TSD File Inventory Index

Date March 1, 2005

Initial S. Henderson

Facility Name Brillion Iron Works, Inc.

Facility Identification Number WID 048 027 734

A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status		1 Correspondence	
1 Correspondence		2 All Other Permitting Documents (Not Part of the ARA)	
2 Notification and Acknowledgment		C.1 Compliance - (Inspection Reports)	
3 Part A Application and Amendments		C.2 Compliance/Enforcement	
4 Financial Insurance (Sudden, Non Sudden)		1 Land Disposal Restriction Notifications	1
5 Change Under Interim Status Requests		2 Import/Export Notifications	
6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
1 Correspondence		1 RFA Correspondence	
2 Reports		2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		3 State Prelim Investigation Memos	
1 Correspondence		4 RFA Reports	
2 Closure/Post Closure Plans Certificates etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		1 RFI Correspondence	
1 Correspondence		2 RFI Workplan	
2 Reports		3 RFI Program Reports and Oversight	
B.1 Administrative Record		4 RFI Draft /Final Report	

TOTAL - 1

5 RFI QAPP		7 Lab data Soil Sampling/Groundwater	
6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data Soil Sampling/Groundwater		D.5 Corrective Action/Enforcement	
8 RFI Progress Reports		1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence		2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		1 Forms/Checklists	
1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		1 Correspondence	
.3 CMS Workplan		.2 Reports	
4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
7 Lab Data. Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
1 CMI Correspondence		4 Ecological - Administrative Record	
2 CMI Workplan		5 Permitting	
3 CMI Program Reports and Oversight		6 Corrective Action Remediation Study	
4 CMI Draft/Final Reports		7 Corrective Action/Remediation Implementation	
5 CMI QAPP		8 Endangered Species Act	
6 CMI Correspondence		9 Environmental Justice	

Note Transmittal Letter to Be Included with Reports

Comments

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 01 2004

REPLY TO THE ATTENTION OF
DE-9J

CERTIFIED MAIL 7001 0320 006 0201 5449
RETURN RECEIPT REQUESTED

Leonard Kopidlansky
Manager of Environmental Affairs
Brillion Iron Works
P.O. Box 127
Brillion, WI 54110-0127

Re: Letter of Acknowledgment
RCRA Compliance Evaluation Inspection
Brillion Iron Works
EPA I.D. No.: WID 048 027 734

Dear Mr. Kopidlansky:

On March 1, 2004, the United States Environmental Protection Agency (U.S. EPA) issued Brillion Iron Works a Notice of Violation (NOV) which identified violations of the Wisconsin Administrative Code at the Brillion, Wisconsin facility.

This letter is to inform you that U.S. EPA received your March 23, 2004, response to the March 1, 2004, NOV. U.S. EPA has reviewed your response and determined that additional enforcement action need not be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the Resource Conservation and Recovery Act, as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Wisconsin Department of Natural Resources in the future. If you have any questions regarding this letter, please contact Duncan Campbell of my staff at (312) 886-4555.

Sincerely yours,

Paul Little

Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Patricia Chabot, WDNR
Jason Moeller, WDNR- Green Bay Service Center

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U.S. EPA
77 W. Jackson Blvd
Chicago, Illinois 60604
ATTN: Duncan Campbell DE-9J

10

U.S. EPA REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: **Brillion Iron Works, Inc.**

FACILITY U.S. EPA ID NO.: WID 048 027 734
FACILITY TYPE: Automotive products
FACILITY ADDRESS: 200 Park Avenue
Brillion, WI 54110

FACILITY REPRESENTATIVE:
Leonard Kopidlansky,
Manager of Environmental Affairs
(920) 756-2121 Ext. 371
kopidlansky@brillionworks.com

U.S. EPA REPRESENTATIVE:
Duncan Campbell
U.S. EPA
WPTD, ECAB, Compliance Section 2
77 West Jackson Blvd(DE-9J)
Chicago, Illinois 60604
(312) 886-4555
(312) 353-4342 Facsimile
campbell.duncan@epa.gov

WDNR REPRESENTATIVE:
Jason W. Moeller
WDNR
P.O. Box 10448
Green Bay, WI 54307-0448
(920) 492-5942
Jason.Moeller@dnr.state.wi.us

DATE(S) OF INSPECTION: January 30, 2004

NAIC (SIC) CODE(s): 3321 Gray iron casting
3523

INTRODUCTION: Brillion Iron Works (BIW) was first organized in 1890 by Henry Airens.

Mr. Airens began his farm implement business with the purchase of a patent of a clod buster from a German company. He then moved the business to its present location around 1900 and continued to expand the business by adding buildings and a gray iron foundry. Mr Airens operated the business until 1933 at which time it was closed. BIW was reorganized in 1934 and divided into two divisions, foundry and farm equipment. Over the next 40 years the foundry business continued to expand as a "job shop" and became a major supplier of truck parts. BIW grew to become one of top ten foundries in the United States. In 1966, BIW switched to coreless induction melting and added gas fired preheaters and in 1968 began production of ductile iron.

In 1969 Beatrice Foods Company purchased BIW and shortly after added Plant 2 on property contiguous to the original facility. Plant 2 was constructed to specialize in ductile iron castings. The facility has changed hands several times since and in 1999 became a subsidiary of Transportation Technologies Industries, which became a private company in 2000.

BIW purchases scrap metal and adds pig iron, re-melt, and coke, along with speciality alloys to produce high-quality complex castings. BIW primarily functions as a "job shop" to end users in the truck and automotive industries. Plants 1 and 2 combined production is 550-650 net tons per day with approximately 60% ductile iron and 40% gray iron.

Plant 1 has a melt capacity of 550 tons per day and is equipped with one 15 ton crucible and five 9 ton crucibles. In 2001, the five old mold machines were removed and replaced with one mold machine. Molds are made with hydraulic compression of the sand. Plant 1 was shutdown due to economic conditions from January to September of 2003. It is currently operating one ten hour shift - four days a week.

Plant 2 was constructed in 1973. It has four molding lines and six coreless induction furnaces in addition to gas fired preheaters. Plant 2 has the capacity to melt 1,200 tons per day.

Castings are moved from Plant 1 and 2 to Plant 4 where they will be machined. Plant 4 is equipped with shot blast and grinding machines.

Plant 3 houses the Farm Equipment Division. BIW has two booths in which it manually applies solvent based paints. BIW also has three dip lines where water based paint is applied to equipment parts.

INSPECTION:

On January 30, 2004, U.S. EPA inspector Duncan Campbell arrived at the facility with Jason Moeller of Wisconsin Natural Resources Department (WDNR). Brillion Iron Works (BIW) was represented by Mr. Leonard Kopidlansky, Manager of Environmental Affairs and Paul Kapellen who oversees the management of wastestreams. The inspectors presented their enforcement credentials and explained the nature, scope, and purpose of the inspection. The inspection was a Compliance Evaluation Inspection to determine the facility's compliance status under the Resource Conservation and Recovery Act. Leonard Kopidlansky allowed the inspectors access

to the facility to conduct the inspection. At the time of the inspection, the facility was a large quantity generator of hazardous waste. Leonard Kopidlansky described the processes as he escorted the inspectors through the facility.

Walk Through

At the time of the inspection the following observations were made:

1) the facility had last been inspected by WDNR in 1995,

2) Plant 1 - one waste stream - baghouse dust. Air pollution control equipment is located on the roof. Dust accumulates in collector and augured to one of two down spouts located inside Plant 1. The maintenance crew uses high lifts and 1 cubic yard Gaylord boxes to capture the dust when it is augured out of the collector. Once the Gaylord box has been filled, it is moved to the loading dock and loaded on semi- trailer which provides secondary containment for the Gaylord boxes while they are being accumulated on-site. BIW manages the Plant 1 baghouse dust as hazardous waste for the metal constituents cadmium and lead. These constituents are present in the baghouse dust as a result of the volatilization of metal ions at 2700 °F. BIW has determined that scrap metal contains significant concentrations of cadmium and lead.

U.S. EPA and WDNR inspectors observed no incidences of noncompliance with the hazardous waste requirements for generators with respect to the management of the waste stream generated in Plant 1.

3) BIW has analytical data on file demonstrating that the spent Green Sand generated in Plants 1 and 2 is not hazardous waste. Mr. Kopidlansky explained that the cadmium and lead in the scrap metal volatilize when it is poured into the induction melting crucible. Once it is poured into the sand molds it no longer contains these hazardous constituents at TCLP threshold levels. This same explanation holds true for the slag which is ladled off the top of the crucible prior to the molten metal being poured into the mold. BIW has received a permit from WDNR to use these materials under the beneficial use program under Wisconsin Administrative Code 538. BIW transports the mixture of spent Green Sand and slag to the east end of the property where it is currently being used to build a berm. BIW has plans to construct a storage pad from which it will marketed the slag and sand as fill material.

4) Plant 2 - BIW has been testing the baghouse dust from Plant 2 since 1994. The test revealed that it was rarely hazardous over those years. In 2002, BIW made the determination, based on statistical analysis of the sampling results that the baghouse dust is not hazardous for either cadmium or lead. BIW continues to analyze each roll-off box prior to shipment to confirm its waste determination.

5) Plant 3 - Farm equipment division - Farm equipment sales have shrunk to less than 10% of BIW's total revenue. Parts are cleaned using phosphate prior to either being dipped in one of three aqueous based paint dip tanks or hung on racks and painted with a solvent based product in one of two paint booths. Paint related waste is stored in the Paint Dispensing Room. This room

is also used to store raw materials and is equipped with a halon and wet sprinkler systems. Spill equipment is located immediately outside of the room. Maintenance staff are equipped with radio communications when handling hazardous waste.

5) Plant 4 - Shot blast and grinding machines. BIW uses high grade steel shot. The spent shot has been tested and found to be nonhazardous. This is a result of the volatilization of both cadmium and lead constituents during the melt phase, therefore these constituents do not appear in the residue. There are eight parts washers on site that Safety-Kleen maintains. All of the parts washers utilize a 150°F solvent. The maintenance department also has a carburetor cleaner which is also maintained by Safety-Kleen. Waste solvent from this machine is manifested off-site as a hazardous waste for the constituent cadmium.

Record Review

U.S. EPA inspector reviewed the facility's manifests, land disposal restrictions, inspection logs, biennial reports, emergency contingency plan, waste characterizations and training records. The following deficiencies were observed:

1) BIW stores the 1 cubic yard Gaylord boxes of baghouse dust in a semi-trailer. They inspect this trailer each week and maintain records of those inspections. It was learned during the inspection that BIW does not arrange the Gaylord boxes such that adequate aisle space is provided to inspect each box. To conduct weekly inspections the BIW employee is obstructed and could not get spill control equipment to the Gaylord boxes positioned at the front of the trailer.

2) BIW could not provide the inspectors with records documenting that training had been given to and completed by facility personnel. BIW has provided EPA with documentation subsequent the inspection.

ATTACHMENT:

WDNR Large Quantity Generator Inspection Form

BRILLION IRON WORKS

BRILLION IRON WORKS INC.

200 PARK AVENUE
P.O BOX 127
BRILLION, WISCONSIN 54110-0127
PHONE: 920-756-2121 • FAX: 920-756-3409

March 23, 2004

Mr. Duncan Campbell
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Blvd (DE-9J)
Chicago, IL 60604-3511

Re: Notice of Violation, RCRA Compliance Evaluation Inspection WID 048027734 – REF: DE-9J

Dear Mr. Campbell:

In response to your request to document what actions Brillion has taken since the inspection on January 30, 2004 the following measures have been implemented.

Brillion has revised its hazardous waste training record file to provide ready access of those files, including records of job titles, descriptions, personnel qualifications, duties and training documentation per NR 630.16 requirements for future audits. Your letter dated March 1, 2004 indicated no further documentation is being requested for this. Also with regard to training, a designated company representative is enrolled in a RCRA Training Refresher course scheduled in April. Records will be kept on file to verify that annual training is provided for appropriate personnel.

With respect to the storage of the Gaylord boxes for emission control dust, Brillion's storage guidelines for temporary storage during the 90-day accumulation period have been modified to provide access for inspection and response as required in NR 630.21(5) and other sections by storing the containers in a single row in the storage van.

The modifications to the training schedule, recordkeeping and storage guidelines will adjust Brillion's Hazardous Waste Management Program to comply with the requirements outlined in the Notice of Violation and applicable codes. These changes should satisfy the exemption requirements to avoid the need for a hazardous waste storage license.

Sincerely,
BRILLION IRON WORKS, INC.

Leonard Kopidlansky

Leonard Kopidlansky
Manager of Environmental Affairs

CC: Jason W. Moeller, Waste Management Specialist, WDNR

3077
9
03/09/2004

Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☒ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : Brillion Iron Works

Facility Location: 200 Park Avenue

City: Brillion **State:** WI 54110-0127

U.S. EPA ID# WID 048 027 734

Assigned Staff Duncan Campbell **Phone:** 6-4555

Name	Signature	Date
Author		03/31/04
Regional Counsel		
Section Chief		3.31.04
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's. Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

7001 0320 0006 0201 5449

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 01 2004

REPLY TO THE ATTENTION OF:

DE-9J

CERTIFIED MAIL 7001 0320 0005 8911 6955
RETURN RECEIPT REQUESTED

Leonard Kopidlansky
Manager of Environmental Affairs
Brillion Iron Works
200 Park Avenue
Brillion, WI 54110

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Brillion Iron Works
EPA I.D. No.: WID 048 027 734

Dear Mr. Kopidlansky:

On January 30, 2004, representatives of the United States Environmental Protection Agency (U.S. EPA) an Wisconsin Department of Natural Resources (WDNR) inspected Brillion Iron Works (BIW) located in Brillion, Wisconsin. The purpose of the inspection was to evaluate Brillion Iron Work's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of U.S. EPA's inspection report and checklist for your reference.

Based on information provided by you and other BIW personnel, review of records, and physical observations by the inspectors, U.S. EPA finds that BIW is engaged in the management of hazardous waste without a hazardous waste storage license, and is in violation of the requirements of the Wisconsin Administrative Code and the United States Code of Federal Regulation (CFR). To be eligible for the exemption from having a hazardous waste storage license, BIW must be in compliance with the conditions of Wisconsin Administrative Code NR 615.05 [40 CFR § 262.34]. Specifically, we find that BIW is in noncompliance with the following conditions for a storage license exemption, and in violation of the following requirements:

1. In order to avoid the need for a hazardous waste storage license, a large quantity generator must maintain the following documents and records at the facility: job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position that shall include the requisite skill, education or other qualifications, and duties of facility personnel assigned to each position; a written description of the type and amount of both introductory and

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continuing training that will be given to each person filling a position referenced above; and records that document that the training or job experience required above has been given to and completed by facility personnel. See, NR 615.05(6)(a), 615.05(4)(a)(6), and 630.16(4)(b). This is also a requirement of owners and operators of hazardous waste storage facilities, under NR 630.16(4)(a)-(d) and 680.22(14). At the time of this inspection your facility could not produce such records for the inspectors. BIW therefore failed to comply with the condition for a storage license exemption, and violated the storage facility hazardous waste training recordkeeping requirement. Subsequent U.S. EPA's inspection, facility representatives have corrected these conditions. No further documentation is required at this time.

2. In order to avoid the need for a hazardous waste storage license and comply with a generator preparedness and prevention requirement, a large quantity generator must provide adequate aisle space in the 90 day accumulation area that allows unobstructed movement of personnel and all emergency equipment to the hazardous waste containers. See, NR 615.05(6)(a), 615.05(4)(a)(6), and 630.21(5). This is also a requirement of owners and operators of hazardous waste storage facilities, under NR 630.21(5). At the time of this inspection your facility was not preserving an aisle space within the semi-trailer which serves as the 90 day accumulation area for the baghouse dust. The 1 cubic yard Gaylord boxes must be climbed over in order to be inspected once a week. BIW therefore failed to comply with the above-referenced condition for a storage license exemption, and violated the above-referenced generator and storage facility preparedness and prevention requirements.

3. A large quantity generator who accumulates hazardous waste on-site for 90 days or less, and who does not meet the conditions for a license exemption of section NR 615.05(4) and (6), is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage license. See, NR 615.05(6)(a) and (b); 680.30, 680.31(1), and 680.32(2). Upon failing to maintain training records and maintain adequate aisle space as specified above, BIW's failure to apply for and obtain a hazardous waste storage license violated the licensing requirements of NR 680.30, 680.31(1), and 680.32.

At this time, U.S. EPA is not requiring BIW to apply for a storage license, so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Duncan Campbell, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604-3590. If you have any questions regarding this letter, please contact Duncan Campbell of my staff at (312) 886-4555.

Sincerely yours,

Paul Little

Paul Little, Chief
Compliance Section # 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosures

cc: Patricia Chabot, WDNR
Jason Moeller, WDNR, Green Bay Service Center

LARGE QUANTITY GENERATOR INSPECTION FORM
HAZARDOUS WASTE MANAGEMENT PROGRAM
WISCONSIN DEPARTMENT OF NATURAL RESOURCES

I. GENERAL INFORMATION

DNR District: Northeast Region **Inspection date:** January 30, 2004

EPA Inspector: Duncan Campbell
WDNR Inspector: Jason Moeller

GENERATOR INFORMATION **EPA ID: WID 048 027 734**

Corporate/Generator Name: Brillion Iron Works

Street: 200 Park Avenue

City: Brillion **County:** Dunn **Zip:** 54110

Site Personnel Present: Leonard Kopidlansky **Title:** Mgr of Environmental Affairs

Paul Kapellen

Generator Mailing Address:

Street: 200 Park Avenue

City: Brillion **State:** WI Zip: 54110

Phone: (920) 756-2121

Operator: Brillion Iron Works

Phone: Same as above

Legal Owner: Transportation Technologies Industries

Street: Michigan Avenue

City: Chicago **State:** IL **Zip:**

Company Product/Main Process: Brillion Iron Works (BIW) was first organized in 1890 by Henry Airens. Mr. Airens began his farm implement business in his garage with the purchase of a patent for a clod buster from a German company. He then moved the business to its present location around 1900 and continued to expand the business by adding buildings and a gray iron foundry. Mr Airens operated the business until 1933 at which time it was closed. BIW was reorganized in 1934 and divided into two divisions, foundry and farm equipment. Over the next 40 years the foundry business continued to expand as a "job shop" and became a major supplier of truck parts. BIW grew to become one of top ten foundries in the United States. In 1966, BIW switched to coreless induction melting and added gas fired preheaters and in 1968 began production of ductile iron.

In 1969 Beatrice Foods Company purchased BIW and shortly after added Plant 2 on property contiguous to the original facility. Plant 2 was constructed to specialize in ductile iron castings. The facility has changed hands several times since and in 1999 became a subsidiary of Transportation Technologies Industries, which became a private company in 2000.

BIW purchases scrap metal and adds pig iron, re-melt, and coke, along with speciality alloys to produce high-quality complex castings. BIW primarily functions as a "job shop" to end users in the truck and automotive industries. Plants 1 and 2 combined production is 550-650 net tons per day with approximately 60% ductile iron and 40% gray iron

II. SUMMARY TABLE

	Waste Type	Hazardous Waste Code	Waste Handling*
1)	Baghouse dust	D006/D008	Shipped to Onyx Environmental
2)	Paint related waste	D001	Shipped to Pollution Control Industries
3)	Carburetor cleaner	D006	Shipped to Safety-Kleen
4)	Benzene	D018	Shipped to Pollution Control Industries

III. **NOTIFICATION:** NR 615.07

A. Has the generator submitted a notification form to the Department and obtained an identification number? Yes

B. 1. Has the generator changed its ownership or added new hazardous waste activities? No

2. Has a subsequent notification form been completed? N/A

C. 1. Has the generator changed its corporate name (no change in ownership, mailing address and/or waste codes)? No

2. Has a letter to DNR and EPA or a subsequent notification form been completed? N/A

IV. **WASTE STREAM INFORMATION**

A. **Waste Determination NR 605.12, NR 615.06, NR 675**

1. Have all wastes been correctly identified, and if necessary, tested to obtain enough information to treat, store or dispose of the waste properly. NR 675 Yes

If no, list those not identified correctly below:

Note: The inspector should determine if the generator has made a hazardous waste determination on all solid waste generated, including compliance with the TCLP requirements of NR 675.07 and NR 605.08(5)

Waste Type	Assigned Classification	Correct Classification

2.	Are records of test results, waste analyses, or other determinations retained on site for at least 3 years from the date waste last sent to a TSD facility?	Yes
3.	Have waste samples been analyzed by a laboratory certified or registered under Chapter NR 149, Wis. Adm. Code for all analyses performed? NR 605.12(1)	N/A
4.	Have both the listed and characteristic waste code been assigned where a listed waste exhibits a characteristic? NR 675.09	Yes
5.	Has multi-source leachate been assigned the F039 waste code?* NR 605.09(2)	N/A

**Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.*

If yes, was single-source leachate combined to form multi-source leachate? N/A

6. If any process has changed that affected solid waste characteristics, has the generator made a new hazardous waste determination? Yes
NR 615.06(4)

B. **Treatability Group/Treatment Standard Identification**

1. F001-F005 Spent Solvent Wastes; F020-F023 and F026-F028 Dioxin Wastes; First, Second, and Third 3rd Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste? Yes

If available, list each waste code and check correct treatability group.

Waste Code	Subcategory	Wastewater*	Nonwastewater

Subcategory-see NR 675.21, Table Constituent Concentrations in Waste Extract, or NR 675.22, Tables 2 and 3 Technology-Based Standards

**Wastewater-less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. NR 600.03(237m)*

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? Yes
NR 675.09(2)

c. Does the generator specify alternative treatment standards for lab packs? N/A

If yes, do lab packs only contain the following wastes? NR 675.22(4)(b)

___ Organometallics: NR 675 Appendix III

___ Organics: NR 675 Appendix IV

d. Does the generator specify alternative treatment standards for F039 multi-source leachate? N/A

2. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? (NR 675.22(1)(a) and (b)

a. Liquid hazardous wastes containing PCBs - ≥50 ppm N/A

If yes, check the appropriate treatability group:

_____ 50 to 500 ppm PCBs _____ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content. N/A

If yes, check the appropriate treatability group:

_____ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)

_____ All other HOC's greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥134 mg/l nickel and/or ≥130 mg/l thallium. N/A

3. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in NR 675.22? Yes

If yes, list the waste code, the technology specified in NR 675.22, the alternative method, and documentation of approval. NR 675.22(2)

Required Alternative

Waste Code	Technology	Method	Approval

4. Does the generator mix restricted wastes with different treatment standards for a constituent of concern? — No

   If yes, did the generator select the most stringent treatment standards? (NR 675.21(2) and NR 675.23(2)) — N/A

C. **Waste Analysis**

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation? NR 675.07(1) — Yes

2. If the answer to question 1 is no, does the generator ship all restricted wastes as not meeting treatment standards? If yes, go to question 4. — N/A

3. Which of the following analytical methods does the generator employ? Under each method, list the specific wastes and pertinent documentation. NR 675.07

   a. Knowledge of waste: — Yes

   <u>Knowledge in combination with analytical test</u>

   b. TCLP: Are wastes with treatment standards specified in NR 675.21 and 40 CFR 268.41 analyzed using TCLP? BDAT = stabilization/immobilization technology. — Yes

   c. Total constituent analysis: Are wastes with treatment standards specified in NR 675.23 analyzed using total constituent analysis? (BDAT = destruction/removal technology) — Yes

   d. PFLT*: Was PFLT used to determine if California List constituents were contained in liquid hazardous waste? — N/A

   *PFLT = Paint filter liquids Test [Test Method 9095, EPA Publication No. SW-846]

4. Dilution Prohibition NR 675.06:

   a. Does the generator mix prohibited wastes with different treatment standards? — No

   Are the wastes amenable to the same type of treatment? — N/A

   b. Does the generator dilute prohibited wastes to meet the treatment standard criteria, or render them nonhazardous? — No

   If no, go to c.

   Check appropriate category:

   __ Dilutes to meet treatment standards
   __ Dilutes to render waste nonhazardous

Do the wastes fall into the following categories? (Check if appropriate.)

__ Managed in treatment systems regulated under the Chapter 147, Wis. Stats.
__ Nontoxic* characteristic wastes
__ Treatment standard specified in NR 675.21 or NR 675.23

**Nontoxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides)*

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

c. Based on an assessment of points a and b, and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? NR 675.06 — No

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in NR 675.21 and NR 675.23? — N/A

V. ON-SITE MANAGEMENT

A. If the generator treats characteristic wastes in systems regulated under Chapter 147, Wis. Stats., have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an WPDES permit are not prohibited (if applicable)? — N/A

B. If the generator treats characteristic wastes in RCRA exempt units to render them nonhazardous, are the wastes managed as restricted until NR 675 treatment standards are met?* NR 675.09(4) — N/A

**This applies to both concentration based treatment standards specified in NR 675.21 and NR 675.23, and to some NR 675.22 required methods which result in treatment below the characteristic level. See Appendix D of the U.S. EPA land disposal restrictions package. (Third 3rd)*

C. Treatment Using NR 630 Exempt Units or Processes

1. Are restricted wastes treated in NR 630 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)? — No

If no, go to section VI.

Waste Type	Waste Code	Type of Treatment	Treatment Units and Process

2. Are treatment residuals generated from these units? — N/A

3. Are residuals further treated, stored for greater than 90 days, or disposed on site? — N/A

If yes, the generator is also is a TSD

VI. OFF-SITE MANAGEMENT AND MANIFEST REQUIREMENTS

A. **Manifest Requirements: NR 615.08, 615.09, 615.11(2), 615.12 & 615.13**

1.	Does the generator initiate a uniform manifest form with all off-site shipments of hazardous waste? NR 615.08(1)	Yes
2.	Are copies of all manifests for the past 3 years retained by the generator and available for review? NR 615.08(7)	Yes
3.	Does the manifest specify a designated facility which is permitted, licensed, or exempt from permitting or licensing and approved to take the waste? NR 615.08(3)	Yes
4.	Are procedures for exception reporting followed properly, if an exception has occurred? NR 615.11(2)	N/A
5.	Does the generator properly route manifest copies to the Department and the consignment state (if waste was shipped out of state)? NR 615.08(6), (9) & (10)	Yes
6.	Are the manifests properly completed? NR 615.08(8)(a)-(1)	Yes
7.	If verifiable, is waste packaged marked and labeled in accordance with DOT regulations concerning hazardous materials? NR 615.08(8)(f), NR 615.09(1) and (2)	Yes
8.	Does the generator offer the initial transporter of the hazardous waste the appropriate placards required by DOT regulations? NR 615.09(3)	Yes

B. **Off-Site Management: Waste Exceeds Treatment Standards**

1.	Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility? *If no, go to C.*	Yes
2.	Does the generator provide a notification to the treatment or storage facility with each waste shipment? NR 675.07(1)(1)	No - Rules have changed.
3.	If the generator specifies alternative treatment standards for lab packs, is the certification required in NR 675.07(1)(j) or (k) included with the notification for each shipment?	N/A

C. **Off-Site Management: Waste Meets Treatment Standards**

1.	Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility? *If no, go to D.*	No
2.	Does the generator provide a notification and a certification to the disposal facility with each waste shipment? NR 675.07(1)(b)	N/A

3. Are characteristic wastes which have been rendered nonhazardous (in a RCRA exempt unit) shipped to a Subtitle D facility? — N/A

D. Records Retention:

1. Does the generator retain on site copies of all LDR notifications, certification, and other relevant documents for a period of 5 years? NR 675.07(1)(e) — No - 3 yrs The requirement has changed

2. Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case-by-case extensions and the soft hammer provisions? — N/A

Note: See summary table on page 2, (treatment standards column).

VII. **ANNUAL REPORTING** NR 615.11(1)

A. Have Annual reports covering generator activities during the previous calendar years been submitted? — Yes

VIII. **CONTINGENCY PLAN AND SAFETY REQUIREMENTS NR 615.05(4)(a)5 and NR 630.22**

A. Does the generator have a written contingency plan addressing potential discharge of hazardous waste or hazardous waste constituents to air, land, groundwater, or surface water? NR 630.22(1)(a) — Yes

B. Is the contingency plan and all revisions kept by the generator and have they been filed with the Department and been sent to all local police and fire departments, hospitals and emergency response teams who may be called to provide emergency services? NR 630.22(1)(b) — Yes

C. Does the plan identify an Emergency Coordinator (including name, position, home address, home and business phone) who is present at all times when the generator is in operation, and present or on call when the generator is not in operation and available to respond to an emergency by reaching the site in a short period of time? NR 630.22(1)(d) and NR 630.22(1)(e)1 — Yes

D. Does the Emergency Coordinator have the authority and training necessary in the event of an emergency? NR 630.22(1)(d) — Yes

E. Does the plan contain the following:

1. A description of the site layout, types of waste handled, their associated hazards, places where site personnel normally work, and entrances to and roads inside the site? NR 630.22(1)(e)2 — Yes

2.	An evacuation plan for the site personnel, including signal(s) to be used to begin evacuation, evacuation roads, and alternative routes? NR 630.22(1)(e)3	Yes

3. Procedures for emergency shutdown of operations, and the actions personnel must take to comply with NR 630.22(1)(a) in response to an emergency including, as appropriate, procedures to:

a)	Activate internal alarms or communication systems to notify all personnel of an imminent or actual emergency situation, where applicable? NR 630.22(2)(a)1.	Yes
b)	Telephone the Division of Emergency Government at 608/266-3232 and comply with the requirements of s. 144.76, Stats., and Chapter NR 158, Wis. Adm. Code? NR 630.22(2)(a)2	Yes
c)	Immediately identify the character, source, amount, and a real extent of any discharged materials? NR 630.22(2)(a)3	Yes
d)	Assess possible hazards to human health or the environment that may result from discharge, fire, or explosion? NR 630.22(2)(a)4	Yes
e)	Immediately notify appropriate local authorities, if an assessment indicates that a discharge, fire, or explosion could threaten human health or the environment outside the site, and that evacuation of local areas may be advisable? NR 630.22(2)(a)5.	Yes
f)	Take all reasonable measures necessary to ensure that fires, explosions, and discharges do not occur, reoccur, or spread to other hazardous waste at the site? NR 630.22(2)(a)6	Yes
g)	Monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment, where appropriate, if the generator stops operation in response to a fire, explosion, or discharge? NR 630.22(2)(a)7	Yes
h)	Provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a discharge, fire, or explosion at the facility, immediately after an emergency? NR 630.22(2)(a)8	Yes
i)	Ensure that, in the affected areas of the site, no waste that may be incompatible with the discharged materials is treated, stored, or disposed of until cleanup procedures are completed; and all emergency equipment listed in the contingency plan is clean and fit for its intended use before operations are resumed? NR 630.22(2)(a)9	Yes
j)	Procedures to be used to notify local police and fire departments, hospitals and emergency response teams of a discharge of hazardous waste or a fire or explosion at the site? NR 630.22(1)(e)5	Yes
k)	Notify the Department and appropriate local authorities before operations are resumed? NR 630.22(2)(b)	Yes

	1) An up-to-date list of all emergency equipment at the site, including the location, physical description and a brief outline of its capabilities for each item? NR 630.22(1)(e)6	Yes
F.	Does the contingency plan need to be amended due to changes? NR 630.22(1)(c)1-5 *Note: The inspector shall ensure that the plan is site specific, that there are emergency coordinators assigned for all shifts, and that all personnel are trained in evacuation procedures.*	No

IX. **PERSONNEL TRAINING/RECORDS: NR 615.05(4)(a)5 & 630.16**

A.	Does the generator have a program of classroom instruction or on-the-job training for personnel in hazardous waste management procedures? NR 630.16(1) *If the answer is no, then a training program must be developed; go to X.*	Yes
B.	Does this program include training of personnel in Contingency Plan implementation? NR 630.16(1)(a)	Yes
C.	Do personnel take part in an annual review of initial training? NR 630.16(3)	**Could not verify - outline of subjects covered in monthly safety meetings was not available**
D.	Are records of personnel training maintained by the generator? NR 630.16(4) *If the answer is no, then these records must be developed and maintained by the generator; go to X.*	**Not available at time of the inspection**
E.	Which of the following items are included in the personnel training records? NR 630.16(4)(a)-(d)	**Could not verify any of the following required items**
	1. Job titles and the name of the employee filling each job?	?
	2. Job descriptions?	?
	3. Description of training required for each position?	?
	4. Written documentation that training or job experience has been given and completed?	?
F.	Are training records of current personnel kept until closure? Training records of former employees must be kept for at least 3 years from the date the employee last worked at the site. NR 630.16(5)	?

