

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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March 31, 2023

FID 469015360
Waupaca County
HW/Licensing
SW/Approvals

Mr. Bryant Esch
Waupaca Foundry, Inc.
1955 Brunner Drive, P.O. Box 249
Waupaca, WI 54981

Subject: Hazardous Waste Long-Term Care Re-License Application and Conditional Plan Approval
Modification, Waupaca Foundry Landfill, License No. 2638

Dear Mr. Esch:

The Department of Natural Resources (department) has reviewed and conditionally approves the Long-Term Care Re-License Application and the associated plan modification for the Waupaca Foundry Landfill (WFI, Lic. No. 2638). The application and plan modification, dated May 27, 2022, and revised on January 18, 2023, were prepared by HydroGeo Solutions LLC on behalf of WFI. The approval is subject to compliance with chs. NR 500-538 and chs. NR 600-679, Wis. Adm. Code, and the conditions listed in the attached approval. Please include this letter and attachments in the written operating record for the landfill, as required by s. NR 664.0073, Wis. Adm. Code.

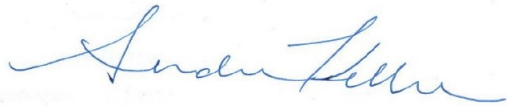
The attachments to this letter include the project summary, long-term care re-license application, and the conditional plan modification approval. Please carefully read the conditions of the attached approval. Summary tables for the approved environmental monitoring program and long-term care cost estimate are attached to the approval.

Please be aware that proof of financial responsibility for long-term care must be established and submitted to the department within 60 days of the date of this approval (see Condition 21 in the attached approval). Please contact Dustin Sholly, owner financial responsibility specialist, at Dustin.Sholly@wisconsin.gov or 608-267-3133, if you have questions.

With this conditional approval, the department is renewing the long-term care license with a 10-year term ending on March 30, 2033 (attached). The department may renew the long-term care license for additional terms of up to 10-years each. This approval requires WFI to submit a revised long-term care license application twelve months prior to the end of the license term (see Condition 1 in the attached approval).

Please keep in mind that this approval does not relieve you of obligations to meet all other applicable federal, state, and local permits and regulatory requirements. If you have questions regarding this approval, please contact Doug Coenen at 608-843-2160, or at douglas.coenen@wisconsin.gov.

Sincerely,



Andrea Keller
Hazardous Waste Prevention & Management Section Chief
Waste and Materials Management Program

Enclosed:

Project Summary
Long-Term Care Re-License Application and Conditional Plan Approval Modification
Attachments:

- Attachment 1 – Environmental Monitoring Tables
 - Table 1-1 – Groundwater Monitoring and Water Supply Wells
 - Table 1-2 – Leachate Monitoring
- Attachment 2 – Approved PALs and ACLs
- Attachment 3 – Long-term Care Cost Estimates
- Additional Attachment – Long-Term Care License dated March 31, 2023

cc: Paula Leier-Engelhardt, HydroGeo Solutions LLC (paula@hydrogeosolutionswi.com)
Doug Coenen – WA/DNR (Douglas.Coenen@wisconsin.gov)
Sally Hronek – WA/DNR (Sally.Hronek@wisconsin.gov)
Jackie Marciulionis – WA/DNR (Jacqueline.Marciulionis@wisconsin.gov)
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Dustin Sholly – WA/DNR (Dustin.Sholly@wisconsin.gov).
Kristin DuFresne – WA/DNR (Kristin.DuFresne@wisconsin.gov)

PROJECT SUMMARY
WAUPACA FOUNDRY LANDFILL (LIC. NO. 2638)
LONG-TERM CARE RE-LICENSE APPLICATION AND CONDITIONAL PLAN MODIFICATION

GENERAL INFORMATION

Authorized Contact

Mr. Bryant Esch
Waupaca Foundry, Inc.
1955 Brunner Drive, P.O. Box 249
Waupaca, WI 54981

Licensee and Property Owner

Waupaca Foundry, Inc. (WFI)

Landfill Status

Waupaca Foundry Landfill (Lic. No. 2638) is a closed landfill in long-term care. The operational landfill ceased accepting waste in 1989, received closure approval in 1992, and continues to be licensed for long-term care under Wisconsin License No. 2638. The landfill is subject to the requirements of the Wisconsin Administrative Code's hazardous waste management regulations (chs. NR 600-679), as well as the solid waste management regulations (chs. NR 550-538).

Site Location

The landfill is located on Elm Valley Road, approximately 0.25 mile north of the intersection of Elm Valley Road and State Highway 49, in the SW¼ of the SE¼ of Section 6, T22N, R12E, Town of Waupaca, Waupaca County, Wisconsin.

Acreage

The landfill footprint is approximately 13.5 acres. The landfill is located within approximately 206.9 acres of contiguous land owned by WFI.

LONG-TERM CARE RE-LICENSE APPLICATION AND PLAN MODIFICATION SUMMARY

WFI owns a closed hazardous and solid waste landfill (Hazardous Waste Long-Term Care License No. 2638; EPA ID WID981093248). The long-term care license for this facility was issued by the department on June 30, 1992, with an expiration date of June 30, 2022. All approvals, license conditions and applicable regulations remain effective beyond the expiration date as outlined in s. NR 670.051, Wis. Adm. Code.

The department's letter dated October 14, 2021, "Subject: Contingent Close Out – Hazardous Waste Compliance Assessment," recommended submittal of a hazardous waste long-term care application for re-licensure. The recommended application was submitted in a document titled "Long-Term Care Re-License Application for the Waupaca Foundry Landfill Lic. No. 2638," prepared by HydroGeo Solutions LLC, dated May 27, 2022, and updated on January 18, 2023 (Application). The Application included an updated long-term care plan required by

s. NR 664.0118, Wis. Adm. Code, and provided the information required under ch. NR 670, Wis. Adm. Code, for long-term care licensing.

The Application proposes changes to the facility's previously approved long-term care plan and groundwater monitoring plan, which require department approval under s. 289.30(6) Wis. Stats.

The Application includes a long-term care plan that details long-term care activities needed to meet the applicable NR 500-series and NR 600-series requirements, including, for example, inspection and maintenance/repairs of the following systems:

- Sections 1, 2, 3, 4, and 5 final covers,
- Perimeter fencing/gate,
- Section 4 pressure relief pipe,
- Section 5 leachate collection system and leachate collection tank,
- Buffer zone/sedimentation basin (run-on and run-off controls),
- Groundwater monitoring wells, and
- Permanently surveyed benchmarks.

The plan describes continuing operation of the leachate collection system, leachate storage, and leachate disposal.

