Container labels shall be visible for inspection in the following container storage areas: E-I, E-I South, E-II, and Dock 6.
3. Container storage sheds, P-1 to P-17, shall remain accessible on two sides.
4. Upon request by the Department, containers stored within the storage sheds, P-1 to P-17, shall be moved as needed to provide adequate aisle space to access all containers and view container labels.
5. Upon request by the Department, WRR will provide an inventory of all containers stored in storage sheds P-1 to P-17, including the quantity of waste in each storage shed, and the length of time that the containers have been on-site.

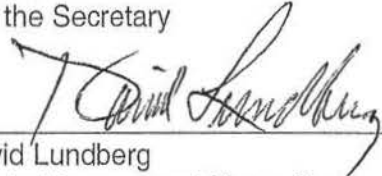
NOTICE OF APPEAL RIGHTS

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

For judicial review of a decision pursuant to ss. 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed or otherwise served by the Department to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as respondent.

Dated: 15 Jan. 2004

Department of Natural Resources
For the Secretary



David Lundberg
Waste Management Team Supervisor
West Central Region



Jill M. Schoen, CHMM
Waste Management Specialist
West Central Region

cc: Pat Chabot – WA/3
John Gaitskill – US EPA Region V



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
 Scott Hassett, Secretary
 Scott Humrickhouse, Regional Director

West Central Region Headquarters
 1300 W. Clairemont Avenue
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 Eau Claire, Wisconsin 54702-4001
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 TTY Access via relay - 711

July 20, 2005

WRR Environmental Services, Co., Inc.
 Attn. Steve Stokke, VP Operations Support
 5200 State Road 93
 Eau Claire, WI 54701

HW/LIC
 WID990829475
 FID #618026530
 Eau Claire County

SUBJECT: Final Determination to Approve Modifications to the Feasibility and Plan of Operation Report Approval for WRR Environmental Services Co., Inc., EPA ID# WID990829475, License # 6005, # 3161, #4303, #4304, and # 4305

Dear Mr. Stokke:

The Waste Management Program of the West Central Region of the Department of Natural Resources has reviewed WRR Environmental Services Co., Inc.'s requests to: update the Part A application to designate Mr. Steven P. Stokke as the facility point of contact, add water reactive and cyanide containing wastewater carrying the waste code D003 to the list of wastes accepted by WRR for container storage, and eliminate a non-required schedule to change out hazardous waste storage tanks. A preliminary determination to approve the requests was issued on May 16, 2005. The final determination to approve the request is attached.

Following the Department's preliminary determination, a legal notice was published in the Wisconsin State Journal and the Eau Claire Leader Telegram and a radio broadcast was made on May 25, 2005 to notify the public and allow the opportunity for public input. No public comments were received on the Preliminary Determination.

The attached final determination should be kept with the Feasibility and Plan of Operation Report Approval, the operating license and all applicable plan modifications for the licensed facility.

If you have any questions regarding this matter, please contact me at (715) 839-2788 or jill.schoen@dnr.state.wi.us.

Sincerely,

Jill Schoen
 Jill Schoen, CHMM
 Waste Management Specialist
 West Central Region

cc: Pat Chabot/Dave Kollasch - WA/3

John Gaitskill, U.S. EPA

BEFORE THE STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

FINAL DETERMINATION

FEASIBILITY AND PLAN OF OPERATION REPORT
MODIFICATIONS

WRR Environmental Services Company, Inc.

EPA ID# WID990829475

FID # 618026530

License # 6005 (container storage), # 3161 (tank storage), #4303 (containment building), #4304 (tank treatment), # 4305 (miscellaneous unit)

FINDINGS OF FACT

The Department of Natural Resources (Department) finds that:

1. WRR Environmental Services Co., Inc. (WRR), owns and operates a hazardous waste storage and treatment facility located at 5200 State Road 93, Eau Claire, Wisconsin.
2. A conditional approval of the Feasibility and Plan of Operation Report (FPOR) for the storage and treatment operations was issued to WRR by the Department on August 14, 2003.
3. Hazardous waste operating licenses for the storage and treatment operations were issued by the Department with effective dates of October 22, 2003.
4. On January 13, 2004 the Department approved a plan modification to clarify the applicability of FPOR conditions #17 & #18 (required aisle space and visible labels in storage areas) and to correct typographical errors on the Part A application associated with waste codes F027, F037 and D035.
5. On March 16, 2005 the Department received a request to modify WRR's FPOR by updating the Part A application to designate Mr. Steven P. Stokke as the facility point of contact and to add the waste code D003 to the list of wastes acceptable for storage.
6. On April 7, 2005 the Department received a request to eliminate Table D-4, a schedule for replacing hazardous waste storage tanks, from the FPOR and the associated condition # 22.
7. WRR has determined that a specific tank schedule may inadvertently hinder operational effectiveness by requiring tank replacement based on a specified date rather than replacing tanks based on the need as determined by annual tank assessments. A mandatory tank change out schedule is not required per ch. NR 645, Wis. Adm. Code, as all hazardous waste storage tanks at WRR are currently equipped with secondary containment. As such, removing the schedule from the FPOR, and Condition # 22 from the approval, is a Class 1 modification as defined in s. NR 680.07(1), Wis. Adm. Code.
8. Updating the Part A application to change the designated facility contact person is a Class 1 informational change as defined in s. NR 680, Wis. Adm. Code, Appendix I.
9. Storage of different types of wastes in containers that do not require additional management

WRR Environmental Services Co., Inc. - Class 2 Plan Modification

2

practices from those authorized in the license is defined as a Class 2 modification per s. NR 680.07(2), Wis. Adm. Code and Appendix I.

10. The following additional submittal was provided by WRR to the Department:

- a. May 3, 2005 letter from WRR explaining the limits on the type of reactive hazardous waste being proposed to be accepted for storage.

CONCLUSIONS OF LAW

The Department concludes that:

1. The Department has promulgated chs. NR 600 through 690, Wis. Adm. Code, establishing minimum requirements for hazardous waste management under the authority of ch. 291, Stats.
2. Pursuant to s. 289.30(6), Stats. and s. NR 680.07(1) and (2), Wis. Adm. Code, the Department has the authority to approve a class 1 and class 2 modification to a license and plan of operation.
3. The conditions of approval set forth below are necessary to ensure compliance with chs. NR 600 through 690, Wis. Adm. Code.
4. The Department has promulgated ch. NR 103, Wis. Adm. Code to preserve and protect the water quality of wetlands.
5. Pursuant to s. 289.30(6), Stats. and s. NR 680.07(1) and (2), Wis. Adm. Code, the Department has the authority to issue the following class 1 and class 2 modification approval.

FINAL DETERMINATION AND CONDITIONS OF ISSUANCE

Based on the Findings of Fact and Conclusions of Law, the Department approves WRR's requests to designate a new facility contact person, add certain wastes carrying the waste code D003 to the list of wastes acceptable for storage in containers, and to eliminate the tank replacement schedule, subject to compliance with ch. 291, Stats., chs. NR 600 through NR 690, Wis. Adm. Code, and the most recent plan of operation approval, and the conditions set forth below:

1. The approval to store D003 reactive hazardous waste in containers is limited to waste classified as water reactive or cyanide containing hazardous waste.
2. WRR is prohibited from storing reactive waste that is capable of detonation or explosive reaction if subjected to a strong initiation source or if heated under confinement, readily capable of detonation or explosive decomposition or reaction at a temperature of 25 C and a pressure of one atmosphere, is a forbidden explosive as defined in 49 CFR 173.51, or a Class A explosive as defined in 49 CFR 173.53, or a Class B explosive as defined in 49 CFR 173.88.
3. Reactive hazardous waste will be stored in original, Department of Transportation approved shipping containers.
4. Reactive hazardous waste shall be segregated from other types of potentially incompatible hazardous waste.

WRR Environmental Services Co., Inc. - Class 2 Plan Modification

3

5. Storage Shed #10 shall be used to store reactive hazardous waste. The storage shed shall be conspicuously marked or posted to indicate the type of waste being stored.
6. Prior to installation of new tank systems, WRR will submit to the Department a written assessment, reviewed and certified by an independent, qualified registered professional engineer, attesting that the tank system has sufficient structural integrity and is acceptable for storing or treating hazardous waste. The assessment shall show that the foundation, structural support, seams, connections and pressure controls, if applicable, are adequately designed and that the tank system has sufficient structural strength, compatibility with the waste to be stored and treated and corrosion protection to ensure that it will not collapse, rupture or fail. The assessment shall include the items listed in s. NR 645.08(1)(a) to (e), Wis. Adm. Code.

The department has the right to modify this determination 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 may be expressly provided below, no other terms or conditions of the feasibility and plan of operation approval or license, or any subsequent modifications thereto, are affected by this determination.

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.

Dated: July 20, 2005

Department of Natural Resources
For the Secretary

David Lundberg
David Lundberg
Waste Management Team Supervisor
West Central Region

Jill M. Schoen
Jill M. Schoen, CHMM
Waste Management Specialist
West Central Region

cc: Pat Chabot - WA/3
John Gaitskill - US EPA Region V



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
Scott Humrickhouse, Regional Director

West Central Region Headquarters
1300 W. Clairemont Avenue
PO Box 4001
Eau Claire, Wisconsin 54702-4001
Telephone 715-839-3700
FAX 715-839-6076
TTY Access via relay - 711

January 7, 2008

WRR Environmental Services, Co., Inc.
Mr. Jan Smit, Compliance Director
5200 Ryder Road
Eau Claire, WI 54701

HW/LIC
WID990829475
FID #618026530
Eau Claire County

SUBJECT: License Modification Determination to Replace Hazardous Waste Storage Tanks at WRR Environmental Services Co., Inc., EPA ID# WID990829475

Dear Mr. Smit:

The Department has completed the review of the license modification request to replace hazardous waste storage tanks, submitted on October 31, 2007.

All of the tanks, including 18 licensed hazardous waste storage tanks, and an overflow tank, located in the E-II sludge tank farm, were damaged or destroyed in a June 22, 2007, facility fire. WRR has proposed to replace 15 of the 18 hazardous waste storage tanks. Tanks identified as J, K, L, M, N, O, Q, R, S, V, W, X, Y, Z and HH will be replaced. Previously licensed tanks P, T, U will not be replaced. The gross storage capacity of the E-II sludge tank farm has decreased from a pre-fire capacity of 187,520 gallons to 167,450 gallons. The total facility hazardous waste tank storage capacity remains administratively limited to 437,653 gallons.

Based on review of the modification request, and the additional information submitted, the Department has determined that the tank replacements, as proposed, meet the regulatory criteria for a Class 1 license modification, and is approving a modification to the hazardous waste tank storage license to allow WRR Environmental Services, Co., Inc., to replace tanks within the E-II sludge tank farm, as provided in the attached conditional approval.

This license modification must be kept with the feasibility and plan of operation report conditional approval determination and the operating license.

If you have any questions or concerns, please contact Jill Schoen at 715-839-2788 or jill.schoen@wisconsin.gov.

Sincerely,


David Lundberg
Waste and Materials Management Program Supervisor
West Central Region

cc: Pat Chabot/Dave Kollasch - WA/3
Dale Meyer- U.S. EPA Region 5, 77 West Jackson Blvd., Chicago, IL
WCR File

**CLASS 1 LICENSE MODIFICATION
TANK REPLACEMENTS**

WRR ENVIRONMENTAL SERVICES CO., INC.

EPA ID# WID990829475

FID# 618026530

GENERAL FACILITY INFORMATION

Facility Name, Site Operator, and Address:

WRR Environmental Services, Co., Inc.
Mr. James L. Hager
5200 Ryder Road
Eau Claire, WI 54701

Business Owner & Site Owner:

Caribou Corporation
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Facility Location:

Township 26 North, Range 9 West, Section 3, Town of Washington, Eau Claire County

Facility Contacts:

Mr. Jim Hager
President / CEO
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Mr. Jan Smit
Compliance Director
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

FACILITY DESCRIPTION

Facility Description:

WRR Environmental Services, Co., Inc. (WRR) provides services in the areas of solvent recycling, wastewater treatment, fuel blending, emergency spill response, remediation, community clean sweeps, and other hazardous waste treatment and storage activities for a variety of hazardous waste and non-hazardous waste generators.

Hazardous waste accepted from off-site sources is sampled and analyzed according to WRR's Sampling and Analysis Plan, outlined in the 2003 approved Feasibility and Plan of Operation Report (FPOR.) This information is used to determine how the waste will be processed, treated or disposed. Waste is stored in containers, or tanks prior to being recycled, treated, or shipped off-site to another licensed facility. Treatment processes conducted at the facility include solvent distillation and purification, wastewater treatment, dry cleaner filter processing, fuel blending and rotary drum filtration. Waste that is not suitable for recycling is blended to produce fuel or sent off-site for incineration. No disposal takes place onsite.

The hazardous wastes stored and treated at the WRR facility belong to the general category of used chemical solvents, waste oils, wastewater and solid wastes. A complete list of waste codes describing the types of hazardous waste handled at WRR is found in WRR's most recent Hazardous Waste Permit Application, Part A, dated December 4, 2007. WRR does not accept or treat radioactive or PCB containing wastes.

Hazardous waste and residues from treatment processes are stored in tanks. The total quantity of hazardous waste stored in tanks at any one time is administratively limited to 437,653 gallons. The tanks are located within three outdoor tank farms. Tanks located in the E-II Sludge Tank Farm were destroyed in a fire on June 22, 2007. Fifteen of the eighteen storage tanks and an overflow tank will be replaced within the E-II Sludge Tank Farm, for a facility total of 43 tank units, including 40 storage tanks and 3 over flow tanks.

FINDINGS OF FACT

The Wisconsin Department of Natural Resources finds that:

1. WRR owns and operates a hazardous waste container storage, tank storage and treatment facility located at 5200 Ryder Road, Eau Claire, Eau Claire County, Wisconsin.
2. A conditional approval of a Feasibility and Plan of Operation Report (FPOR) for the storage and treatment operations was issued to WRR by the Department on August 14, 2003.
3. Hazardous waste operating licenses for the storage and treatment operations were issued by the Department with effective dates of October 22, 2003. The licenses allow WRR to store hazardous waste in designated container storage areas, 3 tank farms and a containment building, and to treat hazardous waste in 5 thin film evaporators, 2 fuel blend dispersers, a rotary drum vacuum filter and a dry cleaning filter solvent reclamation unit.
4. On June 22, 2007, a fire at WRR destroyed or damaged portions of the facility. Storage tanks located within the E-II sludge tank farm were destroyed or damaged beyond repair.

Secondary containment for the E-II sludge tank farm was damaged. In addition, the E-II warehouse, including container storage areas and fuel blending disperser tanks, and a containment building were destroyed. Thin film evaporators E-II and E-III were damaged.

5. On August 16, 2007, WRR submitted a letter outlining a proposed plan for replacement of hazardous waste management units, including a draft tank replacement plan for storage tanks located within the E-II sludge tank farm, as a result of the June 22, 2007 fire.
6. On August 29, 2007, the Department responded to WRR's August 16, 2007 letter, indicating that the replacement of the tanks, as proposed, would be considered a Class 2 license modification.
7. On October 1, 2007, WRR submitted a re-designed draft proposal for replacement of storage tanks located within the E-II sludge tank farm and reconstruction of the E-II sludge tank farm secondary containment structure.
8. On October 24, 2007, the Department provided comments on the draft proposal and concurred that the replacement tanks, as proposed, met the same design standard, and had a capacity within +/- 10% of the replacement tanks, meeting the criteria of a Class 1 license modification per Appendix I of Ch. NR 670, Wis. Adm. Code. The Department also concurred that repairing the secondary containment system to the same specifications as previously approved in the FPOR, constitutes a Class 1 license modification.
9. On October 31, 2007, WRR submitted a Class 1 license modification request to replace hazardous waste storage tanks J, K, L, M, N, O, Q, R, S, V, W, X, Y, Z and HH located within the E-II sludge tank farm. The request proposed: constructing replacement tanks meeting the same design standards with capacities within +/- 10% of the replaced tanks, repairing the tank farm's secondary containment system with the same design as originally approved in Department's August 14, 2003, conditional FPOR approval, and a decrease in total E-II sludge tank farm storage capacity.

Within the October 31, 2007, license modification request WRR indicated that hazardous waste storage tanks P, T, and U located within the E-II sludge tank farm would not be replaced. A report titled Waste Management and Sampling Plan, received by the Department on July 12, 2007, addressed procedures for decontamination of hazardous waste storage tanks.

10. The following additional information was submitted by WRR at the request of the Department:
 - A November 26, 2007, e-mail providing information regarding tank standards;
 - a December 4, 2007, e-mail providing information requested by the Department, including an updated Table F-3, Tank Storage Inspection Schedule;
 - an updated Part A Application, dated December 4, 2007, and received on December 5, 2007;
 - a letter dated and received on December 12, 2007, providing updated tank drawings and information regarding tank capacity changes; and
 - a December 21, 2007, e-mail providing updated drawing numbers.

CONCLUSIONS OF LAW

1. On August 1, 2006, the Department 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. 289.31(1), Wis. Stats., and s. NR 670.415, Wis. Adm. Code, to issue a hazardous waste operating license.
3. The Department has authority pursuant to s. NR 670.042(1), Wis. Adm. Code, to approve a Class I license modification request.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, the Department hereby approves the license modification request to replace hazardous waste tanks and repair the secondary containment structure for the E-II sludge tank farm under s. NR 670.042(1), Wis. Adm. Code, and in accordance with the license, the most recent plan of operation approval, modifications, and the conditions set forth below.

The Department reserves the right to modify this determination 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 may be expressly provided below, no other terms or conditions of the feasibility and plan of operation approval or license, or any subsequent modifications thereto, are affected by this determination.

1. WRR shall comply with all conditions of the license, the provisions of chs. 289 and 291, Wis. Stats., all applicable requirements of chs. NR 660 to 679, Wis. Adm. Code, the feasibility and plan of operation approval and all modifications thereof, and any special order or modifications thereto issued by the Department, except as otherwise authorized by the Department under s. NR 670.061 or 670.079, Wis. Adm. Code.
2. The quantity of hazardous waste stored in tanks at any one time is limited to a maximum of 437,653 gallons. This condition modifies Condition #7 of the August 14, 2003, FPOR approval. Only information associated with hazardous waste storage tanks located within the E-II sludge tank farm has been modified. Hazardous waste stored in tanks shall be limited to the following units:

E-II sludge tank farm (modified per this approval)

Tank	Capacity Gross (gallons)	Capacity Net (gallons)	Location	Year Installed
J	10,730	9,528	E-II	2008
K	10,730	9,528	E-II	2008
L	13,280	12,532	E-II	2008
M	6,180	5,561	E-II	2008
N	13,280	12,532	E-II	2008
O	10,730	9,528	E-II	2008
P	*	*	E-II	*
Q	10,730	9,528	E-II	2008
R	10,730	9,528	E-II	2008
S	10,730	9,528	E-II	2008
T	*	*	E-II	*
U	*	*	E-II	*
V	13,280	12,532	E-II	2008
W	13,280	12,532	E-II	2008
X	13,280	12,532	E-II	2008
Y	13,280	12,532	E-II	2008
Z	10,730	9,528	E-II	2008
HH	6,180	5,561	E-II	2008
Overflow	300	300	E-II	2008

* Removed from service. See Findings of Fact # 9.

EI sludge tank farm (not modified from 2003 FPOR approval)

Tank	Capacity Gross (gallons)	Capacity Net (gallons)	Location	Year Installed
A	17,400	16,930	EI	1979
B	15,060	14,380	EI	1979
C	1,990	1,810	EI	1979
D	1,990	1,840	EI	1995
E	9,920	9,240	EI	1994
F	6,030	5,610	EI	1979
G	10,450	9,920	EI	1995
H	2,770	2,680	EI	1998
ZZ	17,530	16,840	EI	1995
Overflow	300	300	EI	1995
AA	11,960	11,960	EI	1979
BB	7,620	7,620	EI	1979
CC	2,960	2,740	EI	1995
DD	5,440	4,740	EI	1995
EE	11,000	10,260	EI	1997
FF	13,260	12,410	EI	1997
GG	9,930	9,520	EI	1979
BBB	1,000		EI	1979

EI south tank farm (not modified from 2003 FPOR approval)

Tank	Capacity Gross (gallons)	Capacity Net (gallons)	Location	Year Installed
QQ	14,770	13,550	EI South	1980
BF	18,570	17,890	EI South	1980
TT	14,830	14,010	EI South	1980
UU	18,130	17,320	EI South	1980
VV	13,260	12,420	EI South	1997
WW	14,850	14,150	EI South	1980
XX	13,260	12,420	EI South	2000
YY	17,170	16,310	EI South	1980
Overflow	500	500	EI South	1980

4. Within 30 days of installation of the final tank within the E-II sludge tank farm, WRR shall provide the information below.
 - a. A copy of the Wisconsin Department of Commerce Aboveground Liquid Storage Tank Registration (Form ERS-8731), and Checklist for Aboveground Tank Installation (Form ERS-9658) for each tank.
 - b. A copy of construction documentation and certification statements, as required per ss. NR 664.0192(2), (4), (5) and (7), Wis. Adm. Code. This information shall also be kept on file at WRR.
 - c. A certification statement per s. NR 664.1080(2)(g), Wis. Adm. Code that includes reference to all of the tanks that manage hazardous waste and the corresponding applicable Federal and/or State Clean Air Act Regulations that apply and air permit reference, if appropriate.
5. WRR shall keep the following information in their operating record for each licensed hazardous waste tank: tank identifier and location, year installed, dimensions, net and gross capacity, a description of the contents, and the maximum organic vapor pressure limit of contents. This record shall be kept updated and on file for reference.
6. WRR shall design, construct and operate the secondary containment system, in accordance with the detailed design plans referenced in section D-2d of the approved FPOR, and per the requirements stated in s. NR 664.0193, Wis. Adm. Code.
7. Within 7 days after returning the tank system to use, WRR shall provide a certification by an independent, qualified, registered, professional engineer in accordance with s. NR 670.011(4), Wis. Adm. Code, that the repaired secondary containment system is capable of handling hazardous waste without release for the intended life of the system, as required per s. NR 664.0196(6), Wis. Adm. Code.
8. WRR shall follow an inspection schedule and inspect the tank system as required per s. NR 664.0195, Wis. Adm. Code, and as referenced in the Section F-2 and the revised Table F-3 of the FPOR.