X. **PREPAREDNESS AND PREVENTION: NR 615.05(4)(a)5 and NR 630.21**

A. Does the generator have the following equipment, as applicable for the type of waste managed? NR 630.21(2)

1. Internal communication systems? Yes

2.	A device to summon emergency assistance, such as a telephone or a 2-way radio?	Yes
3.	Portable fire extinguishes?	Yes
4.	Fire control equipment, including special extinguishing equipment and extinguishing agents?	Yes
5.	Spill control equipment?	Yes
6.	Decontamination equipment?	Yes
B.	Is all emergency equipment immediately accessible to persons handling the wastes?	Yes
C.	Is all of the equipment mentioned in #1 tested and maintained as required to assure its proper operation in an emergency?	Yes
D.	Is adequate aisle space provided throughout the hazardous waste site to allow unobstructed movement of personnel and all emergency equipment mentioned in #1 above? NR 630.21(5)	Gaylord boxes of baghouse dust stored in the semi-trailer are placed in the trailer so that personnel cannot access the forward most boxes in an unobstructed manner

E. Has the generator made service arrangements with the following groups appropriate for the type of waste handled at the facility and their potential need for the services?

1.	Familiarized police, fire dept. and emergency response team with facility layout, properties of hazardous waste, hazardous waste handled, and associated hazards. NR 630.21(6)(a)	Yes
2.	Where more than one police and fire dept. may respond to an emergency, designated primary emergency authority. NR 630.21(6)(b)	Yes
3.	Made agreements with state emergency response teams,emergency response contractors and equipment suppliers. NR 630.21(6)(c)	Yes
4.	Familiarized local hospital with properties of hazardous waste handled at the facility and the types of illness or injury that could result from exposure. NR 630.21(6)(d)	Yes

XI. OTHER REQUIREMENTS

A. Does the generator have spill containment tanks? No

If the answer is yes, then complete the appropriate attachment.

B. Does the generator combine absorbent material with waste generated on site? No

If the answer is yes, complete the appropriate attachment.

XII. 90-DAY CONTAINER ACCUMULATION: NR 615.05(4)(a) & 615.09(2)(a)

A.	Does this generator accumulate hazardous waste in containers?	Yes
B.	Are the containers marked with the date on which hazardous waste was first placed in the container for accumulation? NR 615.05(4)(a)4	Yes
C.	Are containers marked with the words "Hazardous Waste" before placing them in an accumulation area or on-site storage area? NR 615.09(2)(a)	Yes
D.	Is the hazardous waste removed from the site before the end the 90-day accumulation period or treated, stored or disposed of in an approved on-site hazardous waste facility or on-site recycling facility? NR 615.05(4)(a)1.a. or b.	Yes
E.	Are all the containers which are used to store or treat hazardous waste in good condition? NR 615.05(4)(a)2.d.	Yes
F.	Are containers made of or lined with materials which are compatible with the wastes in them? NR 615.05(4)(a)2.j.	Yes
G.	Are containers stored closed, except when it is necessary to add or remove waste? NR 615.05(4)(a)2.e.	Yes
H.	Are containers opened, handled and stored in such as way as to prevent leaks or ruptures? NR 615.05(4)(a)2.f	Yes
I.	Are containers inspected weekly for leaks and defects? NR 615.05(4)(a)2.b	Yes
J.	Are the weekly inspections recorded into an inspection log or summary, which includes the date and the time of inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions? NR 615.05(4)(a)2.c.	Yes
K.	Are records kept for at least 3 years from date of inspection? NR 615.05(4)(a)2.c.	Yes
L.	If the generator stores ignitable or reactive waste, are the containers at least 50 feet (15 meters from the property line? NR 615.05(4)(a)2.g.	Yes
M.	Are containers of incompatible waste separated or protected from each other by physical barriers such as a berm, dike, wall or other device? NR 615.05(4)(a)2.h.	Yes
N.	Is hazardous waste placed in an unwashed container that previously held an incompatible waste or material? NR 615.05(4)(a)2.i. If yes, see NR 630.17(2)	No
O.	Is the container made or lined with materials that are compatible with the hazardous waste to be stored? NR 615.05(4)(a)2.j.	N/A

XIII. SATELLITE ACCUMULATION NR 615.05(4)(c)

A.	Does the generator accumulate waste at or near the generation point?	Yes

1.	Are the containers in good condition? NR 615.05(4)(c)1.	Yes
2.	Were the containers closed at the time of the inspection except when it was necessary to add or remove waste? NR 615.05(4)(c)2.	Yes
3.	Were the containers lined or compatible with the waste being accumulated? NR 615.05(4)(c)4.	Yes
4.	Were the containers marked with words "Hazardous Waste" or with other words that correctly identify the contents of the container? NR 615.05(4)(c)5.	Yes
5.	Were 55 gallons or more of hazardous waste being accumulated at or near the generation point? NR 615.05(4)(c)6.	No
6.	Has one quart or more of acutely hazardous waste listed in section NR 605.09(2)(a), Table II, or (3)(b), Table IV, accumulated at or near the generation point? NR 615.05(4)(c)6.	N/A

XIV. WASTE MINIMIZATION

Section NR 615.08(8)(k) requires the generator to certify on the hazardous waste manifest that he/she has a program in place to reduce the volume and toxicity of waste generated to the degree economically practicable.

A.	Does the generator have a waste minimization/pollution prevention plan or other written documentation of their program?	Yes
	If yes, can the generator document that a program is being implemented?	Yes
	If no, can the generator provide other evidence to justify their waste minimization certification?	N/A
B.	Look for visual evidence that there is a waste minimization program in place. Make appropriate suggestions for their consideration and provide them with Department literature and information sources.	

Signature: _____ Date: _____

Duncan Campbell

02/27/04 10:31 AM

To: Paul Little
cc:
cc:
Subject: Fw: BIW Information

----- Forwarded by Duncan Campbell/R5/USEPA/US on 02/27/04 10:31 AM -----

"Moeller, Jason W" <Jason.Moeller@dnr.state.wi.us>

02/27/04 10:23 AM

To: Duncan Campbell/R5/USEPA/US@EPA
cc:
Subject: RE: BIW Information

Duncan,

Everything looks good to me.
Let me know when you send the NOV to BIW.

Thanks,
Jason.

-----Original Message-----
From: Campbell.Duncan@epamail.epa.gov
[mailto:Campbell.Duncan@epamail.epa.gov]
Sent: Friday, February 27, 2004 9:08 AM
To: Moeller, Jason W
Cc: Little.Paul@epamail.epa.gov
Subject: BIW Information

Jason-

Attached are the inspection report, checklist and NOV for the two items we observed while at BIW. Please look them over and let me know if they are consistent with your observations and discussion we had regarding BIW.

DC

(See attached file: Inspection report.wpd)(See attached file: Checklist.wpd)(See attached file: BrillionNOV-022304.wpd)

Michael Mcclary
02/24/04 10:15 AM

To: Duncan Campbell/R5/USEPA/US@EPA
cc:
Subject: Re: Change of mind?

Duncan-- I appreciate your checking with me on this and raising the question. Yes-- I think for the time being-- until we hear more from Wis.-- it's best to include cites to both the generator and o/o requirements. That way we keep our options open. So the version below is correct. Just take out the redlines and consider this my concurrence. If you have any questions/concerns/qualms etc etc, just give a holler. Thanks. Mike

Duncan Campbell

Duncan Campbell
02/24/2004 08:29 AM

To: Michael Mcclary/R5/USEPA/US@EPA
cc:
Subject: Change of mind?

Mike -

I listened to your voice mail message left around 4:30 pm yesterday. I thought you relayed information that Count 2 should be cited as a generator "only" violation. I then turned my computer on and saw your e-mail with attached NOV file. The redlining appears to have re-instated the claim that it is also an owner and operator violation. I figure that between the voice mail and the sending of the file you re-thought your position and opted to include the addition of the o/o requirement?

I am attaching the file for your viewing, just in case you sent me the wrong version. I'll be in all day but out tomorrow.

DC

BrilliorNOV-022304.wpd

Michael Mcclary
02/23/04 11:45 AM

To: Duncan Campbell/R5/USEPA/US@EPA, Paul Little/R5/USEPA/US@EPA, Lorna Jereza/R5/USEPA/US@EPA, Joseph Boyle/R5/USEPA/US@EPA, Leverett Nelson/R5/USEPA/US@EPA, Stephen Mendoza/R5/USEPA/US@EPA, Sandra Lee/R5/USEPA/US@EPA, James Cha/R5/USEPA/US@EPA, Deborah Garber/R5/USEPA/US@EPA, Larry Kyte/R5/USEPA/US@EPA, Maria Gonzalez/R5/USEPA/US@EPA
cc:
Subject: Re:Wisconsin's Lack of Interim Status aisle space requirement-- P.S.

Folks-- Another--better--answer to the below, and one I overlooked in my last message, is just citing the aisle space provision as a generator requirement, since Wisconsin's regs state them as both conditions and requirements. That easily solves the generator pleading issue, and the remaining issue is just the missing interim status facility issue, which isn't an issue in this case or other generator cases.

Mike

----- Forwarded by Michael Mcclary/R5/USEPA/US on 02/23/2004 11:38 AM -----

Michael Mcclary
02/23/2004 10:29 AM

To: Maria Gonzalez/R5/USEPA/US@EPA
cc: Duncan Campbell/R5/USEPA/US@EPA, Paul Little/R5/USEPA/US@EPA, Lorna Jereza/R5/USEPA/US@EPA, Joseph Boyle/R5/USEPA/US@EPA, Leverett Nelson/R5/USEPA/US@EPA, Stephen Mendoza/R5/USEPA/US@EPA, Sandra Lee/R5/USEPA/US@EPA, James Cha/R5/USEPA/US@EPA, Deborah Garber/R5/USEPA/US@EPA, Larry Kyte/R5/USEPA/US@EPA
Subject: Fw: NOV - Brillion-Wisconsin's Lack of Interim Status aisle space requirement

Maria-- FYI, the Wisconsin Program staff level response to the question of where is the aisle space requirement for containers in Wis.'s interim status regs: they don't know.

Unless you've found out anything different from your inquiries into the matter, I'll be advising Duncan to interpret 630's aisle space requirement as applying to interim status facilities despite the lack of any reference to it in 680.22, Wisconsin's section listing applicable interim status regs; in that otherwise Wis's program is less stringent; and hope that no one challenges between now and amendment of Wis's regs.

Mike

----- Forwarded by Michael Mcclary/R5/USEPA/US on 02/23/2004 10:19 AM -----

Duncan Campbell
02/23/2004 09:04 AM

To: Michael Mcclary/R5/USEPA/US@EPA
cc:
Subject: NOV - Brillion

Mike-

This version should reflect tweaking to #1, elimination of storage facility allegation in #2, and elimination of citation in #3. Per your discovery about aisle space, my state counterpart didn't have a clue as to finding an interim status requirement for 630.21(5).

NOV020904.wpd

Michael Mcclary
02/23/04 10:51 AM

To: Duncan Campbell/R5/USEPA/US@EPA
cc:
Subject: Re: NOV - Brillion

Duncan-- I've thought about it, and believe we can legitimately put back the storage facility allegation in #2, based on the fact that 630.21(5) is stated to apply to "all" storage facilities. If it ever came up, we'd argue that the absence of the requirement in 680.22 isn't fatal, because of that applicability language in 630. I doubt Maria Gonzalez's inquiries of the Wisconsin folks are going to turn up anything.

A couple other minor revisions in the attached, and then this is good to go.

Mike

BrillionNOV-022304.wpd

Duncan Campbell

Duncan Campbell
02/23/2004 09:04 AM

To: Michael Mcclary/R5/USEPA/US@EPA
cc:
Subject: NOV - Brillion

Mike-

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NOV020904.wpd

Michael Mcclary

02/23/04 10:29 AM

To: Maria Gonzalez/R5/USEPA/US@EPA
cc: Duncan Campbell/R5/USEPA/US@EPA, Paul Little/R5/USEPA/US@EPA, Lorna Jereza/R5/USEPA/US@EPA, Joseph Boyle/R5/USEPA/US@EPA, Leverett Nelson/R5/USEPA/US@EPA, Stephen Mendoza/R5/USEPA/US@EPA, Sandra Lee/R5/USEPA/US@EPA, James Cha/R5/USEPA/US@EPA, Deborah Garber/R5/USEPA/US@EPA, Larry Kyte/R5/USEPA/US@EPA
Subject: Fw: NOV - Brillion-Wisconsin's Lack of Interim Status aisle space requirement

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Mike

----- Forwarded by Michael Mcclary/R5/USEPA/US on 02/23/2004 10:19 AM -----

Duncan Campbell

02/23/2004 09:04 AM

To: Michael Mcclary/R5/USEPA/US@EPA
cc:
Subject: NOV - Brillion

Mike-

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NOV020904.wpd

"Leonard Kopidlansky (Brillion Iron Works)" <kopidlansky@brillionironworks.com>

02/18/04 05:18 PM

To: Duncan Campbell/R5/USEPA/US@EPA
cc:
Subject: Answers to inquiry

Duncan

Sorry for taking so long to respond, but things happen, especially if you have a balky computer.

In the attached document, I took your last email and after each of your comments provided some discussion to elaborate on the activities that take place at Brillion related to hazardous waste management. I hope this provides some clarification of these issues. Job descriptions for the individuals identified are being faxed separately. The job descriptions cover the job titles identified for the persons physically doing the hazardous waste duties and some of the alternates. For some reason the one description for the Maintenance Serviceman is of an old format and in need of update. The other maintenance job descriptions are more realistic in how individual requirements are spelled out. Updating this description will be part of our overhaul of the record keeping for hazardous waste management. As part of the hierarchy in the management scheme, the Environmental Technician reports to the Manager of Plant Engineering/Environmental Affairs who in turn reports to the Director of Plant Engineering and Maintenance and then to the VP/General Manager of the facility.

If you have additional questions please feel free to contact me. I will be out of the office on Thursday, February 19 but expect to be back on Friday.

<<Additional questions to USEPA re HazWaste Inspection 2004.doc>>

Leonard Kopidlansky
Brillion Iron Works , Inc.
200 Park Avenue
Brillion, WI 54110
Telephone 920-756-2121 x371
Fax 920-756-3409
kopidlansky@brillionironworks.com

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BRILLION IRON WORKS, INC.

JOB DESCRIPTION

POSITION: Environmental Technician	File Code: Y503089R1
SUPERVISOR: Director Plant Engineering & Maintenance	JOB CODE: 50 - 3089 3219
DIVISION: Foundry/Farm Equipment	EEO CODE: 2
DEPARTMENT: Y - Plant Engineering	EXEMPT: Yes

SUMMARY:

Primary function is to take environmental test, accumulate data and prepare data for review and to assist Environmental Engineer as directed.

ESSENTIAL DUTIES:

Continually review governmental orders, regulations, and requirements to insure Company compliance.

Monitor and perform testing of facility water and air emissions, solid waste and disposal programs.

Perform periodic inspection of facilities to insure compliance with OHSA regulations and recommendations including dust and noise levels and reporting results to superiors.

Ivestigates and documents citizen and employee environmental complaints determining cause and affect as well as suggesting solutions and corrective action measures to superiors.

Assists Project Engineer - Environmental in energy conservation programs and other prjects as directed.

Primary Work Instructions may be assigned to this Classification: this does not preclude assigning additional instructions or assigning instructions to qualified persons outside this Classification.

QUALIFICATION REQUIREMENTS:

Requirements below are representative of knowledge, skill, physical requirements and abilities needed to perform essential functions. Should a person(s) be hired, transferred or promoted and does not meet the following minimum qualifications they may be required to complete such education and/or training to meet the qualifications in the discipline. Reasonable accommodations, if necessary, may be made for persons with a qualifying disability.

DUCATION:

Associate College Degree in Engineering Sciences and/or Professional Certification and continued familiarity with new technologies.

EXPERIENCE:

UNCONTROLLED

No previous experience required.

COMMUNICATION SKILLS:

Ability to communicate verbally and in various written formats with management and associates.

MATHEMATICAL SKILLS:

Ability to apply mathematical concepts percentages to everyday business applications. PC and computer literate.

REASONING/PROBLEM SOLVING:

Expanded judgement and decision making capabilities within guidelines of Work instructions and supervisory directives.

PHYSICAL REQUIREMENTS:

While in normal performance of duties a person may be required to: walk to various facility locations. Infrequently required to lift, push or move weights up to 50 pounds.

ENVIRONMENTAL:

For a short periods of time and at times consistently a person may be exposed to disagreeable weather and non-weather environmental conditions which, at times, may require use of Personal Protective Equipment.

HR Approval: _____ Dated: 4/25/96

Origination Date: 1/12/96
Revision Date: 4/25/96 Revision #: 1

Occ. Code No. I-267

OCCUPATIONAL DESCRIPTION AND EVALUATION

Dept. Maintenance

Job Title Maintenance Serviceman

Labor Grade 08

JOB DESCRIPTION

Work involves cleaning up and shoveling sand from around and underneath machinery, yards and plant roofs. Paints walls, ceiling, machinery and other plant structures and equipment. Uses shovels, brushes, brooms, wheelbarrows, paint scrappers, wire brushes, paint brushes, commercially prepared paints, ladders and scaffolds. May assist Buildings & Grounds Man in the performance of his duties and as well as any other duties he may be assigned.

NTROLL

JOB EVALUATION

FACTOR	DEGREE	BASIS OF RATING
Education	1 (14)	Requires the ability to read, write, add and subtract whole numbers and follow instructions.
Experience	1 (22)	Up to three months.
Initiative & Ingenuity	2 (28)	Requires the ability to work from detailed instructions and the making of minor decisions involving the use of some judgment.
Physical Demand	4 (40)	Continuous strain of working in difficult positions.
Mental & Visual Demand	3 (15)	Continuous mental or visual attention, involving diversified operations requiring constant alertness.

JOI VALUATION (Continued)

FACTOR	DEGREE	BASIS OF RATING
Resp. Equipment or Process	2 (10)	Probable damage to equipment or process is seldom over $25.
Resp. Material or Product	1 (5)	Probable loss due to damage or scrapping of materials or product is seldom over $10.
Resp. Safety of Others	3 (15)	Careless operation of machine or performance of duties may cause lost time accidents to others, such as crushed toes, feet, fingers, or hands and eye injuries.
Resp. Work of Others	1 (5)	Responsible only for own work.
Working Conditions	4 (40)	Continuous exposure to several disagreeable elements.
Unavoidable Hazards	4 (20)	Exposure to health hazards that are incapacitating in nature, such as extreme dirt, dust, fumes, etc.

TOTAL POINTS 214

Written: 4- 1-69

BRILLION IRON WORKS, INC.

JOB DESCRIPTION

POSITION:	Maintenance Mechanic - Bldg & Grnds	File Code:	I21999R1
SUPERVISOR:	Maintenance Manager	JOB CODE:	21 - 999
DIVISION:	Foundry/Farm Equipment	EEO CODE:	6B Trades
DEPARTMENT:	I - Maintenance	L. G. :	2 - 6

SUMMARY:

Responsible for repairs and maintenance to buildings and grounds and performing such duties as: painting, basic plumbing, snow plowing, lawn and landscaping, minor repairs to roofs, and dependent upon mechanical abilities may be required to perform mechanical repairs equivalent to maintenance mechanics of same labor grade.

ESSENTIAL DUTIES:

Must be capable of operating front end loader, dumptruck, be capable of plowing snow, mowing grass with manual and sit type mowers.

Must be capable of performing basic plumbing repairs, replacement of sinks, pipes, urinals, etc. including the replacement of ceramic or plastic tile.

Must be able to drive load lugger and other CDL Class B certified vehicles in normal performance of duties.

Must understand, be capable of following and assist in informing associates of Work and Safety Regulations and Guidelines (Company and Governmental) and perform duties per Work Instructions.

Primary Work Instructions may be assigned to this Classification; this does not preclude assigning additional instructions or the assigning instructions to qualified persons outside this Classification. Work Instructions are in department Work Instruction Manuals.

QUALIFICATION REQUIREMENTS:

Requirements are representative of knowledge, experience, skill, and ability to perform essential functions of the job. Should a person(s) be hired, transferred or promoted and does not meet the following minimum qualifications they may be required to complete such education and/or training, as defined by the Company, to meet the qualifications in the discipline. Reasonable accommodations, if necessary, may be made for persons with a qualifying disability.

EDUCATION:

High School or High School Equivalency Degree and Class B CDL.

UNCONTROLLED

EXPERIENCE:

General experience with hand tools and small power tools.

COMMUNICATION SKILLS:

Ability to communicate in verbal and in various written formats with associates or management.

MATHEMATICAL SKILLS:

Ability to apply general shop mathematical concepts to everyday work situations.

REASONING/PROBLEM SOLVING:

Limited judgement and decision making responsibilities within guidelines of Work Instructions and supervisory directives.

PHYSICAL:

Must be able to frequently, however not continuously at any one time, lift, carry, or exert the equivalent effort or force of moving equipment, materials or product up to 75 Pounds. Must be able to walk, sit, stoop, crawl, climb ladders and/or stairs, work in confined space areas and heights of up to five to six stories, operate a lift truck, operate and work from a high lift, reach and grasp with hands, manipulate fingers, operate power tools and equipment in the normal performance of duties.

ENVIRONMENTAL CONDITIONS:

May be exposed on a frequent basis to a number of weather and non-weather environmental conditions any one which may be considered disagreeable such as: dust, dirt, heat, humidity or noise, which may require the use of Personal Protective Equipment.

HR Approval: _____ Dated: 4/18/96

Origination Date: 1/20/96
Revision Date: 4/18/96
Revision #: 1

BRILLION IRON WORKS, INC.

JOB DESCRIPTION

POSITION:	Master Repairman	File Code:	I21460R1
SUPERVISOR:	Maintenance Manager	JOB CODE:	21 - 460
DIVISION:	Foundry/Farm Equipment	EEO CODE:	7A Trades
DEPARTMENT:	I - Maintenance	L. G. :	1

SUMMARY:

Primary function is to perform complicated and technical repairs and maintenance of machinery and equipment such as engines, motors, or hydraulic equipment.

ESSENTIAL DUTIES:

Must be capable of troubleshooting and performing a wide range of: complex mechanical repairs, installation and movement of machinery, installing conveyors and ventilation systems, operate various power and hand tools, operate overhead crane, hoists, lift truck, welding equipment, brazing soldering and cutting torches.

Use extensive training in diagnosis of machine problems and capable of making highly educated suggestions as to repairs, remedies and solutions to eliminate or prevent similar occurrences.

May be required to perform duties of Assistant to the Foreman, Machinist, or Maintenance Repairperson in their absence. Must be fully capable of performing all duties and Work Instructions of lesser grade or lesser experience Mechanics, Repairperson, Trainees and Apprentices. May be required to assist in the training of lesser skilled associates including Millwright Apprentices.

Must understand, be capable of following and assist in informing associates of Work and Safety Regulations and Guidelines (Company and Governmental) and perform duties per Work Instructions.

Primary Work Instructions may be assigned to this Classification; this does not preclude assigning additional instructions or the assigning instructions to qualified persons outside this Classification. Work Instructions are in department Work Instruction Manuals.

QUALIFICATION REQUIREMENTS:

Requirements are representative of knowledge, experience, skill, and ability to perform essential functions of the job. Should a person(s) be hired, transferred or promoted and does not meet the following minimum qualifications they may be required to complete such education and/or training, as defined by the Company, to meet the qualifications in the discipline. Reasonable accommodations, if necessary, may be made for persons with a qualifying disability.

EDUCATION:

Trades school and/or Journeyperson in respective discipline.

UNCONTROLLED

EXPERIENCE:

Three(3) years demonstrated experience and knowledge as highly trained Journeyperson and demonstrated leadership capabilities.

COMMUNICATION SKILLS:

Ability to communicate to varying audiences in verbal and in various written formats with associates or management.

MATHEMATICAL SKILLS:

Ability to apply general shop mathematical concepts to everyday work situations.

REASONING/PROBLEM SOLVING:

Ability to troubleshoot, resolve problems and deal with a variety of situations where only standardization may exist, requiring some expanded judgement and decision making responsibilities within guidelines of Work Instructions and supervisory directives.

PHYSICAL:

Must be able to frequently, however not continuously at any one time, lift, carry, or exert the equivalent effort or force of moving equipment, materials or product up to 75 Pounds. Must be able to walk, sit, stoop, crawl, climb ladders and/or stairs, work in confined space areas and heights of up to five to six stories, operate a lift truck, operate and work from a high lift, reach and grasp with hands, manipulate fingers, operate power tools and equipment in the normal performance of duties.

ENVIRONMENTAL CONDITIONS:

May be exposed on a frequent basis to a number of weather and non-weather environmental conditions any one which may be considered disagreeable such as: dust, dirt, heat, humidity or noise, which may require the use of Personal Protective Equipment.

HR Approval: _____ Dated: 4/18/96

Origination Date: 1/20/96
Revision Date: 4/18/96
Revision #: 1

BRILLION IRON WORKS, INC.

JOB DESCRIPTION

POSITION: Coreroom Service Person	File Code: D05038R1
SUPERVISOR: General Foreman Shell Core	JOB CODE: 5 - 038
DIVISION: Foundry	EEO CODE: 7C
DEPARTMENT: D - Core Room	L. G. : 8

SUMMARY:

Primary function is to assist core machine operators in preparation of materials and supplies, clean core boxes, assist with pattern changes, and general cleanup.

ESSENTIAL DUTIES:

Fill sand hoppers, retrieve baskets, boxes and other materials, keep aisles and areas behind machine clean.

Clean core boxes and store in designated areas.

Anticipate needs of machine operators and provide assistance as required.

Responsible for operating lift truck in a safe and efficient manner in constantly high traffic areas.

Must be able to work with minimal supervision.

Primary Work Instructions may be assigned to this Classification; thi does not preclude assigning additional instructions or assigning instructions to qualified persons outside this Classification. Work Instructions are in Departmental Work Instruction Manuals.

QUALIFICATION REQUIREMENTS:

Requirements are representative of the education, experience, skills and abilities to perform essential functions of the job. Should a person(s) be hired, transferred or promoted and who does not meet the following minimum qualifications they may be required to complete such training, as defined by the Company, to attain such qualifications in discipline. Reasonable accomodations, if necessary, may be made for persons with a qualifying disability.

EDUCATION:

High Scool Degree or High School Equivalency Degree.

EXPERIENCE:

No previous experience required.

UNCONTROLLED

COMMUNICATION SKILLS:

Ability to communicate verbally or written format with Supervison, Associates, or Customers regarding Quality Safety, and Work Instructions.

MATHEMATICAL SKILLS:

Ability to apply basic math skills: addition, subtraction, mutiplication division, and fractions to everyday manufacturing applications.

REASONING/PROBLEM SOLVING:

Requires limited judgement and decision making responsibilities within guidelines of Work Instructions.

PHYSICAL:

While in normal performance of duties may be, on a moderate to frequent time basis, required to: walk, sit, push, pull, carry, or exert the same effort of moving equivalent amounts of weights upto 75 Pounds. Must be able to reach and grasp, manipulate fingers and operate a lift trtuck, power equipment or tools and to visually inspect product and/or materials in the normal performance of duties.

ENVIRONMENTAL CONDITIONS:

May be exposed on a frequent basis to a number of weather and non-weather environmental conditions: dust, dirt, heat, humidity or noise, which requires the use of Personal Protective Equipment.

HR Approval: _____ Dated: 4/9/96

Origination Date: 1/19/96
Revision Date: 4/9/96 Revision #: 1

BRILLION IRON WORKS, INC.

JOB DESCRIPTION

POSITION:	**Painter & Material Handler**	**File Code:**	**G35008R2**
SUPERVISOR:	**Foreman Painting**	**JOB CODE:**	**8 - 008**
DIVISION:	**Farm Equipment**	**EEO CODE:**	**7C**
DEPARTMENT:	**G - Assembly**	**L. G. :**	**7**

SUMMARY:

Primary duties are hanging and painting of farm implement parts.

ESSENTIAL DUTIES:

Load and unload parts by hand or hoist on to or off paint line and operate an electrostatic spray paint gun to paint parts. Stack painted parts on pallets or in other containers for staging.

Perform duties of Painter and Assembler during absences and assist or train others in performing similar work.

Maintain work areas in a neat and orderly condition.

Primary Work Instructions may be assigned to this Classification; this does not preclude assigning additional or assigning instructions to qualified persons outside this Classification. Work Instructions may be found in Departmental Work Instruction Manuals.

QUALIFICATION REQUIREMENTS:

Requirements are representative of the education, experience, skills and ability to perform essential functions of the job. Should a person(s) be hired, transferred or promoted who does not meet the following minimum qualifications they may be required to complete such education and/or training as defined by the Company to attain such qualifications in discipline. Reasonable accommodations, if necessary, may be provided for persons with qualifying disabilities.

EDUCATION:

Requires High School Degree or High School Equivalency Degree.

EXPERIENCE:

No previous experience required.

COMMUNICATION SKILLS:

Communicate verbally and in written format with Supervision, Customers and Associates regarding Quality, Safety and Work Instructions.

MATHEMATICAL SKILLS:

Apply basic math skills: addition, subtraction, division multiplication, and fractions to manufacturing applications.

UNCONTROLLED

REASONING/PROBLEM SOLVING:

Limited judgement and decision making responsibilities within the guidelines of Work Instructions.

PHYSICAL REQUIREMENTS:

A person is frequently required to lift, carry, move or push or expend the equivalent effort of moving weights medium to heavy weight materials up to 75 Pounds. A person may frequently be required to walk, stand, climb, operate a lift truck or other similar material moving equipment including a hoist, use small hand tools and power equipment in the normal performance of duties.

ENVIRONMENTAL CONDITIONS:

During normal performance of duties a person may be exposed to disagreeable weather and non-weather conditions for extended period of time such as: heat, dirt, fumes, cold, humidity and chemicals which will require the use of Personal Protective Equipment.

HR Approval: _____ **Dated:** **9/30/96**

Origination Date: **1/16/96**
Revision Date: **9/30/96** **Revision** **2**

BRILLION IRON WORKS INC.
200 PARK AVE. BRILLION WI 54110

DEPARTMENT OF PLANT ENGINEERING

FACSIMILE TRANSMITTAL SHEET

TO: Mr. Duncan Campbell	FROM: Leonard Kopidlansky
COMPANY: U.S. EPA	DATE: 2/18/04
FAX NUMBER: 312-353-4342	TOTAL NO. OF PAGES INCLUDING COVER: 13
PHONE NUMBER: 312-886-4555	SENDER'S FAX NUMBER: 920-756-3409 SENDER'S TELEPHONE NO: 920-756-2121 Ext. 371
RE: Job Descriptions	SENDER'S EMAIL kopidlansky@brillionironworks.com

☐ URGENT ☑ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Enclosed with this cover is a copy of Job Descriptions of people typically handling/managing hazardous waste activities at Brillion Iron Works. These were referenced in the email message of 2/28/04.