The plan also addresses the details of the facility's environmental monitoring program, which requires semi-annual sampling/analysis of groundwater and leachate, measurement of groundwater elevations, and the evaluation of this monitoring data to determine if any releases have, or may have, occurred. Modifications to the environmental monitoring plan from the most recently approved plan (March 9, 2016) include minor modifications to the groundwater monitoring requirements as follows:

- Groundwater monitoring well B-3A-88R is removed from the monitoring program for Lic. No. 2638. Groundwater monitoring well B-3A-88R will be added to the environmental monitoring program for WFI Landfill License No. 3171. This was requested by WFI under a separate plan modification request specifically for License No. 3171 dated September 8, 2022 and approved by the department on December 13, 2022.
- Total dissolved solids (p-code 70295) is replaced with total filterable residue (p-code 70300), which is a p-code change the department made as of July 2017.

In addition, the plan details:

- Training requirements for individuals carrying out long-term care activities,
- Preparedness and prevention requirements and emergency response plans, and
- Recordkeeping and reporting requirements.

With this approval, the department is establishing a long-term care license with a 10-year term as prescribed in s. NR 670.050, Wis. Adm. Code. This approval requires WFI to submit a revised long-term care license application twelve months before the end of the license term (see Condition 1 of this approval).

HISTORICAL BACKGROUND INFORMATION

The information in this section reflects the historical background information provided by WFI in their June 25, 2022, Application. This information is generally consistent with information in the department's historical files, including some additional details provided by the applicant that were considered by the department.

Landfill Licensing History

Disposal operations began at this site in 1976. The department issued WFI a conditional plan approval dated September 20, 1976, for the construction and operation of a landfill for the disposal of foundry wastes generated at WFI's foundries (Plant 1 and Plants 2/3) in Waupaca, Wisconsin. The landfill was constructed so that a continual layer of a minimum of two feet of compacted system sand was placed on the bottom, sides, and top of the disposal site, and developed in phases, designated as Sections 1 through 5. The department did not require the installation of a leachate collection system in Sections 1 through 4. Section 5 was added later and does have a leachate collection system as discussed further below.

The materials approved for disposal included system sand, core sand, and slag, all generated during the casting process; and cupola sludge, consisting of the fines removed by a wet scrubber treating flue gas off of the cupola at Plants 2/3. The wet scrubber fines were sluiced through a series of settling ponds located directly west of Plants 2/3, with the sediment periodically dredged and then transported to the landfill. The dredged sludge material was a relatively small portion of the total waste stream.

The landfill was not originally designed or licensed to accept hazardous waste. It was suspected that the cupola wastewater management practices were not consistent with amendments to the 1976 Resource Conservation and Recovery Act (RCRA), specifically the Solid Waste Disposal Act Amendments (1980), and related regulations promulgated by U.S. EPA and the department. In 1983, the cupola sludge was determined to be hazardous waste based on lead and cadmium results from the Extraction Procedure (EP) toxicity test, the test method that proceeded the current Toxicity Characteristic Leaching Procedure (TCLP) test. Consequently, the landfill was not in compliance with hazardous waste landfill licensing requirements at that time. WFI agreed to cease disposing of hazardous waste at the landfill as of July 1984 in accordance with the consent agreement and final order dated July 23, 1984.

In 1984, Sections 1, 2, and 3 were no longer receiving waste, and a final cover had been installed over these three cells. Cupola sludge, determined to be hazardous waste based on toxicity characteristics, had already been placed in Sections 1, 2, and 3. Section 4 was the active cell in 1984 and was receiving waste, including hazardous waste. Note that cupola sludge was not placed in Section 5.

After closure of the landfill was approved in 1992, a hazardous waste long-term care license (Lic. No. 2638) was issued. WFI has since developed two separate landfills (License No. 3171, which is closed, and License No. 3412, which is active) within the same property for disposal of non-hazardous foundry wastes.

Closure-Related Activities

From 1976 to 1986, landfill Sections 1 through 4 were developed and filled in phases with overlaying slopes. Areas that had been filled to final approved grades were closed and capped.

In 1984, WFI agreed to cease disposing of hazardous waste at the landfill. However, it was recognized that WFI would continue to generate foundry wastes that would require proper disposal. WFI and the department developed an agreement to allow certain continued operations. Specifically, development of Section 5 was allowed, but its volume was limited to approximately 52,000 cubic yards, estimated to be one year of site life. This was meant to provide WFI an engineered and approved disposal location for the period of time necessary to build and obtain construction documentation approval for Phase I of non-hazardous industrial waste landfill license number 3171, which is a separate and non-contiguous landfill located to the south and west.

Section 5 was constructed to lay over the south slope of Section 4, with a perimeter berm constructed on the south and southwest sides. Section 5 has a 2-foot-thick clay liner and leachate collection piping, and an engineered 6-foot separation zone between Sections 4 and 5, which serves as both a cover for Section 4 and a liner for Section 5. A pressure relief pipe was installed on the edge of Section 4 to reduce any pressure build-up at the toe of the

separation zone slope. The 2-foot-thick clay layer of the final cover of Section 5 was keyed into the final cover of Section 4 and the Section 5 liner. The Section 5 final grades were designed as a smooth slope from the top of Section 4 to the base of the perimeter berm. Leachate from Section 5 is collected in the on-site underground 20,000-gallon leachate tank and trucked to the City of Waupaca wastewater treatment plant.

A timeline of key closure activities:

- Fall 1986 – The northern and western parts of Section 4 were brought to grade and final cover was installed.
- Fall 1987 – The remaining portion of Section 4 was brought to grade and final cover was installed. Liner construction began for Section 5. Foundry sand was stockpiled on the western portion of Section 4 until construction documentation was approved for the Section 5 liner.
- February 1988 – Construction documentation approval granted for Section 4 cover and Section 5 liner in the department's letter dated February 26, 1988.
- October 1989 – Construction documentation approval granted for Phase I of Landfill Lic. No. 3171, which allowed for closure and final capping of Landfill Lic. No. 2638.
- 1990 to March 1991 – Final cover installation on Section 5, and the cover on Section 4 was repaired. All final closure activities related to Sections 1, 2, 3, 4, and 5 completed and conditional construction documentation approval for closure granted in the department's letter dated March 29, 1991.
- June 30, 1992 – Conditions of the closure approval were found to be adequately addressed and hazardous waste long-term care license (Lic. No. 2368) was issued.