9. All ancillary equipment that is not provided with secondary containment, unless exempted per s. NR 664.0193(6), Wis. Adm. Code, must be inspected daily.
10. WRR shall provide the Department with documentation that a notice of this modification was mailed to all persons on the facility mailing list, including all appropriate units of state and local governments, within 90 calendar days of this approval, as required by s. NR 670.042(1)(a)2, Wis. Adm. Code.

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.

Dated: Jan. 7, 2008

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
For the Secretary


Dave Lundberg
Waste and Materials Management Program Supervisor
West Central Region


Jill Schoen, CHMM
Waste Management Specialist
West Central Region



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
Scott Humrickhouse, Regional Director

West Central Region Headquarters
1300 W. Clairemont Avenue
PO Box 4001
Eau Claire, Wisconsin 54702-4001
Telephone 715-839-3700
FAX 715-839-6076
TTY Access via relay - 711

November 5, 2008

WRR Environmental Services, Co., Inc.
Mr. Jan Smit, Compliance Director
5200 Ryder Road
Eau Claire, WI 54701

HW/LIC
WID990829475
FID #618026530
Eau Claire County

SUBJECT: License Modification Determination for WRR Environmental Services Co., Inc.,
EPA ID# WID990829475

Dear Mr. Smit:


The Department has completed the review of the following hazardous waste license modification requests submitted by WRR Environmental Services, Co., Inc. (WRR):

- Close the ash containment building (February 7, 2008 license modification request);
- Modify manifesting procedures for incoming and outgoing shipments destined for the rail yard (February 7, 2008 license modification request);
- Replace the E-II hazardous waste container storage warehouse, Dock 1, 4 and 5, and the Fuels Building, as designated in Drawing D-75 (February 7, 2008 and April 3, 2008, license modification requests);
- Revise the contingency plan (April 17, 2008 license modification request); and
- Modify tank placements within the E-II south sludge tank farm (June 4, 2008 license modification request).

In accordance with the procedures in ss. NR 670.042(1) & (2) Wis. Adm. Code, the Department reviewed the modification requests and determined that they contained the minimum information required and are complete and technically adequate.

The Department's determination is attached. This conditional approval must be kept with the feasibility report and plan of operation determinations, the operating license, and all plan approval and license modifications for the licensed facility. If you have any questions or concerns, please contact Jill Schoen at 715-839-2788 or jill.schoen@wisconsin.gov.

Sincerely,


David Lundberg
Waste and Materials Management Program Supervisor
West Central Region

c: Dale Meyer – US EPA Region 5, 77 West Jackson Blvd, DW-8J, Chicago, IL 6060403507
Sue Brumberg – WCR, Eau Claire
Jill Schoen – WCR, Eau Claire
Pat Chabot – WA/5

CLASS 2 LICENSE MODIFICATION

**WAREHOUSE REPLACEMENT
MANIFEST PROCEDURE MODIFICATION
ASH CONTAINMENT BUILDING CLOSURE
CONTINGENCY PLAN UPDATE**

**WRR ENVIRONMENTAL SERVICES CO., INC.
EPA ID# WID990829475
FID# 618026530**

GENERAL FACILITY INFORMATION

Facility Name, Site Operator, and Address:

WRR Environmental Services Co., Inc.
Mr. James L. Hager
5200 Ryder Road
Eau Claire, WI 54701

Business Owner & Site Owner:

Caribou Corporation
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Facility Location:

Township 26 North, Range 9 West, Section 3, Town of Washington, Eau Claire
County

Facility Contacts:

Mr. Jim Hager
President / CEO
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Mr. Jan Smit
Compliance Director
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

FACILITY DESCRIPTION

WRR Environmental Services, Co., Inc. (WRR) provides services in the areas of solvent recycling, wastewater treatment, fuel blending, emergency spill response, remediation, community clean sweeps, and other hazardous waste treatment and storage activities for a variety of hazardous waste and non-hazardous waste generators.

The hazardous wastes stored and treated at the WRR facility belong to the general category of used chemical solvents, waste oils, wastewater and solid wastes. A complete list of waste codes describing the types of hazardous waste handled at WRR is found in WRR's most recent Hazardous Waste Permit Application, Part A, dated April, 2008. WRR does not accept or treat radioactive or PCB containing wastes.

Waste is stored in containers or tanks prior to being recycled, treated, or shipped off-site to another licensed facility. Treatment processes conducted at the facility include solvent distillation and purification, wastewater treatment, dry cleaning filter processing, fuel blending and rotary drum filtration. Waste that is not suitable for recycling is blended to produce fuel or sent off-site for incineration. No disposal takes place onsite.

Hazardous waste is stored in designated container storage areas located throughout the facility. The total amount of hazardous waste stored on-site in containers is administratively limited to 259,100 gallons.

A fire on June 22, 2007, destroyed or damaged portions of WRR's facility, including the following licensed hazardous waste management storage units: a container storage warehouse designated as the E-II container storage building, thin film evaporators E-II and E-III, fuel blend disperser tanks JJ & KK, E-II tank farm, E-I South container storage building, dry cleaning filter recycling unit, and an ash containment building.

A license modification request to reconstruct the E-II tank farm was conditionally approved by the Department on January 7, 2008.

A portion of the E-II warehouse, designated as the Docks 1, 4 and 5, and a tanker pit have been re-constructed. Per this approval, Docks 1, 4 and 5 have been approved to store up to 910 drum equivalents or 50,050 gallons of hazardous waste. The warehouse is equipped with a 1,500 gallon per minute fire pump and water and foam sprinkler systems. The replacement floors were raised 4-inches and have the same footprint and floor slope as the originally approved warehouse design. Secondary containment is provided by sloped, sealed concrete floors constructed with reinforced concrete curbs or concrete block walls.

An additional container storage area, referred to as the Fuels Building, consists of two secondary containment areas, designated as Area # 5 (lower fuel blend area) & #6 (upper fuel blend area). The maximum storage capacity for Area #6 will be 230 drums equivalents or 12,650 gallons, and the maximum storage capacity for Area #5 will be 96 drum equivalents, or 5,280 gallons. The Fuels Building will be equipped with a fire detection and suppression system similar to the system installed in Docks 1, 4 and 5. Secondary containment will be provided by a sealed concrete floor constructed with a minimum 6 inch high reinforced concrete curb that will surround the warehouse perimeter.

FINDINGS OF FACT

The Wisconsin Department of Natural Resources finds that:

1. WRR Environmental Services owns and operates a hazardous waste container storage, tank storage and treatment facility located at 5200 Ryder Road, Eau Claire, Eau Claire County, Wisconsin.
2. A conditional approval of a Feasibility and Plan of Operation Report (FPOR) for the storage and treatment operations was issued to WRR by the Department on August 14, 2003.
3. Hazardous waste operating licenses for the storage and treatment operations were issued by the Department with effective dates of October 22, 2003.
4. On June 22, 2007, a fire at WRR destroyed or damaged several licensed hazardous waste management units, including the E-II container storage warehouse, the E-II tank farm, E-II and E-III thin film evaporators, and a containment storage building.
5. On October 31, 2007, WRR submitted a license modification request to replace storage tanks located in the E-II south sludge tank farm. The Department issued a conditional license modification approval on January 7, 2008.
6. On December 12, 2007, WRR submitted a Class 1 license modification request to replace thin film evaporators E-II and E-III. On March 3, 2008, WRR requested that the Department withdraw the replacement request. The evaporators are not operational at this time; however, the units are retained under WRR's existing license for future refurbishment or replacement.
7. On February 7, 2008, WRR submitted a Class 1 license modification request to reconstruct E-II container storage warehouse Docks 1, 4 and 5, close the ash containment building, and modify manifesting procedures for rail shipments.
8. On February 14, 2008, the Department toured the newly constructed warehouse and inspected the former ash containment building.
9. On February 20, 2008, the Department issued a letter indicating that changes to the container storage warehouse are a Class 2 license modification. The letter acknowledged that changes to the manifesting procedures and closure of the ash containment building are classified as minor, Class 1 license modifications.
10. On February 20, 2008, WRR submitted a closure certification for the former ash containment building.
11. On April 3, 2008, WRR submitted a Class 2 license modification request to reconstruct the E-II container storage warehouse, consisting of Docks 1, 4 and 5, and a Fuels Building, consisting of two containment areas designated as Containment Area #5 and #6. The request also included a temporary authorization request to use the warehouse until the Department makes a determination regarding the Class 2 license modification.

12. On April 3, 2008, WRR notified persons on the interested parties list that a license modification request to replace portions of the E-II building had been submitted to the Department. The letter also served to notify interested persons of WRR's October 31, 2007, request to replace storage tanks in the E-II south sludge tank farm, and February 7, 2008, request to close the ash containment building and modify manifesting procedures for rail shipments.
13. On April 8, 2008, WRR published a notice informing the public of the license modification request, and offering an opportunity for the public to provide comments. No comments were received during the 45-day comment period.
14. On April 18, 2008, the Department sent a letter to WRR providing comments on the April 3rd license modification request and requesting additional information.
15. On April 23, 2008, WRR held an informational meeting to give the public an opportunity to review the proposed modification and provide comments. No comments were received during the meeting. Only WRR and Department staff were present at the meeting.
16. On April 17, 2008, WRR requested a Class 1 license modification request to update the facility contingency plan.
17. On May 23, 2008, WRR provided an updated description of recently installed fire detection and suppression systems.
18. On June 4, 2008, WRR provided additional information, as requested in the April 18th letter from the Department, and provided information regarding modifications to the placement of tanks located within the E-II south sludge tank farm. WRR also provided information modifying the location of storage tanks located in the E-II sludge tank farm.
19. On July 7, 2008, WRR provided an updated closure cost estimate.
20. On September 23, 2008, WRR submitted additional information including an updated Part A application dated September 18, 2008, revised secondary containment calculations for the fuels building and draft copy of drawing D-75.
21. On October 24, 2008, WRR submitted additional information including a discussion on the status of various licensed units, revised and updated FPOR pages, and photographs of licensed hazardous waste units.

CONCLUSIONS OF LAW

1. On August 1, 2006, the Department 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. 289.31(1), Wis. Stats., and s. NR 670.415, Wis. Adm. Code, to issue a hazardous waste operating license.

3. The Department has authority pursuant to s. 289.30(6), Wis. Stats., and s. NR 670.042(1) Wis. Adm. Code, to approve a Class 1 modification of a license or plan of operation approval.
4. In accordance with s. NR 670.042(1), Wis. Adm. Code, the Department concludes that modifying manifesting procedures and partial closure of a waste management unit, as described in Finding of Fact # 7 and updating the contingency plan, as described in Findings of Fact # 16, and changing the location of tanks located within the E-II sludge tank farm, as described in Findings of Fact #18, require a Class 1 license modification.
5. The Department has authority pursuant to s. 289.30(6), Wis. Stats., and s. NR 670.042(2) Wis. Adm. Code, to approve a Class 2 modification of a license or plan of operation approval.
6. In accordance with ss. NR 670.042(2) and (4), Wis. Adm. Code, the Department concludes that the re-construction of portions of the E-II Building, as described in Finding of Fact # 11 requires a Class 2 license modification.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, the Department hereby conditionally approves the license modification requests to:

- Close the ash containment building (February 7, 2008 license modification request);
- Modify manifesting procedures for incoming and outgoing shipments destined for the rail yard (February 7, 2008 license modification request);
- Replace the E-II hazardous waste container storage warehouse, Dock 1, 4 and 5, and the Fuels Building, as designated in Drawing D-75 (February 7, 2008 and April 3, 2008, license modification requests);
- Revise the contingency plan (April 17, 2008 license modification request); and
- Modify tank placements within the E-II south sludge tank farm (June 4, 2008 license modification request).

The modifications are conditionally approved under ss. NR 670.042(1) Wis. Adm. Codes, and in accordance with the license, the most recent plan of operation approval, modifications, and the conditions set forth as follows:

1. The Department reserves the right to modify this determination 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 may be expressly provided below, no other terms or conditions of the feasibility and plan of operation approval or license, or any subsequent modifications thereto, are affected by this determination.
2. WRR shall comply with all conditions of the license, the provisions of chs. 289 and 291, Wis. Stats., all applicable requirements of chs. NR 660 to 679, Wis. Adm. Code, the feasibility and plan of operation approval and all modifications thereof, and any special order or modifications thereto issued by the Department, except as otherwise authorized by the Department under s. NR 670.061 or 670.079, Wis. Adm. Code.

Future replacements.

3. The following hazardous waste management units have been removed from service:

Unit	Management	Capacity
E-II & E-III thin film evaporators	Treatment	4,364 gallons per hour *
Fuel blend disperser tanks JJ & KK	Treatment	27,000 gallons *
Dry Cleaning Filter Recycling Unit	Treatment	1,260 pounds per hour *
E-I South	Container Storage	200, 55-drum equivalents or 11,000 gallons
Off-site warehouse	Container Storage	420, 55-drum equivalents or 23,100 gallons
RDVF process tank BBB	Tank Storage (associated with RDVF)	1,000 gallons

* Process Design Capacity from Section XII of WRR's Hazardous Waste Permit Application, Part A.

Prior to re-installing, replacing, modifying, or partially closing these hazardous waste management units, WRR shall submit a license modification request, per s. NR 670.042, Wis. Adm. Code, to the Department. The license modification requests shall provide a description of compliance with applicable sections of ch. NR 664, and specific feasibility and plan of operation report information specified in applicable sections of NR 670, Wis. Adm. Code.

Ash Containment Building.

4. The Department now considers the ash containment building, License # 4303, to be closed. The current license will expire on October 1, 2008.

Financial Assurance.

5. Within 30 days of the date of this approval, WRR shall submit an updated financial assurance mechanism, as required per s. NR 664.0143, Wis. Adm. Code, in the amount of \$668,414.98 to Colleen Storck, Wisconsin Department of Natural Resources Bureau of Waste and Materials Management, WA/5, P.O. Box 7921, Madison, WI 53707.
6. WRR shall evaluate closure cost estimates annually by comparing the types and quantities of waste described in WRR's closure cost estimate, Appendix I-1, Item #2.a. and 2.b. of the FPOR to actual inventories to ensure compliance with s. NR 664.0142(1)(a), Wis. Adm. Code. The evaluation results shall be reported to the department at the same time that WRR is required to adjust the closure cost estimate for inflation, or 60 days prior to the anniversary date of the establishment of the chosen financial assurance instrument.

If the estimated quantity and associated waste disposal costs, based on review of actual inventories, exceeds the estimated quantities and associated disposal costs provided in the FPOR, by greater than 10%, WRR shall submit a request a license modification to update the closure cost estimates.

Contingency Plan.

7. WRR shall provide the Department with documentation that a notice of the contingency plan modifications was mailed to all persons on the facility mailing list, including all appropriate units of state and local governments, within 90 calendar days of this approval, as required by NR 670.042(1)(a)2, Wis. Adm. Code.

E-II Sludge Tank Farm.

8. WRR shall provide the Department with documentation that a notice of the modifications to tank locations within the E-II Sludge tank farm was mailed to all persons on the facility mailing list, including all appropriate units of state and local governments, within 90 calendar days of this approval, as required by NR 670.042(1)(a)2, Wis. Adm. Code.

Container Storage.

9. WRR shall store hazardous waste in containers only in the designated licensed container storage areas specified in the FPOR. WRR shall not store hazardous waste in excess of the maximum capacities for each individual container storage area designated in Table D-2 of the FPOR:

Container storage areas modified per this approval.

Container Storage Area	Location	Containment Area	Maximum Storage Capacity (55-gallon drums or drum equivalents)	Maximum Storage Capacity (gallons)
E-II Building	E-II Warehouse (includes Dock 1, 4 & 5)	Containment Area #7	910	50,050
E-II Building	Fuels Building (former upper fuel blend area)	Containment Area # 6	230	12,650
E-II Building	Fuels Building (former lower fuel blend area)	Containment Area # 5	96	5,280

Container storage areas not modified per this approval.

Container Storage Area	Location	Maximum Storage Capacity (55-gallon drums or drum equivalents)	Maximum Storage Capacity (gallons)
E-I	E-I Warehouse	2,261	122,815
Dock 6	DOT room, 3M staging area Note: this does not include the Dock 6 warehouse area	80	4,400
Barrel Storage Sheds (17 units)	P-1 to P-17	119 each	6,545 each

Container storage areas not in service.

Container Storage Area	Location	Maximum Storage Capacity (55-gallon drums or drum equivalents)	Maximum Storage Capacity (gallons)
E-I South	E-I South	200	11,000
Off-site Warehouse	E-II	420	23,100

10. WRR shall ensure that all waste stored within an individual secondary containment system is compatible.
11. Except as provided in a January 13, 2004 conditional license modification approval issued by the Department, WRR shall maintain an aisle space between rows of containers to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of the facility operation in an emergency as needed.
12. All concrete surfaced secondary containment structures shall be maintained to have a base free of cracks or gaps and sealed with a chemically resistant material as needed to maintain an impervious surface.

E-II Warehouse, Docks 1, 4 and 5.

13. WRR shall not store hazardous waste on Docks 1, 4 and 5 until a written statement is submitted to the Department certifying that the facility was constructed in substantial compliance with the approved FPOR, and all applicable container storage standards in ch. NR 664, Sub ch. I.
14. WRR shall not store hazardous waste on Docks 1, 4 and 5 until detailed FPOR drawings illustrating the pump up and piping systems for Docks 1, 4 and 5, including the tanker pit, are submitted to the Department. All technical data and design drawings shall be certified by a registered professional engineer.

15. WRR shall not store hazardous waste on Docks 1, 4 and 5 until the Department has inspected the newly re-constructed warehouse units or waived the construction inspection.

Fuels Building: Upper and Lower Levels.

16. WRR shall not store hazardous waste in the Fuels Building until a written statement is submitted to the Department certifying that the facility was constructed in substantial compliance with the approved FPOR, and all applicable container storage standards in ch. NR 664, Sub ch. I.
17. WRR shall not store hazardous waste in the Fuels Building until the following procedures are completed and written approval is received from the Department:
- a. The proposed hazardous waste storage units shall be constructed in accordance with the approved FPOR, this conditional approval, and container standards stated in ch. NR 664 sub ch. I.
 - b. WRR shall provide the following:
 - information to demonstrate compliance with s. NR 664.0032, Wis. Adm. Code;
 - updated FPOR drawings of the Fuels Building, including drawings illustrating the modifications to the building foot print (D-2, D-2A, D12-A), piping, and pump up systems; and
 - information demonstrating that the storage areas are sloped or otherwise designed and operated to drain and remove liquids resulting from leaks or spills, as required per s. NR 664.0175(2)(b), Wis. Adm. Code.
 - c. WRR shall submit a written statement to the Department certifying that the facility was constructed in substantial compliance with the approved FPOR or subsequent modification approval, as required by s. NR 664.0025, Wis. Adm. Code.
 - d. Technical data, such as design drawings, design specifications and engineering studies shall be certified by a registered professional engineer.
 - e. The Department has inspected the newly re-constructed warehouse units or waived the construction inspection.

Changes in the design, materials, or equipment used to re-construct the warehouse are examples which may constitute a modification. Waste shall not be stored in modified portions of the warehouse until a license modification request is submitted and approval is granted by the Department.

18. WRR shall inspect container storage areas, as discussed in Section F-2b(4) of the FPOR. Container storage area inspections, as provided in Table F-2 of the FPOR, shall be completed for individual container storage areas.

NOTICE OF APPEAL RIGHTS

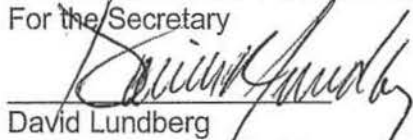
If you believe you have a right to challenge this decision made by the Department, you should know that Wisconsin statutes, administrative codes and case law establish time periods and requirements for reviewing Department decisions.

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.

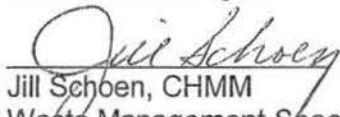
Dated: Nov. 5, 2008

WISCONSIN DEPARTMENT OF NATURAL RESOURCES

For the Secretary



David Lundberg
Waste and Materials Management Program Supervisor
West Central Region



Jill Schoen, CHMM
Waste Management Specialist
West Central Region



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
Scott Humrickhouse, Regional Director

West Central Region Headquarters
1300 W. Clairemont Avenue
PO Box 4001
Eau Claire, Wisconsin 54702-4001
Telephone 715-839-3700
FAX 715-839-6076
TTY Access via relay - 711

November 5, 2008

Caribou Corporation
5200 Ryder Road
Eau Claire, WI 54701

Dear Interested Parties:

WRR Environmental Services Co., Inc. (WRR) located at 5200 Ryder Road, Eau Claire, Wisconsin, owns and operates a licensed hazardous waste storage and treatment facility. The Wisconsin Department of Natural Resources (WDNR) has determined that license modification requests submitted by WRR Environmental Services, Co., Inc., (WRR) are complete and technically adequate.