Leonard.

BRILLION IRON WORKS INC.
200 PARK AVE. BRILLION WI 54110

DEPARTMENT OF PLANT ENGINEERING

FACSIMILE TRANSMITTAL SHEET

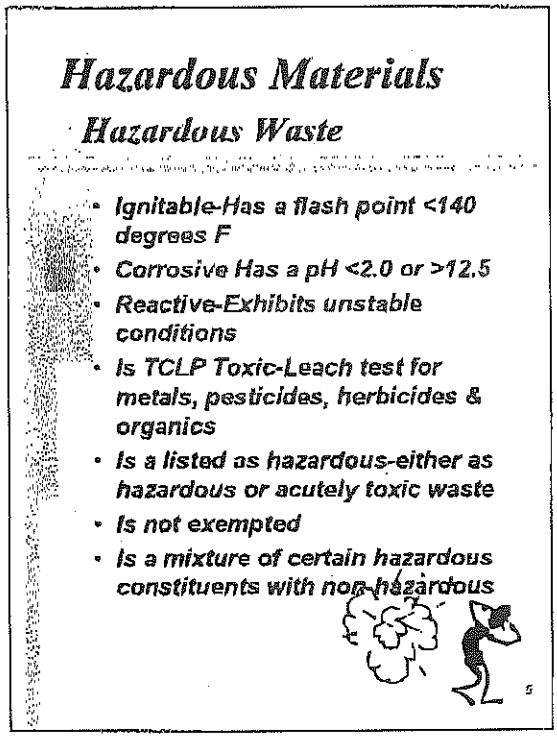
TO: Mr. Duncan Campbell	FROM: Leonard Kopidlansky
COMPANY: U.S. EPA	DATE: 2/11/04
FAX NUMBER: 312-353-4342	TOTAL NO. OF PAGES INCLUDING COVER: 10
PHONE NUMBER: 312-886-4555	SENDER'S FAX NUMBER: 920-756-3409 SENDER'S TELEPHONE NO: 920-756-2121 Ext. 371
RE: Sample of Documentation	SENDER'S EMAIL: kopidlansky@brillionironworks.com

☐ URGENT ☑ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Enclosed with this cover is a copy of the portion of the agenda from the annual Environmental Update meeting that dealt with refresher training for hazardous materials and wastes done in 2003. Also included are meeting record forms for recording the attendees at the Supervisor Safety Meeting devoted to the annual Environmental Update.

Leonard.



This is a routine slide from year-to-year but it is important to keep these criteria in mind and pass the information along to associates

Hazardous **Waste** has a specific definition under DNR & EPA

Non Hazardous does not necessarily mean NOT DANGEROUS

Water is an inhalation hazard

Examples/comments

- Safety-Kleen 150 degree Solvent
- Neutralize Scrubber Water Solution
- Part 2 Isocure Resin (close to reactive)
- Plant 1 Furnace Dust
- Waste Mineral Spirits
- Aerosol Can Waste
- Paint Line flush solvent
- Core Resin line flush solvent
- NO MIXING!!

Chemical Safety Tips

- *Pay attention to training*
- *Know what hazardous chemicals are used in your area*
- *Don't work with a chemical that is in an unlabeled container*
- *Follow manufacturers instructions for chemicals and equipment, see MSDS*
- *Follow company rules on all jobs – Avoid shortcuts!*
- *Wear all PPE required for the job – ask your supervisor if not sure*
- *Work with a partner when performing a potentially hazardous task*
- *Keep containers closed when not in use and regularly check for leaks*
- *Make sure equipment is in good working condition before use*

6

All products are referenced by the material trade name on the Material Safety Data Sheets. The trade name for each product is listed on the label for the product.

All employees should be aware of the location of the MSDS binder in their department. All employees should be able to easily reference the MSDS binder to identify the product they are working with and assess the hazards associated with the product.

Chemical Safety Tips (cont.)

- *Keep incompatible materials away from each other*
- *Keep flammable and explosive materials away from heat sources*
- *Make sure the work area is adequately ventilated*
- *Don't bring food or drinks into a work area where chemicals are used*
- *Wash before eating and drinking*
- *Clean tools, equipment and clothing that have been exposed to hazardous chemicals before storing or reusing them*
- *Dispose of contaminated materials properly*
- *If you find old or unused chemicals in your work area, ask a supervisor what to do*

Recycling

Landfill Bans Remain in force

- ***Appliances***
- ***Used Oil***
- ***Lead/Acid Batteries***
- ***Yard & Garden Waste***
- ***Lamps & Computer Monitors***
- ***#1 & 2 Plastics***
- ***Glass***
- ***Paper***
- ***Corrugated Paper***
- ***Metal Containers***
- ***Tires***
- ***Alkaline & Ni-Cd batteries***
- ***No Home Waste***

8

Very dependent upon markets at various points

- **Reminder-Cardboard is going into compactor-need to place cardboard into core baskets and ship to Central Receiving for Baling and Shipment. The BIW receives income from the recycling of cardboard!**

- **Keep garbage out of recyclables**

  Hardhats, plastic pails and covers, stretch wrap, hoses and plastic spools must be placed in the garbage.

- **Reused Drums**-must be clean and in good condition to meet Transportation Regulations

- **Scrap Wood** - Our pallet vendor accepts all scrap wood produced by the BIW at no cost to the company. There are scrap wood boxes for pieces of wood located next to the west end of the MB2 cooling shed.

  Please setup collection containers in your production areas to source separate the scrap wood and deliver the wood to the scrap wood boxes.

  - **Cost savings for the BIW by properly recycling the scrap wood.**

Miscellaneous Issues

- *Recycling Work Instruction*
- *NR 538 Beneficial Reuse of Industrial Byproducts*
  - *Certain Foundry Byproducts are being diverted to the perimeter berm east of plant 2*
- *Everything must be put it it's place!*
- ***SPCC & Contingency Plans***
  - ***Two spills-2/01 & 3/02***
- *Treat spills like a fire – contain if possible – report to supervisor and cleanup*

9

- Posters are located around the facility w/what can be recycled

NR 538- Kicked off Foundry Byproduct Source Separation program in June 2002. Goal is to produce foundry byproducts that are free of contaminants that can be used as a substitute construction aggregate.

Currently diverting all of the foundry byproducts produced by the BIW for the construction of a perimeter berm east of plant 2 on the former Agrilink property.

All roll-off boxes are labeled for the types of foundry byproducts that can be placed into the containers. Signs are posted at every location listing the types of foundry byproducts that can be placed into each roll-off container.

- <u>Common contaminants:</u> Dust masks, paper cups, ear plugs, cigarette butts, food packaging, paper bags, scrap wood, cardboard and other trash. Non-recyclable foundry byproducts including mag wire, thermocouples, gating and scrap iron.

Transportation Requirements-Placarding, labeling...

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: November 20, 2003 - 2:58 PM

Version: 2.0

User Selection Criteria

Location:	Not Chosen	Evaluation Date Range:	10/01/1980 To 11/20/2003
Group of IDs:	Not Selected	Only Evaluations with Violations:	No
Handler Name:		Federal facilities only:	No
Handler ID:	WID048027734	Reason Code:	All
Universe:	All	Display Code Descriptions:	Yes
Sort Order:	Region, State, Handler Name		

Results

Data meeting the criteria you selected follows.

Total Pages: 4 Handler Count: 1

Report Description

This report provides a complete listing of evaluation, violation and enforcement activities for each Handler. Below the Handler ID information, the data is presented in three sections; evaluations, violations and enforcements. Comments, referred to as Notes, are provided in the respective sections for evaluations and violations. Violation coverage areas are shown horizontally across the page in the evaluation data section. Since evaluations are included regardless of whether or not violations are identified, this report also serves as a useful management tool for tracking progress made towards meeting RECAP commitments.

Report Information

Name:	cmecomp.rdf
Developed by:	EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed Date:	November 2002
Last Updated:	October 2003
Contact:	rcrainfo.help@epa.gov
Tables Used:	cmecomp, cevaluation_area, hreport_univ, aarea, aln_area_event, aevent, gpra_ca, lu_state, hid_groups
Libraries:	cmedec2.pll

Report run on: November 20, 2003 - 2:58 PM

This report may contain enforcement sensitive data.

BRILLION IRON WORKS INC **Activity Location:WI** **WID048027734**

Location: 200 PARK AVE
BRILLION, WI 54110

Mailing: 200 PARK AVE
BRILLION, WI 54110

County Name/Code: CALUMET/WI015

Universes

Generator: LQG
Transporter:

Full Enforcement: -----
Operating TSDF: -----
BOYSNC:
SNC:
Annual BOY Enf:

Subj CA:
Subj CA TSD 3004:
Subj CA TSD Discr:
Subj CA Non-TSD:
CA Wrkld:

Perm Prgrs: -----
Perm Wrkld: -----
Clos Wrkld: -----
Pclos Wrkld: -----

Op Pmt GPRA:
PClos GPRA:
CA GPRA:
CA HE EI:
CA GW EI:

State District: Accessibility: Non-Notifier:

CEI Evaluation 03/30/1995 Act Loc: WI By: State Seq #: 002 Person: R5 Branch: Reason: Found Violation: N
Notes: NO VIOLATIONS DETECTED

Coverage Areas: GGR

Violation Data	Enforcement Data
No Violations	No Enforcements

CEI Evaluation 05/30/1985 Act Loc: WI By: State Seq #: 001 Person: Branch: Reason: Found Violation:
Notes:

Coverage Areas: GER

Violation Data	Enforcement Data
No Violations	No Enforcements

Total Number of Handlers: 1

Total Number of Activity Locations: 1

*** End of Report ***

This report may contain enforcement sensitive data.

Description of codes used on the report:

Universes	Description Of Universes
Operating tsdf	Indicates that the facility is a treatment, storage or land disposal facility subject to any type of enforcement. Then specifies type facility (see LIBST below for further explanation).
PCWrkld	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Post-Closure Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
ClosWrkld	Indicates that the facility is a treatment, storage or land disposal facility which is part of the closure Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
Perm/PC	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Permitting/Closure/Post-Closure Progress universe. It is then specifies type of facility (see LIBST below for further explanation).
PermWrkld	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Permit Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
SubjCA	Indicates that the facility is subject to Corrective Action. ('X' indicates that the facility is in this universe).
CAWrkld	Indicates that the facility is part of the Corrective Action Workload universe. ('X' indicates that the facility is in this universe).
LQG	Indicates that the facility is a Large Quantity Generator. ('X' indicates that the facility is in this universe).
SQG	Indicates that the facility is a Small Quantity Generator. ('X' indicates that the facility is in this universe).
CESQG	Indicates that the facility is a Conditionally Exempt Small Quantity Generator. ('X' indicates that the facility is in this universe). Note: CESQG are not nationally required to notify or obtain an EPA ID. Therefore, the absence of CESQG data for any given state or facility does not indicate a data quality problem.
Transporter	Indicates that the facility transports waste subject to RCRA regulations. ('X' indicates that the facility is in this universe).
SNC	Indicates that the facility is a Significant Non-Complier. ('X' indicates that the facility is in this universe).
BOYSNC	Indicates that the facility was a Significant Non-Complier at the beginning of the fiscal year: Oct 1- Sep 30. ('X' indicates that the facility is in this universe).

LIBST in the above universes indicates:

- **L** Land Disposal facility
- **I** Facility is an Incinerator
- **B** Facility is a Boiler or Industrial Furnace (BIF)
- **S** Storage facility
- **T** Treatment facility

This report may contain enforcement sensitive data.

Description of codes used on the report:

ACT LOC

Act Loc indicates the activity location where the evaluation/inspection was performed, the violation was discovered or the enforcement action was taken.

Agency indicates the agency performing the evaluation or the enforcement action:

X-EPA	EPA region performed the evaluation or enforcement action as part of their oversight function.
C-EPA	Contractor working for EPA conducted the evaluation.
B-State	Contractor working for State conducted the evaluation.
EPA	EPA performed the evaluation or enforcement action.
State	State performed the evaluation or enforcement action.

BY

By indicates the agency who performed the evaluation/inspection.

FOUND VIOLATION indicated whether or not the evaluation discovered a violation.
It will contain the following values:

Code	Description
Y	indicates that the evaluation did find violations.
N	indicates that the evaluation did not find violations.
U	indicates that it is undetermined at this time. The agency may still be determining whether violations existed.
blank	converted from the previous system which did not have a definitive answer to whether nor not violations were found.

EPA United States Environmental Protection Agency

Handler Detail

RCRAInfo

BRILLION IRON WORKS INC **BRILLION** **WID048027734**

** = Indicates source record used for Universe Calculations

Handler Universes										
In a Universe	Genstatus	Transporter	Univ Waste	Recycler	Used Oil	Furnace Exempt	Importer	Onsite Burner Exem	Mixed Waste Gen	Underground Injection
Y	LQG	N	N	N	NNNNNNN	N	N	N	N	N

Permitting and Corrective Action Universes								
Permit Workload	Closure Workload	Postclosure Workload	Permit Progress	CA Workload	Subject to CA	Subject to CA - TSD	Subject to CA - Discretion	Subject to CA - Non-TSD
-----	-----	-----	-----	N	N	N	N	N

Compliance, Monitoring and Enforcement and GPRA Universes							
Full Enforcement	Operating TSDF	SNC	BOYSNC	GPRA Permit	GPRA Postclosure	GPRA CME	GPRA CA
-----	-----	N	N	N	N	N	N

Source Summary Table				
Act Loc	Source	Sequence	Receipt Date	Non-notifier
WI	A	1	12/2/1980	
WI	I	1	5/9/1996	
WI	N	1	8/18/1980	
WI	** R	7	3/1/2002	
WI	R	6	3/1/2000	
WI	R	5	10/29/1998	
WI	R	4	3/1/1996	
WI	R	3	3/1/1994	
WI	R	2	3/1/1992	
WI	R	1	3/1/1990	

RCRA Site Detail Report

Universe Justification

Go To

URL: /Handler2/HAND_main.asp

U.S. Environmental Protection Agency

Facility Registry System (FRS)

Facility Detail Report

Report an Error

FRS

Facility Name:	BRILLION IRON WORKS INCORPORATED
Location Address:	200 PARK AVE.
Supplemental Address:	
City Name:	BRILLION
State	WI
County Name:	CALUMET
ZIP/Postal Code:	54110
EPA Region:	05
Congressional District Number:	06
Legislative District Number:	
HUC Code:	04030101
Federal Facility:	NO
Tribal Land :	
Latitude:	44.179224
Longitude:	-88.061511
Method:	ADDRESS MATCHING-HOUSE NUMBER
Reference Point Description:	PLANT ENTRANCE (GENERAL)
Duns Number:	
Registry ID:	110000420802

Report Facility Discrepancy

Map this facility

Environmental Interests

Information System	Information System ID	Environmental Interest Type	Data Source	Last Updated Date	Supplemental Environmental Interests:
AIRS/AFS	WI0045646	AIR MAJOR	AIRS/AFS	09/24/2001	
NEI	55015408021020	CRITERIA AIR POLLUTANTS INVENTORY	NEI	03/28/2003	

NEI	NTI42977	HAZARDOUS AIR POLLUTANTS INVENTORY	NEI		
NET	550150210	CRITERIA AIR POLLUTANTS INVENTORY	AIR VOLUNTARY SUBMISSION	12/30/1996	
NTI	NTI42977	HAZARDOUS AIR POLLUTANTS INVENTORY	AIR VOLUNTARY SUBMISSION	12/30/1996	
PCS	WI0000761	NPDES NON-MAJOR	NPDES PERMIT	07/21/2000	
RCRAINFO	WID048027734	HAZARDOUS WASTE BIENNIAL REPORTER	RCRAINFO	03/01/2002	
RCRAINFO	WID048027734	LQG	STATE INSPECTION	05/09/1996	
TRIS	54110BRLLN200PA	TRI REPORTER	TRI REPORTING FORM	07/02/2001	

Facility Mailing Addresses

Affiliation Type	Delivery Point	City Name	State	Postal Code	Information System
ALTERNATE MAILING ADDRESS	200 PARK AVE	BRILLION	WI	54110	PCS
FACILITY MAILING ADDRESS	200 PARK AVE	BRILLION	WI	54110	RCRAINFO
FACILITY MAILING ADDRESS	200 PARK AVE	BRILLION	WI	541100000	AIRS/AFS
FACILITY MAILING ADDRESS	200 PARK AVE.	BRILLION	WI	54110-0127	TRIS
PRIMARY MAILING ADDRESS	KARL GABLER	BRILLION	WI	54110	PCS

NAICS Codes

Data Source	NAICS Code	Description	Primary	Report Discrepancy
NEI	331511	IRON FOUNDRIES.		Report
RCRAINFO	331511	IRON FOUNDRIES.		Report

SIC Codes

Data Source	SIC Code	Description	Primary	Report Discrepancy
NEI	3321	GRAY AND DUCTILE IRON FOUNDRIES		Report
NEI	3321	GRAY AND DUCTILE IRON FOUNDRIES		Report
NTI	3321	GRAY AND DUCTILE IRON FOUNDRIES		Report
AIRS/AFS	3321	GRAY AND DUCTILE IRON FOUNDRIES		Report
PCS	3321	GRAY AND DUCTILE IRON FOUNDRIES		Report
TRIS	3321	GRAY AND DUCTILE IRON FOUNDRIES		Report
TRIS	3523	FARM MACHINERY AND EQUIPMENT		Report

Contacts

Affiliation Type	Full Name	Office Phone	Information System	Mailing Address	Report Discrepancy
COGNIZANT OFFICIAL	ED SCHLIES		PCS		Report
COMPLIANCE CONTACT	LEONARD KOPIDLANSKY	4147562121	AIRS/AFS		Report
PUBLIC CONTACT	KENNETH E. WAGNER	9207562121	TRIS		Report
PUBLIC CONTACT	ALEXANDER J. SCARGALL	9207562121	TRIS		Report
REGULATORY CONTACT	SCOTT HUGUET	9207562121	RCRAINFO		Report

Organizations

Affiliation Type	Name	DUNS Number	Information System	Mailing Address	Report Discrepancy
OWNER/OPERATOR		122132301	AIRS/AFS		Report

Alternative Names

No Alternative Names returned.

Query executed on: FEB-23-2004

Duncan Campbell

02/11/04 03:33 PM

To: "Leonard Kopidlansky (Brillion Iron Works)" <kopidlansky@brillionironworks.com>
cc:
cc: Duncan Campbell/R5/USEPA/US@EPA
Subject: RE: Training

Leonard - You continue to demonstrate that a whole lot of training existed prior to my inspection on January 30th.

A large quantity generator must maintain the following documents and records at the facility: job title for each position at the facility related to hazardous waste management, ------ I'm reading that you may meet this for 31 employees. True or false? How many employees are actually involved in some aspect of hazardous waste management? Job title for operators who are not responsible for the movement, cleanup, manifesting, etc. do not have to be included.

and the name of the employee filling each job; ------ you have 31 names. Again, how big is the universe that are actually involved with moving the waste, inspecting the waste, manifesting the waste, cleaning up spills of the waste???????/

a written job descriptions for each position that shall include the requisite skill, ------ if you have sent me this information, I apologize because I am not recognizing it as such. ----------

education or other qualifications, and duties of facility personnel assigned to each position; ---------- again, if you have sent me this, I apologize because I am not getting it----------

a written description of the type -------- per your fax today I would say you meet this requirement ----

and amount of both introductory and continuing training ------- did I miss a statement about amount somewhere??????

that will be given to each person filling a position referenced above; ------- the obvious link is to the above mentioned 31 employees. I'm still groping for how big the universe of employees is that receive on-the-job training from the 31 who received formal training. I understand from your communiques that you will be working to improve the documentation which I presume will identify job title, job description, subjects covered and frequency and amount of training------

and records that document that the training or job experience required above has been given to and completed by facility personnel. -------- again you have provided adequate information for the 31. We can move on to discuss the others who received training from trainers on-the-job.

Thank you for your prompt responses to my information request

DC

"Leonard Kopidlansky (Brillion Iron Works)" <kopidlansky@brillionironworks.com>

02/11/04 02:48 PM

To: Duncan Campbell/R5/USEPA/US@EPA
cc:
Subject: RE: Training

Duncan

As you indicated, for a number of employees information documenting hazardous waste training is available in a different format than outlined in the guidance document provided by Jason Moeller. This is true for the 31 employees mentioned in our letter of February 10. We document copies of the handouts and speaking notes and a sign-in sheet records the employees that attended the training. Some topics related to hazardous waste are not applicable however, may only be mentioned or may not be included in specific training sessions. For example, employees who are not involved in preparing manifests will receive minimal instruction on manifests. I am led to believe that this is acceptable. If this is not, please advise.

At the next level of training, supervisors and group leaders provide the instruction they received to on-the-job employees at monthly safety meetings. We can document that employees attended safety-training meetings, however, detailed documentation was not available to demonstrate conclusively that the topics were covered in full at all meetings. Some supervisors documented the information as above, but some was less detailed. In addition, work instructions or guidance memos exist for most individual waste streams, however, no documentation could be produced to demonstrate that the individual employees were instructed on an annual basis on the handling requirements for specific wastes they manage. This last component of our training documentation is what we found most lacking and this will be corrected on the next round of training this year. Additional documentation will be developed to show that Brillion's train-the-trainer has conducted job-specific training for affected employees and this will be collected in a central file.

I will fax you a copy of the portion of the 2003 Environmental Update on Hazardous Waste & Materials with the Meeting Record Forms as an example of the documentation readily on hand. For the individuals involved in the actual handling of hazardous waste, record keeping, and paperwork, we will implement documentation going forward patterned after the guidance document provided by Jason.

Leonard

-----Original Message-----
From: Campbell.Duncan@epamail.epa.gov
[mailto:Campbell.Duncan@epamail.epa.gov]
Sent: Wednesday, February 11, 2004 9:06 AM
To: Leonard Kopidlansky (Brillion Iron Works)
Subject: Training

Leonard-

BRILLION IRON WORKS

BRILLION IRON WORKS INC.

200 PARK AVENUE
P.O BOX 127
BRILLION, WISCONSIN 54110-0127
PHONE: 920-756-2121 • FAX: 920-756-3409

February 10, 2004

Mr. Duncan Campbell
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd (DE-9J)
Chicago, IL 60604-3511

Dear Mr. Campbell:

During your visit to our facility on January 30, 2004, a few concerns were identified for which we did not have complete documentation readily available and for which you requested follow-up.

As we discussed, Brillion had several personnel changes at the management level recently and revisions are being made on the list of facility contacts in our Hazardous Waste Contingency Plan along with some additional minor revisions that are appropriate at this time. One question in particular that was raised regarding the Contingency Plan was whether copies had been forwarded to local authorities. In an attachment to the master copy there were copies of letters indicating the plan had been sent to the Brillion Police Department, Brillion Dept. of Public Works, and St. Elizabeth's Hospital, Occupational Health Specialist. When ever the plan is revised the appropriate emergency responders are advised and copied.

The main area of concern during your visit however, was adequate documentation of training for individuals responsible for handling specific hazardous waste streams. The short answer is that I cannot provide complete documentation and evidence that training was provided directly to specific individuals on specific tasks related to all individual hazardous wastes. This shortcoming will be corrected. As you observed however, there was no evidence that we were not handling hazardous waste materials correctly and there are opportunities to improve our training record keeping practices. The correction may be less straightforward however, since different persons or departments handle each waste. The following explanation will present what information we do cover and what corrective action we will implement to correct the deficiency.

Brillion conducts annual Environmental Updates at Supervisor Safety Training meetings. Thirty-one individuals at this level were trained in 2003. Topics at this annual update include the gamut of environmental issues including air, water, solid waste, and hazardous waste. Basic information on the definition, identification and characteristics of a hazardous waste are always included as well as which of the wastes classed as hazardous are found at Brillion and where those wastes are generated. This information becomes the topic of the month for those supervisors to present to employees within their

areas of responsibility. All production/shop employees receive basic overview training. At the department level, basic topics of discussion and attendance records are kept. However, this information does not record that the specific requirements on how each waste stream must be handled, labeled and stored prior to shipment to a TSD are communicated to the affected employees. Within the departments, instruction is provided on those topics to employees that handle specific materials, but this is where our documentation needs improving.

Brillion customarily generates about six hazardous waste streams as defined by the 40 CFR 261 and NR 600 codes. Occasionally, lab pack materials or unique maintenance activities may generate wastes such as obsolete paints, solvents, or other materials that meet the requirements of the hazardous waste regulations. Brillion's Environmental Technician manages those materials separately with assistance of outside contractors when the materials are determined to be obsolete or surplus. Each of our customary waste streams is handled separately. A brief description of each material follows.

Monoethanolamine, a carburetor cleaner, is used within a small self-contained parts washer in our vehicle repair facility and is serviced by an outside contractor. No actual handling of the waste occurs by Brillion employees. Awareness training will be conducted and documented for those individuals using the parts washer.

Waste flush solvent (methylpyrrolidone), used to clean core resin lines, is handled by service persons in either Plant 1 or Plant 2 foundry associated with the core-making departments. A guideline was provided to each department foreman and additional instruction was documented in 1998 in a memo to the department foreman at Plant 1 that training had taken place with the service man. However, documentation that this training has been repeated on an annual basis is not available. This work task will be included on a training matrix that is used in the affected departments that tracks review of other job responsibilities for employees to insure that the training is completed. A copy of the training matrix will be kept in a hazardous waste training file. Task requirements will be reviewed to insure that they are accurate.

In Plant 3, waste flush solvent is generated from the cleaning of paint lines. Training and instruction was provided for the one person who typically handles the waste flush solvent as well as one alternate. Training records were on file indicating that topics were covered relative to handling this waste in 2002, but were non-specific for 2003 regarding this particular hazardous waste. Also, existing training did not distinguish between special wastes and hazardous wastes at this location. All special wastes including materials such as oil dry and used oil, were handled as hazardous. Updated training materials will be developed and training for required personnel will be documented. This document will also be kept in a hazardous waste training file.

Emission control dust from baghouses controlling fumes from melting operations at Plant 1 is handled by service persons from the maintenance group assigned to that task. Specific documentation of training of these individuals on this task was not available. A computerized Preventative Maintenance scheduling system triggers performance of the task. This system can also be used to trigger refresher training for the individuals involved and a brief curriculum will be provided for periodic training and

documentation on an annual basis. Copies of the completed preventative maintenance orders for these refresher training activities will be kept in the hazardous waste training file.

In the maintenance satellite waste collection area, aerosol can waste and waste solvent are collected. When filled, a drum of these waste materials may be handled by a variety of personnel on an irregular schedule, however, the labeling and handling is straightforward. We propose to implement an internal chain-of-custody type form with a training check-off list to prompt required instruction by the supervisor(s) who will be trained or by the designated trainer, and sign off on the form will document the task. Copies of the training check-off list will be kept in the hazardous waste training file.

Finally, with regard to "train-the-trainer" training, an upcoming program provided by the Federation of Environmental Technologists is scheduled for April 22, 2004. One or more of our staff will attend this session, which is designed as an "Annual RCRA Refresher". Records of those attending this training will be kept in the hazardous waste training file.

Our target to complete implementation of these issues is May 6, 2004. I hope this answers your questions regarding this matter.

Sincerely,
BRILLION IRON WORKS, INC.

Leonard Kopidlansky

Leonard Kopidlansky
Manager of Environmental Affairs

CC: Jason W. Moeller, Waste Management Specialist, WDNR

"Leonard Kopidlansky (Brillion Iron Works)" <kopidlansky@brillionironworks.com>

To: Duncan Campbell/R5/USEPA/US@EPA
cc:
Subject: Training Documentation

02/10/04 03:17 PM

Duncan

Attached is a letter outlining information I was able to put together on documentation of our training and improvements we will make. The original document was sent certified mail this morning (a company policy on regulatory requirements). You will have to click on the read-only button when you try to open the document in Word. Please let me know if you need additinal information.

Leonard Kopidlansky
Brillion Iron Works , Inc.
200 Park Avenue
Brillion, WI 54110
Telephone 920-756-2121 x371
Fax 920-756-3409
kopidlansky@brillionironworks.com

<<Response re HazWaste Inspect 1- 2004.DOC>>

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distribute or copy this e-mail. Response re HazWaste Inspect 1- 2004.D(

Duncan Campbell

02/10/04 03:02 PM

To: Kopidlansky@brillionironworks.com
cc:
cc:
Subject:

Leonard - Based on information you provided in two e-mails I have pieced together the following violation. Please provide me with those items which were available for inspection at BIW, on the date of the inspection, if everyone involved in the training process had been assembled for interviews and adequate time given to assemble and collate facility records.

In order to avoid the need for a hazardous waste storage license, a large quantity generator must maintain the following documents and records at the facility: job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job descriptions for each position that shall include the requisite skill, education or other qualifications, and duties of facility personnel assigned to each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position referenced above; and records that document that the training or job experience required above has been given to and completed by facility personnel. See, NR 615.05(6)(a), 615.05(4)(a)(6), and 630.16(4)(b). This is also a requirement of owners and operators of hazardous waste storage facilities, under NR 630.16(4)(b) and 680.22(14).

February 10, 2004

Mr. Duncan Campbell
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd (DE-9J)
Chicago, IL 60604-3511

Dear Mr. Campbell:

During your visit to our facility on January 30, 2004, a few concerns were identified for which we did not have complete documentation readily available and for which you requested follow-up.

As we discussed, Brillion had several personnel changes at the management level recently and revisions are being made on the list of facility contacts in our Hazardous Waste Contingency Plan along with some additional minor revisions that are appropriate at this time. One question in particular that was raised regarding the Contingency Plan was whether copies had been forwarded to local authorities. In an attachment to the master copy there were copies of letters indicating the plan had been sent to the Brillion Police Department, Brillion Dept. of Public Works, and St. Elizabeth's Hospital, Occupational Health Specialist. When ever the plan is revised the appropriate emergency responders are advised and copied.

OK

The main area of concern during your visit however, was adequate documentation of training for individuals responsible for handling specific hazardous waste streams. The short answer is that I cannot provide complete documentation and evidence that training was provided directly to specific individuals on specific tasks related to all individual hazardous wastes. This shortcoming will be corrected. As you observed however, there was no evidence that we were not handling hazardous waste materials correctly and there are opportunities to improve our training record keeping practices. The correction may be less straightforward however, since different persons or departments handle each waste. The following explanation will present what information we do cover and what corrective action we will implement to correct the deficiency.

Brillion conducts annual Environmental Updates at Supervisor Safety Training meetings. Thirty-one individuals at this level were trained in 2003. Topics at this annual update include the gamut of environmental issues including air, water, solid waste, and hazardous waste. Basic information on the definition, identification and characteristics of a hazardous waste are always included as well as which of the wastes classed as hazardous are found at Brillion and where those wastes are generated. This information becomes the topic of the month for those supervisors to present to employees within their areas of responsibility. All production/shop employees receive basic overview training. At the department level, basic topics of discussion and attendance records are kept. However, this information does not record that the specific requirements on how each waste stream must be handled, labeled and stored prior to shipment to a TSD are communicated to the affected employees. Within the departments, instruction is provided on those topics to employees that handle specific materials, but this is where our documentation needs improving.