REGULATORY BACKGROUND

Regulatory Authority

Chapter 289, Wis. Stats., governs all solid waste facilities, which includes non-hazardous waste and hazardous waste. Chapter 291, Wis. Stats., establishes additional requirements for the management of hazardous waste. These statutes authorize promulgation of regulations for non-hazardous solid waste (which can be found in chs. 500-544, Wis. Adm. Code) and hazardous waste (chs. 600-679, Wis. Adm. Code), respectively.

Long-Term Care Requirements

The solid and hazardous waste regulations require that a landfill owner or operator implement long-term care activities, which typically involve inspecting/monitoring and maintaining the waste containment systems (such as liner and cap systems), operating leachate and gas control systems, and environmental monitoring (such as groundwater and surface water sampling) to ensure that waste is not impacting the surrounding environment. Under ch. 289, Wis. Stats., long-term care obligations continue in perpetuity.

The regulations also require that landfills develop and follow a written long-term care plan; see s. NR 664.0118, Wis. Adm. Code.

Long-Term Care Financial Assurance Requirements

Chapter 289, Wis. Stats., requires that long-term care responsibilities continue in perpetuity and may require proof of financial responsibility for the long-term care of the facility for more than 40 years. Because it is likely that long-term care activities will be needed for an indefinite time, the Application establishes that WFI will continuously maintain financial assurance for 30 years of long-term care. Annual review and update of the cost estimate, and financial assurance instrument (if needed), are also required under s. 289.41, Wis. Stats.

Groundwater Monitoring and Corrective Action Requirements

An ongoing detection monitoring program, including semi-annual groundwater sampling and analysis, is framed under the provisions of s. NR 664.0098, Wis. Adm. Code and ch. NR 140, Wis. Adm. Code, to identify potential groundwater impacts beyond the points of compliance. To date, no groundwater monitoring results have indicated a release that would trigger the requirement for a corrective action program under s. NR 664.0100, Wis. Adm. Code (RCRA corrective action). WFI's long-term care plan calls for the continued implementation of this monitoring program and careful evaluation of monitoring results.

Long-Term Care Licensing

Closed facilities in long-term care are required to maintain a license. After closure was approved and the license fee paid, the initial long-term care license was issued with an effective date of June 30, 1992 and an expiration date of June 30, 2022.

Hazardous waste facility licensing requirements are established in ch. NR 670, Wis. Adm. Code, and subchapter B identifies the minimum content required for license applications. The department's "Contingent Close Out – Hazardous Waste Compliance Assessment letter," dated October 14, 2021, identified the specific information to be included in the application, which WFI's Application then provided. Although the approval of this Application is occurring shortly after the expiration date of the initial license, pursuant to s. NR 670.051, Wis. Adm. Code, the initial license continues to be effective until the approval occurs, and the license is re-issued.

As documented by the department in a memorandum dated June 30, 1992, WFI paid a long-term care license fee in May 1992. Therefore, pursuant to Appendix II of ch. NR 670, Wis. Adm. Code, no additional license fees are required to be paid at this time.

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

**HAZARDOUS WASTE LONG-TERM CARE RE-LICENSE APPLICATION
AND
CONDITIONAL PLAN APPROVAL MODIFICATION
FOR THE
WAUPACA FOUNDRY LANDFILL
LICENSE No. 2638**

FINDINGS OF FACT

The Department of Natural Resources (department) finds that:

1. Waupaca Foundry, Inc. (WFI) owns a hazardous waste disposal facility known as WFI Landfill Lic. No. 2638 located in the SW¼ of the SE¼ of Section 6, T22N, R12E, Town of Waupaca, Waupaca County, Wisconsin.
2. A conditional plan approval for the landfill was issued by the department on September 20, 1976. This approval allowed Waupaca Foundry to operate the landfill for solid waste disposal. Hazardous waste, as defined at that time by s. NR 605.088, Wis. Adm. Code, was also disposed of in the landfill at various times after November 19, 1980 and after July 26, 1982.
3. The landfill has been closed since 1992 and is currently in long-term care. The department issued hazardous waste long-term care license No. 2638 dated June 30, 1992, for a 30-year period.
4. HydroGeo Solutions LLC, on behalf of WFI, submitted to the department an application to extend the term of long-term care Lic. No. 2638 and to modify the long-term care plan and groundwater monitoring plan for the facility. That application was dated and received electronically in the form of a portable digital file (PDF) on May 27, 2022. A revised version of the application dated January 18, 2023 (Application) was submitted to correct an error in the estimated long-term care costs.
5. Additional documents considered in the department's review of the plan modification and Application include the following:
 - a. The department's plans and specifications approval dated September 20, 1976.
 - b. The department's closure and long-term care plan modification dated September 18, 1987.
 - c. The department's site construction report plan approval dated February 6, 1988.
 - d. Site Construction Documentation Report for Final Cover Placement of Section 5, submitted by STS Consultants, Ltd., dated September 28, 1990.
 - e. The department's conditional approval of closure construction documentation dated March 29, 1991.
 - f. The department's conditional plan modification for groundwater monitoring dated June 30, 1992.
 - g. The department's letter to issue LTC License No. 2638 dated June 30, 1992.

- h. The department's January 31, 2011 grant of exemption for reduced jetting frequency from annually to biennially.
 - i. The department's plan modification approvals regarding groundwater monitoring dated February 22, 1994; April 3, 1995; October 2, 1998; and March 9, 2016.
 - j. The department's Contingent Close Out – Hazardous Waste Compliance Assessment dated September 28, 2020.
 - k. The department's plan modification approval dated December 13, 2022 for WFI landfill Lic. No. 3171 approving a request dated September 8, 2022, from HydroGeo Solutions, LLC, submitted on behalf of WFI. The modification request was to add groundwater monitoring well B-3A-88R to the groundwater monitoring program for Lic. No. 3171.
 - l. The department's guidance document titled 'How to Calculate Preventive Action Limits (PALs) and Alternative Concentration Limits (ACLs) for Solid Waste Facilities,' PUB-WA-1105, Rev. 2007.
 - m. The following documents related to ch. NR 140, Wis. Adm. Code (NR 140), groundwater quality standard exemptions proposed in the Application:
 - i. A memo dated August 23, 2022, to the department's Drinking and Groundwater Program, requesting concurrence in granting the exemption requested in WFI's May 27, 2022 Application.
 - ii. A memo dated September 13, 2022, from the department's Drinking and Groundwater Program, providing concurrence to grant the NR 140 groundwater quality standard exemption granted in this approval.
 - iii. A memo to the Landfill Lic. No. 2638 file dated September 21, 2022, summarizing the department's evaluation of the proposed PALs and ACLs.
 - n. A letter to WFI from Petro-Chemical Systems, Inc. (PCS) dated December 22, 2022 outlining the testing procedure and verifying the results of the leachate tank integrity, in which PCS confirmed that the cathodic protection system is functioning and recommended conducting tests every 3-years.
 - o. The department files and data stored in the department's Groundwater Environmental Monitoring System (GEMS) for WFI Landfill Lic. No. 2638, including the documents identified in Attachment A of the department's Contingent Close Out – Hazardous Waste Compliance Assessment dated September 28, 2020.
 - p. A letter report dated January 10, 2022, from HydroGeo Solutions, LLC, submitted on behalf of WFI, that provided review comments on the draft approval letter. Most comments were minor and were considered in this approval. The comments also included a revision to the long-term care cost estimate to correct a calculation error in the tank replacement costs; this correction was made to Table 4 of WFI's submittal of a revised Application dated January 18, 2023.
6. The department considered the following information while reviewing the requested NR 140 groundwater standard exemption for Lic. No. 2638:

- a. Based on an examination of site conditions and groundwater monitoring data for Lic. No. 2638, the department finds the following:
 - i. Groundwater concentrations of fluoride are found at concentrations exceeding the NR 140 groundwater standards in the landfill area due to background groundwater quality associated with natural hydrogeologic conditions or human activities.
 - ii. Concentrations of fluoride in groundwater monitoring well B-25 have remained stable with no apparent increases or decreases since monitoring began in the well in 1989.
- b. The department finds the following related to the location of groundwater monitoring well B-25 relative to Lic. No. 2638 and fluoride that exceeds the ch. NR 140, Wis. Adm. Code, groundwater quality standards:
 - i. Groundwater monitoring well B-25 is a deep piezometer located upgradient of the Waupaca Foundry landfill facility (i.e., upgradient of all landfills located on the property).
 - ii. The facility has not caused and is not anticipated to cause the further release of fluoride into the environment at B-25 because it is located upgradient of Lic. No. 2638.
- c. Based on an examination of the groundwater quality data for the facility and the information in findings of fact 6a through 6b above, the department finds requested groundwater quality exemptions to be warranted for the following wells and substances:

PAL exemptions for substances of **public health concern (other than nitrate plus nitrite (as N))** in accordance with s. NR 140.28(3)(b), Wis. Adm. Code:

<u>Substance:</u>	<u>Monitoring Wells:</u>
Fluoride	B-25
Notes: -Baseline concentrations attain or exceed the PAL but are below the ES in two or more sample rounds at the monitoring wells. -PALs for substances of public health concern are established in s. NR 140.10, Wis. Adm. Code.	

- d. Granting the exemptions that are set forth below will not inhibit compliance with Wisconsin solid waste management standards in chs. NR 500 through 538, Wis. Adm. Code.
7. The department considered the following information while reviewing the PALs and ACLs:
 - a. The PALs for indicator parameters and the ACLs established in this approval are based on at least 8 sample results for each substance at each monitoring well.
 - b. The PALs for indicator parameters established in this approval are equal to the mean background water quality plus 3 standard deviations or the mean background water quality plus the minimum increase specified in Table 3, ch. NR 140, Wis. Adm. Code, whichever is greater.

- c. The ACLs established in this approval are equal to the mean background water quality plus 2 standard deviations.
 - d. The calculated PALs and ACLs were rounded up to 2 significant figures.
 - e. The indicator parameter PALs, ACLs, and special conditions set forth below are needed to assure that an increase in the concentration of specific conductance, alkalinity, hardness, sodium, total filterable residue, and fluoride, does not cause an increased threat to public health or welfare or inhibit compliance with ch. NR 500 through 538, Wis. Adm. Code.
8. On February 10, 2023, the department posted the following documents on its web site: The Application, a Public Notice, and a draft of this approval letter dated February 7, 2023. The Public Notice was also emailed to the Clerks of Waupaca County and the Town of Waupaca, and to the Waupaca Public Library. The Public Notice inviting public comments prior to March 27, 2022. No comments were received.
 9. The special conditions set forth below are needed to protect human health and the environment.

CONCLUSIONS OF LAW

1. The department has promulgated chs. NR 600 to 679, Wis. Adm. Code, establishing minimum requirements for hazardous waste management under the authority of chs. 289 and 291, Wis. Stats.
2. The department has authority pursuant to ch. NR 140, Wis. Adm. Code, and the applicable portions of chs. NR 660 through 670, Wis. Adm. Code, to require sampling of groundwater. Specifically, the department has authority under subch. F of ch. NR 664, Wis. Adm. Code, to require environmental monitoring at hazardous waste disposal facilities.
3. The department has authority under s. NR 140.28 and ss. 160.19(8) to (10), Wis. Stats., to grant exemptions to groundwater quality standards and to establish corresponding alternative concentration limits. The department has authority under s. NR 664.0094, Wis. Adm. Code, to specify in the facility license concentration limits in the groundwater for hazardous constituents.
4. The department has authority under s. NR 140.20, Wis. Adm. Code, and s. 160.15(3), Wis. Stats., to establish preventive action limits for groundwater indicator parameters at waste disposal facilities.
5. The department has the authority under chs. 289 and 291, Wis. Stats., to issue licenses for hazardous waste facilities.
6. The department has the authority pursuant to s. 670.032(2)(b), Wis. Adm. Code, to establish license conditions as the department determines necessary to protect human health and the environment.
7. The conditions of approval set forth below are needed to ensure compliance with chs. NR 500 to 538 and NR 600 to NR 679, Wis. Adm. Code.

GRANT OF EXEMPTIONS

The department hereby grants exemptions for the wells and substances specified below:

1. Exemptions are granted from the groundwater quality standards in ch. NR 140, Wis. Adm. Code, as provided in s. NR 140.28, Wis. Adm. Code, for the wells and substances listed below for the Lic. No. 2638, and do not apply to any other present or past facility or activity:

PAL exemptions for substances of **public health concern (other than nitrate plus nitrite (as N))** in accordance with NR 140.28(3)(b):

<u>Substance:</u>	<u>Monitoring Wells:</u>
Fluoride	B-25

CONDITIONAL APPROVAL

The department hereby approves the plan modification and “Hazardous Waste Long-Term Care Re-License Application” dated May 27, 2022 and updated on January 18, 2023 (Application) for the Waupaca Foundry Landfill (WFI, or “licensee”) Lic. No. 2638, subject to compliance with chs. 289 and 291, chs. NR 500-538 and NR 600-679, Wis. Adm. Code, and the following conditions:

General

1. The licensee shall submit a license renewal application no later 12 months before the end of the license term. The application shall contain all of the information required by ch. NR 670, Wis. Adm. Code, and identified in Attachment B of the department’s contingent close-out letter dated October 14, 2021. Within 60 days of the department’s request, the application shall be amended to include additional information determined by the department to be necessary. The requirements of this conditional approval and any approved modifications will remain in effect while the license application is under review.
2. The long-term care plan and environmental monitoring plan contained in the Application shall replace the respective previously-approved plans.
3. The licensee shall maintain and perform long-term care of the facility in accordance with the Application, the requirements of chs. NR 500 to 538 and NR 600-679, Wis. Adm. Code, the conditions of this Approval, and any subsequent approved modifications. The approval conditions and chs. NR 600 – 679, Wis. Adm. Code, shall take precedence over any less stringent provisions contained within the Application.
4. Nothing in this conditional Approval shall relieve the licensee of the legal obligation to comply with applicable federal, state, and local regulatory requirements.
5. Any proposed changes to the Application or this Approval shall be submitted to the department in writing. Written department approval is necessary prior to implementing any changes, with the exception of class 1 modifications allowed to be implemented without department approval under s. NR 670.042(1)(a), Wis. Adm. Code. Other proposed changes shall be handled as license modification requests in accordance with s. NR 670.042, Wis. Adm. Code.
6. The conditions applicable to all operating licenses set out in s. NR 670.030, Wis. Adm. Code, apply to the licensee and are hereby incorporated by reference and made part of this Approval. The following additional conditions augment the conditions in s. NR 670.030, Wis. Adm. Code, and are made part of this Approval:

- a. Regarding s. NR 670.030(5), Wis. Adm. Code: Proper operation and maintenance shall also include effective and accurate inspections, timely and effective actions to correct deficiencies, effective training, and supervision of all personnel that direct or support operational workers, effective contingency planning, and effective emergency response.
 - b. Regarding s. NR 670.030(11), Wis. Adm. Code: All reports submitted by the licensee pursuant to chs. NR 664 or NR 670, Wis. Adm. Code, or this Approval and its conditions and other information requested by the department, shall be certified in the manner described in s. NR 670.011, Wis. Adm. Code. All submittals containing technical data, such as engineering computations, analyses and studies, design drawings, and design specifications, and similar documents involving the technical application of engineering knowledge or principals shall be certified by a qualified, licensed professional engineer or geologist, as applicable.
 - c. Regarding s. NR 670.030(12)(j), Wis. Adm. Code: The licensee shall report all instances of noncompliance with this approval not otherwise reported under ss. NR 670.030.12(d), (e) and (f), Wis. Adm. Code. The report shall be submitted no later than 15 days after the licensee becomes aware of the noncompliance.
 - d. Regarding s. NR 670.030(12)(k), Wis. Adm. Code: If the licensee becomes aware that there was a failure to disclose relevant facts in any reports, plans, or other documents submitted, or that incorrect information was submitted to the department, the licensee shall promptly notify the department of such facts and/or correct information and of its plans to cease or modify its operations or activities as may be appropriate. If the facts or information affect the accuracy or completeness of the Application, the licensee shall promptly submit a license modification request under s. NR 670.042, Wis. Adm. Code, but no later than 30 days after becoming aware of the issue.
7. All submittals and reports made pursuant to any condition of this Approval, or any subsequent approval shall:
- a. Be submitted to the department's hazardous waste program and the department's regional office;
 - b. Include a transmittal letter that refers to the approval date and number of the applicable condition, and contains the required certifications; and
 - c. Be submitted via email in a single, readable portable digital file (PDF). If attachments are too large to email, then alternative arrangements acceptable to the department shall be established. The licensee shall bear responsibility for confirming that emails and digital files were received by the department. The licensee shall promptly provide a paper version if requested by the department.
8. The licensee shall comply with all applicable requirements of chs. NR 700 to 799, Wis. Adm. Code. The licensee shall inform the department's hazardous waste program in writing of any notification under s. NR 706, Wis. Adm. Code.
9. Within 90 days of the date of this approval, the licensee shall provide notice required by ss. NR 670.410(3)(a)9. to 12, Wis. Adm. Code, and provide documentation to the department that the notices were sent.

Operations and Maintenance

10. For the facility's leachate underground storage tank:

- a. The licensee shall perform sacrificial anode cathodic protection testing every three years to confirm the tank's corrosion protection system is active and protecting the tank as designed.
 - b. Testing shall be performed by a cathodic protection testing technician holding a certification issued by the Wisconsin Department of Agriculture, Trade and Consumer Protection.
 - c. The licensee shall obtain approval from the department prior to implementing any alternative corrosion protection or tank testing strategies.
 - d. The results of the testing shall be included in the bi-annual report required in Condition 20 of this approval.
11. In case of leachate collection and removal system malfunction, the system shall be made operational or repaired in a timely manner to allow for gravity drainage of leachate in accordance with s. NR 506.07(5), Wis. Adm. Code.
 12. Vegetative cover shall be maintained on all areas of final cover to prevent erosion. The final cover vegetation shall be maintained to prevent the growth of woody vegetation.
 13. The occurrence of and results of all observations, inspections, and monitoring required in the Application and the conditions of this Approval shall be documented in the operating record for at least 3 years. Inspection forms used for this purpose shall be modified as needed to be consistent with any changes that occur at the facility and/or through license modifications. All deficiencies identified during these inspections, or monitoring activities shall be clearly identified and documented on the completed inspection form or otherwise documented in the operating record. For any deficiency identified on the inspection form, the completion date and description of remedial or corrective action(s) (such as repairs or replacement) shall be recorded on the inspection form or otherwise documented in the operating record in a manner that such action(s) can be readily referenced to the noted deficiency.
 14. Personnel performing observations, inspections, and monitoring required in the Application and the conditions of this Approval and performing corrective/remedial actions shall be properly qualified and trained for these activities.
 15. All personnel that direct or perform activities to facilitate compliance with the requirements ch. NR 664, Wis. Adm. Code, and the conditions of this Approval shall be appropriately qualified and trained in the proper performance of these activities. All personnel, regardless of their position, must be familiar with the facility's contingency plan to respond effectively in an emergency. This includes all of the licensee's employees, agents, and any other authorized personnel at the licensed facility (such as contractors, vendors, temporary workers, and visitors).