In June, 2007 a fire destroyed or damaged portions of WRR's facility, including several licensed hazardous waste storage and treatment units. On February 7, 2008 WRR submitted a Class 1 license modification request to: re-construct a licensed hazardous waste container storage area identified as the E-II warehouse, close a licensed containment building; and modify manifesting procedures for rail shipments. The Department determined that the re-construction of the warehouse constituted a Class 2 license modification, as defined in s. NR 670.042(2), Wis. Adm. Code. On April 3, 2008 WRR re-submitted the request to re-construct the warehouse as a Class 2 license modification request. The submittal also included a request to re-construct a second portion of the container storage warehouse, identified as the Fuels Building. Additional Class 1 license modification requests to update the facility contingency plan, and to modify the placement of tanks located within the E-II south sludge tank farm were submitted on April 17, 2008 and June 4, 2008 respectively.

On April 3, 2008 WRR notified interested parties of the Class 2 license modification request. A public notice was published in the Eau Claire Leader Telegram on April 8, 2008 informing the public of the license modification request, announcing a 45-day public comment period, and inviting interested persons to an informational meeting. The informational meeting was held on April 23, 2008. No comments were received during the meeting or comment period.

The Department conditionally approved the above mentioned license modification requests on November 5, 2008. For more information, or to obtain a copy of the conditional approval, contact Jill Schoen at (715) 839-2788, or jill.schoen@wisconsin.gov.

Interested Parties / Distribution List: **WRR Environmental:**

Applicant: WRR Environmental Services, Co., Inc.
5200 Ryder Road
Eau Claire, WI 54701

Land owners: Caribou Corporation
5200 Ryder Road
Eau Claire, WI 54701

Clerk of Municipality Clerk/Treasurer, Town of Washington
Janelle Henning
5750 Old Town Road
Eau Claire, WI 54701

Clerk of County Clerk, Eau Claire County
Janet Loomis
721 Oxford Avenue
Eau Claire, WI 54703

State/ Local Newspaper Wisconsin State Journal
1901 Fish Hatchery Road
Madison, WI 53713

Eau Claire Leader Telegram
636 South Broadway
Eau Claire, WI 54701

Library LE Phillips Public Library
400 Eau Claire Street
Eau Claire, WI 54701

County Zoning Administrator
County Planning
Zoning Administrator
721 Oxford Avenue
Eau Claire, WI 54703

Waste Facility Siting Board
Waste Facility Siting Board
210 W. Washington Ave.
Madison, WI 53702-0001

DNR staff Jill Schoen – WCR, Eau Claire
Department of Natural Resources, WCR
1300 W. Clairemont Ave.
Eau Claire, WI 54702

Waste Supervisor:
Dave Lundberg
Department of Natural Resources, WCR
1300 West Clairemont Avenue
Eau Claire, WI 54701

Pat Chabot
Bureau of Waste & Materials Management
Department of Natural Resources

345 West Washington Avenue
Madison, WI 53703

Dave Kollasch
Bureau of Waste & Materials Management
Department of Natural Resources
345 West Washington Avenue
Madison, WI 53703

Pete Flaherty
Bureau of Legal Services
Department of Natural Resources
101 S. Webster St.
Madison, WI 53707

DOC Dept. of Commerce
Bureau of Storage Tank Regulation
Bureau Chief
PO Box 7837
Madison, WI 53707

EPA USEPA
Dale Meyer
RCRA Permitting
77 West Jackson Street, DU-7J
Chicago, IL 60604

Other potential interested parties:

U.S. Fish & Wildlife Service
4511 Helgesen Drive
Madison, WI 53711

* State Historical Society
Historical Preservation Section
816 State St.
Madison, WI 53706

WI Environmental Decade
122 State St., Suite 200
Madison, WI 53703

Sierra Club
222 S. Hamilton St.
Madison, WI 53703

Midwest Center for Environmental Science and Public Policy
1845 N. Farewell Ave. Suite 100
Milwaukee, WI 53202
Telephone: 414-271-7280
www.mcespp.org

Updated 11/05/08

- Note State Historical Society no longer conducts reviews to determine the presence of known historical or archeological sites at proposed project sites. DNR plan review staff is responsible for conducting the initial review. Unless initial Dept. review of the natural heritage inventory indicates the presence of a historical/archeological site, SHS does not need to be notified.
- Citizens for a Better Environment removed 4/14/08. This organization is no longer in existence. It was replaced by MCESPP.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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February 18, 2009

WRR Environmental Services Co., Inc.
Mr. Jan Smit, Compliance Director
5200 Ryder Road
Eau Claire, WI 54701

HW/LIC
WID990829475
FID #618026530
Eau Claire County

SUBJECT: License modification determination to address aisle space issues D003 storage at WRR Environmental Services Co., Inc., EPA ID# WID990829475

Dear Mr. Smit:

The Department has completed the review of the license modification request submitted by WRR Environmental Services Co., Inc., (WRR) on October 23, 2008. The purpose of this modification request was to clarify aisle space issues for storage sheds P-1 to P-17, and to change the location for storage of reactive (D003) hazardous waste.

On January 15, 2004, the Department approved a license modification that clarified aisle space requirements for storage sheds P-1 through P17. This approval was based, in part, on incorrect information indicating that all of the storage sheds were accessible from two sides. Per s. NR 664.0035, Wis. Adm. Code, the owner or operator of a hazardous waste facility shall maintain aisle space to allow the unobstructed movement of personnel and emergency response equipment to any area of the facility operation in an emergency, unless it can be demonstrated to the department that aisle space is not needed for any of these purposes. Information provided by WRR in the October 23, 2008, license modification request, a March 16, 2005, license modification request, and supporting information provided by the local fire department and State Fire Prevention Coordinator, adequately demonstrates that aisle space isn't required for the purposes of s. NR 664.0035, Wis. Adm. Code. In addition, on July 20, 2005, the Department approved a license modification pertaining to the storage of D003 hazardous waste. The most recent license modification request proposes an alternate storage location for D003 hazardous waste.

Based on review of the modification request the Department has determined that the request meets the regulatory criteria for a Class 1 license modification, and is approving changes to WRR's container storage license, as provided in the attached conditional approval. This license modification must be kept with the feasibility and plan of operation report conditional approval determination and the operating license.

If you have any questions or concerns, please contact Jill Schoen at 715-839-2788 or jill.schoen@wisconsin.gov.

Sincerely,

Thomas E. Woletz, P.E.
Regional Air and Waste Leader
West Central Region

cc: Pat Chabot/Dave Kollasch - WA/5 WCR-File
Dale Meyer- U.S. EPA Region 5, 77 West Jackson Blvd., Chicago, IL 60604-3507

**CLASS 1 LICENSE MODIFICATION
AISLE SPACE & STORAGE OF D003 HAZARDOUS WASTE**

**WRR ENVIRONMENTAL SERVICES CO., INC.
EPA ID# WID990829475
FID# 618026530**

GENERAL FACILITY INFORMATION

Facility Name, Site Operator, and Address:

WRR Environmental Services Co. Inc.
Mr. James L. Hager
5200 Ryder Road
Eau Claire, WI 54701

Business Owner & Site Owner:

Caribou Corporation
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Facility Location:

Township 26 North, Range 9 West, Section 3, Town of Washington, Eau Claire County

Facility Contacts:

Mr. Jim Hager
President / CEO
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Mr. Jan Smit
Compliance Director
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

FACILITY DESCRIPTION

Facility Description:

WRR Environmental Services Co., Inc. (WRR) provides services in the areas of solvent recycling, wastewater treatment, fuel blending, emergency spill response, remediation, community clean sweeps, and other hazardous waste treatment and storage activities for a variety of hazardous waste and non-hazardous waste generators. WRR also processes industrial grade alcohols and other specialty chemicals.

WRR operates a licensed hazardous waste storage and treatment facility. The hazardous wastes stored and treated at the WRR facility belong to the general category of used chemical solvents, waste oils, wastewater and solid wastes. A complete list of waste codes describing the types of hazardous waste handled at WRR is found in WRR's most recent Hazardous Waste Permit Application, Part A. WRR does not accept or treat radioactive or PCB containing wastes.

Hazardous waste is stored in licensed tanks or container storage areas. The total amount of hazardous waste stored on-site in container storage areas is administratively limited to 259,100 gallons. Each of the 21 designated storage areas is provided with secondary containment equal to, or greater than, 10% of the containerized hazardous waste stored in that area. Secondary containment is provided by sloped, sealed concrete floors constructed with reinforced concrete curbs or concrete block walls. The surface of the concrete is free of cracks and gaps and is sufficiently impervious to contain leaks and spills. In addition to 3 warehouse storage areas, WRR stores hazardous waste in 17 individual storage pads. These storage pads are used to store low volume, high value, or incompatible waste streams.

FINDINGS OF FACT

The Wisconsin Department of Natural Resources finds that:

1. WRR owns and operates a hazardous waste container storage, tank storage and treatment facility located at 5200 Ryder Road, Eau Claire, Eau Claire County, Wisconsin.
2. A conditional approval of a Feasibility and Plan of Operation Report (FPOR) for the storage and treatment operations was issued to WRR by the Department on August 14, 2003.
3. Hazardous waste operating licenses for the storage and treatment operations were issued by the Department with effective dates of October 22, 2003.
4. WRR's current license allows for storage of hazardous waste in 21 designated container storage areas and 43 tanks located in 3 tank farms, and for treatment of hazardous waste in 5 thin film evaporators, 2 fuel blend dispersers, a rotary drum vacuum filter and a dry cleaning filter solvent reclamation unit.
5. On January 15, 2004, the Department conditionally approved a class 1 plan modification. The approval modified aisle space requirements for container storage sheds P-1 to P-17. This approval was based, in part, on a letter provided by WRR indicating that the sheds were accessible on both sides.
6. On July 20, 2005, the Department conditionally approved a Class 1 license modification to allow storage of certain D003 reactive waste streams in storage shed #10.
7. On October 23, 2008, WRR requested a class 1 license modification to:
 - a. change the location for storage of D003 hazardous waste (modify condition # 5 of the July 20, 2005 license modification approval),
 - b. clarify storage pad accessibility issues,
 - c. provide additional information demonstrating that aisle space is not needed in the storage sheds P-1 through P-17, and
 - d. eliminate condition # 3 of the Department's January 13, 2004, license modification approval.

CONCLUSIONS OF LAW

1. On August 1, 2006, the Department 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. 289.31(1), Wis. Stats., and s. NR 670.415, Wis. Adm. Code, to issue a hazardous waste operating license.
3. The Department has authority pursuant to s. NR 670.042(1), Wis. Adm. Code, to approve a Class 1 license modification request.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, the Department hereby approves WRR's October 23, 2008, license modification request under s. NR 670.042(1), Wis. Adm. Code, and in accordance with the license, the most recent plan of operation approval, modifications, and the conditions set forth below.

The Department reserves the right to modify this determination 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 may be expressly provided below, no other terms or conditions of the feasibility and plan of operation approval or license, or any subsequent modifications thereto, are affected by this determination.

1. WRR shall comply with all conditions of the license, the provisions of chs. 289 and 291, Wis. Stats., all applicable requirements of chs. NR 660 to 679, Wis. Adm. Code, the feasibility and plan of operation approval and all modifications thereof, and any special order or modifications thereto issued by the Department, except as otherwise authorized by the Department under s. NR 670.061 or 670.079, Wis. Adm. Code.
2. Upon request by the Department, containers stored within the storage sheds P-1 to P-17 shall be moved, as needed, to provide adequate aisle space to access all containers and view container labels.
3. Weekly inspections of individual storage sheds and associated containment systems will be conducted and individually documented, as per Section F of the FPOR. All sumps within storage sheds P-1 to P-17 shall remain visible for inspection.
4. At least annually, WRR shall remove all containers of waste and visually inspect each storage pad secondary containment system for evidence of deterioration and to ensure that the containment is free of cracks or gaps and sufficiently impervious to contain leaks, spills and accumulated precipitation, as required per ss. NR 664.0174 and 664.0175, Wis. Adm. Code. These inspections shall be documented and available upon request.

Note: It is not necessary to empty and inspect all storage sheds at the same time. The individual storage shed inspections may be conducted at different times throughout the year.
5. WRR shall store water reactive and cyanide containing hazardous waste in storage shed P-1. When being used to store D003 hazardous waste, the storage shed shall be marked or posted to indicate the type of waste being stored.

Note: This modifies condition #5 of the Department's July 20, 2005, FPOR approval.

Note: When not being used to store D003 hazardous waste, storage shed P-1 can be used to store other types of compatible waste.

6. WRR can not store D003 reactive waste that is capable of detonation or explosive reaction. (As noted in condition #2 of the Department's July 20, 2005 approval.)
7. WRR shall store incompatible waste in separate container storage units.
8. Within 60 days of this approval, WRR shall take the following actions:
 - a. Update page D-6, Section D-1i, of the FPOR to address alternate aisle space requirements for storage sheds P-1 through P-17.
 - b. Update page F-8, Section F-5 of the FPOR to address handling procedures for reactive hazardous wastes.
 - c. Modify inspection logs in Section F of the FPOR, to identify the individual storage areas, and to include inspection of storage pad sumps.
9. WRR shall provide the Department with documentation that a notice of this modification was mailed to all persons on the facility mailing list, including all appropriate units of state and local governments, within 90 calendar days of this approval, as required by s. NR 670.042(1)(a)2, Wis. Adm. Code.

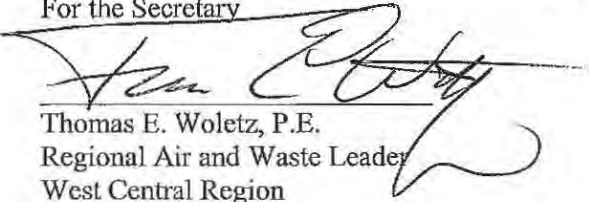
NOTICE OF APPEAL RIGHTS

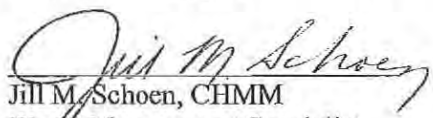
If you believe you have a right to challenge this decision made by the Department, you should know that Wisconsin statutes, administrative codes and case law establish time periods and requirements for reviewing Department decisions.

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.

Dated: FEBRUARY 18, 2009

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
For the Secretary


Thomas E. Woletz, P.E.
Regional Air and Waste Leader
West Central Region


Jill M. Schoen, CHMM
Waste Management Specialist
West Central Region



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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1300 W. Clairemont Avenue
PO Box 4001
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February 4, 2010

Mr. Jan Smit
Compliance Director
WRR Environmental Services, Co., Inc.
5200 Ryder Road
Eau Claire, WI 54701

HW/LIC
WID 990 829 475
FID 618 026 530
Eau Claire Co.

Subject: Temporary Authorization Request to treat waste in the High Viscosity Processing System

Dear Mr. Smit:

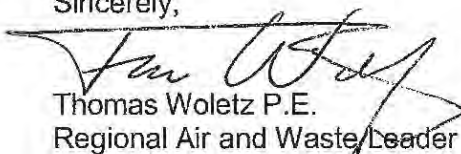
The purpose of this letter is to inform you that the Department has completed review of WRR Environmental Services' request for temporary authorization to treat hazardous waste in a process unit designated as a High Viscosity Processing System (HVPS).

On January 30, 2009, WRR submitted a Class 2 license modification request to replace fuel blend process tanks with a high viscosity processing system. Several modifications to the initial processing system design, as outlined in the attached conditional approval, were made since the original license modification request was submitted. On January 26, 2010, WRR requested temporary authorization to begin start up testing and processing fuel blend waste in the HVPS. The Department has reviewed the information provided by WRR and is granting a six-month conditional approval to begin processing hazardous waste in the HVPS. This temporary authorization will allow WRR to process up to 14,750 gallons of hazardous waste per day in the HVPS. Please be aware that WRR is required to operate the HVPS in compliance with all applicable air and waste regulations. This temporary authorization is not an exemption from any regulatory requirements or standards, but rather is intended to allow WRR to begin start up testing and make any necessary minor changes to the process or operating procedures prior to updating applicable portions of WRR's feasibility and plan of operation report.

This temporary authorization must be kept with the submittals referenced in the attached conditional approval, the feasibility and plan of operation report determination, the operating license, and all license modifications.

Please contact Jill Schoen, 715-839-2788, or jill.schoen@wisconsin.gov, if you have any questions.

Sincerely,



Thomas Woletz P.E.
Regional Air and Waste Leader
West Central Region

c: Dale Meyer – US EPA Region 5, 77 West Jackson Blvd, DW-8J, Chicago, IL 6060403507
WRR File – Eau Claire
Pat Chabot – patricia.chabot@wisconsin.gov (e-copy)
Ed Lynch – edward.lynch@wisconsin.gov (e-copy)

TEMPORARY AUTHORIZATION

**FUEL BLENDING RECONSTRUCTION
WRR ENVIRONMENTAL SERVICES CO., INC.
EPA ID# WID990829475
FID# 618026530**

GENERAL FACILITY INFORMATION

Facility Name, Site Operator, and Address:

WRR Environmental Services Co., Inc.
Mr. James L. Hager
5200 Ryder Road
Eau Claire, WI 54701

Business Owner & Site Owner:

Caribou Corporation
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Facility Location:

Township 26 North, Range 9 West, Section 3, Town of Washington, Eau Claire
County

Facility Contacts:

Mr. Jim Hager
President / CEO
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Mr. Jan Smit
Compliance Director
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

FACILITY DESCRIPTION

WRR provides services in the areas of solvent recycling, wastewater treatment, fuel blending, emergency spill response, remediation, community clean sweeps, and other hazardous waste treatment and storage activities for a variety of hazardous waste and non-hazardous waste generators.

WRR Environmental Services, Co., Inc. (WRR) is a licensed hazardous waste storage and treatment facility. WRR holds licenses for storage in containers (license # 6005), storage in tanks (license # 3161), treatment in tanks (license # 4304), and treatment in miscellaneous units (license #4305).

The hazardous wastes stored and treated at the WRR facility belong to the general category of used chemical solvents, waste oils, wastewater and solid wastes. A complete list of waste codes describing the types of hazardous waste handled at WRR is found in WRR's most recent Hazardous Waste Permit Application, Part A, September 18, 2008.

Waste is stored in containers or tanks prior to being recycled, treated, or shipped off-site to another licensed facility. Treatment processes conducted at the facility include solvent distillation and purification, thin film evaporation, wastewater treatment, dry cleaning filter processing, fuel blending and rotary drum filtration. Waste that is not suitable for recycling is blended to produce fuel or sent off-site for incineration. No disposal takes place onsite.

A fire on June 22, 2007, destroyed licensed fuel blending tanks JJ & KK. WRR submitted a license modification request to replace fuel blend process tanks JJ & KK with a high viscosity waste processing system, and a temporary authorization request to begin startup testing and use of the processing system.

Prior to the fire, WRR's fuel blending operation consisted of two 1,000-gallon disperser tanks. WRR re-constructed fuel blending operations by replacing the two fuel blend disperser tanks with a high viscosity waste processing system. The high viscosity waste processing system consists of various pieces of equipment used to transfer solids from small containers and 55-gallon drums into a hydropulper processing unit. Other liquid materials, some of which are solvents, are pumped into the hydropulper and mixed. The mixed waste is transferred into licensed tanks for storage or into tanker trucks that transport the waste off-site. Empty containers are processed in a drum crushing unit and stored in a covered dumpster. The high viscosity waste processing system is located within an area provided with secondary containment. The containment consists of a sealed concrete floor surrounded by a concrete berm. Other process safeguards include high level alarms to detect spills or leaks, emission break through detectors, nitrogen blanketing and various safety interlocks that monitor oxygen, temperature and pressure.

FINDINGS OF FACT

The Wisconsin Department of Natural Resources finds that:

1. WRR Environmental Services owns and operates a hazardous waste container storage, tank storage and treatment facility located at 5200 Ryder Road, Eau Claire, Eau Claire County, Wisconsin.
2. A conditional approval of a Feasibility and Plan of Operation Report (FPOR) for the storage and treatment operations was issued to WRR by the Department on August 14, 2003.
3. Hazardous waste operating licenses for the storage and treatment operations were issued by the Department with effective dates of October 22, 2003.
4. On June 22, 2007, a fire at WRR destroyed or damaged several licensed hazardous waste management units, including two fuel blend processing tanks.
5. On November 5, 2008, the Department issued a conditional license modification approval to reconstruct the E-II hazardous waste container storage warehouse, including Docks 1, 4 and 5 and the Fuels Building.
6. On January 30, 2009, WRR submitted a request to replace the fuel blend disperser tanks with a high viscosity waste processing system. The fuel blend dispersers were licensed as process tanks. The more encompassing high viscosity waste processing system is regulated as a miscellaneous treatment unit. No increase in processing capacity was requested.
7. In a letter dated January 26, 2010, WRR submitted a temporary authorization request to begin startup testing of the high viscosity waste processing system.
8. Additional correspondence making up the administrative record was considered by the Department:
 - a. A Class 2 license modification request provided by WRR on 1/30/2009;
 - b. Supplemental information provided by WRR on 3/17/09;
 - c. An e-mail and construction certification provided by WRR on 3/27/09;
 - d. An e-mail providing supplemental information provided by WRR on 4/23/09;
 - e. Supplemental information provided by WRR on 6/1/2009;
 - f. An e-mail with attachments provided to US Environmental Protection Agency by WRR on 8/27/09;
 - g. A submittal with attachments from Short Elliot and Henderson, on behalf of WRR, dated 11/12/09;
 - h. A submittal from WRR dated 1/4/09, including a submittal from Short Elliot and Henderson, on behalf of WRR, dated 12/22/09; and
 - i. A submittal from Short Elliot and Henderson, on behalf of WRR, dated 1/29/10.