31

Duncan Campbell

02/10/04 10:20 AM

To: "Leonard Kopidlansky (Brillion Iron Works)" <kopidlansky@brillionironworks.com>
cc:
cc: Duncan Campbell/R5/USEPA/US@EPA
Subject: RE: Hazardous Waste Training Documentation

Leonard-

Once again, thank you for communicating. I am holding off issuance of U.S. EPA's informal enforcement action [Notice of Violation] until you conclude your internal audit of BIWs training and recordkeeping. My reading of your e-mail is that BIW: 1) did satisfy certain, but maybe not all, training requirements for employees involved in the management of hazardous waste as required by Wisconsin's NR 630.16(1)-(3); and 2) does have some documentation of dates that trainees attended training events as required by Wisconsin's s. NR 630.16(4), but that this list may not include all BIW personnel who filled job descriptions pertinent to BIW's hazardous waste management.

I also read your e-mail as being silent as to whether BIW had a written description of training required for each position and less than comprehensive documentation of the job experience required to fill these position at the time of EPA's inspection as required by Wisconsin s. NR 630.16(4)(a)-(d).

When you conclude your internal audit of BIW records, please forward them to me as electronic attachments or by fax.
My fax number is (312) 353-4342.

DC
"Leonard Kopidlansky (Brillion Iron Works)" <kopidlansky@brillionironworks.com>

"Leonard Kopidlansky (Brillion Iron Works)" <kopidlansky@brillionironworks.com>

02/09/04 05:20 PM

To: Duncan Campbell/R5/USEPA/US@EPA
cc:
Subject: RE: Hazardous Waste Training Documentation

Duncan

Key employees do receive annual refresher training on the criteria of a hazardous waste and the locations where those wastes are generated at BIW. We have sign-in sheets to document this and the slide(s) we speak to. These are mid and upper level supervisory people. These people carry this message to hourly people. The weak link is documenting the specific training to individual employees on the handling of specific waste streams. Documentation of this training needs to be better recorded and cannot be clearly shown in all cases. Everyone gets some haz-waste information but documenting that they received the specifics on individual wastes is problematic. In a couple of instances, a task may rotate to any of a number of employees within a job classification. We have come up with a couple of methods of addressing this. Mark Weber my boss, and his boss, our General Manager, are reviewing a draft I put together. I didn't spell out every detail, but I think I have a roadmap to closing the loop on this issue. Hope to have it to you soon.

Leonard Kopidlansky
Brillion Iron Works , Inc.
200 Park Avenue
Brillion, WI 54110

"Leonard Kopidlansky (Brillion Iron Works)" <kopidlansky@brillionironworks.com>

02/07/04 01:10 PM

To: Duncan Campbell/R5/USEPA/US@EPA
cc:
Subject: Hazardous Waste Training Documentation

Mr. Campbell

I have just about completed investigation of training documentation and should be able to forward our current status with regard to each hazardous waste stream early in the week of February 9th with some corrective actions. I need to review with management prior to submitting.

Leonard Kopidlansky
Brillion Iron Works , Inc.
200 Park Avenue
Brillion, WI 54110
Telephone 920-756-2121 x371
Fax 920-756-3409
kopidlansky@brillionironworks.com

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"Moeller, Jason W" <Jason.Moeller@dnr.state.wi.us>
02/02/04 09:30 AM

To: Duncan Campbell/R5/USEPA/US@EPA
cc:
Subject: FW: Haz Waste Inspection

FYI

-----Original Message-----
From: Leonard Kopidlansky (Brillion Iron Works) [mailto:kopidlansky@brillionironworks.com]
Sent: Monday, February 02, 2004 9:19 AM
To: Moeller, Jason W
Subject: RE: Haz Waste Inspection

Thank you Jason. We will review these and make any necessary changes in our procedures. I will be meeting with Dept. supervisors to review training documentation and we will report what we can and address any issues as required.

Paul has identified an FET RCRA Refresher in April I believe, and we will send one or more of us to attend that or some alternate.

Leonard Kopidlansky
Brillion Iron Works , Inc.
200 Park Avenue
Brillion, WI 54110
Telephone 920-756-2121 x371
Fax 920-756-3409
kopidlansky@brillionironworks.com

-----Original Message-----
From: Moeller, Jason W [mailto:Jason.Moeller@dnr.state.wi.us]
Sent: Monday, February 02, 2004 8:46 AM
To: Leonard Kopidlansky (Brillion Iron Works)
Cc: Campbell.Duncan@epamail.epa.gov
Subject: Haz Waste Inspection

Leonard, here are some fact sheets that I said I would e-mail to you.

<<Inspection Logs Wa098.doc>> <<Training Records Wa099.doc>> <<Manifests Wa102.doc>> <<Univerdsal Waste guidance 2003.pdf>>

Jason W. Moeller
Waste Management Specialist
Hazardous Waste Inspector
Wisconsin Department of Natural Resources
P.O. Box 10448, Green Bay WI 54307-0448

HAZARDOUS WASTE ANNUAL REPORT RECORDS FOR SELECTED GENERATOR

EPA ID: WID048027734
Facility Name: BRILLION IRON WORKS INC
Location Address: 200 PARK AVE
BRILLION, WI 54110

Contact Person: SCOTT HUGUET
200 PARK AVE
BRILLION, WI 54110
Phone: (920) 756-2121 ext:

FID: 408021020
County: CALUMET

Activity	License Number	Expiration Date
022 SW/Recyclables Transporter	11016	09/30/2004
120 SW Beneficial Use or Reuse/Low Hazard Exemp		
201 HW Generator - Large		

Report Year 2002

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 33151

FW **Total Lbs Generated:** 55,231 Lbs Recycled: 15,597 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 39,634

Report Year 2001

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 33151

FW **Total Lbs Generated:** 241,454 Lbs Recycled: 7,873 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 233,581

GM D001 WASTE MINERAL SPIRITS FROM MAINTENANCE PARTS CLEANING
Amount Generated: 366 LBS LBS Generated: 366 LBS Shipped: 366
Offsite Mgt. Method Type: Solvents recovery
Shipped To: IND00064943

GM D001 WASTE HYDRITE BLEND 4887; PAINT LINE FLUSH SOLVENT
Amount Generated: 5,713 LBS LBS Generated: 5,713 LBS Shipped: 5,713
Offsite Mgt. Method Type: Solvents recovery
Shipped To: IND00064943

GM D001 LAB PACK - ASSORTED MATERIALS
Amount Generated: 489 LBS LBS Generated: 489 LBS Shipped: 489
Offsite Mgt. Method Type: Incineration - thermal destruction other than use as a fuel
Shipped To:

GM D001 LAB PACK - ASSORTED MATERIALS
Amount Generated: 575 LBS LBS Generated: 575 LBS Shipped: 575
Offsite Mgt. Method Type: Other treatment (specify in comments)
Shipped To: UTD981552177

GM D002 LAB PACK - ASSORTED MATERIALS
Amount Generated: 771 LBS LBS Generated: 771 LBS Shipped: 771
Offsite Mgt. Method Type: Incineration - thermal destruction other than use as a fuel
Shipped To: NYD980536163

GM D006 METHANOLAMINE - CARBURETOR CLEANER USED IN FORKLIFT REPAIR SHOP
Amount Generated: 379 LBS LBS Generated: 379 LBS Shipped: 379
Offsite Mgt. Method Type: Solvents recovery
Shipped To: WID981187297

GM D008 EMISSION CONTROL DUST FROM INDUCTION MELTING OPERATIONS CONTAINING
Amount Generated: 230,194 LBS LBS Generated: 230,194 LBS Shipped: 230,194
Offsite Mgt. Method Type: Landfill or surface impoundment that will be closed as landfill (to ir
Shipped To: WID003967148

GM D008 BURNED OUT INCANDESCENT BULBS
Amount Generated: 1,551 LBS LBS Generated: 1,551 LBS Shipped: 1,551
Offsite Mgt. Method Type: Landfill or surface impoundment that will be closed as landfill (to ir
Shipped To: WID003967148

GM D009 LAB PACK CONTAINING WASTE MERCURY
Amount Generated: 8 LBS LBS Generated: 8 LBS Shipped: 8
Offsite Mgt. Method Type: Incineration - thermal destruction other than use as a fuel
Shipped To: NYD980536163

GM D018 WASTE METAL CLEANER 800-N-METHYLPYRROLIDONE
Amount Generated: 1,415 LBS LBS Generated: 1,415 LBS Shipped: 1,415
Offsite Mgt. Method Type: Solvents recovery
Shipped To: IND000646943

GM Total Lbs Generated for Year 2001: 241,461

HAZARDOUS WASTE ANNUAL REPORT RECORDS FOR SELECTED GENERATOR

EPA ID: WID048027734
Facility Name: BRILLION IRON WORKS INC
Location Address: 200 PARK AVE
BRILLION, WI 54110

Contact Person: SCOTT HUGUET
200 PARK AVE
BRILLION, WI 54110
Phone: (920) 756-2121 ext:

FID: 408021020
County: CALUMET

Report Year 2000

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code:

FW **Total Lbs Generated:** 409,999 Lbs Recycled: 16,164 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 393,835

Report Year 1999

IC Gen. Cat: LQG Stor. Code: Lic. TDR: Lic. Ex. TDR: SIC/NAICS Code:

FW **Total Lbs Generated:** 429,431 Lbs Recycled: 15,874 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 413,557

GM D001 WASTE R/C LAQUER SOLVENT (PAINT LINE CLEANING SOLVENT); MIXTURE OF ME Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 3,799 LBS LBS Generated: 3,799 LBS Shipped: 4,569 Shipped To: IND000646943

GM D001 WASTE MINERAL SPIRITS FROM MANUAL MAINTENANCE PARTS CLEANING Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 1,097 LBS LBS Generated: 1,097 LBS Shipped: 1,097 Shipped To: IND00064943

GM D001 WASTE HYDRITE BLEND 4887; PAINT LINE FLUSH SOLVENT; MIX OF HEAVY NAPHT Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 3,673 LBS LBS Generated: 3,673 LBS Shipped: 2,449 Shipped To: IND000646943

GM D001 LAB PACK WASTES-ASSORTED MATERIALS Offsite Mgt. Method Type: Fuel blending
Amount Generated: 1,106 LBS LBS Generated: 1,106 LBS Shipped: 1,106 Shipped To: ILD980502744

GM D002 WASTE SODIUM BISULFITE Offsite Mgt. Method Type: Other treatment - type unknown
Amount Generated: 1,211 LBS LBS Generated: 1,211 LBS Shipped: 1,211 Shipped To: IND000646943

GM D005 PAINT WASTE MIXED WITH MINERAL SPIRITS Offsite Mgt. Method Type: Fuel blending
Amount Generated: 366 LBS LBS Generated: 366 LBS Shipped: 366 Shipped To: TXD077603371

GM D006 METHANOLAMINE-CARBURETOR CLEANER USED IN FORK LIFT REPAIR SHOP Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 363 LBS LBS Generated: 363 LBS Shipped: 363 Shipped To: WID981187297

GM D008 EMISSION CONTROL DUST FROM INDUCTION MELTING OPERATIONS CONTAINING Offsite Mgt. Method Type: Stabilization/Chemical fixation using cementitiuos and/or pozzolan
Amount Generated: 407,585 LBS LBS Generated: 407,585 LBS Shipped: 404,277 Shipped To: WID003967148

GM D008 BURNED OUT INCANDESCENT LIGHT BULBS Offsite Mgt. Method Type: Stabilization/Chemical fixation using cementitiuos and/or pozzolan
Amount Generated: 2,726 LBS LBS Generated: 2,726 LBS Shipped: 2,726 Shipped To: WID003967148

GM D018 WASTE METAL CLEANER 800-N-METHYLPYRROLIDONE Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 7,502 LBS LBS Generated: 7,502 LBS Shipped: 7,030 Shipped To: IND000646943

GM U151 LAB PACK MATERIALS CONTAINING MERCURY Offsite Mgt. Method Type: Metals recovery - type unknown
Amount Generated: 3 LBS LBS Generated: 3 LBS Shipped: 3 Shipped To: ILD980502744

GM Total Lbs Generated for Year 1999: 429,431

HAZARDOUS WASTE ANNUAL REPORT RECORDS FOR SELECTED GENERATOR

EPA ID: WID048027734
Facility Name: BRILLION IRON WORKS INC
Location Address: 200 PARK AVE
BRILLION, WI 54110

Contact Person: SCOTT HUGUET
200 PARK AVE
BRILLION, WI 54110
Phone: (920) 756-2121 ext:

FID: 408021020
County: CALUMET

Report Year 1998

IC Gen. Cat: NON-GEN Stor. Code: Lic. TDR: Lic. Ex. TDR: SIC/NAICS Code:
FW **Total Lbs Generated:** 526,481 Lbs Recycled: 14,384 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 512,097

Report Year 1997

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 332135
FW **Total Lbs Generated:** 426,579 Lbs Recycled: 4,312 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 422,267

GM D001 R/C LAQUER SOLVENT FROM PAINT LINE CLEANING
Amount Generated: 403 LBS LBS Generated: 403 LBS Shipped:
Offsite Mgt. Method Type: Solvents recovery - type unknown
Shipped To: WID000808824

GM D001 WASTE PETROLEUM NAPHTHA FROM MAINTENANCE PARTS DEGREASING
Amount Generated: 1,122 LBS LBS Generated: 1,122 LBS Shipped:
Offsite Mgt. Method Type: Solvents recovery - type unknown
Shipped To: WID000808824

GM D001 MONOETHANOLAMINE FROM CARBURATOR CLEANING IN VEHICLE REPAIR SHOP
Amount Generated: 395 LBS LBS Generated: 395 LBS Shipped:
Offsite Mgt. Method Type: Solvents recovery - type unknown
Shipped To: WID981187297

GM D005 VARIOUS PAINT WASTES
Amount Generated: 499 LBS LBS Generated: 499 LBS Shipped:
Offsite Mgt. Method Type: Incineration - solids
Shipped To: TXD077603371

GM D008 EMISSION CONTROL DUST FROM BAGHOUSE COLLECTING PARTICULATE FROM II
Amount Generated: 415,661 LBS LBS Generated: 415,661 LBS Shipped:
Offsite Mgt. Method Type: Stabilization - type unknown
Shipped To: WID003967148

GM D008 BURNED OUT INCANDESCENT LIGHT BULBS
Amount Generated: 3,015 LBS LBS Generated: 3,015 LBS Shipped:
Offsite Mgt. Method Type: Stabilization - type unknown
Shipped To: WID003967148

GM D018 WASTE CIMCLEAN 30 & WATER
Amount Generated: 499 LBS LBS Generated: 499 LBS Shipped:
Offsite Mgt. Method Type: Aqueous organic treatment - type unknown
Shipped To: WID000808824

GM D018 METALCLEANER 800 (M-PYROL)
Amount Generated: 2,993 LBS LBS Generated: 2,993 LBS Shipped:
Offsite Mgt. Method Type: Solvents recovery - type unknown
Shipped To: WID000808824

GM D018 CONTAMINATED COREMAKING RESIN
Amount Generated: 506 LBS LBS Generated: 506 LBS Shipped:
Offsite Mgt. Method Type: Incineration - type unknown
Shipped To: ILD980613913

GM F001 ABSORBANT MATERIALS CONTAMINATED W/1,1,1-TRICHLOROETHANE
Amount Generated: 250 LBS LBS Generated: 250 LBS Shipped:
Offsite Mgt. Method Type: Incineration - type unknown
Shipped To: ILD980613913

GM F500 POLYURETHANE WASTE CONTAMINATED WITH 1,1,1-TRICHLOROETHANE
Amount Generated: 1,122 LBS LBS Generated: 1,122 LBS Shipped:
Offsite Mgt. Method Type: Transfer facility storage, waste was shipped off site with no on-sit
Shipped To: ALD000622464 ILD980613913

GM Total Lbs Generated for Year 1997: 426,465

HAZARDOUS WASTE ANNUAL REPORT RECORDS FOR SELECTED GENERATOR

EPA ID: WID048027734
Facility Name: BRILLION IRON WORKS INC
Location Address: 200 PARK AVE
BRILLION, WI 54110

Contact Person: SCOTT HUGUET
200 PARK AVE
BRILLION, WI 54110
Phone: (920) 756-2121 ext:

FID: 408021020
County: CALUMET

Report Year 1996

IC Gen. Cat: LQG Stor. Code: Lic. TDR: Lic. Ex. TDR: SIC/NAICS Code:
FW **Total Lbs Generated:** 403,116 Lbs Recycled: 15,050 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 388,066

Report Year 1995

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 332135
FW **Total Lbs Generated:** 380,586 Lbs Recycled: 21,325 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 359,261

GM D001 WASTE PETROLEUM NAPTHA COMBUSTIBLE SOLVENT FROM MANUAL PARTS DE(Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 17,620 LBS LBS Generated: 17,620 LBS Shipped: Shipped To: WID981187297 WID000808824

GM D006 WASTE CLEANING LIQUID (MONOETHANOLAMINE) (CARBURATOR PARTS CLEANE Offsite Mgt. Method Type: Other recovery - type unknown
Amount Generated: 371 LBS LBS Generated: 371 LBS Shipped: Shipped To: WID981187297

GM D008 EMISSION CONTROL DUST FROM ELECTRIC INDUCTION MELTING OF FERROUS CI Offsite Mgt. Method Type: Stabilization/Chemical fixation using cementitiuos and/or pozzolan
Amount Generated: 356,975 LBS LBS Generated: 356,975 LBS Shipped: Shipped To: WID003967148

GM D008 BURNED OUT INCANDESCENT BULBS Offsite Mgt. Method Type: Stabilization - type unknown
Amount Generated: 1,100 LBS LBS Generated: 1,100 LBS Shipped: Shipped To: WID003967148

GM D018 WASTE M-PYROL (ALSO METAL CLEANER 800) FROM RESIN PUMP & LINE CLEANIN Offsite Mgt. Method Type: Energy recovery - liquids
Amount Generated: 2,413 LBS LBS Generated: 2,413 LBS Shipped: Shipped To: WID000808824

GM F002 REACTED POLYURETHANE (PLASTIC PATERNMAKING WASTE) CONTAMINATED W Offsite Mgt. Method Type: Transfer facility storage, waste was shipped off site with no on-sit
Amount Generated: 2,244 LBS LBS Generated: 2,244 LBS Shipped: Shipped To: ALD000622464

GM F002 SPENT CLEANING/DEGREASING SOLVENT 1,1,1-TRICHLOROETHANE Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 463 LBS LBS Generated: 463 LBS Shipped: Shipped To: WID000808834

GM Total Lbs Generated for Year 1995: 381,186

Report Year 1994

IC Gen. Cat: LQG Stor. Code: Lic. TDR: Lic. Ex. TDR: SIC/NAICS Code: 3321
FW **Total Lbs Generated:** 538,191 Lbs Recycled: 28,162 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 510,029

HAZARDOUS WASTE ANNUAL REPORT RECORDS FOR SELECTED GENERATOR

EPA ID: WID048027734
Facility Name: BRILLION IRON WORKS INC
Location Address: 200 PARK AVE
BRILLION, WI 54110

Contact Person: SCOTT HUGUET
200 PARK AVE
BRILLION, WI 54110
Phone: (920) 756-2121 ext:

FID: 408021020
County: CALUMET

Report Year 1993

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 33213

FW **Total Lbs Generated:** 427,377 Lbs Recycled: 26,761 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 400,616

GM D001 WASTE PETROLEUM NAPTHA COMBUSTIBLE SOLVENT FROM MANUAL PARTS DE(Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 22,569 LBS LBS Generated: 22,569 LBS Shipped: Shipped To: WID981187297 WID000808824

GM D006 WASTE CLEANING LIQUID (MONOETHANBLAMINE) (CARBURATOR PARTS CLEANE Offsite Mgt. Method Type: Other recovery - type unknown
Amount Generated: 174 LBS LBS Generated: 174 LBS Shipped: Shipped To: WID981187297

GM D008 EMISSION CONTROL DUST FROM ELECTRIC INDUCTION MELTING OF FERROUS CI Offsite Mgt. Method Type: Stabilization/Chemical fixation using cementitiuos and/or pozzolan
Amount Generated: 399,859 LBS LBS Generated: 399,859 LBS Shipped: Shipped To: WID003967148

GM D018 WASTE M-PYROL (ALSO METAL CLEANER 800) FROM RESIN PUMP & LINE CLEANIN Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 917 LBS LBS Generated: 917 LBS Shipped: Shipped To: WID000808824

GM F001 SPENT CLEANING/DEGREASING SOLVENT 1,1,1-TRICHLOROETHANE Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 463 LBS LBS Generated: 463 LBS Shipped: Shipped To: WID000808824

GM F002 SPENT CLEANING SOLVENT (NB CLEANER NO 2) FROM RESIN PUMP & LINE CLEAN Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 465 LBS LBS Generated: 465 LBS Shipped: Shipped To: WID000808824

GM F002 REACTED POLYURETHANE (PLASTIC PATTERNMAKING WASTE) CONTAMINATED \ Offsite Mgt. Method Type: Transfer facility storage, waste was shipped off site with no on-sit
Amount Generated: 1,650 LBS LBS Generated: 1,650 LBS Shipped: Shipped To: ALD000622464

GM F002 PCB CLEANUP WASTE W/1,1,1-TRICHLOROETHANE Offsite Mgt. Method Type: Transfer facility storage, waste was shipped off site with no on-sit
Amount Generated: 0 LBS LBS Generated: 0 LBS Shipped: Shipped To: MND981190242

GM F005 IGNITABLE SPENT SOLVENT (R/C WASHSOLVENT) FROM PAINT LINE CLEANING C(Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 780 LBS LBS Generated: 780 LBS Shipped: Shipped To: WID000808824

GM Total Lbs Generated for Year 1993: 426,877

HAZARDOUS WASTE ANNUAL REPORT RECORDS FOR SELECTED GENERATOR

EPA ID: WID048027734
Facility Name: BRILLION IRON WORKS INC
Location Address: 200 PARK AVE
BRILLION, WI 54110

Contact Person: SCOTT HUGUET
200 PARK AVE
BRILLION, WI 54110
Phone: (920) 756-2121 ext:

FID: 408021020
County: CALUMET

Report Year **1992**

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 33213

FW **Total Lbs Generated:** 475,752 Lbs Recycled: 25,288 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 450,464

GM D001 WASTE PETROLEUM NAPTHA, COMBUSTIBLE SOLVENT FROM MANUAL PARTS DE Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 19,098 LBS LBS Generated: 19,098 LBS Shipped: Shipped To: WID981187297 WID000808824

GM D006 WASTE CLEANING LIQUID (MONOETHANOLAMINE) (CARBUARTOR PARTS CLEANE Offsite Mgt. Method Type: Other recovery - type unknown
Amount Generated: 36 LBS LBS Generated: 36 LBS Shipped: Shipped To: WID981187297

GM D007 CLEANUP WASTE FROM WATER BASED PAINT DIPPING W/ CHROMIUM PIGMENT F Offsite Mgt. Method Type: Fuel blending
Amount Generated: 1,590 LBS LBS Generated: 1,590 LBS Shipped: Shipped To: WID000808824

GM D008 EMISSION CONTROL DUST FROM ELECTRIC INDUCTION MELTING OF FERROUS CI Offsite Mgt. Method Type: Stabilization/Chemical fixation using cementitiuos and/or pozzolan
Amount Generated: 449,408 LBS LBS Generated: 449,408 LBS Shipped: Shipped To: IND078911146 WID003967148

GM D018 WASTE-M-PYROL (ALSO METALCLEANER 800) FROM RESIN PUMP & LINE CLEANIN Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 1,403 LBS LBS Generated: 1,403 LBS Shipped: Shipped To: WID000808824

GM D018 WASTE AUTOMATIC TRANSMISSION FLUD CONTAMINATED W/ MINERAL SPIRITS S Offsite Mgt. Method Type: Fuel blending
Amount Generated: 796 LBS LBS Generated: 796 LBS Shipped: Shipped To: WID000808824

GM F001 SPENT CLEANING/DEGREASING SOLVENT 1,1,1-TRICHLOROETHANE Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 390 LBS LBS Generated: 390 LBS Shipped: Shipped To: WID000808824

GM F002 SPENT CLEANING SOLVENT (NB CLEANER NO 2) FROM RESIN PUMP & LINE CLEAN Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 1,904 LBS LBS Generated: 1,904 LBS Shipped: Shipped To: WID000808824

GM F002 REACTED POLYURETHANE (PLASTIC PATTERNMAKING WASTE) CONTAMINATED \ Offsite Mgt. Method Type: Transfer facility storage, waste was shipped off site with no on-sit
Amount Generated: 340 LBS LBS Generated: 340 LBS Shipped: Shipped To: ALD000622464

GM F002 PCB CLEANUP WASTE W/ 1,1,1-TRICHLOROETHANE Offsite Mgt. Method Type:
Amount Generated: 500 LBS LBS Generated: 500 LBS Shipped: Shipped To:

GM F005 IGNITABLE SPENT SOLVENT (R/C WASHSOLVENT) FROM PAINT LINE CLEANING C(Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 787 LBS LBS Generated: 787 LBS Shipped: Shipped To: WID000808824

GM Total Lbs Generated for Year 1992: 476,252

HAZARDOUS WASTE ANNUAL REPORT RECORDS FOR SELECTED GENERATOR

EPA ID: WID048027734
Facility Name: BRILLION IRON WORKS INC
Location Address: 200 PARK AVE
BRILLION, WI 54110

Contact Person: SCOTT HUGUET
200 PARK AVE
BRILLION, WI 54110
Phone: (920) 756-2121 ext:

FID: 408021020
County: CALUMET

Report Year **1991**

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 332135

FW **Total Lbs Generated:** 370,730 Lbs Recycled: 32,824 Lbs Leachate: 0 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 337,906

GM D001 WASTE PETROLEUM NAPHTHA WASTE COMBUSTIBLE SOLVENT FROM MANUAL P Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 14,876 LBS LBS Generated: 14,876 LBS Shipped: Shipped To: WID981187297

GM D001 METHYL ALCOHOL-EXCESS MAT'L FROM DISCONTINUED PROCESS Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 1,449 LBS LBS Generated: 1,449 LBS Shipped: Shipped To: WID000808824

GM D007 CLEANUP WASTE FROM WATER BASED PAINT DIPPING OPERATION W/CHROMIUM Offsite Mgt. Method Type: Fuel blending
Amount Generated: 3,500 LBS LBS Generated: 3,500 LBS Shipped: Shipped To: WID000808824

GM D008 EMMISSION CONTROL DUST FROM ELECTRIC INDUCTION MELTING OF FERROUS Offsite Mgt. Method Type: Stabilization/Chemical fixation using cementitiuos and/or pozzolan
Amount Generated: 344,523 LBS LBS Generated: 344,523 LBS Shipped: Shipped To: IND078911146 WID003967148

GM F001 SPENT CLEANING/DEGREASING SOLVENT CONTAINING 1,1,1-TRICHLOROETHANE Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 1,170 LBS LBS Generated: 1,170 LBS Shipped: Shipped To: WID000808824

GM F002 SPENT CLEANING SOLVENT (NB CLEANER NO 2)FROM RESIN PUMP & LINE CLEAN Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 2,725 LBS LBS Generated: 2,725 LBS Shipped: Shipped To: WID000808824

GM F002 REACTED POLYURETHANE (PLASTIC PATTERN MAKING WASTE) CONTAMINATED Offsite Mgt. Method Type: Incineration - solids
Amount Generated: 680 LBS LBS Generated: 680 LBS Shipped: Shipped To: ILD098642424

GM F005 IGNITABLE SPENT SOLVENT (R/C WASH SOLVENT)FROM PAINT LINE CLEANING, C Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 1,532 LBS LBS Generated: 1,532 LBS Shipped: Shipped To: WID000808824

GM P106 WASTE SODIUM CYANIDE SOLID FROM HARDENING OPERATION Offsite Mgt. Method Type: Incineration - solids
Amount Generated: 275 LBS LBS Generated: 275 LBS Shipped: Shipped To: ILD098642424

GM Total Lbs Generated for Year 1991: 370,730

HAZARDOUS WASTE ANNUAL REPORT RECORDS FOR SELECTED GENERATOR

EPA ID: WID048027734
Facility Name: BRILLION IRON WORKS INC
Location Address: 200 PARK AVE
BRILLION, WI 54110

Contact Person: SCOTT HUGUET
200 PARK AVE
BRILLION, WI 54110
Phone: (920) 756-2121 ext:

FID: 408021020
County: CALUMET

Report Year **1990**

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 332135

FW **Total Lbs Generated:** 507,151 Lbs Recycled: 19,823 Lbs Leachate: 12,510 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 474,818

GM D001 IGNITABLE SPENT SOLVEN (R/C WASHSOLVENT) FROM PAINT LINE CLEANING MIX Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 1,532 LBS LBS Generated: 1,532 LBS Shipped: Shipped To: WID000808824 WID000808824

GM D001 IGNITABLE SPENT SOLVENT FROM MANUAL PARTS DEGREASING WITH MINERAL S Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 16,521 LBS LBS Generated: 16,521 LBS Shipped: Shipped To: WID981187297 WID000808824

GM D001 WASTE ROOFING TAR Offsite Mgt. Method Type: Incineration - liquids
Amount Generated: 5,363 LBS LBS Generated: 5,363 LBS Shipped: Shipped To: MID000724831

GM D007 CLEANUP WASTE FROM WATERBASE DIP PAINTING OPERATION WITH PAINT CON Offsite Mgt. Method Type: Landfill
Amount Generated: 10,420 LBS LBS Generated: 10,420 LBS Shipped: Shipped To: ALD000622464

GM D008 WASTEWATER FROM WATERWASH SPRAY COOTH CONTAINING ORGANIC & INOF Offsite Mgt. Method Type: Other treatment (Specified in comments)
Amount Generated: 1,500 GAL LBS Generated: 12,510 LBS Shipped: Shipped To: ILD010284248

GM D008 EMISSION CONTROL DUST FROM ELECTRIC INDUCTION MELTING OF FERROUS CI Offsite Mgt. Method Type: Stabilization/Chemical fixation using cementitiuos and/or pozzolan
Amount Generated: 455,080 LBS LBS Generated: 455,080 LBS Shipped: Shipped To: IND078912146

GM F001 SPENT CLEANING/DEGREASING SOLVENT CONTAINING 1,1,1 TRICHLOROETHANE Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 585 LBS LBS Generated: 585 LBS Shipped: Shipped To: WID000808824

GM F002 SPENT CLEANING SOLVENT (NB CLEANER NO. 2) FROM RESIN PUMP/LINE CLEANII Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 3,270 LBS LBS Generated: 3,270 LBS Shipped: Shipped To: WID000808824

GM F002 REACTED POLYURETHANE (PLASTIC PATTERNMAKING WASTE) GENERATED FRO Offsite Mgt. Method Type: Incineration - solids
Amount Generated: 1,870 LBS LBS Generated: 1,870 LBS Shipped: Shipped To: ILD000672121

GM Total Lbs Generated for Year 1990: 507,151

HAZARDOUS WASTE ANNUAL REPORT RECORDS FOR SELECTED GENERATOR

EPA ID: WID048027734
Facility Name: BRILLION IRON WORKS INC
Location Address: 200 PARK AVE
BRILLION, WI 54110

Contact Person: SCOTT HUGUET
200 PARK AVE
BRILLION, WI 54110
Phone: (920) 756-2121 ext:

FID: 408021020
County: CALUMET

Report Year **1989**

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 332135

FW **Total Lbs Generated:** 609,427 Lbs Recycled: 20,577 Lbs Leachate: 48,005 Lbs Repaired: 0 Lbs HHHW: 0 **Net Lbs Subject To Fee:** 540,845