Environmental Monitoring

16. Environmental monitoring shall be performed at the facility in accordance with the schedules in the tables of Attachment No. 1. Air quality, storm water and wastewater monitoring shall also be performed in accordance with the applicable department permits or authorizations.
17. Calculated NR 140 PALs and ACLs shall apply for the parameters and substances at the respective groundwater monitoring points as specified in Attachment No. 2. The PALs and enforcement standards (ESs) for all other substances not identified in Attachment No. 2 shall be as specified in Tables 1 and 2 of s. NR 140.10, Wis. Adm. Code, for the purpose of NR 140 compliance in ch. NR 140, Wis. Adm. Code, unless

specifically approved by the department in writing. The lower value of either the NR 140 ES, including an ACL that replaces an ES for which an ES exemption has been granted, or the maximum concentration limit listed in Table 1 of s. NR 664.0094, Wis. Adm. Code, shall be the groundwater protection standard under s. NR 664.002, Wis. Adm. Code.

18. The compliance period for the groundwater protection standards shall run for the entire duration the landfill is closed. The point of standards application for compliance with the groundwater protection standards under s. NR 664.0095, Wis. Adm. Code, shall be at any location beyond the waste boundary, which is the same as the design management zone in s. NR 140.22 (3), Wis. Adm. Code, for a hazardous waste facility regulated under s. NR 664.0090, Wis. Adm. Code. The point of standards application for compliance with NR 140 groundwater standards shall be as specified in s. NR 140.22, Wis. Adm. Code.
19. In the event that deficiencies are found to the groundwater monitoring plan, the licensee shall propose appropriate modifications to its groundwater monitoring plan that are necessary to comply with the requirements of Title 40, Part 264, Subpart F, Code of Federal Regulations, within 60 days after a written notification by the department of any deficiencies and the necessity for modifications.

Inspection and Reporting

20. A bi-annual report shall be submitted to the department no later than April 30th every other year, beginning with the first report, which is due by April 30, 2025, that summarizes the following activities from the two previous calendar years:

General

- a. Provide one or more plan view drawings clearly annotating existing environmental monitoring points and systems (e.g., leachate, groundwater, etc.) on a color-coded site map depicting all on-site landfills and applicable license numbers.

Groundwater

- b. An assessment of the groundwater quality trends, including a graphic depiction that best illustrates environmental impacts of importance.

Leachate Collection

- c. A summary report of each pipe cleaning event as required by s. NR 506.07(5)(g), Wis. Adm. Code. Include a diagram of the leachate pipe layout with leachate cleanout port labeling and leachate pipe lengths. Provide either color coding on the diagram, or include in a summary table, the total length of pipe successfully jetted and location point(s) in the pipe where blockages were detected.
- d. A table listing monthly quantities of leachate removed from the leachate storage tank, and published monthly precipitation.
- e. Summary of monitoring and inspection for leachate storage tank and associated structures. This would include:
 - i. A trend plot of the historical liquid levels measured within the leachate tank excavation area.
 - ii. A copy of the most recent results of the leachate tank tightness/integrity testing (see Condition 10).

iii. A discussion of any repairs, maintenance, etc. to the leachate tank and associated structures.

iv. A discussion regarding whether the tank should be replaced.

Final Cover Maintenance

f. A copy of the WFI's semi-annual summary reports (as noted in Section 7.1 of the May 17, 2022 Application) regarding final cover/fencing inspections.

Financial Responsibility for Long-Term Care

21. Proof of financial responsibility for long-term care shall be established in accordance with chs. NR 520 and NR 664, Wis. Adm. Code, within 60 days of the date of this Approval. The proof of financial responsibility shall be established based upon the approved long-term care cost estimate included in Attachment No. 3.
22. Proof of financial responsibility shall be established and maintained for no less than the approved estimated costs for 30 years of long-term care activities.
23. The cost estimate shall be updated whenever changes in the anticipated long-term care activities or associated costs becomes known to the licensee, that results in an increase to the approved cost estimate by more than 5 percent. The department shall be notified and proof of financial assurance reflecting the new cost estimate shall be established within 60 days of such an increase in the cost estimate.
24. The proof of financial assurance dollar amount for long-term care shall not be reduced until a license modification in accordance with s. NR 670.042, Wis. Adm. Code, is approved.
25. The licensee shall submit an annual financial assurance report (FAR) to the department by June 30 of each year. The FAR shall include:
 - a. The updated long-term care cost estimate in current year dollars, applying as appropriate the inflation adjustment described in ss. NR 520.07(5) and NR 664. 0144(2), Wis. Adm. Code.
 - b. An explanation of any changes to the cost estimate from the approved cost estimate (other than inflation adjustments).
26. All cost estimates submitted to the department shall:
 - a. Include the signature and certification in accordance with s. NR 670.011, Wis. Adm. Code;
 - b. Be based on utilizing a third party (or third parties) to implement all long-term care activities;
 - c. Include third party costs to manage and administer the work (e.g., project management, procurement, contract administration, invoice review and payment, etc.);
 - d. Not consider cost efficiencies for work that might otherwise be performed or facilitated by the licensee;
 - e. Include a minimum 10% contingency for unanticipated or unforeseen work;

- f. Be broken out by discrete tasks and sub-tasks and include unit costs, quantities, and extended costs for each task and subtask;
- g. Describe the basis for or source of the number of units and unit costs used in the cost estimate; and
- h. Include a cost summary in tabular format that:
 - i. contains separate rows for each separate cost item, or task. The scope of work for each such line item and name shall be readily identifiable and described in the long-term care plan;
 - ii. contains separate columns that identify the task name; the estimated costs for that task including units, number of units, unit costs, and extended subtotals;
 - iii. is also provided electronically in a spreadsheet format that is unprotected.

Incident and Release Response/Reporting

27. In accordance with s. NR 664.0056(9), Wis. Adm. Code, the licensee shall submit a report within fifteen (15) days of any incident that results in the implementation of the Consolidated Emergency Action Plan referred to in the Application. The report shall fully describe the incident, including a description of the discovery, response activities, the root cause, and any change in facility plans or operations needed to prevent recurrence and improve response planning and capability. For any such incident that results in notification to or on-site response by an external emergency response agency or entity, the licensee shall promptly perform all of the following when it is safe to do so:
- a. Take photos to visually document the incident;
 - b. Identify the employees or other individuals who have knowledge of, or were involved in the incident;
 - c. Perform interviews with the employees, document in writing the results of the interviews, and retain this documentation;
 - d. Retain and secure any data and other information associated with the incident;
 - e. Retain and secure any equipment and/or parts that were involved in the incident;
 - f. Retain and secure wastes or waste residues that were involved in the incident; and
 - g. Within 24 hours of the incident, notify via email or telephone to the department's hazardous waste program and regional office.

The licensee shall retain all records and items identified above until the department issues written concurrence. A request for concurrence shall explicitly refer to this condition.