CONCLUSIONS OF LAW

1. On August 1, 2006, the Department 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. 289.31(1), Wis. Stats., and s. NR 670.415, Wis. Adm. Code, to issue a hazardous waste operating license.
3. The Department has authority pursuant to s. NR 670.042(5), Wis. Adm. Code, to approve a temporary authorization request.
4. In accordance with s. NR 670.042(5), Wis. Adm. Code, the Department concludes that the revision described in Finding of Fact # 6 requires a Class 2 license modification.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, the Department hereby approves the six-month temporary authorization request to process hazardous waste in the high viscosity waste processing system under s. NR 670.042(5), Wis. Adm. Code, and in accordance with the submittals referenced above, the license, the most recent plan of operation approval and all modifications thereto, all applicable provisions of chs. 289 and 291, Wis. Stats. and chs. NR 660 to 679, Wis. Adm. Code, any special order issued by the Department, and the conditions set forth below.

The Department reserves the right to modify or rescind this temporary authorization approval determination 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 may be expressly provided below, no other terms or conditions of the feasibility and plan of operation approval or license, or any subsequent modifications thereto, are affected by this determination.

The temporary authorization request is conditionally approved under s. NR 670.042(5) Wis. Adm. Code, and in accordance with the license, the most recent plan of operation approval, modifications, and the conditions set forth as follows:

1. WRR shall comply with all conditions of the license, the provisions of chs. 289 and 291, Wis. Stats., all applicable requirements of chs. NR 660 to 679, Wis. Adm. Code, the feasibility and plan of operation approval and all modifications thereof, and any special order or modifications thereto issued by the Department, except as otherwise authorized by the Department under s. NR 670.061 or 670.079, Wis. Adm. Code.

2. This conditional approval pertains only to the treatment of hazardous waste in the high viscosity processing system (HVPS) made up of the following equipment:
 - hydropulper used to mix and grind solids;
 - drum punch and pusher used to transfer waste from 55-gallon drums into the hydropulper;
 - paint can press used to empty 1- and 5-gallon containers;
 - barrel crusher and covered dumpster used to crush and store empty containers;
 - and
 - an aerosol can press used to remove the contents from aerosol cans.
3. WRR shall not treat more than 14,750 gallons of waste per day and 3,250 gallons of waste per batch in the HVPS. The amount of waste processed per day and per batch shall be recorded in the operating record.
4. The number of drums stored in the lower area of the fuel blend building is limited to ten 55-gallon drums.
5. Secondary containment provided for the HVPS and ancillary equipment shall be: designed and operated to contain 100% of the HVPS capacity, maintained free of cracks and gaps, designed and maintained with chemically resistant water-stops in all joints; and provided with an impermeable coating to prevent migration of waste into the concrete.
6. The HVPS shall be electrically interlocked with the safety control equipment, as described in Section V., Attachment C-10 of the 11-12-09 submittal from Short Elliot and Henderson.
7. Breakthrough detection and monitoring for all activated carbon control devices shall be conducted as required per WRR's most current air pollution control permit issued by the Department.
8. All enclosures and closed vent systems shall be equipped with at least one manometer, or other pressure measurement device, that can be read from a readily accessible location. WRR shall measure and record the pressure to verify that a negative pressure is being achieved for each enclosure device used to control volatile organic compound emissions.
9. Systems under positive pressure shall be operated with no detectable emissions.
10. All containers shall remain closed when not adding or removing waste.
11. WRR shall inspect the HVPS and ancillary equipment, as provided in F-2b(4) of the FPOR. Inspections logs, as provided in Table F-2 of the FPOR, or other comparable inspections logs, shall be completed and maintained on-site.

12. WRR shall, with 90 days of this approval, update the Department, in writing, with progress toward updating the FPOR, as needed, with information required for the HVPS.
13. This temporary authorization expires 180 days from the date of this determination.

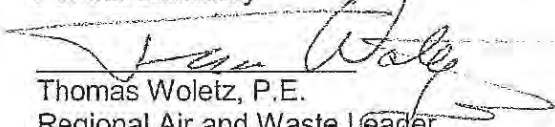
NOTICE OF APPEAL RIGHTS

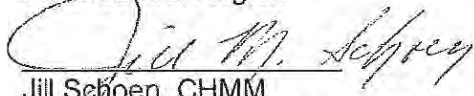
If you believe you have a right to challenge this decision made by the Department, you should know that Wisconsin statutes, administrative codes and case law establish time periods and requirements for reviewing Department decisions.

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.

Dated: February 4, 2010

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
For the Secretary


Thomas Woletz, P.E.
Regional Air and Waste Leader
West Central Region


Jill Schoen, CHMM
Waste Management Specialist
West Central Region



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Scott Humrickhouse, Regional Director

West Central Region Headquarters
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June 17, 2010

Mr. Jan Smit
Compliance Director
WRR Environmental Services, Co., Inc.
5200 Ryder Road
Eau Claire, WI 54701

HW/LIC
WID 990 829 475
FID 618 026 530
Eau Claire Co.

Subject: Temporary Authorization Request to Treat Waste in the High Viscosity Waste Processing System

Dear Mr. Smit:

The purpose of this letter is to inform you that the Department has received a request from WRR Environmental Services Co., Inc. (WRR) for temporary authorization to treat hazardous waste in a process unit designated as a High Viscosity Processing System (HVPS).

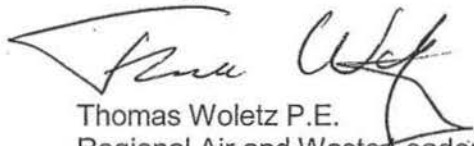
On January 26, 2010, WRR requested temporary authorization to begin start up testing and processing fuel blend waste in the HVPS. The Department reviewed the information provided by WRR and, on February 4, 2010, granted a six-month conditional approval to begin processing hazardous waste in the HVPS. The temporary authorization allowed WRR to process up to 14,750 gallons of hazardous waste per day in the HVPS. The attached conditional approval extends the temporary authorization approval for an additional 180 days.

Please be aware that WRR is required to operate the HVPS in compliance with all applicable air and waste regulations. This temporary authorization is not an exemption from any regulatory requirements or standards, but rather is intended to allow WRR to begin start up testing and make any necessary minor changes to the process or operating procedures prior to updating applicable portions of WRR's feasibility and plan of operation report.

This temporary authorization must be kept with the submittals referenced in the attached conditional approval, the feasibility and plan of operation report determination, the operating license, and all license modifications.

Please contact Jill Schoen, 715-839-2788, or jill.schoen@wisconsin.gov, if you have any questions.

Sincerely,



Thomas Woletz P.E.
Regional Air and Waste Leader
West Central Region

c: Dale Meyer – US EPA Region 5, 77 West Jackson Blvd, DW-8J, Chicago, IL 6060403507
WRR File – Eau Claire
Pat Chabot – patricia.chabot@wisconsin.gov (e-copy)
Ed Lynch – edward.lynch@wisconsin.gov (e-copy)
Dave Kollasch – david.kollasch@wisconsin.gov (e-copy)
Scott Szymanski – scott.szymanski@wisconsin.gov (e-copy)

**TEMPORARY AUTHORIZATION EXTENSION
FUEL BLENDING RECONSTRUCTION
WRR ENVIRONMENTAL SERVICES CO., INC.
EPA ID# WID990829475
FID# 618026530**

GENERAL FACILITY INFORMATION

Facility Name, Site Operator, and Address:

WRR Environmental Services Co., Inc.
Mr. James L. Hager
5200 Ryder Road
Eau Claire, WI 54701

Business Owner & Site Owner:

Caribou Corporation
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Facility Location:

Township 26 North, Range 9 West, Section 3, Town of Washington, Eau Claire
County

Facility Contacts:

Mr. Jim Hager
President / CEO
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Mr. Jan Smit
Compliance Director
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

FACILITY DESCRIPTION

WRR Environmental Services, Co., Inc. (WRR) is a licensed hazardous waste storage and treatment facility. WRR holds licenses for storage in containers (license # 6005), storage in tanks (license # 3161), treatment in tanks (license # 4304), and treatment in miscellaneous units (license #4305).

Waste is stored in containers or tanks prior to being recycled, treated, or shipped off-site to another licensed facility. Treatment processes conducted at the facility include solvent distillation and purification, thin film evaporation, wastewater treatment, dry cleaning filter processing, fuel blending and rotary drum filtration. Waste that is not suitable for recycling is blended to produce fuel or sent off-site for incineration. No disposal takes place onsite.

A fire on June 22, 2007, destroyed licensed fuel blending tanks JJ & KK. On January 30, 2009, WRR submitted a license modification request to replace fuel blend process tanks JJ & KK with a high viscosity waste processing system.

Prior to the fire, WRR's fuel blending operation consisted of two 1,000-gallon disperser tanks. WRR re-constructed fuel blending operations by replacing the two fuel blend disperser tanks with a high viscosity waste processing system. The high viscosity waste processing system consists of various pieces of equipment used to transfer solids from small containers and 55-gallon drums into a hydrapulper processing unit. Other liquid materials, some of which are solvents, are pumped into the hydrapulper and mixed. The mixed waste is transferred into licensed tanks for storage or into tanker trucks that transport the waste off-site. Empty containers are processed in a drum crushing unit and stored in a covered dumpster. The high viscosity waste processing system is located within an area provided with secondary containment. The containment consists of a sealed concrete floor surrounded by a concrete berm. Other process safeguards include, but are not limited to, high level alarms to detect spills or leaks, emission break through detectors and monitoring, nitrogen blanketing and various safety interlocks that monitor oxygen, temperature and pressure.

WRR requested temporary authorization to being start up and testing of the equipment, and to provide flexibility to make minor process changes, if needed, prior to updating the feasibility and plan of operation report. The department conditionally approved this request. WRR has requested an additional 180 extension.

FINDINGS OF FACT

The Wisconsin Department of Natural Resources finds that:

1. WRR Environmental Services Co., Inc., owns and operates a hazardous waste container storage, tank storage and treatment facility located at 5200 Ryder Road, Eau Claire, Eau Claire County, Wisconsin.
2. A conditional approval of a Feasibility and Plan of Operation Report (FPOR) for the storage and treatment operations was issued to WRR by the Department on August 14, 2003.
3. Hazardous waste operating licenses for the storage and treatment operations were issued by the Department with effective dates of October 22, 2003.
4. On June 22, 2007, a fire at WRR destroyed or damaged several licensed hazardous waste management units, including two fuel blend processing tanks.
5. On November 5, 2008, the Department issued a conditional license modification approval to reconstruct the E-II hazardous waste container storage warehouse and fuels building.
6. On January 30, 2009, WRR submitted a Class 2 license modification request to replace the fuel blend disperser tanks with a high viscosity waste processing system.

The fuel blend dispersers were licensed as process tanks. The more encompassing high viscosity waste processing system is regulated as a miscellaneous treatment unit. No increase in processing capacity was requested.

7. On February 2, 2009, WRR notified persons on the facility mailing list and local government officials of the license modification request, and offered an opportunity for the public to provide comments.
8. A public notice was published in the Eau Claire Leader Telegram on February 3, 2009, notifying the public of the license modification request, and offering an opportunity for the public to provide comments and attend a public informational meeting.
9. On February 19, 2009, WRR hosted a public informational meeting to provide the public an opportunity to review and comment on the proposed modification. No comments were received during the meeting or public comment period.
10. In a letter dated January 26, 2010, WRR submitted a temporary authorization request to begin startup testing of the high viscosity waste processing system. On February 4, 2010, the department conditionally approved the temporary authorization request.
11. On June 10, 2010, department staff observed waste being processed in the high viscosity waste processing system.
12. In a letter dated June 15, 2010, WRR submitted a letter to the department requesting to extend the temporary authorization to treat waste in the high viscosity waste processing system for an additional 180 days.
13. Additional correspondence making up the administrative record was considered by the Department:
 - a. A Class 2 license modification request provided by WRR on 1/30/2009;
 - b. Supplemental information provided by WRR on 3/17/09;
 - c. An e-mail and construction certification provided by WRR on 3/27/09;
 - d. An e-mail providing supplemental information provided by WRR on 4/23/09;
 - e. Supplemental information provided by WRR on 6/1/2009;
 - f. An e-mail with attachments provided to US Environmental Protection Agency by WRR on 8/27/09;
 - g. A submittal with attachments from Short, Elliot and Henderson, on behalf of WRR, dated 11/12/09;
 - h. A submittal from WRR dated 1/4/09, including a submittal from Short, Elliot and Henderson, on behalf of WRR, dated 12/22/09; and
 - i. A submittal from Short, Elliot and Henderson, on behalf of WRR, dated 1/29/10.

CONCLUSIONS OF LAW

1. On August 1, 2006, the Department 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. 289.31(1), Wis. Stats., and s. NR 670.415, Wis. Adm. Code, to issue a hazardous waste operating license.
3. The Department has authority pursuant to s. NR 670.042(5), Wis. Adm. Code, to approve a temporary authorization request.
4. In accordance with s. NR 670.042(5), Wis. Adm. Code, the Department concludes that the changes described in Finding of Fact # 6 requires a Class 2 license modification.
5. The department has authority pursuant to s. NR 670.042(5)(d), to reissue a temporary authorization for one additional term of up to 180 days if the licensee has requested a class 2 license modification.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, the Department hereby approves a 180 day extension of the temporary authorization request to hazardous waste in the high viscosity waste processing system under s. NR 670.042(5), Wis. Adm. Code, and in accordance with the submittals referenced above, the license, the most recent plan of operation approval and all modifications thereto, all applicable provisions of chs. 289 and 291, Wis. Stats. and chs. NR 660 to 679, Wis. Adm. Code, any special order issued by the Department, and the conditions set forth below.

The Department reserves the right to modify or rescind this temporary authorization approval determination 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 may be expressly provided below, no other terms or conditions of the feasibility and plan of operation approval or license, or any subsequent modifications thereto, are affected by this determination.

The temporary authorization request is conditionally approved under s. NR 670.042(5) Wis. Adm. Code, and in accordance with the license, the most recent plan of operation approval, modifications, and the conditions set forth as follows:

1. WRR shall comply with all conditions of the license, the provisions of chs. 289 and 291, Wis. Stats., all applicable requirements of chs. NR 660 to 679, Wis. Adm. Code, the feasibility and plan of operation approval and all modifications thereof, and any special order or modifications thereto issued by the Department, except as otherwise authorized by the Department under s. NR 670.061 or 670.079, Wis. Adm. Code.
2. This conditional approval pertains only to the treatment of hazardous waste in the high viscosity processing system (HVPS) made up of the following equipment:
 - hydropulper used to mix and grind solids;
 - drum punch and pusher used to transfer waste from 55-gallon drums into the hydropulper;
 - paint can press used to empty 1- and 5-gallon containers;
 - barrel crusher and covered dumpster used to crush and store empty containers; and
 - an aerosol can press used to remove the contents from aerosol cans.
3. WRR shall not treat more than 14,750 gallons of waste per day and 3,250 gallons of waste per batch in the HVPS. The amount of waste processed per day and per batch shall be recorded in the operating record.
4. The number of drums stored in the lower area of the fuel blend building is limited to ten 55-gallon drums.
5. Secondary containment provided for the HVPS and ancillary equipment shall be: designed and operated to contain 100% of the HVPS capacity, maintained free of cracks and gaps, designed and maintained with chemically resistant water-stops in all joints; and provided with an impermeable coating to prevent migration of waste into the concrete.
6. The HVPS shall be electrically interlocked with the safety control equipment, as described in Section V., Attachment C-10 of the 11-12-09 submittal from Short, Elliot and Henderson.
7. Breakthrough detection and monitoring for all activated carbon control devices shall be conducted as required per WRR's most current air pollution control permit issued by the Department.
8. All enclosures and closed vent systems shall be equipped with at least one manometer, or other pressure measurement device, that can be read from a readily accessible location. WRR shall measure and record the pressure to verify that a negative pressure is being achieved for each enclosure device used to control volatile organic compound emissions.
9. Systems under positive pressure shall be operated with no detectable emissions.
10. All containers shall remain closed when not adding or removing waste.


11. WRR shall inspect the HVPS and ancillary equipment, as provided in F-2b(4) of the FPOR. Inspections logs, as provided in Table F-2 of the FPOR, or other comparable inspections logs, shall be completed and maintained on-site.
12. WRR shall, with 90 days of this approval, update the Department, in writing, with progress toward updating the FPOR, as needed, with information required for the HVPS.
13. WRR shall send notice about the temporary authorization request to all persons on the facility mailing list and appropriate units of state and local government within 7 days of submission of the authorization request.
14. This temporary authorization expires 180 days from the date of this determination.

NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that the Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed. For judicial review of a decision pursuant to sections 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review must name the Department of Natural Resources as the respondent.

Dated: June 17, 2010

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
For the Secretary


Thomas Woletz, P.E.
Regional Air and Waste Leader
West-Central Region


Jill Schoen, CHMM
Waste Management Specialist
Bureau of Waste and Materials Management

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
West Central Region Headquarters
1300 W. Clairemont Avenue
PO Box 4001
Eau Claire WI 54702-4001

Scott Walker, Governor
Cathy Stepp, Secretary
Scott Humrickhouse, Regional Director
Telephone 715-839-3700
FAX 715-839-6076
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January 10, 2011

WRR Environmental Services Co., Inc.
Mr. Jan Smit, Compliance Director
5200 Ryder Road
Eau Claire, WI 54701

HW/CME
WID990829475
FID # 618026530
Eau Claire County

Subject: Class 2 Conditional License Modification Approval to Treat Waste in a High Viscosity Waste Processing System

Dear Mr. Smit:

On January 30, 2009, WRR Environmental Services, Co., Inc. (WRR) submitted a license modification request to re-construct fuel blending equipment that was destroyed in a 2007 facility fire. The Department has received the information, including a license modification request, construction documentation certifications, and other information outlined in the attached conditional approval, that was needed to complete the review of WRR's request.

Prior to 2007, WRR conducted hazardous waste treatment in two licensed process tanks, identified as tanks JJ and KK. A high viscosity waste processing system (HVPS) has been constructed to replace process tanks JJ and KK. The HVPS, consisting of a hydrapulper and supporting equipment outlined in the attached conditional approval, is regulated as a miscellaneous unit and is located in the newly constructed fuels building.

The Department has allowed WRR to operate the HVPS under two 6-month temporary authorization approvals issued on February 4, 2010 and June 17, 2010. The second temporary authorization expired on December 14, 2010.

Based on review of the modification request, construction documentation certifications, and other information provided by WRR, the Department has determined that the feasibility and plan of operation report (FPOR) modifications contain all of the required elements per ch. NR 670, Wis. Adm. Code and that the equipment, if maintained and operated as designed, meets applicable standards in ch. NR 664, Wis. Adm. Code, and is approving the hazardous waste license modification to allow for the treatment of hazardous waste in the newly constructed HVPS.

This license modification does not change WRR's licensed hazardous waste storage capacity, the type of waste managed, or any other waste management procedures not specifically associated with the HVPS. This modification does not allow for any increase in hazardous waste storage or treatment capacity.

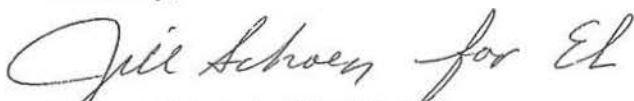
Several locations in the modified FPOR indicate that WRR may change the HVPS in the future. Please be aware that this review and conditional approval apply only to the HVPS as presented in the FPOR. Any future changes to this system must be evaluated to determine if the proposed changes are in compliance with applicable regulations and to determine if the proposed changes require a license modification.

Nothing in the FPOR precludes WRR from maintaining compliance with all applicable hazardous waste management regulations.

Over the past several years we have discussed the use of agitated tanker trucks, referred to as Robbie Rollers, as portable process tanks used as part of the fuel blending process. Information provided by WRR did not include these trucks as part of the HVPS. Therefore, the Department did not review the use of these trucks as part of the licensed treatment process and is not including them as part of this conditional approval.

This license modification must be kept with the feasibility and plan of operation report and conditional approval determination, subsequent license modifications, and the operating license. If you have questions, please contact Jill Schoen, 715-839-2788, or jill.schoen@wisconsin.gov.

Sincerely,



Edward K. Lynch, PE, Chief
Hazardous Waste Prevention & Management Section
Bureau of Waste & Materials Management

C: WRR Files – WCR
Mike Ellenbecker – Michael.ellenbecker@wisconsin.gov
Pat Chabot – pat.chabot@wisconsin.gov
Jae Lee - Lee.Jae@epa.gov

CLASS 2 LICENSE MODIFICATION

**RECONSTRUCTION OF FUELS PROCESSING EQUIPMENT
WRR ENVIRONMENTAL SERVICES CO., INC.
EPA ID# WID990829475
FID# 618026530**

GENERAL FACILITY INFORMATION

Facility Name, Site Operator, and Address:

WRR Environmental Services Co., Inc.
Mr. James L. Hager
5200 Ryder Road
Eau Claire, WI 54701

Business Owner & Site Owner:

Caribou Corporation
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Facility Location:

Township 26 North, Range 9 West, Section 3, Town of Washington, Eau Claire
County

Facility Contacts:

Mr. Jim Hager
President / CEO
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

Mr. Jan Smit
Compliance Director
5200 Ryder Road
Eau Claire, WI 54701
715-834-9624

FACILITY DESCRIPTION

WRR provides services in the areas of solvent recycling, wastewater treatment, fuel blending, emergency spill response, remediation, community clean sweeps, and other hazardous waste treatment and storage activities for a variety of hazardous waste and non-hazardous waste generators.