GM D001 IGNITABLE SPENT SOLVENT (R/C WASHSOLVENT) FROM PAINT RINSE/CLEANING I Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 1,532 LBS LBS Generated: 1,532 LBS Shipped: Shipped To: WID048027734

GM D001 IGNITABLE SPENT SOLVENT FROM MANUAL PARTS DEGREASING WITH MINERAL S Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 18,338 LBS LBS Generated: 18,338 LBS Shipped: Shipped To: WID981187297 WID000808824

GM D001 OUT OF DATE CHEMICALS/MATERIALS/MIXTURES IN LAB PACKS Offsite Mgt. Method Type: Incineration - liquids
Amount Generated: 275 GAL LBS Generated: 1,925 LBS Shipped: Shipped To: MAD980523203

GM D001 WASTE FLAMMABLE LIQUID LAB PACKS OF OUT OF DATE CHEMICALS Offsite Mgt. Method Type: Incineration - liquids
Amount Generated: 160 GAL LBS Generated: 1,120 LBS Shipped: Shipped To: MAD980523203

GM D002 CAUSTIC WASTE FROM PAINT HOOK CLEANING CONTAINING SODIUM HYDROXIDE Offsite Mgt. Method Type: Other treatment (Specified in comments)
Amount Generated: 1,582 LBS LBS Generated: 1,582 LBS Shipped: Shipped To: ALD000622464

GM D002 OUT OF SPEC R&D WASTE CORROSIVE MATERIALS CONTAINING SODIUM SILICAT Offsite Mgt. Method Type: Other treatment - type unknown
Amount Generated: 110 GAL LBS Generated: 1,385 LBS Shipped: Shipped To: ILD000608471

GM D007 CLEANUP WASTE FROM WATERBASE PAINT DIPPING OPERATION WITH PAINT CC Offsite Mgt. Method Type: Landfill
Amount Generated: 28,700 LBS LBS Generated: 28,700 LBS Shipped: Shipped To: ALD000622464

GM D008 WASTEWATER FROM WATERWASH SPRAY BOOTH CONTAINING ORGANIC & INOF Offsite Mgt. Method Type: Other treatment (Specified in comments)
Amount Generated: 5,756 GAL LBS Generated: 48,005 LBS Shipped: Shipped To: ILD010284248

GM D008 SPRAY BOOTH PAINT WASTE SOLIDS SKIMMED FROM WATERWASH SPRAY BOOT Offsite Mgt. Method Type:
Amount Generated: 0 LBS LBS Generated: 0 LBS Shipped: Shipped To:

GM D008 EMISSION CONTROL DUST FROM ELECTRIC INDUCTION MELTING OF FERROUS CI Offsite Mgt. Method Type: Landfill
Amount Generated: 499,620 LBS LBS Generated: 499,620 LBS Shipped: Shipped To: IND078911146

GM F001 SPENT CLEANING/DEGREASING SOLVENT CONTAINING 1,1,1, TRICHOLOROETHAN Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 585 LBS LBS Generated: 585 LBS Shipped: Shipped To: WID000808824

GM F002 SPENT CLEANING SOLVENT (NB CLEANER NO 2) FROM RESIN PUMP/LINE CLEANIN Offsite Mgt. Method Type: Solvents recovery - type unknown
Amount Generated: 3,270 LBS LBS Generated: 3,270 LBS Shipped: Shipped To: WID000808824

GM F002 REACTED POLYURETHANE (PLASTIC PATTERNMAKING WASTE) GENERATED FRO Offsite Mgt. Method Type: Incineration - solids
Amount Generated: 2,210 LBS LBS Generated: 2,210 LBS Shipped: Shipped To: ILD000672121

GM F005 OUT OF DATE LAB PACK CHEMICALS WITH VARIABLE HALOGENATED CONTENT Offsite Mgt. Method Type: Incineration - liquids
Amount Generated: 165 GAL LBS Generated: 1,155 LBS Shipped: Shipped To: MAD053452637

GM Total Lbs Generated for Year 1989: 609,427

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK323074

Shipped: 10/10/2003 COPY 3 DNR Received: 10/27/2003 Batch/Seq: 368 / 259
Received: 10/16/2003 TSD EPA ID: WID003967148 TSD Facility Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	10/10/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 Y	10,080
1	2	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	165 G	1,376
			Manifest Lbs. Total	**11,456**

COPY 1 DNR Received: 10/16/2003 Batch/Seq: 366 / 974

WIK351532

Shipped: 08/19/2003 COPY 3 DNR Received: 09/05/2003 Batch/Seq: 348 / 550
Received: 08/25/2003 TSD EPA ID: IND000646943 TSD Facility Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	08/19/2003
NE0000080580	TRANSWOOD INC	08/25/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D001- NON-LISTED IGNITABLE WASTES	55 G	459
1	2	D018- BENZENE	110 G	917
			Manifest Lbs. Total	**1,376**

COPY 1 DNR Received: 08/25/2003 Batch/Seq: 342 / 404

WIK330907

Shipped: 08/18/2003 COPY 3 DNR Received: 09/10/2003 Batch/Seq: 344 / 727
Received: 08/18/2003 TSD EPA ID: WID981187297 TSD Facility Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	08/18/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	5 G	42
1	2	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	75 G	626
			Manifest Lbs. Total	**667**

COPY 1 DNR Received: 08/25/2003 Batch/Seq: 342 / 601

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

EPA ID: WID048027734
Facility Name: BRILLION IRON WORKS INC
Location Address: 200 PARK AVE
BRILLION, WI 54110-

Contact Person: SCOTT HUGUET
200 PARK AVE
BRILLION, WI 54110-
Phone: (920) 756-2121 ext:

FID: 408021020
SIC Code: 3321
County: CALUMET

Activity	License Number	Expiration Date
022 SW/Recyclables Transporter	11016	09/30/2004
120 SW Beneficial Use or Reuse/Low Hazard Exemp		
201 HW Generator - Large		

WIK327406

Shipped: 11/11/2003 COPY 3 DNR Received: 12/10/2003 Batch/Seq: 386 / 704
Received: 11/11/2003 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	11/11/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	5 G	42
			Manifest Lbs. Total	**42**

COPY 1 DNR Received: 11/19/2003 Batch/Seq: 383 / 693

WIK351691

Shipped: 10/28/2003 COPY 3 DNR Received: 11/17/2003 Batch/Seq: 382 / 17
Received: 11/03/2003 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	10/28/2003
NE0000080580	TRANSWOOD INC	11/03/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D001- NON-LISTED IGNITABLE WASTES	110 G	917
1	2	D018- BENZENE	55 G	459
1	3	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	55 G	459
			Manifest Lbs. Total	**1,835**

COPY 1 DNR Received: 11/06/2003 Batch/Seq: 370 / 241

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK252485

Shipped: 07/14/2003 COPY 3 DNR Received: 07/18/2003 Batch/Seq: 333 / 500
Received: 07/14/2003 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	07/14/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	24 Y	40,320
			Manifest Lbs. Total	**40,320**

COPY 1 DNR Received: 07/16/2003 Batch/Seq: 330 / 318

WIK313828

Shipped: 05/27/2003 COPY 3 DNR Received: 06/10/2003 Batch/Seq: 293 / 788
Received: 05/27/2003 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	05/27/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
1	2	D039- TETRACHLOROETHYLENE	73 G	609
			Manifest Lbs. Total	**659**

COPY 1 DNR Received: 06/03/2003 Batch/Seq: 292 / 322

WIK273327

Shipped: 05/20/2003 COPY 3 DNR Received: 06/06/2003 Batch/Seq: 295 / 573
Received: 05/27/2003 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	05/20/2003
NE0000080580	TRANSWOOD INC	05/27/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D018- BENZENE	55 G	459
1	2	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	55 G	459
			Manifest Lbs. Total	**917**

COPY 1 DNR Received: 05/27/2003 Batch/Seq: 290 / 770

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

IL09979455

Shipped: 05/14/2003 COPY 3 DNR Received: 06/10/2003 Batch/Seq: 293 / 73
Received: 05/20/2003 TSD EPA ID: ILD980613913 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC - DOLTON

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	05/14/2003
TXR000050930	SAFETY-KLEEN SYSTEMS INC	05/20/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F003- SPENT NON-HALOGENATED SOLV	55 G	459
			Manifest Lbs. Total	**459**

COPY 1 DNR Received: 05/19/2003 Batch/Seq: 268 / 7

WIK312754

Shipped: 03/04/2003 COPY 3 DNR Received: 04/10/2003 Batch/Seq: 245 / 796
Received: 03/04/2003 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	03/04/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
1	2	D039- TETRACHLOROETHYLENE	69 G	575
			Manifest Lbs. Total	**626**

COPY 1 DNR Received: 03/11/2003 Batch/Seq: 241 / 402

WIK293114

Shipped: 02/20/2003 COPY 3 DNR Received: 03/11/2003 Batch/Seq: 241 / 846
Received: 02/28/2003 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WI0000815381	ADVANCED WASTE CARRIERS INC	02/20/2003
IND000646943	POLLUTION CONTROL INDUSTRIES INC	02/26/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D009- MERCURY	5 G	42
1	2	D001- NON-LISTED IGNITABLE WASTES	5 G	42
1	3	D002- NON-LISTED CORROSIVE WASTES	30 G	250
			Manifest Lbs. Total	**334**

COPY 1 DNR Received: 02/27/2003 Batch/Seq: 238 / 163

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

IL09979322

Shipped: 02/20/2003 COPY 3 DNR Received: 03/10/2003 Batch/Seq: 237 / 74
Received: 02/21/2003 TSD EPA ID: ILD980613913 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC - DOLTON

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	02/20/2003
TXR000050930	SAFETY-KLEEN SYSTEMS INC	02/21/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	U226- 1,1,1-TRICHLOROMETHANE	30 G	250
			Manifest Lbs. Total	**250**

COPY 1 DNR Received: 02/27/2003 Batch/Seq: 238 / 164

WIK273094

Shipped: 02/13/2003 COPY 3 DNR Received: 02/27/2003 Batch/Seq: 238 / 342
Received: 02/17/2003 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	02/13/2003
NE0000080580	TRANSWOOD INC	02/17/2003

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D001- NON-LISTED IGNITABLE WASTES	200 G	1,668
1	2	D018- BENZENE	110 G	917
			Manifest Lbs. Total	**2,585**

COPY 1 DNR Received: 02/24/2003 Batch/Seq: 236 / 358

WIK269122

Shipped: 12/11/2002 COPY 3 DNR Received: 01/10/2003 Batch/Seq: 228 / 892
Received: 12/11/2002 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	12/11/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	5 G	42
			Manifest Lbs. Total	**42**

COPY 1 DNR Received: 12/18/2002 Batch/Seq: 216 / 623

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK296423

Shipped: 12/09/2002 COPY 3 DNR Received: 12/30/2002 Batch/Seq: 218 / 425
Received: 12/11/2002 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	12/09/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	8 Y	13,440
1	2	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	11000 P	11,000
1	3	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	55 G	459
			Manifest Lbs. Total	**24,899**

COPY 1 DNR Received: 12/12/2002 Batch/Seq: 215 / 147

WIK248916

Shipped: 11/05/2002 COPY 3 DNR Received: 11/26/2002 Batch/Seq: 211 / 554
Received: 11/11/2002 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	11/05/2002
NE0000080580	TRANSWOOD INC	11/11/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D001- NON-LISTED IGNITABLE WASTES	210 G	1,751
1	2	D018- BENZENE	110 G	917
1	3	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	55 G	459
			Manifest Lbs. Total	**3,128**

COPY 1 DNR Received: 11/11/2002 Batch/Seq: 205 / 873

WIK270140

Shipped: 10/04/2002 COPY 3 DNR Received: 11/08/2002 Batch/Seq: 226 / 1003
Received: 10/04/2002 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	10/04/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 10/11/2002 Batch/Seq: 199 / 66

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

IL10391341

Shipped: 10/03/2002 COPY 3 DNR Received: 10/31/2002 Batch/Seq: 203 / 437
Received: 10/18/2002 TSD EPA ID: ILD000608471 TSD Facilty Name: CLEAN HARBORS OF CHICAGO INC

Transporter EPA ID	Transporter Name	Transporter Date
MAD039322250	CLEAN HARBORS ENVIRONMENTAL SERVICES INC	10/03/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D001- NON-LISTED IGNITABLE WASTES	25 P	25
1	2	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	70 P	70
			Manifest Lbs. Total	**95**

COPY 1 DNR Received: 10/22/2002 Batch/Seq: 201 / 594

WIK253765

Shipped: 08/29/2002 COPY 3 DNR Received: 09/10/2002 Batch/Seq: 224 / 944
Received: 08/29/2002 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	08/29/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	5 G	42
			Manifest Lbs. Total	**42**

COPY 1 DNR Received: 09/04/2002 Batch/Seq: 190 / 353

WIK248744

Shipped: 07/30/2002 COPY 3 DNR Received: 08/14/2002 Batch/Seq: 186 / 418
Received: 08/05/2002 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	07/30/2002
NE0000080580	TRANSWOOD INC	08/05/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D001- NON-LISTED IGNITABLE WASTES	55 G	459
1	2	D001- NON-LISTED IGNITABLE WASTES	55 G	459
			Manifest Lbs. Total	**917**

COPY 1 DNR Received: 08/06/2002 Batch/Seq: 184 / 676

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK254867

Shipped: 07/24/2002 COPY 3 DNR Received: 08/09/2002 Batch/Seq: 223 / 868
Received: 07/24/2002 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	07/24/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D039- TETRACHLOROETHYLENE	17 G	142
			Manifest Lbs. Total	**142**

COPY 1 DNR Received: 07/29/2002 Batch/Seq: 183 / 1346

WIK254868

Shipped: 07/24/2002 COPY 3 DNR Received: 08/09/2002 Batch/Seq: 223 / 869
Received: 07/24/2002 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	07/24/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	5 G	42
			Manifest Lbs. Total	**42**

COPY 1 DNR Received: 07/29/2002 Batch/Seq: 183 / 1341

WIK294992

Shipped: 07/10/2002 COPY 3 DNR Received: 07/22/2002 Batch/Seq: 181 / 290
Received: 07/12/2002 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	07/10/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	7 Y	11,760
1	2	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	40 G	334
			Manifest Lbs. Total	**12,094**

COPY 1 DNR Received: 07/12/2002 Batch/Seq: 177 / 130

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK248695

Shipped: 06/18/2002 COPY 3 DNR Received: 07/08/2002 Batch/Seq: 174 / 425
Received: 06/24/2002 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	06/18/2002
NE0000080580	TRANSWOOD INC	06/24/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D001- NON-LISTED IGNITABLE WASTES	440 G	3,670
1	2	D018- BENZENE	110 G	917
			Manifest Lbs. Total	**4,587**

COPY 1 DNR Received: 06/25/2002 Batch/Seq: 171 / 27

WIK250692

Shipped: 06/10/2002 COPY 3 DNR Received: 07/10/2002 Batch/Seq: 170 / 881
Received: 06/10/2002 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	06/10/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 06/14/2002 Batch/Seq: 166 / 618

WIK251322

Shipped: 05/02/2002 COPY 3 DNR Received: 06/10/2002 Batch/Seq: 158 / 965
Received: 05/02/2002 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	05/02/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	5 G	42
			Manifest Lbs. Total	**42**

COPY 1 DNR Received: 05/09/2002 Batch/Seq: 153 / 70

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

S00641392

Shipped: 04/15/2002 COPY 3 DNR Received: 05/10/2002 Batch/Seq: 141 / 428
Received: 04/26/2002 TSD EPA ID: TXD077603371 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	04/15/2002
SCR000075150	SAFETY-KLEEN SYSTEMS INC	04/19/2002
MNR000022947	NIGHTHAWK TRANSPORT INC	04/24/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D002- NON-LISTED CORROSIVE WASTES	55 G	459
			Manifest Lbs. Total	**459**

COPY 1 DNR Received: 05/13/2002 Batch/Seq: 155 / 503

WIK248527

Shipped: 03/21/2002 COPY 3 DNR Received: 04/01/2002 Batch/Seq: 136 / 374
Received: 03/25/2002 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	03/21/2002
NE0000080580	TRANSWOOD INC	03/25/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D018- BENZENE	110 G	917
1	2	D001- NON-LISTED IGNITABLE WASTES	385 G	3,211
			Manifest Lbs. Total	**4,128**

COPY 1 DNR Received: 03/25/2002 Batch/Seq: 134 / 545

WIK243301

Shipped: 03/19/2002 COPY 3 DNR Received: 04/10/2002 Batch/Seq: 128 / 937
Received: 03/19/2002 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	03/19/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 03/25/2002 Batch/Seq: 134 / 401

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK163659

Shipped: 03/06/2002 COPY 3 DNR Received: 03/14/2002 Batch/Seq: 130 / 189
Received: 03/06/2002 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	03/06/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	12 Y	20,160
			Manifest Lbs. Total	**20,160**

COPY 1 DNR Received: 03/12/2002 Batch/Seq: 127 / 568

WIK242734

Shipped: 02/07/2002 COPY 3 DNR Received: 03/08/2002 Batch/Seq: 115 / 880
Received: 02/07/2002 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	02/07/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 02/14/2002 Batch/Seq: 117 / 350

WIK222554

Shipped: 01/04/2002 COPY 3 DNR Received: 01/14/2002 Batch/Seq: 100 / 268
Received: 01/07/2002 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	01/04/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 Y	10,080
1	2	D008- LEAD	441 P	441
1	3	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	5000 P	5,000
1	4	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	600 P	600
			Manifest Lbs. Total	**16,121**

COPY 1 DNR Received: 01/10/2002 Batch/Seq: 96 / 394

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK188413

Shipped: 01/03/2002 COPY 3 DNR Received: 01/16/2002 Batch/Seq: 101 / 494
Received: 01/07/2002 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	01/03/2002
NE0000080580	TRANSWOOD INC	01/07/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D001- NON-LISTED IGNITABLE WASTES	275 G	2,294
1	2	D018- BENZENE	110 G	917
			Manifest Lbs. Total	**3,211**

COPY 1 DNR Received: 01/08/2002 Batch/Seq: 95 / 18

WIK243799

Shipped: 01/02/2002 COPY 3 DNR Received: 02/08/2002 Batch/Seq: 99 / 1105
Received: 01/02/2002 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	01/02/2002

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 01/10/2002 Batch/Seq: 96 / 395

WIK163660

Shipped: 12/21/2001 COPY 3 DNR Received: 01/10/2002 Batch/Seq: 96 / 340
Received: 12/27/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	12/21/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	24 Y	40,320
			Manifest Lbs. Total	**40,320**

COPY 1 DNR Received: 01/08/2002 Batch/Seq: 95 / 19

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK107994

Shipped: 11/19/2001 COPY 3 DNR Received: 12/10/2001 Batch/Seq: 59 / 1130
Received: 11/19/2001 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	11/19/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 11/30/2001 Batch/Seq: 72 / 153

WIK191680

Shipped: 10/12/2001 COPY 3 DNR Received: 11/09/2001 Batch/Seq: 58 / 1180
Received: 10/12/2001 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	10/12/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 10/24/2001 Batch/Seq: 42 / 366

WIK163658

Shipped: 10/10/2001 COPY 3 DNR Received: 10/17/2001 Batch/Seq: 40 / 577
Received: 10/10/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	10/10/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	24 Y	40,320
			Manifest Lbs. Total	**40,320**

COPY 1 DNR Received: 10/17/2001 Batch/Seq: 40 / 404

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK222230

Shipped: 10/09/2001 COPY 3 DNR Received: 10/17/2001 Batch/Seq: 40 / 597
Received: 10/10/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	10/09/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	18976 P	18,976
1	2	D008- LEAD	450 P	450
1	3	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	2400 P	2,400
1	4	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	10000 P	10,000
			Manifest Lbs. Total	**31,826**

COPY 1 DNR Received: 10/15/2001 Batch/Seq: 39 / 162

WIK188277

Shipped: 10/02/2001 COPY 3 DNR Received: 11/20/2001 Batch/Seq: 62 / 677
Received: 10/09/2001 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	10/02/2001
NE0000080580	TRANSWOOD INC	10/08/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D001- NON-LISTED IGNITABLE WASTES	275 G	2,294
1	2	D018- BENZENE	55 G	459
			Manifest Lbs. Total	**2,752**

COPY 1 DNR Received: 10/10/2001 Batch/Seq: 38 / 23

IL9792557

Shipped: 09/18/2001 COPY 1 DNR Received: 09/24/2001 Batch/Seq: 32 / 1030
Received: 00/00/0000 TSD EPA ID: ILD980502744 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC - PECATONICA

Transporter EPA ID	Transporter Name	Transporter Date
SCR000074591	SAFETY-KLEEN (TG) INC	09/18/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	3	D002- NON-LISTED CORROSIVE WASTES	16 G	133
1	4	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	110 G	917
1	2	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	70 G	584
1	1	D001- NON-LISTED IGNITABLE WASTES	1 Y	1,680
			Manifest Lbs. Total	**3,315**

NO SECONDARY COPY AVAILABLE

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK185328

Shipped: 08/28/2001 COPY 3 DNR Received: 09/10/2001 Batch/Seq: 28 / 1160
Received: 08/28/2001 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	08/28/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 09/05/2001 Batch/Seq: 20 / 224

WIK163657

Shipped: 08/28/2001 COPY 3 DNR Received: 09/05/2001 Batch/Seq: 20 / 732
Received: 08/29/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	08/28/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	24 Y	40,320
			Manifest Lbs. Total	**40,320**

COPY 1 DNR Received: 09/05/2001 Batch/Seq: 20 / 223

WIK163656

Shipped: 08/15/2001 COPY 3 DNR Received: 08/22/2001 Batch/Seq: 17 / 317
Received: 08/15/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	08/15/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	24 Y	40,320
			Manifest Lbs. Total	**40,320**

COPY 1 DNR Received: 08/22/2001 Batch/Seq: 17 / 708

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK106985

Shipped: 07/17/2001 COPY 3 DNR Received: 08/10/2001 Batch/Seq: 27 / 1100
Received: 07/17/2001 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	07/17/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 07/24/2001 Batch/Seq: 99901221 / 531

WIK163648

Shipped: 07/11/2001 COPY 3 DNR Received: 07/24/2001 Batch/Seq: 99901221 / 1086
Received: 07/11/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	07/11/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	24 Y	40,320
			Manifest Lbs. Total	**40,320**

COPY 1 DNR Received: 07/20/2001 Batch/Seq: 99901214 / 53

WIK225919

Shipped: 06/29/2001 COPY 3 DNR Received: 07/11/2001 Batch/Seq: 99901201 / 698
Received: 07/02/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	06/29/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	22622 P	22,622
1	2	D008- LEAD	223 P	223
1	3	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	700 P	700
1	4	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	15000 P	15,000
			Manifest Lbs. Total	**38,545**

COPY 1 DNR Received: 07/06/2001 Batch/Seq: 99901197 / 1431

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

INA1492924

Shipped: 06/14/2001 COPY 3 DNR Received: 07/20/2001 Batch/Seq: 99901214 / 1014
Received: 06/19/2001 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	06/14/2001
NE0000080580	TRANSWOOD INC	06/18/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D001- NON-LISTED IGNITABLE WASTES	220 G	1,835
1	2	D018- BENZENE	110 G	917
1	3	D001- NON-LISTED IGNITABLE WASTES	55 G	459
			Manifest Lbs. Total	**3,211**

COPY 1 DNR Received: 06/20/2001 Batch/Seq: 99901184 / 180

WIK163647

Shipped: 06/11/2001 COPY 3 DNR Received: 06/18/2001 Batch/Seq: 99901176 / 689
Received: 06/11/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	06/11/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	24 Y	40,320
			Manifest Lbs. Total	**40,320**

COPY 1 DNR Received: 06/15/2001 Batch/Seq: 99901176 / 434

WIK186703

Shipped: 06/01/2001 COPY 3 DNR Received: 07/10/2001 Batch/Seq: 99901193 / 1164
Received: 06/01/2001 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	06/01/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 06/07/2001 Batch/Seq: 99901171 / 65

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK163646

Shipped: 05/07/2001 COPY 3 DNR Received: 05/11/2001 Batch/Seq: 99901141 / 1404
Received: 05/07/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	05/07/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	24 Y	40,320
			Manifest Lbs. Total	**40,320**

COPY 1 DNR Received: 05/11/2001 Batch/Seq: 99901141 / 1310

WIK173035

Shipped: 04/23/2001 COPY 3 DNR Received: 05/10/2001 Batch/Seq: 99901137 / 1197
Received: 04/23/2001 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	04/23/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 04/26/2001 Batch/Seq: 99901127 / 25

WIK161877

Shipped: 04/18/2001 COPY 3 DNR Received: 04/27/2001 Batch/Seq: 99901127 / 1161
Received: 04/20/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	04/18/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	17176 P	17,176
1	2	D008- LEAD	878 P	878
			Manifest Lbs. Total	**18,054**

COPY 1 DNR Received: 04/23/2001 Batch/Seq: 99901121 / 485

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK163645

Shipped: 03/22/2001 COPY 3 DNR Received: 03/28/2001 Batch/Seq: 99901095 / 1534
Received: 03/23/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	03/22/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	24 Y	40,320
			Manifest Lbs. Total	**40,320**

COPY 1 DNR Received: 03/30/2001 Batch/Seq: 99901095 / 2287

INA1492821

Shipped: 03/15/2001 COPY 1 DNR Received: 03/20/2001 Batch/Seq: 99901087 / 453
Received: 00/00/0000 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	03/15/2001
NE0000080580	TRANSWOOD INC	00/00/0000

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D018- BENZENE	110 G	917
1	2	D001- NON-LISTED IGNITABLE WASTES	220 G	1,835
			Manifest Lbs. Total	**2,752**

NO SECONDARY COPY AVAILABLE

WIK192940

Shipped: 03/12/2001 COPY 3 DNR Received: 04/10/2001 Batch/Seq: 99901101 / 1240
Received: 03/12/2001 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	03/12/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	5 G	42
			Manifest Lbs. Total	**42**

COPY 1 DNR Received: 03/16/2001 Batch/Seq: 99901087 / 200

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK163644

Shipped: 03/06/2001 COPY 3 DNR Received: 03/14/2001 Batch/Seq: 99901085 / 1139
Received: 03/06/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	03/06/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	24 Y	40,320
			Manifest Lbs. Total	**40,320**

COPY 1 DNR Received: 03/13/2001 Batch/Seq: 99901081 / 50

IL9444283

Shipped: 02/13/2001 COPY 1 DNR Received: 12/11/2001 Batch/Seq: 79 / 381
Received: 00/00/0000 TSD EPA ID: ILD980502744 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC - PECATONICA

Transporter EPA ID	Transporter Name	Transporter Date
SCR000074591	SAFETY-KLEEN (TG) INC	02/13/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	PCB- POLYCHLORINATED BIPHENYLS	55 G	459
1	2	D001- NON-LISTED IGNITABLE WASTES	85 G	709
1	3	D009- MERCURY	5 G	42
1	4	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	55 G	459
2	1	D002- NON-LISTED CORROSIVE WASTES	5 G	42
2	2	D002- NON-LISTED CORROSIVE WASTES	5 G	42
2	3	NONH- NON-HAZARDOUS WASTE RECORDED ON MANIF	16 G	133
2	4	D001- NON-LISTED IGNITABLE WASTES	16 G	133
			Manifest Lbs. Total	**2,018**

NO SECONDARY COPY AVAILABLE

WIK177093

Shipped: 01/30/2001 COPY 3 DNR Received: 02/09/2001 Batch/Seq: 99901051 / 1292
Received: 01/30/2001 TSD EPA ID: WID981187297 TSD Facilty Name: SAFETY-KLEEN SYSTEMS INC

Transporter EPA ID	Transporter Name	Transporter Date
WID981187297	SAFETY-KLEEN SYSTEMS INC	01/30/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	6 G	50
			Manifest Lbs. Total	**50**

COPY 1 DNR Received: 01/31/2001 Batch/Seq: 99901045 / 43

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2001 AND 12/31/2003

WIK153297

Shipped: 01/25/2001 COPY 3 DNR Received: 02/07/2001 Batch/Seq: 99901047 / 655
Received: 01/25/2001 TSD EPA ID: WID003967148 TSD Facilty Name: ONYX ENVIRONMENTAL SERVICES LLC

Transporter EPA ID	Transporter Name	Transporter Date
NJD080631369	ONYX ENVIRONMENTAL SERVICES LLC	01/25/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D006- CADMIUM	24 Y	40,320
			Manifest Lbs. Total	**40,320**

COPY 1 DNR Received: 01/29/2001 Batch/Seq: 99901044 / 83

INA1491461

Shipped: 01/23/2001 COPY 3 DNR Received: 03/07/2001 Batch/Seq: 99901074 / 531
Received: 01/30/2001 TSD EPA ID: IND000646943 TSD Facilty Name: POLLUTION CONTROL INDUSTRIES INC

Transporter EPA ID	Transporter Name	Transporter Date
WID000712935	HYDRITE CHEMICAL CO	01/23/2001
NE0000080580	TRANSWOOD INC	01/29/2001

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D001- NON-LISTED IGNITABLE WASTES	165 G	1,376
			Manifest Lbs. Total	**1,376**

COPY 1 DNR Received: 01/26/2001 Batch/Seq: 99901043 / 603

Q00017 MEETING RECORD FORM

CHARGE TO OPER 470

GENERAL CATEGORY		EXAMPLES
Job Skills	✓	Computer, Hydraulic, Blueprint, Metallurgy, Sand Sys
Safety		Lift Truck, Respirator, Fire, Lock Out, etc.
Quality		SPC, TPM, Scrap, ISO9000, Customer Required, etc.
Compliance		OSHA, DNR, EPA, EEOC, Wage & Hour, DOT, etc.
General		EAP, Health, Disciplinary, Telephone, Procedure, etc.
Mgt. Review		

BRIEF DESCRIPTION: Supervisor's Safety meeting Environmental Update

DATE & TIME: 3/14/03 FROM: 5:00 TO: SESSION NO: 1 OF 4

LOCATION: Plant 1 Lg Conf. Room

NO. OF ATTENDEES: 8 CHAIRPERSON: Scott Huguet

ATTENDANCE SIGN IN

CLOCK #	SIGNATURE	CLOCK #	SIGNATURE
3765	John John		
2485	Reed Ott		
9567	[illegible] Wittman		
5259	Jeff Behnke JEFF BEHNKE		
4830	Randy Bollison		
9743	Margie O'Connel		
3978	Daniel M. Farrell		
9748	[illegible] TED PETRIE		

UNEXC	EXC	ABSENT

FORM Q363B, REV. 02/2000

8

Q00017 MEETING RECORD FORM

CHARGE TO OPER 470

GENERAL CATEGORY		EXAMPLES
Job Skills	✓	Computer, Hydraulic, Blueprint, Metallurgy, Sand Sys
Safety		Lift Truck, Respirator, Fire, Lock Out, etc.
Quality		SPC, TPM, Scrap, ISO9000, Customer Required, etc.
Compliance		OSHA, DNR, EPA, EEOC, Wage & Hour, DOT, etc.
General		EAP, Health, Disciplinary, Telephone, Procedure, etc.
Mgt. Review		

BRIEF DESCRIPTION: Supervisor's Safety Meeting Environmental Update

DATE & TIME: 3/14/03 FROM: 06:30 TO: SESSION NO: 2 OF 4

LOCATION: Plant 1 Lg Conf. Room

NO. OF ATTENDEES: CHAIRPERSON: Scott Huguet

ATTENDANCE SIGN IN

CLOCK #	SIGNATURE	CLOCK #	SIGNATURE
4160	Gary Janke GARY JANKE		
4152	[illegible]		
1269	John Behnke		
9755	J. Koster JAMES KOSTER		
5144	[illegible]		
0712	Dan Emmer		
9738	Kick Cach		
3756	Chris D. Burick		
4738	Glenn Brandenburg		
643	Kevin Schulz		
3211	Jan v Muellenbach		