28. None of the conditions of this approval supersede or otherwise affect the licensee's duty to comply with the reporting requirements in s. NR 670.030(12)(f), Wis. Adm. Code, regarding any noncompliance that may endanger health or the environment, or otherwise affect WFI's duty to comply with the reporting requirements under ss. NR 664.0056(9) or NR 706.05, Wis. Adm. Code, or other governmental requirements for reporting releases or emergency response incidents.

Corrective Action

29. The department may require corrective action by the licensee as authorized in s. 291.37, Wis. Stats., and/or chs. NR 664, subch. F, Wis. Adm. Code. If corrective action is required, the licensee shall submit a license modification request with a description of the work and a cost estimate. Financial assurance shall be established in a manner approved by the department.

This Approval is based on the information available to the department as of the date of approval. If additional information, project changes or other circumstances indicate a possible need to modify this approval, the department may ask the licensee to provide further information relating to this activity. Likewise, the department accepts proposals to modify approvals, as provided for in state statutes and administrative codes.

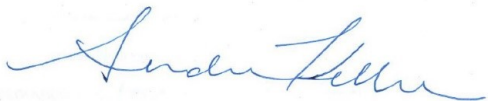
NOTICE OF APPEAL RIGHTS

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.

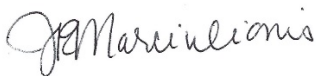
To seek judicial review of the department's decision, sections 227.52 and 227.53, Wis. Stats., establish criteria for filing a petition for judicial review. You have 30 days after the decision is mailed or otherwise served by the department to file your petition with the appropriate circuit court and serve the petition on the department. The petition shall name the Department of Natural Resources as the respondent.

Dated: March 31, 2023

DEPARTMENT OF NATURAL RESOURCES
For the Secretary



Andrea Keller
Hazardous Waste Prevention & Management Section Chief



Jackie Marciulionis, P.G.
Hydrogeologist
Northeast Region



Doug Coenen, P.E.
Hazardous Waste Management Engineer
Hazardous Waste Prevention & Management Section

Attachment 1: Tables 1-1 and 1-2

TABLE 1-1: GROUNDWATER MONITORING					
Monitoring Location	DNR Point ID	WUWN	Location relative to landfill/ Well Type	Sampling and Reporting Frequency¹	Parameters
B-1	401	BW490	DG/deep	Semiannually (May and November)	00010 Field Temperature (°C)
B-1A	402	BW491	DG/mid		00094 Field Specific Conductance @ 25°C (umho/cm)
B-1B	403	BW492	DG/WT		00400 Field pH (standard units)
B-7	408	BW497	DG/PZ		00930 Sodium, Dissolved (mg/L)
B-7A	409	BW498	DG/WT		00940 Chloride, Total or Dissolved (mg/L)
B-25	428	DM543	UG/deep		00946 Sulfate, Dissolved (mg/L)
B-25A	429	DM544	UG/mid		00950 Fluoride, Dissolved (mg/L)
B-25B	430	DM545	UG/WT		01000 Arsenic, Dissolved (ug/L)
B-28	420	CK949	DG/WT		01025 Cadmium, Dissolved (ug/L)
B-28A	444	Unknown	DG/PZ		01030 Chromium, Dissolved (ug/L)
B-29	421	CK950	DG/WT		01049 Lead, Dissolved (ug/L)
B-30	431	DM546	UG/WT		04189 Groundwater Elevation (ft MSL)
					22413 Total Hardness, Filtered (mg/L)
					39036 Total Alkalinity, Filtered (mg/L)
					70300 Residue, Total Filterable (mg/L)
					Note sample odor (00001), color (00002), and turbidity (00003), if present
				Annually (May)	00620 Nitrate Nitrogen, Total (mg/L)
					00631 Nitrate + Nitrite, Dissolved (mg/L)
					01046 Iron, Dissolved (mg/L)
					01056 Manganese, Dissolved (ug/L)
					34043 Phenolics, Total (ug/L)
					SVOCs (ch. NR 507 Appendix IV substances)
					VOCs (ch. NR 507, Appendix III, including acetone, carbon disulfide, methyl ethyl ketone and tetrahydrofuran), using EPA SW-846 Method 8260

Notes:

¹ Data shall be submitted within 60 days after the end of the sampling period, in accordance with s. NR 507.26(3), Wis. Adm. Code, unless otherwise specified.

WUWN = Wisconsin Unique Well Number
 DG = Downgradient
 UG = Upgradient
 WT = Water Table
 PZ = Piezometer
 deep = Deep Piezometer
 mid = Intermediate Piezometer

TABLE 1-2: LEACHATE MONITORING			
Monitoring Location	DNR Point ID	Sampling and Reporting Frequency ¹	Parameters
Leachate Tank East Leachate Tank	417	Semiannually (May and November)	00010 Field Temperature (°C) 00032 Leachate Volume Pumped (x1000 gal) 00094 Specific Conductance, Field (umho/cm @ 25°C) 00150 Total Suspended Solids (mg/L) 00310 Biochemical Oxygen Demand (mg/L, 5 Day @ 20°C) 00340 Chemical Oxygen Demand, Unfiltered (mg/L) 00400 pH, Field (Standard Units) 00410 Alkalinity, Total (mg/L) 00665 Phosphorus, Total (mg/L) 00900 Hardness, Total (mg/L) 00929 Sodium, Total (mg/L) 00940 Chloride, Total (mg/L) 00945 Sulfate, Total (mg/L) 01002 Arsenic, Total (ug/L) 01027 Cadmium, Total (ug/L) 01034 Chromium, Total (ug/L) 01051 Lead, Total (ug/L) 34043 Phenols, Total (ug/L) Note sample odor (00001), color (00002), and turbidity (00003), if present VOCs (ch. NR 507, Appendix III, including acetone, carbon disulfide, methyl ethyl ketone and tetrahydrofuran), using EPA SW-846 Method 8260
		Annually (May)	00951 Fluoride, Total (mg/L) 01007 Barium, Total (ug/L) 01042 Copper, Total (ug/L) 01055 Manganese, Total (ug/L) 01067 Nickel, Total (ug/L) 01077 Silver, Total (ug/L) 01092 Zinc, Total (ug/L) 01147 Selenium, Total (ug/L) 71900 Mercury, Total (ug/L) 74010 Iron, Total (mg/L)

Notes:

¹ Data shall be submitted within 60 days after the end of the sampling period, in accordance with s. NR 507.26(3), Wis. Adm. Code, unless otherwise specified.