WRR Environmental Services, Co., Inc. (WRR) is a licensed hazardous waste storage and treatment facility. WRR holds hazardous waste licenses for storage in containers (license # 6005), storage in tanks (license # 3161), treatment in tanks (license # 4304), and treatment in miscellaneous units (license #4305).

The hazardous wastes stored and treated at the WRR facility belong to the general category of used chemical solvents, waste oils, wastewater and solid wastes. A complete list of waste codes describing the types of hazardous waste handled at WRR is found in WRR's most recent Hazardous Waste Permit Application, Part A, dated 11/29/2010. WRR does not accept or treat radioactive or PCB containing wastes.

Waste is stored in containers or tanks prior to being recycled, treated, or shipped off-site to another licensed facility. Treatment processes conducted at the facility may include solvent distillation and purification, thin film evaporation, wastewater treatment, dry cleaning filter processing, fuel blending and rotary drum filtration. Waste that is not suitable for recycling is blended to produce fuel or sent off-site for incineration. No on-site disposal of hazardous waste is authorized by the Department.

A fire on June 22, 2007, destroyed or damaged portions of WRR's facility, including the following licensed hazardous waste management storage units: a container storage warehouse designated as the E-II container storage building, thin film evaporators E-II and E-III, fuel blend disperser tanks JJ & KK, E-II tank farm, E-I South container storage building, dry cleaning filter recycling unit, and an ash containment building.

A hazardous waste license modification request to reconstruct the E-II tank farm was conditionally approved by the Department on January 7, 2008. A license modification request to reconstruct the E-II container storage and fuels building was conditionally approved by the Department on November 5, 2008. A request to re-construct fuels processing equipment replacing fuel blend process tanks JJ and KK was received on January 30, 2009, and is the subject of this conditional approval.

Prior to the fire, WRR's fuel blending operation consisted of two 1,000-gallon disperser tanks that operated with a combined maximum capacity of 15,000 gallons of hazardous waste per day. Following the fire, WRR re-constructed the fuel blending operations by replacing two fuel blend disperser tanks with a high viscosity waste processing system (HVPS). The HVPS consists of: an aerosol can processing unit that removes the contents from aerosol cans; a paint can press processing unit used to empty small containers of paint; a hydrapulper that grinds up solids, and mixes them with other liquids, such as solvents, to form a pumpable material; a barrel punch and pusher that transfers waste from barrels into the hydrapulper; a barrel crusher; and a covered dumpster that is designed to control emissions from crushed drums.

Processing equipment is used to transfer waste from containers and drums into the hydrapulper. Drums containing solids that cannot be pumped are brought to the barrel

punch and pusher. The drum is placed upside down on a metal grate by a hydraulic powered barrel lift, the top of the container is removed by a metal cutter, and the contents in the drum are pushed out of the drum through a grate using a hydraulic ram. A slurry pump is used to pump the material into the hydrapulper. A grinder is located in the hydrapulper.

Other liquid materials, such as solvents, are pumped into the hydrapulper and mixed to generate a pumpable fuel. The mixed waste is transferred into tanks for storage or directly into tanker trucks for off-site shipment. Empty containers are crushed and stored in a covered dumpster.

The waste processing system, including the hydrapulper and its supporting equipment listed above, is regulated as a miscellaneous treatment unit, per ch. NR 664, Subchapter X, Wis. Adm. Code.

The high viscosity waste processing system is located in an area provided with secondary containment consisting of a sealed concrete floor surrounded by a containment berm. Other safeguards include, but are not limited to, nitrogen blanketing of the hydrapulper, emergency operation shut offs, high level alarms, oxygen sensors, high temperature and pressure sensors, a lower explosive limit sensor, spill control equipment, and various procedures and inspections to ensure that the equipment and process is operating as designed.

FINDINGS OF FACT

The Wisconsin Department of Natural Resources finds that:

1. WRR Environmental Services owns and operates a hazardous storage and treatment facility located at 5200 Ryder Road, Eau Claire, Eau Claire County, Wisconsin.
2. A conditional approval of a Feasibility and Plan of Operation Report (FPOR) for the storage and treatment operations was issued to WRR by the Department on August 14, 2003.
3. Hazardous waste operating licenses for the storage and treatment operations were issued by the Department with effective date of October 22, 2003.
4. On June 22, 2007, a fire at WRR destroyed or damaged several licensed hazardous waste management units, including the E-II container storage warehouse, the E-II tank farm, E-II and E-III thin film evaporators, the E-I South container storage building, the off-site warehouse, fuel blend process tanks and a containment storage building.
5. On January 30, 2009, WRR submitted a request to replace the fuel blend disperser tanks with a high viscosity waste processing system (HVPS). The fuel blend dispersers were licensed as process tanks. The more encompassing HVPS system is regulated as a miscellaneous treatment unit. A plan review fee in the amount of \$1,600 was received by the Department.

6. On February 3, 2009, WRR published a notice in the Eau Claire Leader Telegram and sent a direct mailing to persons on the interested parties mailing list, informing the public and interested persons of the plan modification request, and offering an opportunity for the public to provide comments. No comments were received during the 45-day comment period.
7. On February 19, 2009, WRR held a meeting to give the public an opportunity to review the proposed modification and provide comments. No comments were received during the meeting.
8. On January 26, 2010, WRR requested temporary authorization to operate the HVPS. On February 4, 2010, the Department issued a temporary authorization approval to allow WRR to begin using the HVPS. This temporary approval allowed WRR to begin start up operations of the system, and to make minor modifications to the process, as needed, to efficiently and safely operate this system prior to updating the FPOR. On June 15, 2010, WRR requested to extend the initial temporary authorization approval for an additional 180 days. On June 17, 2010, the Department issued a second temporary authorization approval to WRR to allow for the use of the HVPS for an additional 180 days. The second temporary authorization approval expired on December 14, 2010, and could not be renewed in accordance with s NR 670.42(5)(d), Wis. Adm. Code.
9. The Department considered the following additional information and submittals, provided by or on behalf of WRR, in the review of this proposal:

Document title	Topic	Date received	Prepared or Submitted by
Hydropulper For Fuels Building and Closure of Dispersers RCRA Permit Class 2 Plan Modification Application	License modification request to install high viscosity waste processing system	1/20/2009	WRR
Updated FPOR Pages	Supplemental information	3/17/2009	WRR
e-mail: Fuels Bldg Info	Partial response to 4/15/2009 notice of incompleteness	4/23/2009	WRR
Additional Fuels Building Equipment Information for RCRA Permit Plan Modification Application	Remaining response to 4/15/2009 notice of incompleteness	6/1/2009	WRR
e-mails: WRR Fuels Bldg Lower Level Revised Containment; Robbie Roller	Revised secondary containment calculations; discussion of Robbie Roller mixing tank	8/12/2009, 8/14/2009	WRR

WRR Environmental Services Co., Inc. High Viscosity Processing System	Revised Flow Diagrams and Process and Instrumentation Diagrams	11/12/2009	SEH
Revised Design Analysis for an Activated Carbon System – WRR Environmental Services, Co., Inc.	Revised design analysis	1/29/2010	SEH
WRR FPOR HVPS Changes – Submittal #1	Modified and replacement FPOR pages	11/24/2010	WRR
WRR FPOR HVPS Changes – Submittal #2	Modified and replacement FPOR pages	12/1/2010	WRR
e-mail: WRR FPOR changes	Updated FPOR pages	12/2/2010	WRR
WRR Revised Design Analysis	Updated design analysis	11/23/2010, 12/9/2010, 12/14/2010	SEH

- Additional correspondence that make up the WRR file.

CONCLUSIONS OF LAW

1. On August 1, 2006, the Department 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. 289.31(1), Wis. Stats., and s. NR 670.415, Wis. Adm. Code, to issue a hazardous waste operating license.
3. The Department has authority pursuant to s. 289.30(6), Wis. Stats., and s. NR 670.042(2) Wis. Adm. Code, to approve a Class 2 modification of a license or plan of operation approval.
4. In accordance with ss. NR 670.042(2) and (4), Wis. Adm. Code, the Department concludes that the replacement of the fuel blend dispersers JJ and KK with the HVPS of the same capacity is a Class 2 license modification.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, the Department hereby conditionally approves the license modification request to process hazardous waste in the high viscosity waste processing system as described in the FPOR.

The modification is conditionally approved under s. NR 670.042(1) Wis. Adm. Code, and in accordance with the license, the most recent plan of operation approval, modifications, and the conditions set forth as follows:

1. The Department reserves the right to modify this determination 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 may be expressly provided below, no other terms or conditions of the feasibility and plan of operation approval or license, or any subsequent modifications thereto, are affected by this determination.
2. WRR shall comply with all conditions of its hazardous waste license, the provisions of chs. 289 and 291, Wis. Stats., all applicable requirements of chs. NR 660 to 679, Wis. Adm. Code, the feasibility and plan of operation approval and all modifications thereof, and any special order or modifications thereto issued by the Department, except as otherwise authorized by the Department under s. NR 670.061 or 670.079, Wis. Adm. Code.
3. WRR shall evaluate all proposed changes in the design, materials, equipment, procedures or monitoring schedules associated with the HVPS to determine if the changes meet applicable standards in ch. NR 664, Wis. Adm. Code, are subject to Department review, or constitute a license modification per ch. NR 670, Wis. Code. WRR shall notify the Department of all changes requiring a license modification, and submit a license modification request along with the associated plan review fees required in Appendix II, ch. NR 670, Wis. Adm. Code.
4. This conditional approval applies only to equipment that makes up the HVPS. The HVPS, as defined in the FPOR, is made up of the following equipment: a hydropulper, a barrel punch and pusher, a paint can press, a barrel crusher, an aerosol can processing unit, and a covered dumpster.

Environmental standards associated with equipment other than the equipment explicitly listed above, have not been reviewed, and are not part of this conditional approval.

5. WRR shall limit the capacity of the HVPS to not more than 14,750 gallons of waste per day. The amount of waste processed per day shall be recorded in the operating record.
6. WRR shall operate the HVPS with a maximum capacity of 3,750 gallons per batch.
7. To reduce the potential for an explosion, an inert gas shall be provided to the hydropulper enclosure to maintain an oxygen deficient environment, as proposed in the FPOR.
8. The HVPS will be operated with the following safety interlocks as described in Table D-10 of the FPOR:
 - a. E-stop shut offs located in the lower level fuels building, upper level fuels building, tanker loading bay south of the fuels building, tanker loading bay on the west wall near dock 4, and the control panel.

- b. Low and high level switches in the hydropulper vessel.
- c. High temperature and high pressure alarms and shut offs.
- d. Oxygen sensors with alarms and shut offs.
- e. Lower explosive limit sensors with shut offs for the barrel punch and pusher.

This equipment, and all other equipment that provides safeguards critical to the operation of the HVPS, shall be adequately maintained and fully operational. WRR shall not operate the HVPS without fully operational safety interlocks as provided in the FPOR and this approval.

9. The fuels building and covered dumpster function as permanent or temporary enclosures for purposes of compliance with Subchapters AA and BB of NR 664, Wis. Adm. Code. The fuels building and the covered dumpster shall be maintained and operated in accordance with the criteria for a permanent total enclosure as specified in "Procedure T – Criteria for and Verification of a Permanent or Temporary Enclosure" under 40 CFR 52.741, Appendix B.

The fuels building shall be vented with two 500 acfm fans, to a control device, as described in the FPOR and supporting information provided as part of this review. The doors of the building shall be kept closed while the HVPS is operating.

The dumpster shall be vented to a control device as described in the FPOR and supporting information provided as part of this review.

10. The barrel punch and pusher shall be safety interlocked to cease operation if the exhaust reaches 10 % of the lower explosive limit, as described in a December 18, 2009, certification signed by consulting engineer, Mr. William Hable, P.E.
11. The HVPS shall be operated in a manner that will eliminate spillage of any materials before, during and after processing. The HVPS will be maintained so that all equipment, monitoring devices, and safety controls are maintained in working order.
12. Within 90 days of the date of this approval, WRR shall provide a copy of the facility operating records that demonstrate compliance with all applicable leak detection and monitoring requirements.
13. WRR shall conduct initial monitoring to demonstrate that the theoretical expected life of the carbon emission control units, as determined in the December 14, 2010 design analysis provided by SEH, is adequate to control emissions and meet the required 95% VOC removal efficiency. The results of the initial monitoring shall be provided to the Department within 90 days of the date of this approval.
14. WRR shall conduct leak detection and monitoring to demonstrate compliance with equipment standards, as required per s. NR 670.025(4), Wis. Adm. Code, and keep records of this monitoring, as required per s. NR 664.1064, Wis. Adm. Code. The results of the initial monitoring shall be provided to the Department within 90 days of the date of this approval.

687,862.68 JS

15. WRR shall provide financial responsibility for the updated closure cost estimate in the amount of ~~\$687,356.52~~ and as specified in sub ch. H of ch. NR 664, Wis. Adm. Code, to the Department within 60 days of the date of this approval.

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 and administrative codes 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. 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: January 10, 2011

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
For the Secretary

Jill Schoen for EL

Edward K. Lynch, PE, Chief
Hazardous Waste Prevention & Management Section
Bureau of Waste & Materials Management

Jill Schoen

Jill Schoen, CHMM
Waste & Materials Management Supervisor
West Central Region

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
West Central Region Headquarters
PO Box 4001
Eau Claire WI 54702-4001

Scott Walker, Governor
Cathy Stepp, Secretary
Scott Humrickhouse, Regional Director
Telephone 715-839-3700
FAX 715-839-6076
TTY Access via relay - 711



October 14, 2011

Jan Smit, PE
WRR Environmental Services, Inc.
5200 Ryder Road
Eau Claire, WI 54701

HW/APPR
FID 618026530
Eau Claire County

SUBJECT: Hazardous Waste Class 1 Plan Modification Determination
Modification to add the F034 Waste Code
WRR Environmental Services, Inc.
EPA ID# WID990829475

Dear Mr. Smit:

On August 22, 2011, the Department of Natural Resources (Department) received your letter dated August 16, 2011. The letter requested a plan modification to add waste code F034 to WRR Environmental Services, Inc.'s (WRR) Hazardous Waste Permit Application Part A. The letter also discussed the replacement of tanks Q and R and updates to facility personnel and operational changes. This letter serves as notice that the Department has completed its review of WRR's request and is issuing a determination to conditionally approve WRR's plan modification request to add waste code F034. Updates to facility personnel and operational changes do not require Department approval; however, these changes are still considered a class 1 plan modification. This plan modification must be kept with the Feasibility and Plan of Operation (FPOR) determination, the operating license, and all plan modifications for the licensed facility.

WRR's letter and the July 20, 2011, e-mail to the Department, asked the Department of the applicability of the F034 waste code to the treated wastes that will consist of an oil mixture and a water mixture. The July 20, 2011, e-mail also asked the Department to evaluate if the K048 - K052 exemption would apply to the F034 treatment.

F034 applicability on the K048 through K052 Exemption

EPA's memorandum R0-11102 specifically deals with petroleum refining waste codes K048 through K052. There is no discussion in EPA's memorandum to not apply the 'derived from' rule to other hazardous wastes. Therefore the Department has determined that because of the 'derived from' rule, the F034 waste code would apply to all wastes generated from the treatment of the F034 waste. To remove the F034 waste code from the treated waste, you would need to petition the EPA region 5 administrator for a regulatory amendment under 40 CFR 260.20 and 260.22.

Besides the domestic sewer and point source discharge exclusions under s. NR 661.03(b), Wis. Adm. Code, there is another exception to the 'derived from' rule. In s. NR 661.03(b), Wis. Adm. Code a material that is reclaimed from a hazardous waste and used beneficially, e.g., used as a product, is no longer considered a solid waste, and thus is not a hazardous waste. This exception does not apply when a reclaimed material is burned for energy recovery or used in a manner constituting disposal. Wood products treated with the reclaimed wood preserving solutions are placed on the land (used in a manner constituting disposal), thus the exclusion in s. NR 661.03(b), Wis. Adm. Code would not apply to the reclaimed preservatives or to the treated wood products. In other words the preservatives and the wood products would be regulated as derived from listed hazardous wastes. However, under s. NR 661.04(1)(i)2, Wis. Adm. Code spent wastewaters from wood preserving processes that have been reclaimed and reused to treat wood are not solid wastes and thus not hazardous wastes.

F034 Treatment in Tanks

WRR could add a tank to treat F034 waste that could operate for up to ninety (90) days provided that the treatment of the F034 waste is limited to neutralization, dewatering, phase separation or component separation (filtering). This would be a class 1 plan modification requiring Department approval. If WRR wishes to pursue operation of a tank for up to 90 days, the submittal to the Department needs to have detail information on how WRR will comply with the applicable tank standards in subchapter J of chapter NR 665 Wis. Admin. Code.

K048 – K052 Discussion

EPA's memorandum R0-11102 shows that EPA made a decision not to uniformly apply the '*derived from*' rule for wastewaters generated from the sludge dewatering process for the K048 – K052 waste. EPA's decision is based on the presumption that properly conducted sludge dewatering will ensure that none of the sludge (a listed waste) is returned to the wastewater treatment system that generated the waste. In order for the returned wastewater to not be a listed hazardous waste, the refinery needs to show that the returned wastewater is chemically equivalent to the influent of the wastewater treatment system that originally generated the wastewater and the wastewater is returned to the wastewater treatment system that originally generated the wastewater.

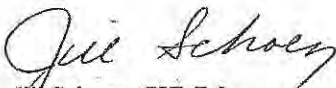
In summary three conditions need to be met in order for the wastewaters generated from the sludge dewatering process to not be a K048 – K052 listed hazardous waste:

1. The treatment needs to be conducted by a refinery. Language in R0-11102 always refers to a refinery conducting the wastewater treatment operation. There is no discussion in R0-11102 of treatment by an off-site TSD facility. In addition, EPA's memorandum RO-12347 for K049 waste states that off-site treatment of K049 waste for non-reclaimed emulsions (even if it is reclaimable) is a hazardous waste.
2. The returned wastewater is chemically equivalent to the influent of the wastewater treatment system that originally generated the wastewater.
3. The wastewater is returned to the wastewater treatment system that generated the wastewater. Language in R0-11102 always refers to returning the wastewaters to the wastewater treatment system that generated the wastewater.

This interpretation of R0-11102 is different than the one made in the Department's August 6, 2008, letter to WRR. At that time the Department failed to completely take items 1 and 3 into consideration. Under the Department's new interpretation of R0-11102, WRR's on-site treatment of K048 – K052 would no longer be eligible for the exemption from the '*derived from*' rule described in R0-11102.

If you have any questions or concerns regarding this approval, please contact Mike Ellenbecker, at mike.ellenbecker@wi.gov or at 262-884-2342.

Sincerely,



Jill Schoen, CHMM
Waste and Materials Management Program Supervisor
West Central Region

c: Pat Chabot – pat.chabot@wisconsin.gov
Jae Lee – US EPA Region 5
Scott Szymanski – scott.szymanski@wisconsin.gov

**BEFORE THE STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES**

**CLASS 1 LICENSE MODIFICATION
FINAL DETERMINATION**

**WRR ENVIRONMENTAL SERVICES, INC.
EPA ID# WID9908294751
FID# 618026530**

FINDINGS OF FACT

The Department finds that:

1. WRR Environmental Services, Inc. owns and operates a hazardous storage and treatment facility located at 5200 Ryder Road, Eau Claire, Eau Claire County, Wisconsin.
2. A conditional approval of a Feasibility and Plan of Operation Report (FPOR) for the storage and treatment operations was issued to WRR Environmental Services, Inc. by the Department on August 14, 2003.
3. Hazardous waste operating licenses for the storage and treatment operations were issued by the Department with effective date of October 22, 2003.
4. On August 22, 2011, the Department received a letter dated August 16, 2011. The letter requested a plan modification to add waste code F034 to WRR Environmental Services, Inc.'s (WRR) Hazardous Waste Permit Application Part A.
 - a. The letter also discussed the replacement of tanks Q and R and updates to facility personnel and operational changes.
 - b. The letter included an EPA RCRA Part A Hazardous Waste Permit Application dated August 8, 2011.
 - c. The letter also included a \$400 check (check # 117476) dated August 3, 2011.
5. Addendums received for this plan modification include the following:
 - a. On August 30, 2011, the Department received an e-mail containing a letter dated August 30, 2011. The letter explained the proposed treatment process and fuel blending the F034 waste.
 - b. On October 3, 2011, the Department received an e-mail responding to the Department's September 6 2011 e-mail.
6. Documents reviewed by the Department for the plan modification request includes the following:
 - a. A July 20, 2011, e-mail from Jan Smit of WRR regarding how the F034 waste will be treated.
 - b. EPA memorandum R0-11102 entitled '*Applicability of the "Mixture" and "Derived From" Rules to Petroleum Refinery Wastewater Systems*'.
 - c. EPA memorandum R0-12347 entitled '*November 20th Meeting with Texas Department of Water Resources (TDWR) and Texas Mid-Continental Oil and Gas Association (TMOGA)*'
 - d. EPA memorandum R0-11732 entitled '*Recycling Petroleum Refinery Oily Wastes; Regulatory Status of Separation and Recovery Systems Sarex Process for Recycling Petroleum Refinery Oily Wastes*'
 - e. EPA memorandum R0-12348 entitled '*Oily Wastewater Treatment Ponds, Permitting Coverage of*'.
 - f. EPA memorandum R0-13516 entitled '*Reclaimed Spent Wood Preservative Exclusion in 40 CFR Section 261.4(a)(9)*'.