UNEXC	EXC	ABSENT

FORM Q363B, REV. 02/2000

Q00017 **MEETING RECORD FORM**

CHARGE TO OPER 470

GENERAL CATEGORY		EXAMPLES
Job Skills		Computer, Hydraulic, Blueprint, Metallurgy, Sand Sys
Safety	✓	Lift Truck, Respirator, Fire, Lock Out, etc.
Quality		SPC, TPM, Scrap, ISO9000, Customer Required, etc.
Compliance		OSHA, DNR, EPA, EEOC, Wage & Hour, DOT, etc.
General		EAP, Health, Disciplinary, Telephone, Procedure, etc.
Mgt. Review		

BRIEF DESCRIPTION: Supervisor's Safety Meeting
Environmental Update

DATE & TIME: 3/14/03 FROM: 13:00 TO: _____ SESSION NO: 3 OF 4

LOCATION: Plant 1 Rg Conf. Room

NO. OF ATTENDEES: _____ CHAIRPERSON: Scott Huguet

ATTENDANCE SIGN IN

CLOCK #	SIGNATURE	CLOCK #	SIGNATURE
1836	Andy Geil		
6155	Matt Wolf		
5223	Steve Kriter		
9684	Bob Thorpe ROBERT THORPE		
2299	Mike Welch MIKE WELCH		

	UNEXC	EXC	ABSENT

FORM Q363B, REV. 02/2000

5

Q00017 MEETING RECORD FORM

CHARGE TO OPER 470

GENERAL CATEGORY		EXAMPLES
Job Skills		Computer, Hydraulic, Blueprint, Metallurgy, Sand Sys
Safety	✓	Lift Truck, Respirator, Fire, Lock Out, etc.
Quality		SPC, TPM, Scrap, ISO9000, Customer Required, etc.
Compliance		OSHA, DNR, EPA, EEOC, Wage & Hour, DOT, etc.
General		EAP, Health, Disciplinary, Telephone, Procedure, etc.
Mgt. Review		

BRIEF DESCRIPTION: Supervisor's Safety Meeting Environmental Update

DATE & TIME: 3/14/03 FROM: 14:30 TO: SESSION NO: 4 OF 4

LOCATION: Plant 1 Lg Conf. Room

NO. OF ATTENDEES: CHAIRPERSON: Scott Huguet

ATTENDANCE SIGN IN

CLOCK #	SIGNATURE	CLOCK #	SIGNATURE
5067	Joe Behmke		
890	Ron Detert RON DETERT		
2942	Wm Zinkel WILLIAM ZINKEL		
5321	Steve Lemberger STEVE LEMBERGER		
9837	Mitch Dye MITCH DYE		
2498	Daryl Gilbertson DARYL GILBERTSON		
1321	Mark Loose MARK LOOSE		

UNEXC	EXC	ABSENT

FORM Q363B, REV. 02/2000

7

Company Lookup Report / Global Family View

Lookup for brillion iron works (Contains Within Match)

Rank	Business Name	Match Count	Family Members	Global Ultimate D&B D-U-N-S Number	Global Ultimate Name	Global Ultimate Country
100	Brillion Iron Works Inc	1	26	80-910-2148	Johnstown America Industries, Inc.	UNITED STATES

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Company Lookup Report / Family View

Business Name	Match Count	Family Members	Global Ultimate D&B D-U-N-S Number	Global Ultimate Name	Global Ultimate Country
Brillion Iron Works Inc	1	26	**80-910-2148**	Johnstown America Industries, Inc.	UNITED STATES

D&B D-U-N-S Number	Location Type	Address	City	State / Province	ZIP / Postal Code	Country	Domestic Ultimate D&B D-U-N-S Number	Domestic Ultimate Name	Domestic Ultimate Country	Tradestyle
12-213-2301	SINGLE	200 Park Ave	Brillion	Wisconsin	54110	USA	**80-910-2148**	Johnstown America Industries, Inc.	USA	

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Site Information for Brillion Iron Works Inc (12-213-2301)

Business Name:	Brillion Iron Works Inc
Tradestyle:	
Second Tradestyle:	
D&B D-U-N-S Number:	12-213-2301
Location Type:	SINGLE
Primary SIC Code:	33219903
Primary SIC Description:	GRAY IRON CASTINGS, NEC
Physical Street Address:	200 Park Ave
Second Address Line:	
Physical City:	Brillion
State / Province Name:	Wisconsin
Physical State / Province Abbreviation:	WI
Physical Zip / Postal Code:	54110
County Name:	CALUMET
Country Name:	USA
Mail Address:	P.O. BOX 127
Second Mail Address Line:	
Mail City:	Brillion
Mail State / Province:	WI
Mail Zip / Postal Code:	541100127
Telephone Number:	9207562121
Fax Number:	9207563550
Employees Here:	1,000
Employees Total:	1,000
Sales Volume:	$72,700,000.00
Percent Growth Employees (3yr) with sign:	0%
Percent Growth Sales (3yr) with sign:	0%
Latitude with sign:	44.1793
Longitude with sign:	-88.0616
Public/Private Indicator:	PRIVATE COMPANY
Square Footage:	580,000
CEO Full Name:	Al Scargall
CEO Title:	President
Global Ultimate D&B D-U-N-S Number:	80-910-2148
Global Ultimate D&B Business Name:	Johnstown America Industries, Inc.
Domestic Ultimate D&B D-U-N-S Number:	80-910-2148
Domestic Ultimate D&B Business Name:	Johnstown America Industries, Inc.
Parent D&B D-U-N-S Number:	17-445-7069
Headquarters D&B D-U-N-S Number:	00-000-0000
Parent/HQ Name:	Truck Components Inc (delivery)
Parent/HQ State / Province:	IL
Number of Family Members:	26

PREVENTION

MANAGEMENT

Hazardous Waste
Training Records

Wisconsin Department of Natural Resources • Waste Management Program • PUBL-WA-099 98

P.O. Box 7921 • Madison WI • 53707-7921 • 608/266-2111

Training employees to safely handle hazardous waste is essential to safe hazardous waste management.

Generators. Anyone generating 100 kilograms (220 lbs.) or more of hazardous waste per month, or accumulating 1,000 kilograms (2,205 lbs.) at any time, must train all employees to properly handle hazardous waste. Employees must also know how to handle emergencies.

Treatment, Storage and Disposal Facilities (TSDs). All licensed treatment, storage and disposal facilities must train all employees how to properly handle hazardous waste and respond to emergencies.

Training

Either classroom or on-the-job training meet DNR's hazardous waste training requirements. However, it is important that your employee training include waste handling and emergency procedures appropriate to each employee's job. Examples of training topics include

- responding to emergencies and implementing contingency plans
- handling empties and leaks
- labeling, marking and placarding
- waste handling, collecting, segregating and accumulating

Keeping Track

All generators except very small quantity generators and SOGs that accumulate less than 1,000 kilograms (2,205 lbs.) must keep written training records. There is no formal training record form. Make up your own or use a blank piece of paper, but make sure to include the following:

- your EPA ID number
- employee name, starting date, job title and job description

- date and areas employee was trained in
- training renewal date

Make sure to keep all training records on file for at least three years.

Small Business, Inc.
EPA #WID123456789

HAZARDOUS WASTE PERSONNEL TRAINING RECORD

1. Employee Name: ***Marla Maintenance***

2. Employee Starting Date: ***4/12/82***

3. Job Title: ***Maintenance Supervisor***

4. Job Description:
Oversee entire maintenance staff, participate with plant safety committee

5. Training Topics — Date/Instructor

Training Topics	Date/Instructor
Contingency Plan Familiarization	*1/17/95* *S. Supervisor*
Empties, Leaks & Emergency Response	*4/19/95* *T. Trainer*
Labeling, Marking & Placarding	*4/19/95* *T. Trainer*
Shipping Papers/Manifests	*4/19/95* *T. Trainer*
Waste Handling	*4/20/95* *T. Trainer*
Collection	*4/20/95* *T. Trainer*
Segregation	*4/20/95* *T. Trainer*
Accumulation	*4/20/95* *T. Trainer*

6. Annual Review

Waste handling review	*5/30/95* *T.T.*
contingency plan	*5/30/95* *T.T.*
new regulations	*1/2/96* *S.S.*
contingency plan & waste handling	*6/2/96* *S.S.*

Questions?
Call your DNR Regional waste management program (see attached map) if you have additional questions or consult the NR 600 series, Wisconsin Administrative Code. You may also want to check on DNR's web

site at http://www.dnr.state.wi.us or contact your regional waste management program or DNR's Bureau of Cooperative Environmental Assistance at 608/267-9700 for a list of other publications that might be of interest. Copies of Wisconsin statutes and administrative rules can be purchased from Wisconsin Department of Administration, Document Sales and Distribution, P.O. Box 7840, Madison, WI 53707-7840 or call 608/266-3358. Wisconsin State statutes and some administrative rules are also on the Revisor of Statutes Bureau's world wide web site: http://www.legis.state.wi.us/rsb/stats.html.

***Disclaimer**: This fact sheet is not intended as a substitute for the statutes and rules that apply. Rather, it is a brief summary of the topic. Please consult Wisconsin's statutes and administrative rules for detailed information.*

Note: DNR provides equal opportunity in employment, programs, services and functions under an Affirmative Action Plan. This document is available in alternative format upon request. Call the Bureau of Waste Management at 608/266-2111 for information about alternative formats.

Source: lap/wa099.doc

HERITAGE COMPANIES
Claims Office • P.O. Box 1068 • 2506 South Taylor Drive, Sheboygan, WI 53082-1068 (414) 458-9176

July 25, 1991

RECEIVED
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

U.S. Environmental Agency
Region 5
230 South Deerborn Street
Chicago, Illinois 60604

RE:	Claim Number:	B39692-8
	Insured:	Suzanne J. Nolte
	Date of Loss:	1-7-91
	Claimant:	Brillion Iron Works

Dear Sir or Madam:

Please be advised that we are processing a claim for damages done to our insured, Suzanne J. Nolte's 1985 Chevy Nova, for damages we believe were caused by the release of hazardous substances, pollutants or contaminants at the Brillion Iron Works in Brillion, Wisconsin. According to our insured a reclaim unit in the Finishing Department sprang a leak and filings from ground castings got into the air. It is our understanding that at least four other individuals have brought this to the attention of the Brillion Iron Works.

We are wondering if there is any type of form which should be completed in order to have some type of investigation initiated into this matter.

On April 22, 1991 we mailed you similar correspondence regarding damage to another one of our insured's vehicles. We have had no response to that correspondence.

Your prompt attention to this matter is requested.

Very truly yours,

Kelli Kisiolek

Kelli Kisiolek
Claims Correspondent

KK/pc

Heritage Mutual Insurance Company
Greatway Insurance Company
Heritage Computer Corporation
Heritage Financial Corporation
All Lines Insurance Agency, Inc.

125 WID048027734

BRILLION IRON WORKS, INC.
200 PARK AVENUE • BRILLION, WISCONSIN 54110 • Phone: 414/756-2121

May 8, 1989

RECEIVED
MAY 10 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

United States Environmental Protection Agency
Region V
RCRA Enforcement Branch
230 South Dearborn Street
Chicago, Illinois 60604

Attention: Andrew Tschampa (5HR-12)

Dear Sir:

Enclosed is the information you requested in the notice dated April 20, 1989 under Section 3007 of the Resource Conservation and Recovery Act, regarding information on hazardous waste generation and disposal activities and waste characteristics at Brillion Iron Works, Inc.

BACKGROUND:

Brillion Iron Works, Inc. is composed of two divisions, a Foundry Division which produces gray and ductile iron castings and a Farm Equipment Manufacturing Division which primarily produces a line of tillage tools. Both hazardous waste, as defined under 40CFR261.3 and Wisconsin Administrative Code NR181.04(44) and nonhazardous solid waste are generated. All operations take place at one location in Brillion, Wisconsin.

The Foundry Division comprises the largest portion of the business and accounts for the largest portion of the waste generation. The operation includes electric induction melting utilizing No 1 carbon steel scrap, remelt from the foundry, and some pig iron as charge material, to which additional carbon and silicon are added along with other alloys for various types of castings depending upon final use. Molding is primarily green sand molding using silica based sands with the addition of clay binders and seacoal. Coremaking includes cold box cores, shell cores, carbon dioxide cores, and oil sand cores which are oven cured. Slag and waste refractory are produced as a byproduct waste from the melting and pouring operations and fumes collected result in emission control dust being generated from the melting operation. Non-hazardous excess sand and dust collection material comprise the majority of the waste generated in the foundry. Smaller quantities of paint waste from casting painting and miscellaneous solvent wastes are also generated, including solvent contaminated, reacted polyurethane from patternmaking, and PCB capacitors when decommissioned from service.

In the Farm Equipment Manufacturing operation, paint wastes and some solvent wastes are generated. General refuse, which includes waste paper, cardboard boxes, pallets, and small empty containers, is also generated from the entire facility as well as waste oils. Certain miscellaneous wastes such as copper, brass, aluminum, steel and iron metal turnings and metallic fines may be accumulated for recycling with metal recyclers.

PROCESS AND WASTE GENERATION

Following is a description of the processes that generate wastes at this facility. A summary of the hazardous waste disposal for each year in question is attached at the end of this report. Also attached are the waste analysis documentation for each waste described. These are filed in the order described.

NONHAZARDOUS BULK WASTES

The largest volume of waste generated is from the mold making operation in the foundry. Typically, about 95% of molding sand is recycled in the system. New sand, bond mix, consisting of southern and western bentonite clays and seacoal, and water are added to used sand which is then compacted into molds. Cores, manufactured by one of several methods, may be placed into the molds. Molten metal is poured into the molds, which are then cooled, and the casting is separated from the sand for final finishing, the sand is screened, metallics are removed and the sand is reused again. Waste is generated from lumps screened out, casting cleaning, dust collection, general cleanup and occasionally disposing of sand to adjust sand composition. Emission control dust collected from these operations are the fines collected from the same materials and are included in this waste.

The second largest category of wastes are slags and refractories generated in the melting and pouring operations. Slag is the dirt and nonmetallic impurities carried with the charge material that is removed from the molten metal before it is cast. Refractories are composed of either silica based materials used in furnace linings or aluminum oxide materials generally used to line ladles used to transfer the molten metal from the melt furnaces to the molding areas.

Analyses of the molding wastes, core wastes and slags and refractories have been conducted at various times in response to general interest, disposal activities, or various regulatory activities. The most comprehensive of these evaluations, which confirmed earlier data and has been confirmed by some recertification analyses since, was conducted in 1986 in response to having the foundry wastes permitted into a commercial landfill. Excerpts from a comprehensive report submitted to the Wisconsin DNR are included in the appendix. Descriptions of how certain similar wastes were composited and the analysis are included. These analyses were all conducted according to approved test methods. The processes generating these specific wastes has remained basically the same since 1966.

OTHER NONHAZARDOUS WASTES

Assorted trash and empty containers are generated from various areas of the facility. The empty containers are all preapproved with the landfill and by WDNR for disposal. Material Safety Data Sheets are provided to the landfill operator along with the quantity estimates, and containers are required to be crushed before disposal. Empty drums are either returned to suppliers or picked up by drum recyclers. MSDS must also be supplied to drum recyclers before they accept the empty drums. Open top drums that previously contained dry materials may be sent to scrap metal processors. Metal turnings and scrap metals are also sent to scrap processors.

Certain wastes are classified as nonhazardous special wastes usually due to liquid content or handling in special containers such as steel drums. Summaries of quantities are found on the hazardous waste summary sheets attached. These wastes are generally handled the same as hazardous wastes except for generator storage time limits.

Black waterbase paint wastes are placed in steel drums and shipped offsite to a TSD where further solidification or stabilization will take place if necessary before landfilling. This waste is generated from cleanup of drain boards and the dip tank top and some airless spraying of parts. Before 1985, some waterbase black dip paint used at one location contained some hazardous constituents and was handled as a hazardous waste. That waste is covered later in this report.

Spray booth paint waste is generated from the collection of overspray from the spray painting of parts in our Farm Equipment manufacturing operation in a waterwash spray booth. The overspray material is collected on the water surface and skimmed daily and placed in drums. The material is then transported and disposed of the same as the black waterbase paint) In late fall of 1987, lead free paint was substituted for the lead based paint used until then. Lead was the hazardous constituent remaining in the waste previously. In August of 1988, all approvals were completed to handle the material as a nonhazardous waste which began with the shipment of December 23, 1988. Additional information is provided under a later category for the hazardous waste disposal before December 23, 1988.

A red waterbase paint was used in a dipping operation for small parts in the Farm equipment operation for a short period of time. Due to production cutbacks at the time, the paint material was disposed of as a special nonhazardous waste in 1984. The material was not used again.

Transportation and disposal by landfilling for special nonhazardous wastes is by Chemical Waste Management, a licensed hazardous waste transporter.

Waste oils and oil-water mixtures are also handled as special nonhazardous wastes. Waste hydraulic/lubricating oils from equipment maintenance are pumped from storage drums stored in a roofed, spill-controlled area, and transported by tanker to fuel processors.

Individual waste hydraulic oils are shipped if possible (minimum quantities are required) to a reprocessor and returned to us. Oil and water mixtures generated from air compressors and other miscellaneous sources are also pumped from drums by tanker and shipped to a wastewater treatment plant. Waste motor oil from fork lift servicing is accumulated in a small storage tank and picked up by a local waste oil processor for a fuels program.

Waste oil and solvent collection areas are provided at several areas at the facility with drums labeled for waste mineral based oil, synthetic oil, waste mineral spirits, and 1,1,1,Trichloroethane. This was done in response to regulatory changes which limited chlorinated content of wastes to prevent other waste contamination by solvents when satellite accumulations areas for over 90 days were allowed. Weekly inspections are done at all the collection and storage areas and an inventory is updated weekly. The waste oils are handled as described above. Solvent disposal is handled by recyclers, described further in this report under hazardous wastes.

Although PCB's are non-RCRA materials they are strictly regulated and carefully handled. PCB capacitors are in service in two access-controlled electrical equipment vaults in the foundry operation. When capacitors fail electrically, they are removed from service and stored in a special spill controlled storage building. Toward the end of the 9 month storage period, a PCB Service Company is contacted to arrange transportation and disposal. Certificates of destruction are returned to us when disposal is completed. Continuous inventories are maintained with annual reports, inspections of installations and labeling of decommissioned units. An EPA PCB inspection of our facility was conducted in 1984 and several minor labeling deficiencies were corrected at that time. Some transformers with PCB concentrations above 50 ppm were previously in use. The last of these were drained and flushed by a PCB contractor and certified PCB free with the waste oil incinerated in 1986.

RCRA HAZARDOUS WASTE GENERATION AND HANDLING

Hazardous waste categories and disposals are summarized on the annual summary sheets included in the appendix to this report. Between November 19, 1980 and present, some of the waste categories have changed due to process changes and cost or waste minimization efforts and are documented in the appendix also.

It appears from documentation available that considerable confusion existed in the earliest days of RCRA compliance. Sampling was being conducted, lasting into 1981, sometimes with varying results even on split samples sent to different laboratories. Some confusion also existed on what constituted treatment. It is clear however, that after November 19, 1980, waste identified as potentially hazardous waste was stored on site until proper disposal could be arranged. According to manifest dates, this likely resulted in exceedences of some 90 day storage limits initially, however, regular shipments were documented by June of 1981. In March, 1981, Wisconsin DNR did visit the facility to insure proper steps were being taken. Approximately 200 manifests have been recorded documenting off-site shipments since 1980.

With only a few exceptions of special disposal requirements, only full service contractors have been used, enabling control by one company of transportation and disposal.

PROCESS AND WASTE GENERATION DESCRIPTIONS

The largest volume of hazardous waste generated has been emission control dust generated from fume/dust collection over electric induction melting furnaces. Although the raw material has less than any reportable quantity of any hazardous ingredient, lead fume may be generated after exposure of residual paint and impurities on some of the scrap metal to the temperature of the molten metal solution. Smoke and fume are collected in a baghouse with sufficient lead content to result in an D008 EP toxic Waste.

In 1980 when RCRA took effect, the metal fumes were being collected in a baghouse mixed with sand system dust sources and the resulting material when discharged from the collector again diluted with sand before disposal. By mixing ratios and some analysis, the waste was considered non-hazardous. As production levels change however, exact contaminant levels would vary and WDNR advised us we would become a treater and/or that the entire mixture would be hazardous. This was discussed in a series of letters with Lisa Pierard, Karl Klepitsch and Hugo Bursteon of EPA in 1984. Beginning in April 1981, all mixing of any kind was halted and waste separation was implemented to minimize volumes and the waste was managed as a hazardous waste. The material is wetted (in a mixer) as it is discharged from the collector and discharged into a 12 cubic yard plastic lined lugger box and transported in bulk to the TSD or, beginning in 1989, some dry material is being placed in DOT approved one cubic yard plastic lined cardboard shipping containers to be shipped in an enclosed van to the TSD. Periodically, waste dust collector bags may also be disposed of in this manner. In 1988, nine shipments of two containers each were made. Quantity summaries are outlined in the appendix. Materials are stored in the containers mentioned until shipping is arranged, on average about 40 days maximum. Outside containers are tarped and inspected weekly. The material has always been transported and disposed by Chemical Waste Management and is currently disposed at Chemical Waste Management of Indiana, Adams Center Landfill. Current technology for treatment or metals reclamation has not been economically feasible.

Red oxide primer waterbase paint is used to paint some castings, including some military specification castings for one customer. Parts are dipped into the paint and hung on hooks on a moving conveyor to dry. Waste is generated in cleaning the drainboard, drip areas and tank top area where residue builds up. Most of the waste is already solidified at this point. The primary hazardous constituent is chromium used in one of the pigments. Collected waste is placed in drums which are then temporarily stored when full in a spill controlled storage shelter until shipment by a full service hazardous waste contractor. Weekly inspections and inventories are conducted to make sure handling and labeling are correct and insure that arrangements are made to ship the waste in less than 90 days. At the TSD the drums are inspected for final solidification and stabilization and landfilled in a secure

This waste was managed as a special nonhazardous waste briefly in 1984 when analysis and product formulation resulted in low hexavalent chromium concentration. Since 1984 this waste was again managed as an EP Toxic D007 hazardous waste. This operation takes place mainly in the Foundry Division with an additional dipping operation performed in the Farm Equipment Facility for the Foundry Division beginning in 1989. Paint hooks are sent offsite for thermal cleaning.

SOLVENT WASTES

Solvent wastes are generated at several areas of the facility, both in the Foundry and Farm Equipment Manufacturing Divisions. Some analysis is available, however, most of the waste characteristics are easily determined from the MSDS listing of characteristics. The largest volume of solvents are generated in the miscellaneous parts washing in small tanks used for degreasing and two small process related uses.

Waste mineral spirits are generated as a D001 waste from manual parts degreasing in small tanks designed for the operation. Currently, all such degreasing units are maintained by Safety-Kleen, a solvent reclaimer, and the waste solvent recycled or disposed by them. Miscellaneous sources of mineral spirits solvents or oils contaminated by solvents used outside of parts wash tanks are collected in drums at satellite collection areas. When filled, these materials are temporarily stored and either recycled or incinerated through Hydrite Chemical Company. Before 1986, all waste mineral spirits solvents were managed internally, collected and then transported offsite for recovery or disposal by Hydrite Chemical, Cottage Grove, WI., a licensed hazardous waste TSD and solvent reclaimer. Before 1983 records do not show specific disposal of mineral spirits solvent wastes. Limited restrictions on solvent mixture disposal and disposal with waste oil were possible, however no records exist.

1,1,1,trichloroethane is another solvent used in three locations that may produce a hazardous waste. In both general maintenance and Farm Equipment operations the solvent is used in manual degreasing. Most of this material evaporates and replenishment only takes place. In 1986 waste oil was shipped offsite to a special fuel blender under waste code F500, a Wisconsin waste code identifying low levels of chlorinated solvent contamination. In 1984 and succeeding years, shipments of waste solvents identified as waste mineral spirits mixture with waste codes F001, F002, F003 and F500 were shipped through Hydrite Chemical for disposal or recycling. In 1986 the waste oil/solvent collection areas were begun at the facility (satellite collection areas) and waste 1,1,1,trichloroethane was specifically collected as a wastestream for disposal.

A solvent containing methylene chloride is used as a cleaner for a core resin pump used to pump resins from drums into a process tanks. Waste generated from this process was evaporated and/or codisposed with other waste solvents and oils before 1985. With the advent of OSHA 1910.1200 and RCRA regulatory changes in 1985 and 1986, brand name solvents were more clearly identified and individual waste collection areas were placed for this wastestream which is now managed for recovery through Hydrite Chemical.

A plastic patternmaking process was first introduced on a limited basis in November 1982. A reacted polyurethane is injected into a mold cavity and the mixing and injection machine was cleaned with methylene chloride. This solvent residue was evaporated initially with the solid waste being managed as a unregulated waste. After RCRA regulatory changes in 1986 the material was accumulated while it was being more fully evaluated and ultimately permitted for disposal by incineration. In 1988 1,1,1,trichloroethane was substituted for methylene chloride. This results in higher solvent content in the waste and the waste has continued to be disposed by incineration at CWM Chemical Services, (SCA Chemical Services) in Chicago.

Occasionally out-of-date or off-spec combustible resins or other materials may be disposed at varying locations. A hazardous waste transportation and management firm is then contracted, E & K Hazardous Wastes Services, for locating a disposal site, permitting and transportation.

OTHER RCRA HAZARDOUS WASTES-FARM EQUIPMENT DIVISION ONLY

Several wastes are generated in the Farm Equipment Manufacturing Division only. As indicated earlier, before August 1988, the paint used in spraying in the FE Division contained lead pigments. Overspray from the electrostatic spray painting was collected on a water curtain of a water wash spray booth. Once per day of painting, the sludge was skimmed from the water surface and placed in drums. The paint waste was then handled as a hazardous waste through Chemical Waste Management and landfilled at licensed hazardous waste disposal sites. Each drum is inspected after transportation for required solidification and stabilization at the TSD and the waste then placed in a secure landfill. In 1981 paint waste was first shipped as an F017 waste which was later discontinued. Thereafter the waste was classified as a D008 waste. Again, this waste has been handled exclusively by Chemical Waste Management, including transportation and disposal since November 19, 1980. Final disposal before discontinuing the lead based paint waste generation was at the Emelle Facility of Chemical Waste Management.

The paint booth water is also managed as a special waste. The water, used to collect the overspray solids from spray painting, became contaminated from the lead pigments. The water is reused until operation becomes impaired by solids buildup, sometimes two years or more depending upon production requirements, when the water is shipped to a treatment plant by tanker. Chem-Clear and Chemical Waste Management have both been used as treatment facilities for this wastestream. With the change to lead free paints, metals contents of this wastewater has diminished to less than EP Toxicity levels, however, organic solvent levels are still being evaluated for compliance with the Metalfinishing Pretreatment Standards and the wastewater is still being managed for offsite treatment.

A small amount of waste "Washsolvent", a D001 solvent blend is used to clean spray paint lines and guns. This material is picked up by Hydrite Chemical for recovery.

Also associated with the spray paint lines, a small paint hook stripping tank is kept for small paint hook removal requirements. A sodium hydroxide based solution is used to dissolve paint residue by soaking the hooks. The residue from the tank and an adjacent rinse tank is skimmed periodically into drums for disposal as a solid hazardous waste. This D002, D008, D007 waste is also transported and disposed by landfilling by Chemical Waste Management at their Emelle Facility. This process, used between 1984 and 1989 is being phased out in favor of thermal cleaning.

A very small amount of sodium cyanide waste is generated in a small forge hardening operation in the Farm Equipment Manufacturing Operation. A one time 35 pound waste disposal by incineration at Chemical Waste Management's Trade Waste Incinerator occurred in 1988.

A green waterbase paint was used in a dipping operation in the Farm Equipment operation for a short period of time, approximately one year to paint small parts. Due to production cutbacks in that division at the time, the paint was disposed as a hazardous waste due to chromium pigments as a D007 waste at Chemical Waste Management's Emelle Facility in 1984. This material has not been used since.

MISCELLANEOUS

Periodically the 90 day generator storage limit has been reached, primarily due to waste backlogs at TSD's. In those situations the District WDNR office was notified to obtain a time extension until the waste could be moved. Once in 1988 an offsite licensed storage facility at Chemical Waste Management was also used to temporarily store some hazardous plastic patternmaking waste awaiting incineration. All materials were ultimately shipped to licensed TSD's.

The attachments summarize the hazardous and special nonhazardous waste handling for the specified periods during which disposal occurred. Individual waste analysis are also included, the most representative and accurate available for each wastestream, and a table of contents of the appendix is included for clarity. Waste disposal for 1989 is continuing on the same basis as described in the summary of 1988.

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in responding to this information request and request for production of documents. Based on my review of all relevant documents and inquiry of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate and complete. I am aware that there is significant penalties for submitting false information, including the possibility of fine and imprisonment.

Prepared by:

Leonard Kopidlansky

Leonard Kopidlansky
Plant Project Engineer

Certified by:

Karl Gabler
President

SIGNED BEFORE ME THIS 8TH DAY OF MAY, 1989

COMMISSION EXPIRES MARCH 14, 1993.