Attachment 2

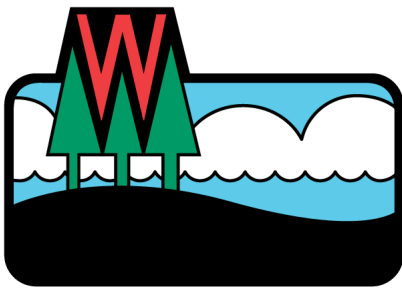
PALs and ACLs							
Parameter Type		Indicator Parameters					Public Health and Welfare Substances
Parameter Name		Field Specific Conductivity @25°C (mhos/cm)	Alkalinity, Total Filtered (mg/L)	Hardness, Total Filtered (mg/L)	Sodium, Diss. (mg/L)	Residue, Total Filterable (mg/L)	Fluoride, Diss. (mg/L)
Parameter Code		00094	39036	22413	00930	70300	00950
Point Name	DNR Point ID	PALs					ACLs
B-1	401	730	350	390	15	520	--
B-1A	402	750	360	390	15	510	--
B-1B	403	830	430	400	63	570	--
B-7	408	750	370	400	16	530	--
B-7A	409	740	390	400	15	540	--
B-25	428	710	350	380	14	510	1.2
B-25A	429	800	380	420	16	560	--
B-25B	430	730	370	390	15	510	--
B-28	420	890	380	250	160	610	--
B-28A	444	890	410	440	56	600	--
B-29	421	1200	510	470	110	690	--
B-30	431	790	420	430	16	560	--

Attachment 3

LONG-TERM CARE COST ESTIMATES				
MAJOR COST ITEM / BASIS	UNIT	UNIT COST*	QNTY	AVERAGE COST PER YEAR
<u>Groundwater/Leachate Monitoring</u>				
May - Annual sampling				
Mobilization	Each	\$1,716.00	1	\$1,716.00
Monitoring wells -- Field parameters, purging, field filtering	Each	\$1,082.39	1	\$1,082.39
Monitoring wells -- Analyses	Each	\$5,890.73	1	\$5,890.73
East leachate tank -- Analyses	Each	\$655.25	1	\$655.25
GEMS electronic deliverable report	Each	\$40.00	1	\$40.00
November - Semiannual sampling				
Mobilization	Each	\$1,716.00	1	\$1,716.00
Monitoring wells -- Field parameters, purging, field filtering	Each	\$1,082.39	1	\$1,082.39
Monitoring wells -- Analyses	Each	\$2,546.46	1	\$2,546.46
East leachate tank -- Analyses	Each	\$550.70	1	\$550.70
GEMS electronic deliverable report	Each	\$40.00	1	\$40.00
<u>Monitoring Well Inspection</u>				
Annual inspection of groundwater monitoring wells	Each	\$65.52	1	\$65.52
<u>Leachate Hauling</u>				
262,800 gallons @ \$55/hr hauling 1.25 hr and 6500 gallons/haul	Each	\$68.75	40	\$2,750.00
<u>Leachate Disposal</u>				
\$4.00/1000 gallon	GAL	\$0.004	262,800	\$1,051.20
Admin Fee	LS	\$42.25	1	\$42.25
<u>Leachate System Line Cleaning</u>				
1800 feet @ \$0.095/ft	FT	\$0.095	1800	\$171.00
Mobilization @ \$1,000	LS	\$1,000.00	1	\$1,000.00
Subtotal				\$1,171.00
<i>prorated biennially</i>				\$585.50
<u>Leachate Collection Tank Maint./Inspection</u>				
12 hours @ \$50/hr	LS	\$800.00	1	\$800.00
<u>Leachate Tank Replacement</u>				
Leachate removal/transport/disposal	Each	\$1,635.00	1	\$1,635.00
Leachate tank removal/disposal	Each	\$8,000.00	1	\$8,000.00
Replacement tank	Each	\$81,525.00	1	\$81,525.00
Tank installation	Each	\$7,000.00	1	\$7,000.00
Tank instrumentation	Each	\$7,500.00	1	\$7,500.00
Pipe boots	Each	\$500.00	5	\$2,500.00
Removal/stockpiling of backfill	CYD	\$6.00	3900	\$23,400.00
Replacement of backfill	CYD	\$4.00	3820	\$15,280.00
Replacement of geomembrane cover	SF	\$1.00	4000	\$4,000.00
Replace soil cover	CYD	\$12.00	81	\$972.00
Revegetate area	Acre	\$3,000.00	0.25	\$750.00
Engineering support/field observation/documentation report	Each	\$27,000.00	1	\$27,000.00

LONG-TERM CARE COST ESTIMATES				
MAJOR COST ITEM / BASIS	UNIT	UNIT COST*	QNTY	AVERAGE COST PER YEAR
<u>Leachate Tank Replacement (cont.)</u>				Subtotal \$177,927.00
				<i>Prorated 30 years</i> \$5,930.90
<u>Site Inspection Activities</u>				
30 hours @ \$50/hr	HR	\$50.00	30	\$1,500.00
Seeding 1 acre @ \$3,000 acre	Acre	\$3,000.00	1	\$3,000.00
<u>Semiannual Environmental Monitoring Reports</u>				
Data review - 3 hours @ \$150/hr	HR	\$150.00	3	\$450.00
Report preparation and submittal - 3 hours @ \$150/hr	HR	\$150.00	2.5	\$375.00
Postage	Each	\$20.00	1	\$20.00
<u>Well Maintenance/Replacement</u>				
\$7,500 each/3 years prorated	LS	\$7,500.00	0.33	\$2,475.00
<u>Administration</u>				
20 hours @ \$50/hr	HR	\$50.00	20	\$1,000.00
Subtotal				\$36,965.29
Contingency (10%)				\$3,696.53
ANNUAL GRAND TOTAL				\$40,661.82
30-YEAR LONG-TERM CARE COST				\$1,219,854.57

*Costs presented are based on 2022 dollars (see Table 4 of the Application).



**STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES**

HAZARDOUS WASTE FACILITY LONG-TERM CARE LICENSE

Hazardous Waste Disposal - Landfill Long Term Care

License Number: 2638

Licensee Name: WAUPACA FOUNDRY INC

Effective Date: March 31, 2023

Expiration Date: March 30, 2033

Facility Information

FID: 469015360

EPA ID: WID981093248

WAUPACA FOUNDRY LF

N4496 Elm Valley Rd

Waupaca WI 54981

Waupaca County (69)

DNR Region: NE

This license is subject to and conditioned upon compliance with the provisions of Chapters 289 and 291, Wis. Stats., and Chapters NR 500-590 and 600-679, Wis. Adm. Code, any plan approval and modifications thereof, and any special order and modifications thereof issued by the Department.