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(4)(b)1., Wis. Adm. Code, to approve a class 1 modification to a license or plan of operation.

3. In accordance with s. NR 670.042, Wis. Adm. Code, the Department concludes that the revision described in Findings of Fact number 4 requires a class 1 license modification needing Department approval.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, the Department hereby approves the August 16, 2011, class 1 modification request under s. NR 670.042(4)(b)1., Wis. Adm. Code, and s. 289.30(6), Wis. Stats., and in accordance with the license and the most recent FPOR approval and the conditions set forth as follows:

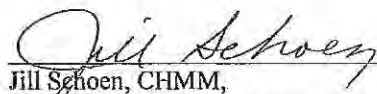
1. The Department has the right to modify this determination and to require additional information at any time. Nothing in this conditional approval shall relieve the owner or operator of the legal obligation to comply with applicable federal, state and local requirements. Except as may be expressly provided below, no other terms or conditions of the FPOR approval or license, or any subsequent modifications thereto, are affected by this determination.
2. WRR Environmental Services, Inc. shall provide the Department with documentation that a notice of this modification was mailed to all persons on the facility mailing list, including all appropriate units of state and local governments, within ninety (90) calendar days of the date of this approval, as required by s. NR 670.042(1)(a)2., Wis. Adm. Code.
3. WRR Environmental Services, Inc. shall at all times maintain in good working order and operate efficiently all facilities and systems used to manage and treat the F034 hazardous waste. Proper operation and maintenance includes, but is not limited to, effective performance based on designed facility removals/treatment, preventive maintenance, adequate funding, effective management, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures.
4. Prior to initially accepting a F034 waste from a generator, WRR Environmental Services, Inc. shall analyze the chemical and physical attributes of the F034 waste for the parameters and test methods identified in table C-2 of the approved FPOR. Within 30 days after the analysis, a copy of the analytical results shall be sent to Michael Ellenbecker at 9531 Rayne Rd, Suite IV, Sturtevant, WI 53177.

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 and administrative codes establish time periods and requirements for reviewing Department decisions.

To seek judicial review of the Department's decision, sections 227.52 and 227.53, Wis. Stats.; establish criteria for filing a petition 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: October 14, 2011
WISCONSIN DEPARTMENT OF NATURAL RESOURCES
FOR THE SECRETARY



Jill Schoen, CHMM,
Waste and Materials Management Program Supervisor
West Central Region



Michael Ellenbecker,
Waste Management Specialist
Sturtevant Service Center



February 2, 2012

Jan Smit, PE
WRR Environmental Services, Inc.
5200 Ryder Road
Eau Claire, WI 54701

SUBJECT: Hazardous Waste Class 1 Plan Modification Determination
Omitting CC-1 and using CC-7 to Control Emissions from the Hydrapulper
WRR Environmental Services, Inc.
EPA ID# WID990829475
FID# 618026530
License # 4303 for Containment Building

Dear Mr. Jan Smit:

The Department received your January 10, 2012, letter informing the Department of omitting CC-1 and using CC-7 to control emissions from the hydrapulper. Your letter stated that the change occurred on January 5, 2012. As per section A.3 in Appendix 1 of chapter NR 670 Wis. Adm. Code the tank replacement is a class one plan modification that does not require prior Department approval or the \$400 review fee.

The Department requests that you send information which shows a notice of the modification has been sent to all persons on the facility mailing list within 90 days of putting the change in effect, as required by NR 670.042(1)(a)2., Wis. Adm. Code.

If you have any questions or comments regarding this letter please contact me at (262) 880-5913.

Sincerely,

A handwritten signature in purple ink that reads "Mike Ellenbecker".

Michael Ellenbecker
Licensing and Policy Review Coordinator

cc: SER File



February 14, 2012

Mr. Jan Smit, PE
WRR Environmental Services, Inc.
5200 Ryder Road
Eau Claire, WI 54701

SUBJECT: Hazardous Waste Class 1 Plan Modification Determination
Modifications to the Container Storage Sheds
WRR Environmental Services, Inc.
EPA ID# WID990829475
FID# 618026530
License # 6005 for Container Storage

Dear Mr. Smit:

The Department of Natural Resources (Department) received your letter dated January 11, 2012. The letter requested a class 1 plan modification to the hazardous waste container storage sheds. The specific changes identified in the letter include:

1. Reduce the number of hazardous waste container storage sheds from seventeen (17) to eight (8).
 - a. Sheds P-1, P-2, P-3, P-6, P-7, P-8, P-9 and P-10 would remain as hazardous waste container storage sheds.
 - b. Sheds P-4, P-5, P-11, P-12, P-13, P-14, P-15, P-16 and P-17 will be used for the storage of non hazardous wastes.
 - c. Shed P-1 will be used for the storage of water reactive and cyanide reactive wastes.
 - d. Shed P-8 will be used for the storage of oxidizer wastes.
 - e. Shed P-10 will be used for corrosive wastes.
2. Reduce the maximum number of containers stored in sheds P-1, P-2, P-3, P-6, P-7, P-9 and P-10 from 119 (6,545 gallons) to 80 (4,400 gallons).
3. Reduce the maximum number of containers stored in shed P8 from 119 (6,545 gallons) to 8 (440 gallons). Note that the February 9, 2012 e-mail requested a change to forty (40) 55 gallon containers or 2,200 gallons.
4. Installing a steel liner over the secondary containment system and removing the second sump that is found in any shed by filling in the sump with concrete.
5. Providing aisle space in the shed.
6. General repairs to the shed.

These changes are a class 1 plan modification under A.3, A.8 and F.5.B located in Appendix 1 of chapter NR 670, Wisconsin Administrative Code. This letter serves as notice that the Department has completed its review of WRR's request and is issuing a determination to conditionally approve WRR's plan modification request.

WRR will need to initiate closure of sheds P-4, P-5, P-11, P-12, P-13, P-14, P-15, P16 and P17 as identified in section I of your Feasibility and Plan of Operation Report (FPOR). Submit this closure documentation by May 31, 2012. Section I-2a(1) in the FPOR discusses partial closure of a license storage unit and therefore the class 1 plan modification discussed on page two (2) of the February 6, 2012, letter from Assistant Attorney General Cynthia Hirsch is no longer required. If you have any questions or concerns regarding this approval, please contact Mike Ellenbecker, at mike.ellenbecker@wi.gov or at 262-884-2342.

Sincerely,

Edward K Lynch, PE, Chief
Hazardous Waste Prevention & Management Section
Bureau of Waste and Materials Management

c: Pat Chabot – WA/5, Jae Lee – US EPA Region 5

**BEFORE THE STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES**

**CLASS 1 LICENSE MODIFICATION
FINAL DETERMINATION**

**WRR ENVIRONMENTAL SERVICES, INC.
EPA ID# WID9908294751
FID# 618026530**

FINDINGS OF FACT

The Department finds that:

1. WRR Environmental Services, Inc. owns and operates a hazardous storage and treatment facility located at 5200 Ryder Road, Eau Claire, Eau Claire County, Wisconsin.
2. A conditional approval of a Feasibility and Plan of Operation Report (FPOR) for the storage and treatment operations was issued to WRR Environmental Services, Inc. by the Department on August 14, 2003.
3. Hazardous waste operating licenses for the storage and treatment operations were issued by the Department with an effective date of October 22, 2003.
4. The Department received a letter dated January 11, 2012 with a \$400.00 plan review fee check. The letter requested a class 1 plan modification to the hazardous waste container storage sheds. The specific changes identified in the letter include:
 - a. Reduce the number of hazardous waste container storage sheds from seventeen (17) to eight (8).
 - i) Sheds P-1, P-2, P-3, P-6, P-7, P-8, P-9 and P-10 would remain as hazardous waste container storage sheds.
 - ii) Sheds P-4, P-5, P-11, P-12, P-13, P-14, P-15, P-16 and P-17 will be used for the storage of non hazardous wastes.
 - iii) Shed P-1 will be used for the storage of water reactive and cyanide reactive wastes.
 - iv) Shed P-8 will be used for the storage of oxidizer wastes.
 - v) Shed P-10 will be used for corrosive wastes.
 - b. Reduce the maximum number of containers stored in sheds P-1, P-2, P-3, P-6, P-7, P-9 and P-10 from 119 (6,545 gallons) to 80 (4,400 gallons).
 - c. Reduce the maximum number of containers stored in shed P-8 from 119 (6,545 gallons) to 8 (440 gallons).
 - d. Installing a steel liner over the secondary containment system and removing the second sump that is found in any shed by filling in the sump with concrete.
 - e. Providing aisle space in the shed.
 - f. General repairs to the shed.
5. On January 30, 2012, and February 1, 2012 the Department sent Jan Smit of WRR an e-mail requesting additional information.
6. Addendums received for this plan modification include a February 9, 2012, e-mail. This e-mail responded to the Department's e-mails described in Findings of Fact number 5.

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(4)(b)I., Wis. Adm. Code, to approve a class 1 modification to a license or plan of operation.
3. In accordance with s. NR 670.042, Wis. Adm. Code, the Department concludes that the revision described in Findings of Fact number 4 requires a class 1 license modification needing Department approval.

DETERMINATION AND CONDITIONS

Based on the foregoing Findings of Fact and Conclusions of Law, the Department hereby approves the August 16, 2011, class 1 modification request under s. NR 670.042(4)(b)1., Wis. Adm. Code, and s. 289.30(6), Wis. Stats., and in accordance with the license and the most recent FPOR approval and the conditions set forth as follows:

General Conditions

1. The Department has the right to modify this determination 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 may be expressly provided below, no other terms or conditions of the FPOR approval or license, or any subsequent modifications thereto, are affected by this determination.
2. WRR Environmental Services, Inc. shall provide the Department with documentation that a notice of this modification was mailed to all persons on the facility mailing list, including all appropriate units of state and local governments, within ninety (90) calendar days of the date of this approval, as required by s. NR 670.042(1)(a)2., Wis. Adm. Code.
3. WRR Environmental Services, Inc. shall develop a new written shed inspection training program. WRR Environmental Services, Inc. shall submit the training program to the Department by March 31, 2012, for approval and implement the training program within thirty (30) days after the Department has approved the training program.
4. WRR Environmental Services, Inc. shall develop a new weekly written shed inspection template. WRR Environmental Services, Inc. shall submit the inspection template to the Department by March 31, 2012, for approval and implement the inspection template within thirty (30) days after the Department has approved the inspection template.

Shed Conditions

5. WRR Environmental Services, Inc. shall maintain the sheds and the secondary containment systems in good working order.
6. WRR Environmental Services, Inc. shall develop and implement a preventive maintenance program that reduces the risk of deteriorations to the sheds and the secondary containment systems.
7. WRR Environmental Services, Inc. shall prevent precipitation from infiltrating the sheds. This condition does not apply when WRR Environmental Services, Inc. is actively adding or removing wastes and/or materials from the sheds.
8. WRR Environmental Services, Inc. shall maintain the sheds to be free of animals and animal activity (e.g., nests, food storage). This condition does not apply when it would cause WRR Environmental Services, Inc. to violate a governmental rule if WRR Environmental Services, Inc. were to act on this condition (e.g. knocking down a barn swallow nest that is being used by the barn swallows).
9. WRR Environmental Services, Inc. shall secure the shed doors when adding or removing wastes and/or materials from the sheds to prevent the shed doors from moving in the wind.
10. WRR Environmental Services, Inc. shall place a sign on each hazardous waste shed with these words or similar words "*Hazardous Waste Shed*". In addition sheds P-1, P-8 and P-10 shall have the following sign.
 - a. Shed P-1 shall be identified with word(s) as containing reactives.
 - b. Shed P-8 shall be identified with word(s) as containing oxidizers.
 - c. Shed P-10 shall be identified with word(s) as containing corrosives.Each sign shall be conspicuously located so that the sign is visible and the sign maintained so that the sign is readable and not faded.
11. The capacity and use of the sheds are as follows:
 - a. Storage of hazardous waste shall be limited to sheds P-1, P-2, P-3, P-6, P-7, P-8, P-9 and P-10.
 - b. Storage of hazardous waste is no longer permitted in sheds P-4, P-5, P-11, P-12, P-13, P-14, P-15, P-16 and P-17.
 - c. Storage of water and cyanide reactive hazardous wastes is restricted to Shed P-1.
 - d. Storage of oxidizer wastes is restricted to shed P-8.

- e. Storage of corrosive wastes is restricted to shed P-10.
 - f. The maximum number of containers stored in sheds P-1, P-2, P-3, P-6, P-7, P-9 and P-10 is restricted to eighty (80) 55 gallon drums or 4,400 gallons.
 - g. The maximum number of containers stored in shed P8 is restricted to forty (40) 55 gallon drums or 2,200 gallons.
12. WRR Environmental Services, Inc. shall remove accumulated snow from around the sheds within twenty-four (24) hours.

Container Conditions

13. WRR Environmental Services, Inc. shall maintain a minimum of a forty-two (42) inch aisle space down the center of the shed.
14. WRR Environmental Services, Inc. shall manage non-hazardous waste stored in a licensed storage unit as if it were a hazardous waste (e.g. secondary containment, inspection, license storage capacity).
15. WRR Environmental Services, Inc. shall store waste in sturdy, leak-proof containers.
16. WRR Environmental Services, Inc. shall place containers in the storage areas so that labels are visible from the aisles.
17. WRR Environmental Services, Inc. shall place containers of equal or larger size on the bottom level when storing containers two (2) high on pallets.
18. WRR Environmental Services, Inc. shall stack containers in a stable manner to minimize the risk of containers tipping over.
19. WRR Environmental Services, Inc. shall not stack containers when the stacking would compromise the structural integrity of the container.
20. WRR Environmental Services, Inc. shall use pallets to separate the first level from the second level when containers greater than twenty (20) gallons in size are stored two (2) high.

Secondary Containment System Conditions

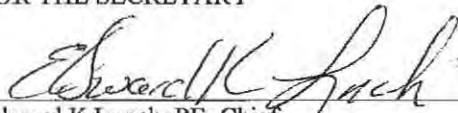
21. WRR Environmental Services, Inc. shall operate the secondary containment system to prevent any migration of wastes or accumulated liquid out of the secondary containment system into the air, soil, groundwater or surface water at any time.
22. WRR Environmental Services, Inc. shall ensure the secondary containment system is capable of detecting and collecting releases and accumulated liquids until the collected material is removed.
23. WRR Environmental Services, Inc. shall maintain the secondary containment system to be liquid tight and free of cracks, gaps and corrosion.
24. WRR Environmental Services, Inc. shall repair any damage to the coating on the steel liner of the secondary containment system with a chemically resistant coating that prevents corrosion within forty-eight (48) hours after discovery of the damage. If repairs can not be made within forty-eight (48) hours, the containers stored in the shed shall be moved to another licensed storage area.
25. WRR Environmental Services, Inc. shall remove, properly manage and dispose of all uncontained wastes and liquids located within the secondary containment system from the secondary containment system area daily.
26. WRR Environmental Services, Inc. shall not store materials or equipment whose volume will adversely affect the secondary containment system capacity of the storage units, other than the equipment considered in the secondary containment system calculations included in the FPOR.

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 and administrative codes establish time periods and requirements for reviewing Department decisions.

To seek judicial review of the Department's decision, sections 227.52 and 227.53, Wis. Stats., establish criteria for filing a petition 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: 2-14-2012
WISCONSIN DEPARTMENT OF NATURAL RESOURCES
FOR THE SECRETARY



Edward K Lynch, PE, Chief
Hazardous Waste Prevention & Management Section
Bureau of Waste and Materials Management



Michael Ellenbecker,
Waste Management Specialist
Sturtevant Service Center

Smit, Jan

From: Smit, Jan
Sent: Tuesday, June 12, 2012 2:12 PM
To: Mike Ellenbecker
Cc: Scott Szymanski; Hager, Jim
Subject: WRR Fuels Bldg Procedure T Modification
Attachments: Section D Revised Text 061212.pdf

Tracking:	Recipient	Delivery	Read
	Mike Ellenbecker		
	Scott Szymanski		
	Hager, Jim	Delivered: 6/12/2012 2:12 PM	Read: 6/12/2012 3:11 PM

Mike,

Re: EPA ID No. WID 990 829 475
WDNR FID No. 618 026 530

In accordance with NR 670.042(1)(a)1 this email is to notify the Department that a Class 1 RCRA license modification was put into effect on June 6, 2012 at WRR that consisted of modifying the Procedure T analysis for the Fuels Building. The damper on the south wall of the Fuels Building located near the southeast corner has been enlarged in accordance with the calculations provided to you on 5/31/12. On 6/4/12 we discussed on the telephone that this change is a Class 1 Plan Modification that does not require prior Department approval. There is one change which is on page D-27 of the FPOR as a result of this plan modification. The reason for the change is as explained in my 5/23/12 email which is shown in part below:

“With the warmer summer weather coming, WRR would like to increase the make up air flow into the Fuels Building. It has been determined (computations are available) that increasing the draft opening will decrease the velocity of make up air into the building while increasing the air flow. This was determined in conjunction with a revision to the Procedure T analysis. There would be no change to the emissions controls or exhaust equipment. There would still be a negative pressure in the Fuels Building which will still necessitate keeping all doors closed during operation of the equipment. It appears that this change would be a Class 1 plan modification approval in accordance with Section A.3 in Appendix 1 of Chapter NR 670 for much the same reasoning that the elimination of CC-1 was under the 2/2/12 plan mod approval.”

WRR will be sending a notice to all persons on the facility mailing list as required in NR 670.042(1)(a)2.

Let me know if you have any questions pertaining to this modification. A couple of copies of this email and attachment will be mailed to you. It is my understanding that there is no review fee for this type of a Class 1 plan modification.

Jan Smit
Compliance Director
WRR Environmental Services Co., Inc.
5200 Ryder Road
Eau Claire, WI 54701
Phone: 715-834-9624 X- 8780
Direct: 715-852-1630
Cell: 715-563-7907
FAX: 715-836-8785
jsmit@wrres.com

Smit, Jan

From: Ellenbecker, Michael J - DNR [Michael.Ellenbecker@wisconsin.gov]
Sent: Monday, August 06, 2012 11:02 AM
To: Smit, Jan
Subject: RE: WRR Proposed Plan Mod

Jan based on your email and our phone call today the Department agrees with WRR that this is a class 1 plan mod that does not need Department approval.

Mike Ellenbecker

Waste and Materials Management Specialist
Waste and Materials Management Program
Wisconsin Department of Natural Resources
Southeast Region, Sturtevant Service Center

(☎) phone: (262) 884-2342

(☎) fax: (262) 884-2307

(✉) e-mail: michael.ellenbecker@wisconsin.gov

From: Smit, Jan [mailto:jsmit@WRRES.com]
Sent: Wednesday, August 01, 2012 10:18 AM
To: Ellenbecker, Michael J - DNR
Cc: Hager, Jim; Szymanski, Scott J - DNR; Anderson, Becky; Bochert, Linda
Subject: WRR Proposed Plan Mod

Mike,

WRR is seeking your concurrence that the change described below is a Class 1 plan modification that does not require prior Department approval. WRR's RCRA permit currently allows for pumping hazardous waste from the E-II tanker pit to tanks in the E-II South Sludge Tank Farm. The proposed modification involves pumping hazardous waste residues from Tank R in this tank farm to a tanker truck in the E-II tanker pit.

The modification will involve installing a new pipe from Tank R to the E-II tanker pit, and installing a new pump. The new piping will allow use of the existing centrifugal pump in the tanker pit. The existing piping was constructed to only allow for pumping from the tanker pit to the fifteen hazardous waste tanks. The same piping cannot be used to pump from a specific tank to the tanker pit. The new pump will be an air pump. The air pump is needed to prime the existing centrifugal pump. The air pump will be located in the tanker pit near the existing centrifugal pump. The existing pump is used to pump waste from the E-II tanker pit to the tanks in the E-II South Sludge Tank Farm. Because the new pipe will be functionally equivalent to the existing pipe, and because the same centrifugal pump will be used with the addition of a pump to prime it for the longer suction distance from Tank R vs. the suction distance to a tanker truck, it seems that this change would be a Class 1 plan modification in accordance with Section A.3 in Appendix 1 of Chapter NR 670.

Let me know as soon as possible if you agree that this is a Class 1 plan modification that does not require prior Department approval. If you agree, and after the change is put into effect, WRR will notify persons on the facility mailing list in accordance with NR 670.042(1)(a)2, and will make any changes needed to text and drawings in the FPOR. Any such edits to the FPOR will be provided to you.



September 4, 2012

Jan Smit, PE
WRR Environmental Services, Inc.
5200 Ryder Road
Eau Claire, WI 54701

SUBJECT: Hazardous Waste Class 1 Plan Modification Determination
Upgrading to a 2 inch nitrogen supply line to the Hydrapulper
WRR Environmental Services, Inc.
EPA ID# WID990829475
FID# 618026530
License # 4303 for Containment Building

Dear Mr. Jan Smit:

The Department received your August 31, 2012, email requesting Department concurrence to upgrade the 1 inch nitrogen supply line and fittings to the hydrapulper with a 2 inch supply line and fittings. As per section A.3 in Appendix 1 of chapter NR 670 Wis. Adm. Code the equipment replacement is a class one plan modification that does not require prior Department approval or the \$400 review fee.