APPENDIX

Summaries of Hazardous & Special Nonhazardous Waste Shipments 1981-1988

Waste Analysis

- Foundry Nonhazardous Bulk Wastes
  - Sample Composite Descriptions
  - Excess Mold Sands-Plant 1
  - Excess Mold Sands-Plant 2
  - Wet Scrubber Sludge-Sand System
  - Finishing & Cleaning Dusts/Sands
  - Finishing Sand Wastes
  - Slag
  - Preheater Dust
  - Refractory Waste

- Nonhazardous Special Waste
  - Black Waterbased Paint Waste
  - Spray Booth Paint Waste 1988
  - Red Aqua Waterbase Paint Waste

- Hazardous Waste Analysis
  - Emission Control Dust
    - Previous EPA Correspondence
  - Red Oxide Waterbased Primer Paint Waste
  - Solvent Wastes
  - Plastic Patternmaking Waste

- Hazardous Waste Analysis-Farm Equipment Division
  - Spray Booth Paint Waste (Before 1988)
  - Spray Booth Paint Water (Before 1988)
  - Spray Booth Paint Water (Current)
  - Paint Hook Stripping Waste
  - Sodium Cyanide Waste
  - Green Aqua Waterbase Paint Waste
  - Black Enamel Paint Waste (Before 1985)

1981-1988

BRILLION IRON WORKS, INC.
HAZARDOUS AND TOXIC WASTES SHIPPED

DESCRIPTION	WASTE CODE	SOURCE	DISPOSAL	DISPOSER	USUAL LOCATION	1981-1988 TOTAL DISPOSED QUANITY
R/C Washsolvent	D001	F.E. Painting	Recycled	Hydrite Chemical Co.	Cottage Grove, WI	31,682 Lbs.(55 Gal.)
Waste Mineral Spirits	D001	Maint-F.E.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	1,071 Gal.
Waste Mineral Spirits	D001	Maint-F.E.	Recycled	Safety-Kleen	Kaukauna, WI	19,813 Lbs.(1,599 Gal.)
Spray Booth Solids	D008,D007	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	180,983 Lbs.
Spray Booth Solids	Special	F.E.	Landfilled	Chemical Waste Mgmt.	Menomonee Falls, WI	6,375 Lbs.(935 Gal.)
Red Oxide Paint Waste	D007,D008	Finishing	Landfilled	Chemical Waste Mgmt.	Emelle, AL	54,662 Lbs.
Spray Booth Water	D008,D007	F.E.	Treated	Chemical Waste Mgmt.	Calumet City, IL	131,896 Lbs.(15,815 Gal.)
Paint Hook Stripper	D002,D008	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	2,493 Lbs.
1,1,1,Trichloroethane	F001	Maint.-F.E.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	1,390 Lbs.(165 Gal.)
Waste Oil	Non-Haz.	Fork Lift Rep.	Fuel Pgrm.	Javco & Halron Oil Co.	Green Bay, WI	Unknown Periodic Pickup
Waste Oil-Industrial	Non-Haz.	Throughout	Fuel Pgrm.	ESI-Rogers Oil	Waukesha, WI	Unknown Gal.
Waste Hydraulic Oil	Non-Haz.	Throughout	Recycled	Benz Oil/Amoco	Milwaukee, WI	935 Gal.
Waste Oil/Water Mixtures	Non-Haz.	Throughout	Treated	ESI-Rogers Oil	Waterloo, WI	5,555 Gal.
Plastic Ptrnmaking Wste	F500,F002	Pattern Shop	Incinerated	SCA Services	Chicago, IL	7,625 Lbs.
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Recycled	Hydrite Chemical	Cottage Grove, WI	4,556 Lbs.(436 Gal.)
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Incinerated	Hydrite Chemical	Cottage Grove, WI	594 Lbs.
Baghouse Dust	D008.D006	Melting	Landfilled	Chemical Waste Mgmt.	Fort Wayne, IN	1,722,643 Lbs.
Black Waterbase Paint	Special	F.E.-Finishing	Solid-Ldfld	Waste Management	Menomonee Falls, WI	9,233 Lbs.(1,073 Gal.)
Black Waterbase Paint	D007	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	Incl. w/Spray Booth
PCB's-Capacitors		Melting	Incinerated	Aptus/Nat'l Elec	Coffeeville, KS	26,664 Lbs.(Gross)
PCB's-Transformer Oil		XFMRS	Incinerated	Aptus/Nat'l Elec	Coffeeville, KS	11,400 Lbs.+2,676 Gal.
Waste Core Resin-Combust	D001	Core/R&D	Fuel Pgrm.	EWR (E & K Haz. Waste)	Coal City, IL	55 Gal
Waste Boiler Treat-Caust	D002	Maint-Plt 1	Treated	Chem Met (E & K Haz.W)	Wyandotte, MI	165 Gal.
Waste Sodium Cyanide	P104	F.E. Heat Trt.	Incinerated	Chemical Waste Mgmt.	Sauget, IL	35 Lbs.
Green Waterbase Paint	D007	F.E.	Solid-Ldfld	Chemical Waste Mgmt.	Emelle, AL	6,060 Lbs.
Paint Wastes(Incl.Spray)	D008,D007	F.E.	Solid-Ldfld	Chemical Waste Mgmt.	Calumet City, IL	179,620 Lbs.
Red Waterbase Paint	Special	F.E.	Solid-Ldfld	Chemical Waste Mgmt.	Menomonee Falls, WI	10,123 Lbs.

NOTE: Weights of drummed wastes except solvents are gross weights including shipping containers

1981

BRILLION IRON WORKS, INC.
HAZARDOUS AND TOXIC WASTES

DESCRIPTION	WASTE CODE	SOURCE	DISPOSAL	DISPOSER	LOCATION	1981 QUANITY
R/C Washsolvent	D001	F.E. Painting	Recycled	Hydrite Chemical Co.	Cottage Grove, WI	0 Lbs.(Gal.)
Waste Mineral Spirits	D001	Maint-F.E.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	
Black Enamel W.B. Paint	D007	F.E.	Solid-Ldfld	Chemical Waste Mgmt.	Calumet City, IL	Lbs.
Paint Wastes(Incl.Spray)	D008,D007	F.E.	Solid-Ldfld	Chemical Waste Mgmt.	Calumet City, IL	104,560 Lbs.
Red Oxide Paint Waste	D007,D008	Finishing	Solid-Ldfld	Chemical Waste Mgmt.	Menomonee Falls, WI	Lbs.
Spray Booth Water	D008,D007	F.E.	Treated	Chemical Waste Mgmt.	Calumet City, IL	0 Lbs.
1,1,1,Trichloroethane	F002	Maint.-F.E.				0
Waste Oil	Non-Haz.		Fuel Pgrm.	Halron Oil Co.	Green Bay, WI	Unknown
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Evaporated/Codisposed w/solvents & oils			Unknown
Baghouse Dust	D008.D006	Melting	Landfilled	Waste Management	Menomonee Falls, WI	54,847 Lbs.
Black Waterbase Paint		Finishing	Solid-Ldfld	Waste Management	Menomonee Falls, WI	Lbs.(Gal.)
PCB's-Transformers			Incinerated			0 Lbs.(Liquid)
PCB's-Capacitors		Melting	Incinerated			0 Lbs.Capacitor

1982

BRILLION IRON WORKS, INC.
HAZARDOUS AND TOXIC WASTES

DESCRIPTION	WASTE CODE	SOURCE	DISPOSAL	DISPOSER	LOCATION	1982 QUANITY
R/C Washsolvent	D001	F.E. Painting	Recycled	Hydrite Chemical Co.	Cottage Grove, WI	0 Lbs.(Gal.))
Waste Mineral Spirits	D001	Maint-F.E.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	
Black Enamel W.B. Paint	D007	F.E.	Solid-Ldfld	Chemical Waste Mgmt.	Calumet City, IL	Lbs.
Paint Wastes(Incl.Spray)	D008,D007	F.E.	Solid-Ldfld	Chemical Waste Mgmt.	Calumet City, IL	27,500 Lbs.
Red Oxide Paint Waste		Finishing	Solid-Ldfld	Chemical Waste Mgmt.	Menomonee Falls, WI	Lbs.
Spray Booth Water	D008,D007	F.E.	Treated	Chemical Waste Mgmt.	Calumet City, IL	0 Lbs.
1,1,1,Trichloroethane	F002	Maint.-F.E.				0
Waste Oil	Non-Haz.		Fuel Pgrm.	Halron Oil Co.	Green Bay, WI	Unknown
Plastic Ptrnmaking Wste		Pattern Shop	Landfilled	Waste Management	Whitelaw, WI	Unknown-Begin experimental
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Evaporated & Codisposed w/solvents		& waste oils	in Nov.
Baghouse Dust	D008.D006	Melting	Landfilled	Waste Management	Menomonee Falls, WI	233,100 Lbs.
Black Waterbase Paint		Finishing	Solid-Ldfld	Waste Management	Menomonee Falls, WI	Lbs.(Gal.)
PCB's-Transformers			Incinerated			0 Lbs.(Liquid)
PCB's-Capacitors		Melting	Incinerated			0 Lbs.Capacitors

1983

BRILLION IRON WORKS, INC.
HAZARDOUS AND TOXIC WASTES

DESCRIPTION	WASTE CODE	SOURCE	DISPOSAL	DISPOSER	LOCATION	1983 QUANITY
R/C Washsolvent	D001	F.E. Painting	Recycled	Hydrite Chemical Co.	Cottage Grove, WI	15,750 Lbs.(1,925 Gal.))
Waste Mineral Spirits	D001	Maint-F.E.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	
Black Enamel W.B. Paint	D007	F.E.	Solid-Ldfld	Chemical Waste Mgmt.	Menomonee Falls, WI	Lbs.
Paint Wastes(Incl.Spray)	D008,D007	F.E.	Solid-Ldfld	Chemical Waste Mgmt.	Calumet City, IL	47,620 Lbs.
Red Oxide Paint Waste	Special	Finishing	Solid-Ldfld	Waste Management	Menomonee Falls, WI	Lbs.
Spray Booth Water	D008,D007	F.E.	Treated	Chemical Waste Mgmt.	Calumet City, IL	24,000 Lbs.
1,1,1,Trichloroethane	F002	Maint.-F.E.				0
Waste Oil	Non-Haz.		Fuel Pgrm.	Halron Oil Co.	Green Bay, WI	Unknown
Plastic Ptrnmaking Wste		Pattern Shop	Landfilled	Waste Management	Whitelaw, WI	Unknown
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Evaporated & Codisposed w/solvents		& oils	Unknown
Baghouse Dust	D008.D006	Melting	Landfilled	Chemical Waste Mgmt.	Calumet City, IL.	358,820 Lbs.
Black Waterbase Paint		Finishing	Solid-Ldfld	Waste Management	Menomonee Falls, WI	Lbs.(Gal.)
PCB's-Transformers			Incinerated	Electric Equipment		0 Lbs.(Liquid)
PCB's-Capacitors		Melting	Incinerated	Electric Equipment		0 Lbs.Capacitors

1984

BRILLION IRON WORKS, INC.
HAZARDOUS AND TOXIC WASTES

DESCRIPTION	WASTE CODE	SOURCE	DISPOSAL	DISPOSER	LOCATION	1984 QUANITY
R/C Washsolvent	D001	F.E. Painting	Recycled	Hydrite Chemical Co.	Cottage Grove, WI	5,915 Lbs.(770 Gal.
Waste Mineral Spirits	D001	Maint-F.E.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	3,350 Lbs.(330 Gal.
Black Enamel W.B. Paint	D007	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	1,100 Lbs.
Green Waterbase Paint	D007	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	6,060 Lbs.
Spray Booth Solids	D008,D007	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	75,176 Lbs.
Red Oxide Paint Waste	D007,D008	Finishing	Landfilled	Chemical Waste Mgmt.	Emelle, AL	18,227 Lbs.
Spray Booth Water	D008,D007	F.E.	Treated	Chemical Waste Mgmt.	Calumet City, IL	58,448 Lbs.
Paint Hook Stripper	D002,D008	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	558 Lbs. (55 Gal.
1,1,1,Trichloroethane	F002	Maint.-F.E.				0
Waste Oil	Non-Haz.		Fuel Pgrm.	Halron Oil Co.	Green Bay, WI	Unknown
Plastic Ptrnmaking Wste	Non-Haz	Pattern Shop	Landfilled	Waste Management	Whitelaw, WI	Unknown
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Evaporated & Codisposed w/solvents		& oils	Unknown
Baghouse Dust	D008.D006	Melting	Landfilled	Chemical Waste Mgmt.	Calumet City, IL.	265,120 Lbs.
Red Waterbase Paint		F.E.	Solid-Ldfld	Waste Management	Menomonee Falls, WI	10,123 Lbs.(1,045 Ga
Black Waterbase Paint		Finishing	Solid-Ldfld	Waste Management	Menomonee Falls, WI	3,786 Lbs.(440 Gal.
PCB's-Transformers			Incinerated	Electric Equipment	White Bluff, TN	11,200 Lbs.(Liquid)
PCB's-Capacitors		Melting	Incinerated	Electric Equipment	El Dorado, AR	10,800 Lbs.Capacitor
Waste Mineral Spir. Mx.	D001,F500		Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	330 Gal.

1985

BRILLION IRON WORKS, INC.
HAZARDOUS AND TOXIC WASTES

DESCRIPTION	WASTE CODE	SOURCE	DISPOSAL	DISPOSER	LOCATION	1985 QUANITY
R/C Washsolvent	D001	F.E. Painting	Recycled	Hydrite Chemical Co.	Cottage Grove, WI	5,850 Lbs.(750 Gal.
Waste Mineral Spirits	D001	Maint-F.E.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	3,222 Lbs.
Spray Booth Solids	D008,D007	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	14,942 Lbs.
Red Oxide Paint Waste	D007,D008	Finishing	Landfilled	Chemical Waste Mgmt.	Emelle, AL	10,030 Lbs.
Spray Booth Water	D008,D007	F.E.	Treated	Chemical Waste Mgmt.	Calumet City, IL	20,800 Lbs.
Paint Hook Stripper	D002,D008	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	0 Lbs. (55 Gal.
1,1,1,Trichloroethane	F002	Maint.-F.E.				0
Waste Oil/water-Contamin			Treated	Chem Clear, Inc.	Chicago, IL	3,080 Gal.
Waste Oil	Non-Haz.		Fuel Pgrm.	Halron Oil Co.	Green Bay, WI	Unknown
Plastic Ptrnmaking Wste		Pattern Shop	Began accumulating pending reanalysis & permitting			0
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Evaporated and Codisposed w/solvents & oils			0
Baghouse Dust	D008.D006	Melting	Landfilled	Chemical Waste Mgmt.	Calumet City, IL.	186,011 Lbs.
Black Waterbase Paint	Special NHF	F.E.-Finishing	Solid-Ldfld	Chemical Waste Mgmt.	Menomonee Falls, WI	413 Gal.
PCB's-Transformers			Incinerated	National Electric	Beatty, NV	2,035 Gal.
PCB's-Transformers			Incinerated	National Electric	Beatty, NV	200 Lbs.
PCB's-Capacitors		Melting	Incinerated	National Electric	El Dorado, AR	2,995 Lbs.Capacitor
Waste Mineral Spir. Mx.	D001,F500		Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	470 Gal.

1986

BRILLION IRON WORKS, INC.
HAZARDOUS AND TOXIC WASTES

DESCRIPTION	WASTE CODE	SOURCE	DISPOSAL	DISPOSER	LOCATION	1986 QUANITY
R/C Washsolvent	D001	F.E. Painting	Recycled	Hydrite Chemical Co.	Cottage Grove, WI	3,003 Lbs.(385 Gal.)
Waste Mineral Spirits	D001	Maint-F.E.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	0
Waste Mineral Spirits	D001	Maint-F.E.	Recycled	Safety-Kleen	Kaukauna, WI	865 Lbs.
Spray Booth Solids	D008,D007	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	34,365 Lbs.
Red Oxide Paint Waste	D007,D008	Finishing	Landfilled	Chemical Waste Mgmt.	Emelle, AL	6,280 Lbs.
Spray Booth Water	D008,D007	F.E.	Treated	Chemical Waste Mgmt.	Calumet City, IL	0
Paint Hook Stripper	D002,D008	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	480 Lbs. (55 Gal.)
1,1,1,Trichloroethane	F002	Maint.-F.E.				0
Waste Oil-Contaminated	F500		Fuel Pgrm	Industrial Fuels & Res.	South Bend, IN	5,300 Gal.
Waste Oil	Non-Haz.		Fuel Pgrm.	Halron Oil Co.	Green Bay, WI	Unknown
Plastic Ptrnmaking Wste	?	Pattern Shop	Waste being accumulated pending reanalysis & permiting			0 Lbs.
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Waste being accumulated at satellite accumulation area			0 Lbs.
Baghouse Dust	D008.D006	Melting	Landfilled	Chemical Waste Mgmt.	Calumet City, IL	288,320 Lbs.
Black Waterbase Paint	Special-NHF.E.-Finishing		Solid-Ldfld	Chemical Waste Mgmt.	Menomonee Falls, WI	55 Gal.
PCB's-Transformers			Incinerated	National Electric	Coffeeville, KS	641 Gal.
PCB's-Capacitors		Melting	Incinerated	National Electric	Coffeeville, KS	7 Capacitors
Waste Mineral Spir. Mx.	D001,F500		Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	55 Gal.

1987

BRILLION IRON WORKS, INC.
HAZARDOUS AND TOXIC WASTES SHIPPED

DESCRIPTION	WASTE CODE	SOURCE	DISPOSAL	DISPOSER	LOCATION	1987 QUANITY
R/C Washsolvent	D001	F.E. Painting	Recycled	Hydrite Chemical Co.	Cottage Grove, WI	772 Lbs.(135 Gal.)
Waste Mineral Spirits	D001	Maint-F.E.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	772 Lbs.(135 Gal.)
Waste Mineral Spirits	D001	Maint-F.E.	Recycled	Safety-Kleen	Kaukauna, WI	6,315 Lbs.(881 Gal.)
Spray Booth Solids	D008,D007	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	28,025 Lbs.
Red Oxide Paint Waste	D007,D008	Finishing	Landfilled	Chemical Waste Mgmt.	Emelle, AL	11,991 Lbs.
Spray Booth Water	D008,D007	F.E.	Treated	Chemical Waste Mgmt.	Calumet City, IL	0
Paint Hook Stripper	D002,D008	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	975 Lbs. (108 Gal.)
1,1,1,Trichloroethane	F002	Maint.-F.E.				0
Waste Oil	Non-Haz.		Fuel Pgrm.	Halron Oil Co.	Green Bay, WI	Unknown
Waste Oil/Wtr-Industrial	Non-Haz.	Throughout	Fuel Pgrm.	RDS	Waukesha, WI	3,800 Gal.
Plastic Ptrnmaking Wste	F500,F002	Pattern Shop	Incinerated	SCA Services	Chicago, IL	0 Lbs.-On Wait List
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Recycled	Hydrite Chemical	Cottage Grove, WI	2,376 Lbs.(216 Gal.)
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Incinerated	Hydrite Chemical	Cottage Grove, WI	594 Lbs.(54 Gal.)
Baghouse Dust	D008.D006	Melting	Landfilled	Chemical Waste Mgmt.	Fort Wayne, IN	333,045 Lbs.
Black Waterbase Paint	Special	F.E.-Finishing	Solid-Ldfld	Chemical Waste Mgmt.	Menomonee Falls, WI	0 Gal.
PCB's-Capacitors		Melting	Incinerated	National Electric	Coffeeville, KS	55 Gal.(13 Cap.)
Waste Mineral Spir. Mx.	F003		Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	108 Gal.

1988

BRILLION IRON WORKS, INC.
HAZARDOUS AND TOXIC WASTES SHIPPED

DESCRIPTION	WASTE CODE	SOURCE	DISPOSAL	DISPOSER	LOCATION	1988 QUANITY
R/C Washsolvent	D001	F.E. Painting	Recycled	Hydrite Chemical Co.	Cottage Grove, WI	392 Lbs.(55 Gal.)
Waste Mineral Spirits	D001	Maint-F.E.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	0 Lbs.
Waste Mineral Spirits	D001	Maint-F.E.	Recycled	Safety-Kleen	Kaukauna, WI	12,633 Lbs.(1,599 Gal.)
Spray Booth Solids	D008,D007	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	28,475 Lbs.
Spray Booth Solids	Special	F.E.	Landfilled	Chemical Waste Mgmt.	Menomonee Falls, WI	6,375 Lbs.(935 Gal.)
Red Oxide Paint Waste	D007,D008	Finishing	Landfilled	Chemical Waste Mgmt.	Emelle, AL	8,134 Lbs.
Spray Booth Water	D008,D007	F.E.	Treated	Chemical Waste Mgmt.	Calumet City, IL	28,648 Lbs.(3,435 Gal.)
Paint Hook Stripper	D002,D008	F.E.	Landfilled	Chemical Waste Mgmt.	Emelle, AL	480 Lbs.(55 Gal.)
1,1,1,Trichloroethane	F001	Maint.-F.E.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	1,390 Lbs.(165 Gal.)
Waste Oil	Non-Haz.	Fork Lift Rep.	Fuel Pgrm.	Javco & Halron Oil Co.	Green Bay, WI	Unknown Periodic Pickup
Waste Oil-Industrial	Non-Haz.	Throughout	Fuel Pgrm.	ESI-Rogers Oil	Waukesha, WI	2,100 Gal.
Waste Hydraulic Oil	Non-Haz.	Throughout	Recycled	Benz Oil/Amoco	Milwaukee, WI	935 Gal.
Waste Oil/Water Mixtures	Non-Haz.	Throughout	Treated	ESI-Rogers Oil	Waterloo, WI	5,555 Gal.
Plastic Ptrnmaking Wste	F500,F002	Pattern Shop	Incinerated	SCA Services	Chicago, IL	7,625 Lbs.
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Recycled	Hydrite Chemical	Cottage Grove, WI	2,180 Lbs.(220 Gal.)
Ashland NB Cleaner #2	F002	Isocure 1 & 2	Incinerated	Hydrite Chemical	Cottage Grove, WI	0
Baghouse Dust	D008.D006	Melting	Landfilled	Chemical Waste Mgmt.	Fort Wayne, IN	303,380 Lbs.
Black Waterbase Paint	Special	F.E.-Finishing	Solid-Ldfld	Waste Management	Menomonee Falls, WI	165 Gal.(3 DM)
PCB's-Capacitors		Melting	Incinerated	Aptus	Coffeeville, KS	2,200 Lbs.(12 Cap.)
Waste Mineral Spir. Mx.	F003	Maint.	Incinerated	Hydrite Chemical Co.	Cottage Grove, WI	108 Gal.
Waste Core Resin-Combust	D001	Core/R&D	Fuel Pgrm.	EWR (E & K Haz. Waste)	Coal City, IL	55 Gal
Waste Boiler Treat-Caust	D002	Maint-Plt 1	Treated	Chem Met (E & K Haz.W)	Wyandotte, MI	165 Gal.
Waste Sodium Cyanide	P104	F.E. Heat Trt.	Incinerated	Chemical Waste Mgmt.	Sauget, IL	35 Lbs.

The following is a description of the composition of each of the composite samples:

1. Composite Sample A - This sample consists of uncured or unburned core wastes which are rejected or spilled at the coremaking and core setting areas. This waste sample will provide an indication of the release of organic and inorganic contaminants from the cores prior to the contact of the sand with the molten metal.

2. Composite Sample B - This sample consists of excess molding and pouring sands from Plant 1, which have been subjected to the molten metal in the pouring and cooling processes. The leaching test results from this sample will indicate the residual effects of the resins and other additives used in core manufacturing after contact with the molten metal and partial vaporization of the organic compounds. The effect of residual bentonite in the molding sands will influence the overall leaching potential of this waste type.

3. Composite Sample C - Sample C consists of dust collection sludges from each of the three molding lines in Plant No. 1. This waste type represents the dust collected from the shakeout units, return sand screens and Muller units which represent mold and core sands which have been subjected to the molten metal.

4. Composite Sample E - This sample was composed of excess system sand from Plant No. 2 and also represents the mold and core sands which have been wasted from the molding lines. The leaching test results from this sample would indicate the leaching potential of the burned out sands.

5. Composite Sample F - This sample is sludge from the wet dust collector over the shakeout on the BMD line and represents the sand dust collected after pouring and shakeout in this molding line.

6. Composite Sample G - Composite Sample G was composed of dusts collected from the blast cleaning unit and from the grinding machines in Plant 4. This sample was composited with a sample of fine dust from the blast cleaning unit, a sample of the heavy fraction of the dust, a sample of dust from the grinding machines and sample of the heavy fraction of the dust from the grinding machines. This waste sample contains significant quantities of iron shot and burrs and flashing from the cooled castings and, therefore, may contain somewhat higher leachable concentrations of metals than the excess sand wastes.

7. Composite Sample H - This sample consists of shot separating waste and finishing sand from the blast cleaning unit in Plant 4. Similar to Sample G, this waste sample contains significant quantities of iron shot and flashings from the castings. The leaching test results from this sample would indicate the potential of this waste type to release metals in the leachate.

3.2 Waste Types and Quantities

Waste materials, types, and quantities are summarized on Table No. 3-1. The waste identification number for each waste type is specified on the BIW Materials Flow Diagrams. The waste quantity included in Table No. 3-1 was compiled based on estimates from BIW personnel. The generation source of each waste type can also be identified on the Materials Flow Diagrams. The source of each waste type and general characteristics are discussed below.

1. Slag Wastes (Waste Identification No. 19 for Plants 1 and 2). The slag wastes consist of bouyant impurities skimmed off molten metal in the ladles and furnaces. The slag is placed in waste piles or luggers for cooling prior to transport to the landfill.

2. Preheater Dust (Waste Identification Nos. 16, 38, 40 and 41). This waste consists of dust collected over the preheater facilities. Five AAF skimmers and one SLY baghouse are utilized to remove dust from the discharge air stream and deposit it into hoppers and lugger boxes. The preheater heats the charge material to approximately 1000°F prior to the melting process in the induction furnaces.

3. Refractory Wastes (Waste Identification No. 20 for Plants 1 and 2). These wastes consist of compacted sand removed from the walls of the ladle and furnace units.

As Table No. 3-1 shows, an estimated total of 5112 tons of the described materials was generated in 1985. This quantity of wastes may increase or decrease depending upon production levels at the foundry. Based on discussions with BIW personnel, it is likely that production levels may increase in the next two to four year period and the quantity of wastes could increase in a proportional manner.

3.3 Waste Composite Methodology

The waste sampling program was designed to provide for the compiling of similar waste types generated within the foundries into composite samples. For this study, three composite waste samples were prepared and were identified as Samples I, J and K. The composition of each of the composite waste samples is shown on Table No. 3-2. The table shows the waste description, plant number, individual waste identification number, sample identification number, the estimated tons generated in 1985 of this waste and the percentage of the total waste generated for each individual waste stream.

The following is a description of the composition of each of the composite samples:

1. Composite Sample I - Five individual slag samples were obtained to prepare this composite sample. The leachate results from this sample would indicate the leaching potential of the solidified impurities skimmed off the molten metal in the ladles and furnaces.

2. Composite Sample J - This sample was composed of preheater dust collected from the AAF skimmers and the SLY baghouse in Plants 1 and 2.

3. Composite Sample K - Refractory waste samples were obtained from lugger boxes containing ladle refractory in Plant 1 and furnace refractory from both Plants 1 and 2.

The sampling and compositing program was designed to provide for laboratory testing for all the described types generated within the foundries. The composition of the waste samples will allow for an evaluation of the leaching potential of each of the major waste groups identified above.

3.4 Discussion of Laboratory Leaching Tests

Laboratory leaching tests have recently evolved out of a need for a simplistic and rapid screening test to assess a waste materials potential effect on leachate and groundwater when disposed in a landfill. The test methods were designed to approximate the effects of surface washing of wastes as rainwater filters through a disposal site and migrates toward a clay liner and leachate collection system.

The UW Standard Leaching Tests and the U.S. EPA extraction procedure are described in Section 3.4 of the referenced Phase I Waste Characterization report. The UW Standard Leaching Test consists of elutions of waste material in aqueous leaching solutions to simulate the effect of repeated surface washing of the wastes which would occur due to multiple rainfall events at

Brillion

A SUBSIDIARY OF BEATRICE FOODS CO.

BRILLION IRON WORKS, INC.

200 PARK AVENUE • BRILLION, WISCONSIN 54110 • Phone: 414/756-2121

October 4, 1984

Mr. Karl J. Klepitsch
Chief, Waste Management Branch
RCRA Activities
Region V
P.O. Box A3587
Chicago, IL 60690-3587

RE: Request for Information--Hazardous Waste Permit Review 5HW-13
(Signature and Certification)
Brillion Iron Works, Inc., Subsidiary of Beatrice Companies, Inc.
U.S. EPA ID No. WID980795215 (Foundry Landfill Site)

Dear Mr. Klepitsch:

Enclosed you will find a copy of our previous correspondence dated August 31, 1984 with the additional signature of Mr. Karl Gabler, President of Brillion Iron Works, Inc., which should satisfy the requirements of 40CFR Part 270.11 to the fullest.

It is our understanding that our Part A Hazardous Waste Permit Application should be withdrawn at this time because we are not now a hazardous waste treatment, storage or disposal facility. Waste, which consisted of hazardous air emission control dust from induction melting operations which had been mixed during generation and handling with nonhazardous air emission control dust and sand was placed in the site under discussion between August 11, 1980 and April 15, 1981. That area of the landfill was closed in October of 1981. (See attached sketch).

As indicated in the operating permit requirements and procedures included with this letter, which includes closure requirements, we cover area at grade every 6 months and we close that portion of the landfill that was filled the preceding year by covering with 2 feet of compacted clay and 6 inches of topsoil and seeding that area. Final closure of the entire Phase I of this foundry landfill is anticipated to occur in 1986 or 1987, depending upon production levels which have fluctuated sharply since the landfill was put into service.

Please be advised that Mr. Harrison Weaver has retired from Brillion Iron Works and that his duties have been assumed by Edward Schlies.

If you have any further questions please contact us. If necessary we can schedule a meeting to discuss any further questions.

Sincerely,

BRILLION IRON WORKS, INC.

Leonard Kopidlansky

Leonard Kopidlansky
Plant Project Engineer

Edward Schlies

Edward Schlies
Director of Plant Engineering
& Maintenance

Karl Gabler
President

LK/jg

enclosures

cc: Mr. Jim Reyburn, Wis. DNR

Brillion

A SUBSIDIARY OF BEATRICE FOODS CO.

BRILLION IRON WORKS, INC.

200 PARK AVENUE • BRILLION, WISCONSIN 54110 • Phone: 414 756-2121

November 16, 1984

Mr. Hugo Bursteon
U. S. EPA Region V
RCRA Activities 5HW-13
P.O. Box A3587
Chicago, IL 60690-3587

RE: Information on Foundry Landfill Site WI980795215
Brillion Iron Works, Inc. Brillion, WI

Dear Sir:

This is in reply to your telephone call of November 7, 1984, requesting clarification of information we had submitted. A careful review of our records and correspondence indicates that at no time since November 19, 1980 did we treat, store or dispose of any hazardous waste in our Foundry Landfill Site No. WI980795215.

If you have any further questions, please feel free to contact us.

Sincerely,

BRILLION IRON WORKS, INC.

Edward Schlies

Edward Schlies
Director of Plant Engineering
and Maintenance

Karl Gabler
President

ES/jg

Temporary 1984 only

THIS FORM HAS BEEN DEVELOPED BY AND FOR THE USE OF CHEMICAL WASTE MANAGEMENT, INC. AND OTHER WASTE MANAGEMENT, INC. COMPANIES.

464

R-83

SALES CODE

CWD B 20686

WASTE PROFILE SHEET CODE

WAS A27171

s/e 8/19/83

GENERATOR'S WASTE MATERIAL PROFILE SHEET

GENERAL DIRECTIONS: In order for us to determine whether we can lawfully, safely and environmentally transport, store, treat or dispose of your waste stream, we must ask certain information about your waste. All of the information we seek is necessary, for our purposes and yours. Be complete in your answers: if your response is "none," so indicate. Answers must be in ink or typewritten. Information you provide will be maintained in strictest confidence. Please make a copy of this form for your records, returning the original to the location indicated below.