The Department requests that you send information which shows a notice of the modification has been sent to all persons on the facility mailing list within 90 days of putting the change in effect, as required by NR 670.042(1)(a)2., Wis. Adm. Code.

If you have any questions or comments regarding this letter please contact me at (262) 880-5913.

Sincerely,

Michael Ellenbecker
Licensing and Policy Review Coordinator

cc: WC File

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Sturtevant Service Center
9531 Rayne Rd
Suite IV
Sturtevant WI 53177

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 262-884-2342
FAX 262-884-2307
TTY Access via relay - 711



January 7, 2013

Jan Smit, PE
WRR Environmental Services, Inc.
5200 Ryder Road
Eau Claire, WI 54701

SUBJECT: Hazardous Waste Class 1 Plan Modification Determination
New piping to convey hazardous wastes
WRR Environmental Services, Inc.
EPA ID# WID990829475
FID# 618026530

Dear Mr. Jan Smit:

The Department received your December 19, 2012, email requesting Department concurrence to install piping in order to convey hazardous wastes from the E-I thin film evaporator into a tanker truck and to convey hazardous wastes from Tank FF to the tanker dock area located south of the E1 tank farm. As per section A.3 in Appendix 1 of chapter NR 670 Wis. Adm. Code the installation of the new equipment (piping) is a class one plan modification that does not require prior Department approval or the \$400 review fee.

The Department requests that you send information which shows a notice of the modification has been sent to all persons on the facility mailing list within 90 days of putting the change in effect, as required by NR 670.042(1)(a)2., Wis. Adm. Code.

If you have any questions or comments regarding this letter please contact me at (262) 880-5913.

Sincerely,

Mike Ellenbecker

Michael Ellenbecker
Licensing and Policy Review Coordinator

cc: WC File

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Sturtevant Service Center
9531 Rayne Rd
Suite IV
Sturtevant WI 53177

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 262-884-2342
FAX 262-884-2307
TTY Access via relay - 711



February 20, 2013

Jan Smit, PE
WRR Environmental Services, Inc.
5200 Ryder Road
Eau Claire, WI 54701

SUBJECT: Hazardous Waste Class 1 Plan Modification Determination
Adding second pump to the hydrapulper
WRR Environmental Services, Inc.
EPA ID# WID990829475
FID# 618026530
License # 4303 for Containment Building

Dear Mr. Smit:

The Department received your February 18, 2013, email requesting Department concurrence to install a second pump and additional piping to the hydrapulper. This upgrade to the hydrapulper will reduce the need to use the hydrapulper and thus reduce emissions within the fuel building. As per section A.3 in Appendix 1 of chapter NR 670 Wis. Adm. Code the equipment replacement is a class one plan modification that does not require prior Department approval or the \$400 review fee.

The Department requests that you send information which shows a notice of the modification has been sent to all persons on the facility mailing list within 90 days of putting the change in effect, as required by NR 670.042(1)(a)2., Wis. Adm. Code.

If you have any questions or comments regarding this letter please contact me at (262) 880-5913.

Sincerely,

Mike Ellenbecker

Michael Ellenbecker
Licensing and Policy Review Coordinator

cc: WC File

Smit, Jan

From: Ellenbecker, Michael J - DNR [Michael.Ellenbecker@wisconsin.gov]
Sent: Wednesday, February 20, 2013 9:03 AM
To: Smit, Jan
Cc: Hager, Jim; Szymanski, Scott J - DNR; Anderson, Becky
Subject: RE: WRR Proposed Plan Mod for HVPS
Attachments: WRR Class 1 Plan Mod for adding second pump to the hydrapulper.pdf

Jan change is approved (see attachment)

Mike Ellenbecker

Waste and Materials Management Specialist
Waste and Materials Management Program
Wisconsin Department of Natural Resources
Southeast Region, Sturtevant Service Center

(☎) phone: (262) 884-2342

(☎) fax: (262) 884-2307

(✉) e-mail: michael.ellenbecker@wisconsin.gov

From: Smit, Jan [mailto:jsmit@WRRES.com]
Sent: Monday, February 18, 2013 10:03 AM
To: Ellenbecker, Michael J - DNR
Cc: Hager, Jim; Szymanski, Scott J - DNR; Anderson, Becky
Subject: WRR Proposed Plan Mod for HVPS

Mike,

WRR is seeking your concurrence that the change described below is a Class 1 plan modification that does not require prior Department approval.

WRR's RCRA permit currently allows for pumping hazardous waste liquids from containers into the hydrapulper. The proposed modification involves pumping hazardous waste semisolids using a second pump into the hydrapulper. Currently solids and semisolids are put into the hydrapulper using the barrel punch/pusher in conjunction with the slurry pump. Having the new pump will reduce the need to use this equipment thus reducing emissions within the Fuels Building.

The modification will involve installing a new 3" pipe from the new pump to the hydrapulper. A 3" flexible hose will be used to suck the material out of the container. The new pump will be an air operated Gorman Rupp pump. An air emissions vent hose will be connected to the new pump and vent to CC-7. The new pump will not change the permitted capacity of the hydrapulper. Because the new pump and pipe will be functionally equivalent to the existing air operated liquids pump and pipe, it seems that this change would be a Class 1 plan modification in accordance with Section A.3 in Appendix 1 of Chapter NR 670.

Let me know as soon as possible if you agree that this is a Class 1 plan modification that does not require prior Department approval. If you agree, and after the change is put into effect, WRR will notify persons on the facility mailing list in accordance with NR 670.042(1)(a)2. Because the new FPOR application will be submitted to you within the 90 period specified by this code, WRR proposes to make changes needed to text and drawings in the new FPOR.

Thank you,

Smit, Jan

From: Ellenbecker, Michael J - DNR [Michael.Ellenbecker@wisconsin.gov]
Sent: Monday, May 06, 2013 11:03 AM
To: Smit, Jan
Subject: RE: WRR Proposed RCRA Plan Mod for CC-2 & 3

Jan based on the information in your email and our phone conversation on May 1 I agree that it would be a class 1 plan mod not requiring Department approval.

Mike Ellenbecker

Waste and Materials Management Specialist
Waste and Materials Management Program
Wisconsin Department of Natural Resources
Southeast Region, Sturtevant Service Center

(☎) phone: (262) 884-2342

(☎) fax: (262) 884-2307

(✉) e-mail: michael.ellenbecker@wisconsin.gov

From: Smit, Jan [mailto:jsmit@WRRES.com]
Sent: Tuesday, April 30, 2013 1:31 PM
To: Ellenbecker, Michael J - DNR
Cc: Szymanski, Scott J - DNR; Hager, Jim; Anderson, Becky; Zuerlein, Kirk; Sabin, Dean; Gullicksrud, Steven
Subject: WRR Proposed RCRA Plan Mod for CC-2 & 3

Mike,

Yesterday the carbon in canister units CC-2 and CC-3 became warmer than normal. For safety concerns, it was decided to move both units out away from the north exterior wall of the Fuels Building. This appears to be a situation similar to what happened in 2011 to the former CC-1 carbon canister. WRR intends to most likely place CC-2 and CC-3 near the location where CC-1 had been moved to west of the Fuels Building. For now, nothing is being put into the dumpster, and both CC-2 and CC-3 are not connected to the air duct system. Drums ready to crush are being stockpiled inside the Fuels Building.

WRR does not intend to change the size of these two units. WRR proposes to extend the vent piping that comes from the dumpster over to the new location for CC-2 and CC-3. The blower will also be moved. It appears that this will be a Class 1 RCRA plan modification that will not require prior Department approval. **Do you agree?**

In order to commence using CC-2 and CC-3 again, WRR intends to extend the piping as soon as the necessary parts can be shipped in and the electrical conduit is extended, and thus WRR needs your concurrence on this as soon as possible. Thanks,

Jan Smit
Environmental Compliance
WRR Environmental Services Co., Inc.
5200 Ryder Road
Eau Claire, WI 54701-5140
715-852-1630

Smit, Jan

From: Smit, Jan
Sent: Tuesday, September 10, 2013 3:11 PM
To: Ellenbecker, Michael J - DNR
Cc: Hager, Jim; Anderson, Becky; Gasser, Mark; Szymanski, Scott J - DNR
Subject: WRR Barrel De-Header RCRA Plan Mod

Mike,

WRR is seeking your concurrence that the change described below is a Class 1 plan modification that does not require prior Department approval.

WRR's RCRA permit currently allows for removing lids from hazardous waste drums using the barrel cutter. The proposed modification involves having a second method for opening such drums. The second method will involve the use of a barrel de-header. For any given drum of waste, either the barrel cutter or the barrel de-header would be used to remove the metal tops of drums. For tight head barrels of high viscosity materials to be processed by the ARO ink pump, the barrel de-header would be used in place of the barrel cutter. The barrel de-header will create a smooth edge around the head of the barrel. This smooth cut will prevent tearing the gasket of the ARO ink pump. The barrel de-header will be located between the ARO ink pump and the barrel crusher. There would not be any additional emissions from the barrel de-header. Any barrels processed by the barrel de-header would have been processed by the barrel cutter. Emissions will be released into the fuels building; then sucked into CC-7.

The addition of the barrel de-header will not involve the installation of any new piping. Because the de-header will be functionally equivalent to the existing barrel cutter, it seems that this change would be a Class 1 plan modification in accordance with Section A.3 in Appendix 1 of Chapter NR 670.

Let me know if you agree that this is a Class 1 plan modification that does not require prior Department approval. If you agree, and after the change is put into effect, WRR will notify persons on the facility mailing list in accordance with NR 670.042(1)(a)2. WRR will also make changes needed to text and drawings in the new FPOR and submit them to you as a change.

Thank you,

Jan Smit
Environmental Compliance Coordinator
WRR Environmental Services Co., Inc.
5200 Ryder Road
Eau Claire, WI 54701-5140
715-852-1630
715-563-7907 (cell)
jsmit@wrres.com

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Sturtevant Service Center
9531 Rayne Rd
Suite IV
Sturtevant WI 53177

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 262-884-2342
FAX 262-884-2307
TTY Access via relay - 711



Rec'd 10/10/13

October 7, 2013

Jan Smit, PE
WRR Environmental Services, Inc.
5200 Ryder Road
Eau Claire, WI 54701

SUBJECT: Hazardous Waste Class 1 Plan Modification Determination
WRR Barrel De-Header
WRR Environmental Services, Inc.
EPA ID# WID990829475
FID# 618026530

Dear Mr. Jan Smit:

The Department received your September 10, 2013, email requesting Department concurrence to install a second machine in order to have another method to open containers. As per section A.3 in Appendix 1 of chapter NR 670 Wis. Adm. Code the installation of the new equipment is a class one plan modification that does not require prior Department approval or the \$400 review fee.

The Department requests that you send information which shows a notice of the modification has been sent to all persons on the facility mailing list within 90 days of putting the change in effect, as required by NR 670.042(1)(a)2., Wis. Adm. Code.

If you have any questions or comments regarding this letter please contact me at (262) 880-5913.

Sincerely,

Mike Ellenbecker

Michael Ellenbecker
Licensing and Policy Review Coordinator

cc: WC File

Part 1
Section A – General Requirements

Appendix A-2
Household Hazardous Waste

WRR operates a Household Hazardous Waste (HHW) Collection facility in accordance with the requirements of NR 666, Subchapter HH. In 2009 WRR completed and submitted the Form 4430-020, "Notification of Activity for Household Hazardous Waste Collection Facility" to the WDNR. The building that WRR uses is connected to the office building, but is completely enclosed and heated. It has a concrete floor. It is often referred to as the Clean Sweep Room or the HHW Room. Figure A.1, Facility Site Plan, shows the location of the Clean Sweep Room.

WRR is considered by the WDNR to be a permanent household hazardous waste collection facility. For the past several years, WRR has been holding Clean Sweep collection services for the residents of Eau Claire County on four Saturday's from April to November. WRR also provides Clean Sweep services in several western and northwestern Wisconsin communities each year. The waste from off-site Clean Sweep events is brought back to WRR on a manifest and unloaded onto a receiving dock permitted as a hazardous waste container storage area. After acceptance into inventory, the material is sorted in the Clean Sweep Room. That is, WRR conducts both depacking and repacking activities in this room.

In 2014 the HHW Room is being included in the WRR RCRA relicensing process. Thus, the HHW Room has the identity of being both a HHW facility and a licensed Hazardous Waste Container Storage Area.

The following sections of this FPOR have been updated to include the HHW facility as a Hazardous Waste Container Storage Area:

- a) Identification of the HHW facility as a hazardous waste container storage area on facility Map A.1
- b) The Process Codes and Design Capacities section of the Hazardous Waste Permit Information Form found in the completed Part A application
- c) Part 1 – Section L: Closure Plan Requirements
- d) Part 1 – Section M: Closure Cost Estimate and Financial Responsibility
- e) Part 2 – Section B: Container Standards - Containment

An angle iron containment curb was constructed around the perimeter of the room in 2013. The containment computations are in Appendix 2B-6. In addition, containment consists of both secondary containment in drums, and the placement of drums containing used motor oil, waste antifreeze, and waste gasoline/oil mixes on a four drum (55 gallon each) in-line polyethylene containment pallet. The containment pallet has a spill capacity of 66 gallons. The secondary containment in drums consists of small containers of household hazardous waste stored inside larger over pack containers. Both vermiculite and absorbent pads are kept in the room.

Although NR 666.903(3) allows for the storage of hazardous waste for up to one year, WRR strives to move all hazardous waste out of the Clean Sweep Room within 90 days of it initially being placed there. Less than 80,000 gallons of hazardous waste are kept in the room at any given time.

Part 1
Section A – General Requirements

Appendix A-3
Non Hazardous Waste Operations at WRR

Solvent recycling is the main activity conducted at WRR. Both hazardous waste and non-hazardous waste are recycled through the use of thin film evaporators. Per [NR 661.06\(3\)\(a\)](#), the recycling process itself is exempt from regulation except for the requirements for subchs. [AA](#) and [BB of ch. NR 664](#).

WRR operates three thin film systems for solvent reclamation. They are identified as the E1, E4 and E23 thin film systems. Under its current permit, the thin film systems E1 and E4 are classified as Miscellaneous Units. These thin film systems were designated as such to allow for their use in hazardous wastewater treatment. In this application, WRR is removing the E1's classification as a Miscellaneous Unit; since the issuance of WRR's current permit, the E1 has not processed any hazardous wastewater. The sole activity of the E1 unit has been to recycle both hazardous and non-hazardous solvent streams.

When the E23 thin film system was installed in 2008, it was classified as an exempt recycling unit.

Also in this application, WRR is classifying two existing fractionation systems as exempt recycling units. The equipment designations for these two systems are F2 and F3. Both systems operate under ambient pressure and can perform both batch and continuous operations.

Since recyclable materials are stored prior to the reclamation process, WRR maintains compliance with the applicable provisions of subchs. [A](#) to [L](#) of [ch. NR 664](#).

WRR will maintain the E4 thin film system as a Miscellaneous Unit in this application. This will allow its continued use as a hazardous wastewater treatment unit if the need arises.

Residues from WRR's recycling activities, as well as hazardous waste that is blended, are filled into bulk tankers for transport to cement kilns for use as supplemental fuel or incinerators. The material shipped to cement kilns may be transported directly to the kiln via tanker truck or may be moved to the kilns via rail car.

For transport via rail, WRR leases a transfer facility located in Bloomer WI. The transfer facility (EPA ID# WIR000138180) is owned by Progressive Rail Inc. Tanker trucks filled with WRR generated solvent recycling residues and fuel blend materials transport the material to the transfer facility where it is trans-loaded into rail cars. Manifests are used to track shipments to the transfer facility and cement kiln.

WRR uses the transfer facility to trans-load hazardous wastewater from tanker truck to rail car. The transfer facility can also be used to trans-load and ship rail car volumes of product from WRR.

Rail car volumes of product and waste can be received and trans-loaded at the transfer facility for shipment back to the WRR facility.¹

¹ Item# 10

Part 1
Section A – General Requirements

Appendix A-4
Local Approval Requests and Responses



**State of Wisconsin
Waste Facility Siting Board**

5005 University Avenue, Suite 201, Madison, WI 53705-5400

Phone: (608) 266-7709

Fax: (608) 264-9885

e-mail: dhamail@wisconsin.gov

James Schuerman
Chairman

David H. Schwarz
Executive Director

January 15, 2013

CERTIFIED MAIL

WRR Environmental Services Co., Inc.
5200 Ryder Road.
Eau Claire, WI 54701

Town of Washington Clerk
Janelle Henning
5750 Old Town Hall Road
Eau Claire, WI 54701

City of Eau Claire Clerk
203 S. Farwell Street
Eau Claire, WI 54701

Eau Claire County Clerk
Janet Loomis
721 Oxford Avenue
Eau Claire, WI 54703

Re: RCRA Permit Renewal for WRR Environmental Services Co., Inc.

To whom it may concern:

On January 8, 2013 the Waste Facility Siting Board received copies of written requests for local approvals sent by WRR Environmental Services Co., Inc. to the City of Eau Claire, the County of Eau Claire, and the Town of Washington. This request was received by the City of Eau Claire, Eau Claire County, and the Town of Washington on November 7, 2012.

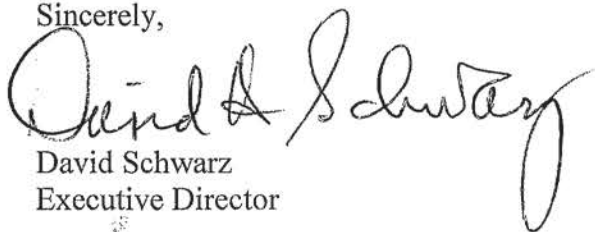
The law allows an affected municipality to participate in the negotiation process if the governing body adopts a siting resolution and appoints members of the local committee within 60 days after the municipality receives written requests by the applicant. Wis. Stats. § 289.33(6)(a).

In this case, neither the City of Eau Claire nor Eau Claire County took the action required to participate in the negotiation and arbitration process. The Town of Washington filed a siting resolution in which they waived their rights under Wis. Stats. § 289.33 (3)(d).

As a result, the Waste Facility Siting Board considers this case closed and WRR Environmental Services Co., Inc. may continue to seek Wisconsin Department of Natural Resources permit renewal of its hazardous waste storage facility and is not required to negotiate or arbitrate under Wis. Stats. § 289.33.

If you have any questions, please contact me.

Sincerely,



David Schwarz
Executive Director

DHA:br

cc: Linda Bochert, Esq
Michael Best & Friedrich LLP

Mike Ellenbecker
Waste and Materials Management Specialist
Wisconsin Department of Natural Resources

Scott Szymanski
Waste Management Specialist
Wisconsin Department of Natural Resources

Phillips Public Library
400 Eau Claire Street
Eau Claire, WI 54701



**State of Wisconsin
Waste Facility Siting Board**

5005 University Avenue, Suite 201
MADISON, WI 53705-5400

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WRR Environmental Services Co
5200 Ryder Road
Eau Claire, WI 54701

000158

"Where Technology and Ecology Meet"

January 8, 2013

James W. Schuerman, Chairman
Waste Facility Siting Board
Wisconsin Department of Administration
5005 University Avenue, Suite 201
Madison, WI 53705-5400

Re: RCRA Permit Renewal
WRR Environmental Services Co., Inc.
EPA ID No. WID 990 829 475
WDNR FID No. 618 026 530

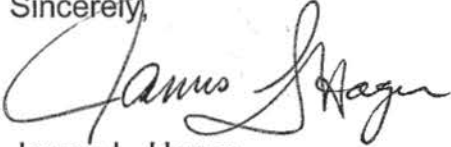
Dear Mr. Schuerman:

The purpose of this letter is to provide documentation in accordance with instructions from the Wisconsin Department of Natural Resources (WDNR) of the submittal of notification to local municipalities for the siting of a hazardous waste facility. WRR Environmental Services Co., Inc. (WRR) is in the process of preparing a renewal application for a RCRA Part B Permit for treatment and storage of hazardous waste. WRR has been in business at 5200 Ryder Road, Eau Claire, Wisconsin since 1970. WRR was initially approved for this operating permit with an effective date of September 30, 1988. It was re-issued by the WDNR on October 22, 2003.

Enclosed is a copy of our November 5, 2012 letter to local municipalities, copies of the certified mailing receipts, and a copy of resolution no. 2012-11-15 received from the Town of Washington. No response was received from either Eau Claire County or from the City of Eau Claire.

If you have any questions, please contact me at (715) 834-9624 or at hagerjl@wrres.com. Thank you for your assistance.

Sincerely,



James L. Hager
President/CEO
WRR Environmental Services Company, Inc.

Enclosures:

WRR November 5, 2012 letter to local municipalities with enclosure
Certified mailing receipts for each municipality including return receipts
Town of Washington Resolution No. 2012-11-15

cc:

Linda Bochert, Esq. (via email)
Michael Best & Friedrich LLP

Mike Ellenbecker (2 copies)
Waste and Materials Management Specialist
Wisconsin Department of Natural Resources

Scott Szymanski (via email)
Waste Management Specialist
Wisconsin Department of Natural Resources

November 5, 2012

Clerk/Treasurer, Town of Washington
Janelle Henning
5750 Old Town Hall Road
Eau Claire, WI 54701

Clerk, Eau Claire County
Janet Loomis
721 Oxford Avenue
Eau Claire, WI 54703

City Clerk, City of Eau Claire
203 S. Farwell Street
Eau Claire, WI 54701

Re: Request For Approval and Exemption
RCRA Permit Renewal
WRR Environmental Services Co., Inc.
EPA ID No. WID 990 829 475
WDNR FID No. 618 026 530

To Municipal Clerks of Town of Washington, Eau Claire County, and City of Eau Claire:

This notice is being sent to you in accordance with Wisconsin Statute s. 289.33. WRR Environmental Services Co., Inc. (WRR) operates a hazardous waste treatment and storage facility located at 5200 Ryder Road, Eau Claire, Wisconsin in the Town of Washington, Eau Claire County.

The initial hazardous waste operating license for this facility was approved by the Wisconsin Department of Natural Resources (WDNR) with an effective date of September 30, 1988. The operating license was re-issued by the WDNR on October 22, 2003. The license is effective for ten years. Because WRR would like to continue operating the hazardous waste facility, a revised application must be submitted by WRR to the WDNR by April 22, 2013. After the first of the year WRR will have a public notice published in the Eau Claire Leader-Telegram newspaper, and will hold a pre-application public meeting. The public notice will also be placed on a sign near the meeting location, and a public media announcement will be made on at least one local radio station or television station. A copy of the newspaper announcement will be sent to you. The date and location of the meeting will be in the public notice. The public meeting is

intended to inform the community of the relicensing application and to solicit questions from the community.

WRR has been in business at this location since 1970. Our relicensing efforts will not significantly change our operations or the types of waste we handle. However, there are certain processes and equipment that is currently covered in the license that WRR no longer intends to operate: thin film evaporators E-II and E-III, dry filter cleaning recycling unit, disperser tanks JJ and KK, the E-I south container storage area, the former off-site warehouse, or to process certain waste codes that are no longer valid. WRR's capacity to store hazardous waste has decreased since the re-licensing in 2003.

There are also certain processes that WRR intends to either include in the application for the renewal license or will submit to the WDNR as a license plan modification at some point in the future. These future items include, but may not be limited to (in no particular order):

- Construct a new hazardous waste tanker loading and unloading dock along the west side of the E-I Building which will have adequate spill storage containment.
- Modify the east side truck Docks 4 and/or 5 of the E-II Warehouse Building including adding containment.
- Provide maps and written descriptions of the locations where tanker trucks of hazardous waste are currently loaded and unloaded.
- Additional waste codes might be added to the license.
- Estimated quantities of certain waste codes will be adjusted.
- There will be a small reduction in the containment capacity to the E-II South Sludge Tank Farm that will account for the structural steel to be installed to support safety grates.
- A change in the operating procedure for the Hydrapulper will be requested so that the doors to the Fuels Building can be opened while the Hydrapulper is either mixing or is being emptied to a tanker truck.
- Install a second barrel cutter in the Fuels Building.
- Designate additional tanks and containers for the treatment of hazardous waste.
- A period longer than the current 24 hours allowed for the temporary storage of hazardous waste being staged for off-site transport will be requested in the application.
- A period longer than the current 24 hours allowed for the temporary storage of hazardous waste arriving on-site before it is unloaded will be requested in the application.
- The location in which material received from clean sweeps that is currently temporarily stored will be requested in the permit to store this material for a period of up to one year.
- The existing fractionation units (F-I, F-II, F-III, and F-IV) and the alcohol dehydrator will be designated for the treatment of hazardous waste.

- Certain existing tanks might be designated for the treatment of hazardous waste.
- Robbie Roller agitated tanker trucks, or equivalent, might be used to transport hazardous waste off-site, but will not be used for fuel blending.
- The centrifuge located in the E-I Building might be used to process hazardous waste.

Part of the reapplication involves local approval. Enclosed is a copy of a Standard Notice prepared by the State of Wisconsin Waste Facility Siting Board. This board is governed under the Wisconsin Department of Administration. The enclosed letter can be found at:

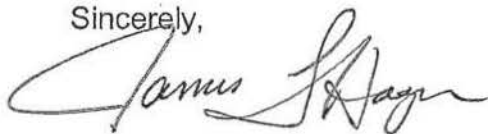
<http://dha.state.wi.us/home/WFSB/Forms/standard%20notice.pdf>

In accordance with the notice, WRR is requesting from the Town of Washington, Eau Claire County, and the City of Eau Claire the specification of all applicable local approvals which will be necessary for the continued operation of the WRR hazardous waste treatment facility. By Statute, each above named municipality has 15 days from receipt of this letter to respond. Additional information is provided in the enclosed notice.

WRR is also requesting that the Town of Washington, Eau Claire County, and the City of Eau Claire each waive the 120 day waiting period prerequisite to the WDNR's acceptance and processing of the application. WDNR requires confirmation from local municipalities of compliance with local regulations and a copy of the resolution or similar documentation granting the 120 day waiver.

If you have any questions regarding these requests, please contact me at (715) 834-9624 or at hagerjl@wrres.com. You can also contact Mike Ellenbecker, Wisconsin Department of Natural Resources, at (262) 884-2342 for additional information.

Sincerely,



James L. Hager
President/CEO
WRR Environmental Services Company, Inc.

Enclosures:
Standard Notice From Wisconsin Waste Facility Siting Board.

cc:
Linda Bochert, Esq. (via email)
Michael Best & Friedrich LLP

cc (continued):
Mike Ellenbecker (2 copies)
Waste and Materials Management Specialist
Wisconsin Department of Natural Resources

Scott Szymanski (via email)
Waste Management Specialist
Wisconsin Department of Natural Resources

LE Phillips Public Library
400 Eau Claire Street
Eau Claire, WI 54701



**State of Wisconsin
Waste Facility Siting Board**

5005 University Avenue, Suite 201, Madison, WI 53705-5400

Phone: (608) 266-7709

Fax: (608) 264-9885

e-mail: dha.mail@wisconsin.gov

James W. Schuerman
Chairman

David H. Schwarz
Executive Director

STANDARD NOTICE

**TIME LIMITS AND REQUIREMENTS FOR MUNICIPALITIES
TO PARTICIPATE IN THE NEGOTIATION AND ARBITRATION PROCESS
FOR THE SITING OF A SOLID OR HAZARDOUS WASTE FACILITY
UNDER SEC. 289.33, WISCONSIN STATUTES.**

PLEASE READ ALL PAGES CAREFULLY.

This notice informs a municipality of the actions and deadlines required to qualify for participation in negotiations and arbitration concerning the proposed siting of all new or expanded solid or hazardous waste facilities in the state of Wisconsin.

This standard notice shall be submitted with any written requests for local approvals by the applicant to the clerk of each affected municipality and to the main public library in each affected municipality. s. 289.22(1m)(2) and s. 289.32, Wis. Stats.

Who is the Waste Facility Siting Board?

The Waste Facility Siting Board is an impartial body composed of six members. These members include the secretaries, or their formally appointed designees, of the Departments of Agriculture, Trade and Consumer Protection; Commerce; and Transportation; and two town elected officials and one county elected official appointed by the governor for three year terms.

What does the Waste Facility Siting Board do?

The Waste Facility Siting Board administers the negotiation and arbitration process for the siting of every solid and hazardous waste facility in the state of Wisconsin.

The board's authority is created by law in Chapter 289, Subchapter III, Wis. Stats. The intent of the law is to create and maintain a comprehensive and effective policy of negotiation and arbitration between an applicant for a waste facility license and a local committee representing the affected municipalities.

Who is an Applicant?

An “applicant” is any person applying for a license or the owner or operator of a facility.

What is an Affected Municipality?

An affected municipality is any town, village, city, or county:

- (a) where any or all of the proposed waste site will be located, or
- (b) whose boundary is within 1500 feet of the facility designated in the feasibility report for the disposal of solid waste or the treatment, storage or disposal of hazardous waste.

An applicant that is a municipality or is under contract with a municipality for development of the site, is not considered an affected municipality for purposes of negotiation.

What is an Additional Municipality?

An additional municipality is any town, city, village, or county which does not qualify as an affected municipality but is included in the negotiation and arbitration process by written agreement of the applicant and the participating affected municipalities.

How does the negotiation-arbitration process begin?

The process is initiated by the applicant. Before submitting a feasibility report to the Department of Natural Resources (DNR), the applicant must submit by certified mail to the clerk of each affected municipality a written request for specification of all applicable local approvals. The municipality has 15 days to respond.

What is a “local approval”?

The term “local approval” is defined in s. 289.33(3)(d), Stats. It essentially means any requirement, restriction, condition, or prohibition imposed by a municipality on a waste facility site by ordinance, resolution, or regulation.

The law gives special weight to “pre-existing local approvals.” Pre-existing local approvals are those that have been in effect at least 15 months before the applicant submits to DNR an initial site report or a feasibility report, whichever happens first. A new or expanded waste facility is subject to pre-existing local approvals unless specified as inapplicable in a negotiated agreement or an arbitration award. A new or expanded waste facility is not subject to other local approvals unless specified as applicable in a negotiated agreement.

If an Affected Municipality wants to negotiate with the applicant concerning the site what is required?

There are three requirements.

First, an affected municipality must pass a siting resolution within 60 days of receipt of the applicant’s initial written request for local approvals. If this deadline is missed, a municipality

may not participate in negotiations. A copy of the siting resolution must be sent to the board within 7 days of passage.

Each affected municipality that wishes to negotiate with the applicant about the proposed facility must pass a siting resolution which shall state the following:

- (1) the name and location of the municipality,
- (2) the name and location of the applicant,
- (3) the specific location of the proposed facility, and
- (4) the municipality's intent to negotiate and, if necessary, arbitrate with the applicant concerning the proposed facility.

Second, an affected municipality must appoint members to the local committee within 60 days of receipt of the applicant's request for local approvals. Names and addresses of local committee members must be sent to the Waste Facility Siting Board within 7 days of appointment.

Each affected municipality that wishes to negotiate with the applicant must appoint members to the local negotiating committee. Each town, village, or city where all or part of the proposed waste facility is to be located may appoint 4 members, or 2 more than the total number of all other members, whichever number is greater; no more than 2, however, may be elected officials or municipal employees. Each county where all or any part of the proposed waste facility will be located may appoint 2 members. Every other town, village, city, or county within 1500 feet of the proposed waste facility may appoint 1 member. Appointment of members may be included in the siting resolution or in a separate resolution.

Third, each member appointed to the local committee must file with the Waste Facility Siting Board a Statement of Economic Interests within 15 days of appointment. A member who fails to file a Statement of Economic Interests may not serve on the local committee.

These forms are available at no cost from the Waste Facility Siting Board.

What is required if an Additional Municipality wants to negotiate with the applicant concerning the site?

There are four requirements.

First, an additional municipality must receive written agreement of all parties to be added to the process.

Second, an additional municipality must pass a siting resolution within 30 days of the agreement between the parties to allow participation by the additional municipality. A copy of the siting resolution must be sent to the board within 7 days of passage.

The siting resolution must state the following:

- (1) the name and location of the municipality,
- (2) the name and location of the applicant,
- (3) the specific location of the proposed facility, and
- (4) the municipality's intent to negotiate and, if necessary,

arbitrate with the applicant concerning the proposed facility.

Third, an additional municipality must appoint one member to the local committee within 60 days. The name and address of the local committee member must be sent to the Waste Facility Siting Board within 7 days of appointment.

Fourth, the appointed member to the local committee must file with the Waste Facility Siting Board a Statement of Economic Interests within 15 days of appointment. A member who fails to file a Statement of Economic Interests may not serve on the local committee.

These forms are available at no cost from the Waste Facility Siting Board.

When may negotiations begin?

Negotiations may begin at any time after notification by the Waste Facility Siting Board. The board will send a notification of participation to the applicant and the clerk of each participating municipality within 5 days after the board receives copies of the resolutions and names and addresses of members appointed to the local committee, or within 72 days after all affected municipalities have received written request for local approvals. This notice will identify the participating municipalities, identify the names of the members of the local committee, and inform the parties that negotiations may begin.

If, for error or change in plans, the applicant must add any other affected municipality following the board's notification of participation, that affected municipality shall have the same rights and obligations as outlined above. The board may issue an order delaying negotiations until that affected municipality has time to act. This procedure is outlined in s. 289.33(6)(c), Stats.

Either the applicant or the local committee may initiate negotiations. The time and place of negotiating sessions are determined by agreement between the applicant and the local committee. Negotiating sessions must be open to the public.

What issues can be negotiated?

Any subject may be negotiated except the need for the facility and any proposal that would make the applicant's responsibilities less stringent than required by the Department of Natural Resources. Either party may petition the board in writing for a determination as to whether a proposal is negotiable. The board will conduct a hearing and issue a binding decision in 14 days.

If a negotiated settlement is reached, what is required?

There are two requirements.

First, the agreement must be approved by all appropriate bodies.

An appropriate body is the governing body of each town, city, or village where all or a portion of the waste facility is to be located. If the agreement is approved by all of the appropriate bodies, the agreement is binding on all participating municipalities.

Second, if the agreement is approved, the applicant shall send a copy or notice of any negotiated agreement to the Waste Facility Siting Board and to the Department of Natural Resources within 10 days after the agreement is approved by all appropriate bodies. If the agreement is not approved by all of the appropriate bodies, the agreement is void. The parties may resume negotiations, begin mediation, or initiate arbitration.

Who initiates mediation?

Either party may request a mediator at any time during the negotiation.

Who is the mediator?

The board maintains a list of competent, impartial, disinterested persons consisting of lawyers, retired judges, and professional mediators who serve as mediators.

Who chooses the mediator?

Upon receipt of a request for a mediator, the board will immediately send the parties a list of 5 mediators. The parties shall alternately strike names until one name is left who will be appointed by the board.

What is the role of the mediator?

The role of the mediator is to encourage a voluntary settlement. The mediator may not impose a settlement on either party.

Who pays for the mediator?

Unless specified in the negotiated agreement or the arbitration award, the costs of the mediator will be shared equally by the applicant and the local committee.

What happens if the mediator fails to bring settlement?

The parties may resume negotiations or initiate arbitration.

Who initiates arbitration?

The applicant or the local committee may petition the board jointly or separately to initiate arbitration.

Arbitration may not be initiated until at least 120 days after the appointment of the local committee.

A statement in response to a unilateral arbitration petition must be filed within 14 days.

What issues can be arbitrated?

Only eight issues can be arbitrated. These issues are:

1. Compensation to any person for substantial economic impacts which are a direct result of the facility including insurance and damages not covered by the waste management fund.
- 1m. Reimbursement of reasonable costs, but not to exceed \$20,0000, incurred by the local committee relating to negotiations, mediation and arbitration activities under this section.
2. Screening and fencing related to the appearance of the facility. This item may not affect the design capacity of the facility.
3. Operational concerns including, but not limited to, noise, dust, debris, odors and hours of operation but excluding design capacity.
4. Traffic flows and patterns resulting from the facility.
5. Uses of the site where the facility is located after closing the facility.
6. Economically feasible methods to recycle or reduce the quantities of waste to the facility. At facilities for which the applicant will not provide or contract for collection and transportation services, this item is limited to methods provided at the facility.
7. The applicability or non-applicability of any pre-existing local approvals.

If requested by either party, the board will rule on the arbitrability of a specific issue.

Once initiated, how does the arbitration process work?

Within 15 days of receipt of a petition to initiate arbitration, the board will issue a decision either to have the parties continue negotiation for at least 30 days, delay arbitration until a feasibility report is submitted, or order the parties to submit their final offers within 90 days. If, when ordered by the board, the applicant fails to submit a final offer within 90 days, the applicant may not construct or operate the facility. If the local committee fails to submit a final offer in 90 days the local committee loses all rights to further negotiation and the facility is not subject to any local approval.

Within 30 days after the last day for submitting final offers, the board shall conduct a public meeting for the parties to explain their final offers.

Within 90 days after the last day for submitting final offers, the board will issue an arbitration award. If the board fails to issue an award because it lacks the necessary five votes, the governor will issue an arbitration award within 120 days after the last day for submitting final offers.

The board's arbitration award is binding on the applicant and the participating municipalities.

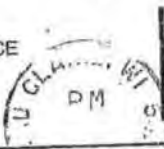
The information presented here serves as a guide to help affected and additional municipalities comply with the negotiation-arbitration laws concerning siting of solid and hazardous waste facilities under s. 289.33, Stats. For specific legal advice, or changes in the statute or administrative rules, an applicant or affected municipality should consult its attorney or contact the Waste Facility Siting Board, 5005 University Avenue, Suite 201, Madison, Wisconsin 53705-5400, (608) 266-7709, FAX: (608) 264-9885.

STANDARD NOTICE

Revised: 01/31/11

G:\DOCS\WFSBD\BOARD DOCUMENTS\STANDARD NOTICE.DOC

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

WRR ENVIRONMENTAL SERVICES CO.
5200 RYDER ROAD
EAU CLAIRE, WI 54701

Jan Smit

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

L.E. Phillips Public Library
400 Eau Claire Street
Eau Claire, WI 54701

2. Article #
(Transfer)

7005 3110 0000 0421 6835

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Janean Hankes*

Agent
 Addressee

B. Received by (Printed Name)

Janean Hankes

C. Date of Delivery

11-7-12

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

PS Form 3811, August 2001

Domestic Return Receipt

102695-02-M-1540

UNITED STATES POSTAL SERVICE PERMITS NO. 5457

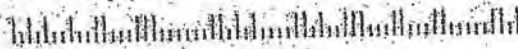
07 NOV 2012 PM 1:17

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

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WRR ENVIRONMENTAL SERVICES CO.
5200 RYDER ROAD
EAU CLAIRE, WI 54701

Jan Smit



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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

City Clerk/City of Eau Claire
203 S Farwell St
Eau Claire, WI 54701

2. Article Number
(Transfer)

7005 3110 0000 0421 6675

COMPLETE THIS SECTION ON DELIVERY

A. Signature

L. Rasmussen

Agent
 Addressee

B. Received by (Printed Name)

L. Rasmussen

C. Date of Delivery

11-07-2012

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Certified Mail
- Registered
- Insured Mail
- Express Mail
- Return Receipt for Merchandise
- C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

UNITED STATES POSTAL SERVICE

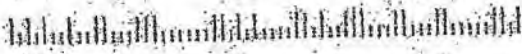


First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

WFR ENVIRONMENTAL SERVICES CO.
5200 RYDER ROAD
EAU CLAIRE, WI 54701

Jan Smit



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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

*Janet Loomis
Clerk / Eau Claire County
721 Oxford Ave
Eau Claire, WI 54703*

2. Article Number
(Transfer from)

7005 3110 0000 0421 6811

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Roxy Jaeger Agent Addressee

B. Received by (Printed Name)

Roxy Jaeger 11-7-12

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
- Registered Return Receipt for Merchandise
- Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

UNITED STATES POSTAL SERVICE

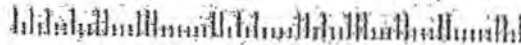
07 NOV 2012 PM 1 17

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

WRR ENVIRONMENTAL SERVICES CO.
5200 RYDER ROAD
EAU CLAIRE, WI 54701

Jan Smit



4

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Town of Washington
Janette Henning / Clerk / Treasurer
5750 Old Town Hall Rd
Eau Claire, WI 54701

2. Article (Transit)

7005 3110 0000 0421 6828

COMPLETE THIS SECTION ON DELIVERY

A. Signature: *Jackie Vold* Agent Addressee

B. Received by (Printed Name): *Jackie Vold* C. Date of Delivery: *11-7-12*

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

RESOLUTION NO: 2012-11-15

A RESOLUTION FOR MUNICIPAL APPROVAL AND TO WAIVE THE 120-DAY WAITING PERIOD PREREQUISITE TO WISCONSIN'S DEPARTMENT OF NATURAL RESOURCES ACCEPTANCE AND PROCESSING OF THE RCRA LICENSE RENEWAL FOR WRR ENVIRONMENTAL SERVICES CO., INC.

WHEREAS, the Town of Washington is in receipt of correspondence by WRR Environmental Services Co., Inc. in relation to the renewal of the corporation's RCRA Permit (hazardous waste operating license),

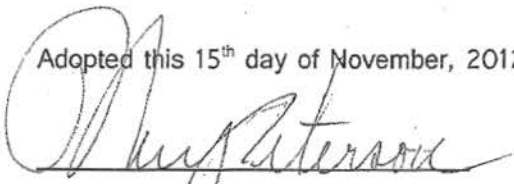
WHEREAS, WRR Environmental Service Co., Inc. is requesting the specification of all applicable local approvals which shall be necessary for the continued operation of the WRR hazardous waste treatment facility,

WHEREAS, WRR Environmental Service Co., Inc. is requesting that the Town of Washington wave the 120-day waiting period prerequisite to the acceptance and processing of the application by the Wisconsin Department of Natural Resources, and

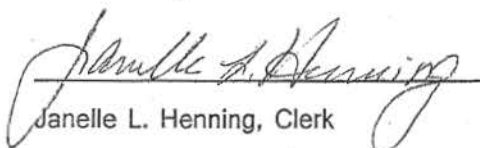
WHEREAS, the Town of Washington does not specify a requirement, restriction, condition or prohibition on the licensing of a hazardous waste facility site by ordinance, resolution, or regulation,

NOW, THEREFORE BE IT RESOLVED, the Town of Washington hereby provides local approval pursuant Wis. Stat. s. 289.33.(3)(d) and waives the 120-day waiting period provided in Wis. Stat. s. 289.23(2) and concurs that the Wisconsin Department of Natural Resources may accept and process the feasibility report submitted by WRR Environmental Services Co., Inc. without waiting the 120 days.

Adopted this 15th day of November, 2012.



Micheal H. Peterson, Chairman
Town of Washington



Janelle L. Henning, Clerk
Town of Washington