THIS FORM AND ANY SUPPLEMENTAL INFORMATION SHOULD BE RETURNED TO:

WASTE MANAGEMENT OF WISCONSIN
CONTROLLED WASTE DIVISION
W124 N9451 Boundary Road
Menomonee Falls, WI 53051

1. GENERATOR NAME: Brillion Iron Works Inc
2. GENERATING FACILITY NAME/ADDRESS/USEPA FACILITY I.D. NUMBER (IF ANY): Brillion Iron Works Inc / 200 Park Ave / Brillion, WI. 54110
WID 048027734
3. COMPANY CONTACTS:
   GENERAL Dean Evel TITLE Maint. Supt. PHONE 414-756-2121
   Dallas Wenzel TITLE Maint. Gen. Foreman PHONE "
   TECHNICAL Leonard Kopidlansky TITLE Plant Proj. Engr PHONE "
   Ed Schlies TITLE Dir. Pht. Engr. Maint PHONE "
4. WASTE NAME: Red Oxide Water Base Primer
5. PROCESS GENERATING WASTE: Finishing Primer Dip Paint
6. WASTE CHARACTERISTICS:
   A. PHASES/LAYERS: BILAYERED ☐ MULTILAYERED ☐ NONE ☒ may have occasional layer.
   B. PHYSICAL STATE AT 70°F: SOLID ☒ SEMI-SOLID ☐ LIQUID ☒ POWDER ☐ OTHER: _____
   C. SOLIDS: TOTAL (%): 47-92 TOTAL DISSOLVED (ppm or %): Unable to analyze
   D. SPECIFIC WEIGHT (AS # PER UNIT): 10.51 #/gal.
   E. pH: 8.22 (Show the following as range of %)

AS:	H_2SO_4	– %	H_3PO_4	– %
	HC1	– %	NaOH	– %
	HF	– %	NH_4OH	– %
	HNO_3	– %	$Ca(OH)_2$	– %
OTHER:		– %		– %
		– %		– %

   F. FLASH POINT: 212 No Flash °F (CLOSED CUP TEST ONLY)
   G. VAPOR PRESSURE (in mm of Hg at 25°C): N/A
   H. BTU PER #: N/A ASH CONTENT 52 %
   I. CHARACTERISTIC COLOR Reddish Brown DISTINCTIVE ODOR Paintish
   J. HALOGENATED? NO % SULFONATED? NO %
   K. ALPHA RADIATION AS pCi/l: ~ NO

Changes & Additions made per L. Kopidlansky 10/25/83 -dl

FORM WMI-50-A (Rev. 11-5-80)
© 1980 WASTE MANAGEMENT, INC.

7. WASTE COMPOSITION:

A. ORGANIC COMPONENTS (WITH RANGES — INDICATE WHETHER % OR ppm)

phenol 0.46 ppm

(ATTACH ADDITIONAL PAGES IF NECESSARY)

DOES THIS WASTE CONTAIN ENDRIN, LINDANE, METHOXYCHLOR, TOXAPHENE, 2,4-D, 2,4,5-TP SILVEX, OR ANY OTHER ORGANIC COMPOUNDS LISTED BY USEPA AT 40 CFR 261.24? NO IF SO, PLEASE NOTE ABOVE.

B. HEAVY METALS (WITH ppm RANGES):

	TOTAL	TOTAL LEACHABLE		TOTAL	TOTAL LEACHABLE
Ag	<0.8	<0.02 mg/l EP	Hg	0.03	<0.004 mg/l EP
As	1.7	0.008 mg/l EP	Ni	21	
Ba	<664	1.6 mg/l EP	Pb	<32	<0.1 mg/l EP
Cd	0.70	<0.01 mg/l EP	Se	<0.01	<0.001 mg/l EP
Cr^{+6}	90	2.8 mg/l EP	Zn	5.3	
Cu	3.9		Other (ATTACH ADDITIONAL PAGES)		

(IF YOU HAVE DETERMINED TOTAL LEACHABLES USING USEPA'S "EP TOXICITY TEST PROCEDURE" — AT 40 CFR, PART 261, APPENDIX II — SO INDICATE BY MARKING "EP" AFTER THE RESULT SHOWN ABOVE.)

C. INORGANIC COMPONENTS (WITH % RANGES): OTHER

TOTAL CYANIDE	<0.1 ppm	%		%
FREE CYANIDE	<0.1 ppm	%		%
SULFIDE AS:	87.0 ppm	%		%
BISULFITE AS:		%		%
SULFITE AS:	<250 ppm	%		%

(ATTACH ADDITIONAL PAGES IF NECESSARY)

D. DOES THIS WASTE STREAM CONTAIN BIOLOGIC MATERIALS, PATHOGENS, OR ETIOLOGICAL AGENTS? NO
IF SO, ATTACH ADDITIONAL PAGES DESCRIBING SUCH MATERIALS.

E. IS THE WASTE A PESTICIDE OR PRODUCED BY A PESTICIDE MANUFACTURING PROCESS? NO
IF SO, INDICATE WHETHER IT CONTAINS:

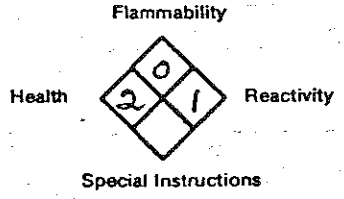
- ☐ ORGANOPHOSPHATES — CONTAINING SULFUR ☐ YES ☐ NO
- ☐ CARBAMATES
- ☐ CHLORINATED HYDROCARBONS

8. HAZARDOUS COMPONENTS AND CHARACTERISTICS

A. HAZARDOUS PROPERTIES (INSERT NUMBER CODES PER INSTRUCTIONS ON LAST PAGE)

(1) TOXICITY RATING: INHALATION 2 DERMAL 2 ORAL 2

(2) HAZARD IDENTIFICATION SYSTEM:



B. LIST ANY OTHER ACUTE OR CHRONIC HAZARDS ASSOCIATED WITH OR ALLEGED TO BE ASSOCIATED WITH HUMAN CONTACT WITH OR EXPOSURE TO THE WASTE: None

9. REGULATORY CLASSIFICATION OF WASTE

A. IS THIS WASTE A "HAZARDOUS MATERIAL" AS DEFINED BY REGULATIONS OF THE U.S. DEPARTMENT OF TRANSPORTATION PURSUANT TO THE HAZARDOUS MATERIALS TRANSPORTATION ACT? No (SEE 49 CFR 172.101 AND 173 FOR "HAZARDOUS MATERIALS" LIST AND CHARACTERISTICS.) IF SO, PLEASE ADVISE OF THE FOLLOWING:

(1) CORRECT SHIPPING DESCRIPTION: Non Hazardous Special Waste

(2) HAZARD CLASS(ES): N/A

(3) MATERIAL I.D. NO.(S) N/A

B. DOES THIS WASTE CONTAIN ANY "HAZARDOUS SUBSTANCE" AS DEFINED BY REGULATIONS OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY PURSUANT TO SECTION 311 OF THE CLEAN WATER ACT? NO (SEE 40 CFR 117 FOR "HAZARDOUS SUBSTANCES" AND CATEGORIES.) IF SO, PLEASE ADVISE OF THE FOLLOWING:

(1) THE NAMES OF EACH HAZARDOUS SUBSTANCE PRESENT IN THE WASTE, THE HAZARD CATEGORY (X, A, B, C OR D) AND THE APPROXIMATE CONCENTRATION OF THE SUBSTANCE BY WEIGHT IN THE WASTE:

(ATTACH ADDITIONAL PAGES IF NECESSARY)

C. IS THIS WASTE A "HAZARDOUS WASTE" AS DEFINED BY REGULATIONS OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY PURSUANT TO SECTION 3001 OF THE RESOURCE CONSERVATION AND RECOVERY ACT? No (SEE 40 CFR, PART 261 FOR WHAT IS A "HAZARDOUS WASTE.") IF SO, STATE:

(1) THE USEPA HAZARDOUS WASTE NUMBER(S):

(2) DO YOU CLAIM TO BE A SMALL QUANTITY GENERATOR? NO (SEE 40 CFR 261.5.)

D. IS THIS WASTE A "HAZARDOUS WASTE" AS DEFINED BY THE ENVIRONMENTAL REGULATORY AGENCY IN YOUR STATE? NO IF SO, STATE WHY IT IS SO DEFINED AND ANY STATE HAZARDOUS WASTE CODE NUMBERS ASSIGNED:

10. IS THE INFORMATION PROVIDED IN SECTIONS 6-9 BASED UPON LABORATORY ANALYSIS OF THE WASTE MATERIAL? Yes IF SO, PLEASE ADVISE OF THE DATE OF THE MOST RECENT ANALYSIS: 8-17-81

11. HAVE YOU OBTAINED TOXICITY STUDIES OF THIS WASTE STREAM? NO IF SO, PLEASE ATTACH A COPY OF THE RESULTS.

12. QUANTITY/SHIPPING REQUIREMENTS:

ANTICIPATED VOLUME IS: 6

GALLONS ☐ TONS ☐ CUBIC YARDS ☐ DRUMS ☒ OTHER ☐

PER: DAY ☐ WEEK ☐ MONTH ☐ YEAR ☒ ONE TIME ☐

TRANSPORTATION EQUIPMENT REQUIRED: Flat bed type truck

SERVICE/SCHEDULING REQUIREMENTS: Removal within 90 days of generation

GENERATOR'S AUTHORIZED SIGNATORY: Leonard Kopidlansky TITLE Plant Proj. Engr. DATE 8-15-83

CONFIDENTIALITY AGREEMENT: _____, as consideration for the Generator's release of the above information, and any other supplemental data provided, agrees to treat such information as confidential property and will not disclose such information to others except as is required by law, and in such circumstances only after first giving notice to the Generator.

By: _____
Name

_____
Title

HYDRITE CHEMICAL CO.

191 WEST 28TH AVENUE
P.O. BOX 2763 (54903)
OSHKOSH, WISCONSIN 54901
414/233-8181
WI: 800/242-8270

MATERIAL PRESENTING UNUSUAL HAZARDS TO PERSONNEL AND PROPERTY ARE SPECIFICALLY NOT ALLOWED TO BE HANDLED BY HYDRITE CHEMICAL COMPANY.

Customer: Brillion Iron Works
Waste Name: Methylene Chloride
Salesman: D. Antoine

Contact: Leonard Kopidlansky
Product Code: 00008129

This restriction applies to items intended for reclamation, tolling, acquisition, or disposal. The following is a list of these materials:

1. Carcinogenic or low TLV materials, i.e.:
   - Carbon Tetrachloride
   - Benzene and related benzene compounds
   - Allyl Chloride
   - Chloroform
   - PCB Types
   - Asbestos Residue
2. Substances above pH 10 or below pH 4.
3. Explosives or material combinations which can form explosives.
4. Highly reactive compounds including catalysts, monomers, etc.
5. Drug or drug residues, herbicides or herbicide residues.
6. Ethers (other than THF); Cyanaides, Mutagenic or Radioactive Substances.
7. Odoriferious substances, i.e.:
   - Sulfides including carbon disulfide
   - Amines, nitrates, amides
   - Residues containing sulfur salts
   - High sulfur content cutting oil residues.
8. Heavy metal concentrations.
9. Phenols and cresol.

   (approved on a case-by-case basis. See sign off below)
10. Thermoset resins.

Some materials will be accepted at or below specific concentrations when listed below and accompanied by the generators signature.

Product ASHLAND ISOCURE I-320 Concentration TRACE - PHENOL/FORMALDEHYDE RESIN

Signature Leonard Kopidlansky Company Brillion Iron Works, Inc Date 10-13-87

It is the generators responsibility and in their interest to ensure that waste shipments are consistant, uniform and match the characteristics of the inital waste sampled. Hydrite, as a policy, **DOES NOT RECOMMEND** intermixing reactive streams; this practice is solely at the discretion and liability of the generator.

AVGANIC INDUSTRIES INC.
LABORATORY REPORT FORM

SEP 21 1987

LAB ANALYSIS NR A003491

IDENTIFIERS

LAB TYPE	WSA	SALES LAB NR	S709088	BATCH NR	
PART NR	RW003000	PCB NR		LOT NR	
WASTE MAST NR	00008129	INCOMING NR		CUSTOMER NR	
AUTHOR NR		RETAIN NR		OTHER NR	

COMPANY BRILLION IRON WORKS SALESPERSON [redacted] BRANCH 0

LABORATORY DATA

WASTE DENSITY	1.188	WASTE PH	6.60	IBP	5% DIS	10% DIS
PRODUCT DENSITY	0.000	PROD PH	0.00	15% DIS	20% DIS	25% DIS
T AL DISTILL	24/50	SOLIDS	F	30% DIS	35% DIS	40% DIS
% YIELD	45	% WATER KF	0.000000	45% DIS	50% DIS	55% DIS
ACID ACCEPT	0.000	APHA COLOR		60% DIS	65% DIS	70% DIS
% TOTAL CHLOR	0.00	PCB PPM		75% DIS	80% DIS	85% DIS
BTU/LB		BTU/GAL		90% DIS	95% DIS	
ODOR						DP

CHLORIDE COMMENT

LABEL COMMENTS NONFLAMMABLE

COMMENTS BRILLION, WI
DISTILLATE HAD 1 ML OF WATER.
0.5% NOS CONTAINS TRACES OF MEK & IPA.

RECOMMENDATION ACQUIRE 30

LAB ANALYSIS NR A003491

SOLVENT ANALYSIS

ALCOHOLS		DILUENTS, COND		ACTIVES, COND	
N-BUTANOL	0.0	STODDARD	0.0	GLYCOLETH,EE	0.0
ETHANOL	0.0	TOLUENE	0.0	GLYCOLETH,EEAC	0.0
ISOPROPANOL	0.0	XYLENE	0.0	GLYCOLETH,EM	0.0
N-PROPANOL	0.0	VMP NAPHTHA	0.0	GLYCOLETH,EMAC	0.0
ISOBUTANOL	0.0	CHLORINATEDS		GLYCOLETH,EP	0.0
METHANOL	2.0	MECL2	97.0	ISOBUOAC	0.0
DIACETONE ALC	0.0	PERC	0.0	ISOPROOAC	0.0
WATER	0.5	1,1,1	0.0	MEK	0.0
DILUENTS		112,122	0.0	MAK	0.0
CYCLOHEXANE	0.0	TRICHLOROETHYLEN	0.0	MIBK	0.0
CYCLOPENTANE	0.0	ACTIVES		DIBK	0.0
HEPTANE	0.0	ACETONE	0.0	N-PROOAC	0.0
HEXANE	0.0	N-BUOAC	0.0	GLYCOLETH,PM	0.0
LACTOL SP	0.0	EA	0.0	GLYCOLETH,PMA	0.0
MINERAL SP	0.0	GLYCOLETH,EEP	0.0	THF	0.0
100 SOLVENT	0.0	GLYCOLETH,EB	0.0	CYCLOHEXANONE	0.0
140 FL NAPH	0.0	GLYCOLETH,EBAC	0.0	NOS	0.5
150 SOLVENT	0.0				
PENTANE	0.0				

MATERIAL COMMENT METHYLENE CHLORIDE

CARBON COPY

ANALYZED BY RT

APPROVED BY

ANALYSIS DATE 87/09/15

DOT PROPER SHIPPING NAME:
Waste Methylene Chloride Mixture

DOT HAZARD CLASS:
ORM-A

UN/NA NUMBER:
UN1593

EPA WASTE CODE NO:
F002

avganic

MNAFR
(MATERIALS NOT ACCEPTABLE FOR RECYCLING)

MATERIAL PRESENTING UNUSUAL HAZARDS TO PERSONNEL AND PROPERTY ARE SPECIFICALLY NOT ALLOWED IN THE AVGANIC SOLVENT PROCESSING FACILITY.

Brillion Iron Works, Inc. 1,1,1/MS 00008925 Leonard Kopidlansky/D. Antoine

This restriction applies to items intended for recycling, tolling, acquisition, purchase or disposal. Some materials will be accepted at or below specific concentrations when listed in SPECIFIC HAZARD SECTION below and accompanied by the generator's signature. It is the generator's responsibility and in their interest to ensure that waste shipments are consistent, uniform and match the characteristics of the initial waste sampled. Avganic, as a policy, DOES NOT RECOMMEND intermixing reactive streams; this practice is solely at the discretion and liability of the generator. The following is a list of these materials.

1. Carcinogenic materials or materials with low TLV's, i.e.

   Carbon Tetrachloride
   Benzene and some benzene related compounds
   Allyl Chloride
   Chloroform
   PCB Types
   Asbestos Residue

2. Substances above pH 10 or below pH 4.

3. Explosives or material combinations which can form explosives.

4. Highly reactive compounds including catalysts, monomers, etc. (list any concentrations over 1%).

5. Drug or drug residues, pesticides or pesticide residues.

6. Ethers (other than THF and Glycol Ethers); Cyanides, Mutagenic or Radioactive substances.

7. Odoriferous obnoxious substances, i.e.:

   Sulfides including carbon disulfide. High Sulfur content cutting oil residues.
   Amines, nitrates, amides. Residues containing sulfur salts.

8. Some heavy metal concentrations. List any heavy metal concentration above:

   AS - 100ppm Ba - 5000ppm Cd - 500ppm Cr - 3000ppm
   Pb - 5000ppm Hg - 1ppm Se - 1ppm Zn - 3000ppm

9. Phenols and Creosol. List any concentration over 1%.

10. Reactive Resins

Specific Hazard Section

Substance	Concentration	Substance	Concentration

I have reviewed the above sheet and understand the information contained herein. To the best of my knowledge none of these hazards are present in my waste stream except as noted in the SPECIFIC HAZARD SECTION above.

Signature Leonard Kopidlansky Company Brillion Iron Works Date 4/26/88

Address 200 Park Avenue Brillion, WI 54110 Product No. 8425

Product

AMERICAN INDUSTRIES INC.
LANCASTER, PA REPORT FORM

LAB ANALYSIS NR A007392

IDENTIFYING

LAB TYPE	WSA	SALES LAB NR	M004022	BATCH NR	
PART NR	RWD00200	PCB NR		LOT NR	
WASTE MAST NR	00008925	INCOMING NR		CUSTOMER NR	
AUTHOR NR		RETAIN NR		OTHER NR	

COMPANY BRILLION IRON WORKS, INC SALESPERSON ANTOINE BRANCH 0

LABORATORY DATA				DISTILLATION DATA		
WASTE DENSITY	1.010	WASTE PH	5.90	IBP	5% DIS	10% DIS
PRODUCT DENSITY	0.000	PROD PH	0.00	15% DIS	20% DIS	25% DIS
TOTAL DISTILL	18/50	SOLIDS	F	30% DIS	35% DIS	40% DIS
% YIELD	0	% WATER KF	0.000000	45% DIS	50% DIS	55% DIS
ACID ACCEPT	0.000	APHA COLOR		60% DIS	65% DIS	70% DIS
% TOTAL CHLOR	0.00	PCB PPM	0	75% DIS	80% DIS	85% DIS
BTU/LB		BTU/GAL				
ODOR				90% DIS	95% DIS	DP

CHLORIDE COMMENT

LABEL COMMENTS NONFLAMMABLE

COMMENTS BRILLION, WI
"WASTE 1,1,1"
16 MLS H2O IN DISTILLATE

RECOMMENDATION CHLOR. DISPOSAL D-02

LAB ANALYSIS NR A007392

SOLVENT ANALYSIS

ALCOHOLS		DILUENTS, COND		ACTIVES, COND	
N-BUTANOL	0.0	STODDARD	0.0	GLYCOLETH,EE	0.0
ETHANOL	0.0	TOLUENE	3.0	GLYCOLETH,EEAC	0.0
ISOPROPANOL	0.0	XYLENE	1.0	GLYCOLETH,EM	0.0
N-PROPANOL	0.0	VMP NAPHTHA	0.0	GLYCOLETH,EMAC	0.0
ISOBUTANOL	0.0	CHLORINATEDS		GLYCOLETH,EP	0.0
METHANOL	0.0	MECL2	0.0	ISOBUOAC	0.0
DIACETONE ALC	0.0	PERC	0.0	ISOPROOAC	0.0
WATER	0.5	1,1,1	72.0	MEK	1.0
DILUENTS		112,122	0.0	MAK	0.0
CYCLOHEXANE	0.0	TRICHLOROETHYLEN	0.0	MIBK	2.0
CYCLOPENTANE	0.0	ACTIVES		DIBK	0.0
HEPTANE	0.0	ACETONE	0.5	N-PROOAC	0.0
HEXANE	0.0	N-BUOAC	0.0	GLYCOLETH,PM	0.0
LACTOL SP	0.0	EA	0.0	GLYCOLETH,PMA	0.0
MINERAL SP	20.0	GLYCOLETH,EEP	0.0	THF	0.0
100 SOLVENT	0.0	GLYCOLETH,EB	0.0	CYCLOHEXANONE	0.0
140 FL NAPH	0.0	GLYCOLETH,EBAC	0.0	NOS	0.0
150 SOLVENT	0.0				
PENTANE	0.0				

MATERIAL COMMENT 1,1,1 VMS

CARBON COPY

ANALYZED BY RT

APPROVED BY

ANALYSIS DATE 88/04/08

DOT PROPER SHIPPING NAME:
Waste 1,1,1 Trichloroethane Mixture
DOT HAZARD CLASS:
ORM-A

UN/NA NUMBER:
UN2831
EPA WASTE CODE NO:
F001

HYDRITE CHEMICAL CO.

150 WEST DONKLE STREET
P.O. BOX 189
COTTAGE GROVE, WI 53527
608/257-5892

MATERIAL PRESENTING UNUSUAL HAZARDS TO PERSONNEL AND PROPERTY ARE SPECIFICALLY NOT ALLOWED TO BE HANDLED BY HYDRITE CHEMICAL COMPANY

Jan. '86

Brillion Iron Works, Brillion, WI, Waste Mineral Spirits, Prod # D4608-0-01 Gee

This restriction applies to items intended for reclamation, tolling, acquisition, or disposal. the following is a list of these materials:

1. Carcinogenic or low TLV materials, i.e.:

   Carbon Tetrachloride
   Benzene and related benzene compounds
   Allyl Chloride
   Chloroform
   PCB Types
   Asbestos Residue

2. Substances above pH 10 or below pH 4.

3. Explosives or material combinations which can form explosives.

4. Highly reactive compounds including catalysts, monomers, etc.

5. Drug or drug residues, herbicides or herbicide residues.

6. Ethers (other than THF); Cyanaides; Mutagenic or Radioactive Substances.

7. Odoriferous substances, i.e.:

   Sulfides including carbon disulfide
   Amines, nitrates, amides
   Residues containing sulfur salts
   High sulfur content cutting oil residues.

8. Heavy metal concentrations.

9. Phenols and cresol. (approved on a case-by-case basis. See sign off below.)

10. Thermoset resins.

Some materials will be accepted at or below specific concentrations when listed below and accompanied by the generators signature.

Product _____ Concentration _____

Signature Leonard Kapidlansky Company Brillion Iron Works Date 6/26/86

It is the generators responsibility and in their interest to ensure that waste shipments are consistant, uniform and match the characteristics of the initial waste sampled. Hydrite, as a policy, DOES NOT RECOMMEND intermixing reactive streams; this practice is solely at the discretion and liability of the generator.

HYDRITE CHEMICAL CO.

150 WEST DONKLE STREET
P.O. BOX 189
COTTAGE GROVE, WI 53527
608/257-5892

MATERIAL PRESENTING UNUSUAL HAZARDS TO PERSONNEL AND PROPERTY ARE SPECIFICALLY NOT ALLOWED TO BE HANDLED BY HYDRITE CHEMICAL COMPANY

Jan. '86

Brillion Iron Works, Brillion, WI, Wash Solvent, Prod 3 2349=0 Ralph Gee

This restriction applies to items intended for reclamation, tolling, acquisition, or disposal. the following is a list of these materials:

1. Carcinogenic or low TLV materials, i.e.:

   Carbon Tetrachloride
   Benzene and related benzene compounds
   Allyl Chloride
   Chloroform
   PCB Types
   Asbestos Residue

2. Substances above pH 10 or below pH 4.

3. Explosives or material combinations which can form explosives.

4. Highly reactive compounds including catalysts, monomers, etc.

5. Drug or drug residues, herbicides or herbicide residues.

6. Ethers (other than THF); Cyanaides; Mutagenic or Radioactive Substances.

7. Odoriferous substances, i.e.:

   Sulfides including carbon disulfide
   Amines, nitrates, amides
   Residues containing sulfur salts
   High sulfur content cutting oil residues.

8. Heavy metal concentrations.

9. Phenols and cresol. (approved on a case-by-case basis. See sign off below.)

10. Thermoset resins.

Some materials will be accepted at or below specific concentrations when listed below and accompanied by the generators signature.

Product _____ Concentration _____

Signature Leonard Kapidlansky Company Brillion Iron Works Date 6/26/86

It is the generators responsibility and in their interest to ensure that waste shipments are consistant, uniform and match the characteristics of the initial waste sampled. Hydrite, as a policy, DOES NOT RECOMMEND intermixing reactive streams; this practice is solely at the discretion and liability of the generator.

HYDRITE CHEMICAL CO.

191 WEST 28TH AVENUE
P.O. BOX 2763 (54903)
OSHKOSH, WISCONSIN 54901
414/233-8181
WI: 800/242-8270

MATERIAL PRESENTING UNUSUAL HAZARDS TO PERSONNEL AND PROPERTY ARE SPECIFICALLY NOT ALLOWED TO BE HANDLED BY HYDRITE CHEMICAL COMPANY.

Customer: Brillion Iron Works
Waste Name: Xylene Wash Solvent
Salesman: D. Antoine

Contact: Leonard Kopidlowsky
Product Code: 00008141

This restriction applies to items intended for reclamation, tolling, acquisition, or disposal. The following is a list of these materials:

1. Carcinogenic or low TLV materials, i.e.:
   - Carbon Tetrachloride
   - Benzene and related benzene compounds
   - Allyl Chloride
   - Chloroform
   - PCB Types
   - Asbestos Residue
2. Substances above pH 10 or below pH 4.
3. Explosives or material combinations which can form explosives.
4. Highly reactive compounds including catalysts, monomers, etc.
5. Drug or drug residues, herbicides or herbicide residues.
6. Ethers (other than THF); Cyanaides, Mutagenic or Radioactive Substances.
7. Odoriferious substances, i.e.:
   - Sulfides including carbon disulfide
   - Amines, nitrates, amides
   - Residues containing sulfur salts
   - High sulfur content cutting oil residues.
8. Heavy metal concentrations.
9. Phenols and cresol. (approved on a case-by-case basis. See sign off below)
10. Thermoset resins.

Some materials will be accepted at or below specific concentrations when listed below and accompanied by the generators signature.

Product _____ Concentration LEAD - TRACE DUE TO AGE OF SOLVENT WASTE & RESIDUE OF PAINT

Signature Leonard Kopidlowsky Company Brillion Iron Works Inc Date 10-13-87

It is the generators responsibility and in their interest to ensure that waste shipments are consistant, uniform and match the characteristics of the inital waste sampled. Hydrite, as a policy, **DOES NOT RECOMMEND** intermixing reactive streams; this practice is solely at the discretion and liability of the generator.

AVGANIC INDUSTRIES INC.
LABORATORY REPORT FORM

LAB ANALYSIS NR A003494

IDENTIFIERS

LAB TYPE	WSA	SALES LAB NR	S709091	BATCH NR	
PART NR	RWD00101	PCB NR		LOT NR	
WASTE MAST NR	00008141	INCOMING NR		CUSTOMER NR	
AUTHOR NR		RETAIN NR		OTHER NR	

COMPANY BRILLION IRON WORKS SALESPERSON ANTOINE BRANCH 0

LABORATORY DATA

WASTE DENSITY	0.943	WASTE PH	6.40	IBP	5% DIS	10% DIS
PRODUCT DENSITY	0.000	PROD PH	0.00	15% DIS	20% DIS	25% DIS
TOTAL DISTILL	32/50	SOLIDS	NF	30% DIS	35% DIS	40% DIS
% YIELD	0	% WATER KF	0.000000	45% DIS	50% DIS	55% DIS
ACID ACCEPT	0.000	APHA COLOR		60% DIS	65% DIS	70% DIS
% TOTAL CHLOR	0.00	PCB PPM		75% DIS	80% DIS	85% DIS
BTU/LB		BTU/GAL		90% DIS	95% DIS	
ODOR						DP

CHLORIDE COMMENT

LABEL COMMENTS FLAMMABLE

COMMENTS BRILLION, WI
CUSTOMER'S NAME OF WASTE: PAINT LINE SOLVENT.
DISTILLATE HAD 9 ML OF WATER.

RECOMMENDATION * DISPOSAL 01

LAB ANALYSIS NR A003494

SOLVENT ANALYSIS

ALCOHOLS		DILUENTS, COND		ACTIVES, COND	
N-BUTANOL	0.0	STODDARD	0.0	GLYCOLETH,EE	0.0
ETHANOL	0.0	TOLUENE	7.5	GLYCOLETH,EEAC	0.0
ISOPROPANOL	0.0	XYLENE	74.5	GLYCOLETH,EM	0.0
N-PROPANOL	0.0	VMP NAPHTHA	0.0	GLYCOLETH,EMAC	0.0
ISOBUTANOL	0.0	CHLORINATEDS		GLYCOLETH,EP	0.0
METHANOL	0.0	MECL2	0.0	ISOBUOAC	0.0
DIACETONE ALC	0.0	PERC	0.0	ISOPROOAC	0.0
WATER	0.0	1,1,1	0.0	MEK	0.5
DILUENTS		112,122	0.0	MAK	0.0
CYCLOHEXANE	0.0	TRICHLOROETHYLEN	0.0	MIBK	0.0
CYCLOPENTANE	0.0	ACTIVES		DIBK	0.0
HEPTANE	0.0	ACETONE	0.5	N-PROOAC	0.0
HEXANE	0.0	N-BUOAC	0.0	GLYCOLETH,PM	0.0
LACTOL SP	0.0	EA	0.0	GLYCOLETH,PMA	0.0
MINERAL SP	15.0	GLYCOLETH,EEP	0.0	THF	0.0
100 SOLVENT	0.0	GLYCOLETH,EB	0.0	CYCLOHEXANONE	0.0
140 FL NAPH	0.0	GLYCOLETH,EBAC	0.0	NOS	2.0
150 SOLVENT	0.0				
PENTANE	0.0				

MATERIAL COMMENT XYLENE WASH SOLVENT

C/ ON COPY

ANALYZED BY RD,RT

APPROVED BY

ANALYSIS DATE 87/09/18

DOT PROPER SHIPPING NAME:
Waste Xylene Mixture

DOT HAZARD CLASS:
Flammable Liquid

UN/NA NUMBER:
UN1307

EPA WASTE CODE NO:
F003

SPECIAL WASTE ANALYSIS REPORT

This Report is intended for the sole use and benefit of Waste Management and its companies. No representation concerning significance of the reported data is made to any other person or entity.

Chemical Waste Management Inc.

WASTE PROFILE SHEET CODE

FROM SAMPLE CONTAINER

LABORATORY NAME: Donohue Analytical

ADDRESS: 4738 North 40th Street Sheboygan LAB MGR. PHONE: 414-458-8711

DATE SAMPLE RECEIVED AT LAB: 5/6/86 DATE SAME TAKEN: 5/1/86

LAB SAMPLE NUMBER ASSIGNED: 28293 CERTIFICATION OF REP. SAMPLE OBTAINED? [X] YES [ ] NO

CERTIFICATION: Except as explicitly noted, all analytical data reported below were obtained under my direction and supervision, using sample preparation and analytical methods and analytical equipment specified or approved in the most recent "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods," SW 846, USEPA Office of Solid Waste. This laboratory follows a quality assurance control program, including a sample chain of custody procedure.

DATE OF REPORT: 6/18/86 SIGNATURE: James A. Bilgo

LAB MANAGER NAME: James A. Bilgo

PHYSICAL CHARACTERISTICS OF WASTE Plastic Patternmaking Waste

SAMPLE VOLUME	COLOR	ODOR	PHYSICAL STATE @ 70°F	LAYERS	FREE LIQUIDS
200 g	Tan/yellow	[X] NONE [ ] MILD [ ] STRONG DESCRIBE	[X] SOLID [ ] SEMI-SOLID [ ] LIQUID [ ] POWDER	[ ] MULTILAYERED [ ] BI-LAYERED [X] SINGLE PHASED	[ ] YES [X] NO VOLUME %

Test	As Received	Extraction Procedure	Date of Analysis	Test	As Received	Extraction Procedure	Date of Analysis
Specific Gravity	1.22		5/20/86				
pH s.u.	6.42		5/8/86				
Acidity % as							
Alkalinity % as				Phenols, mg/l	0.983		5/22/86
C.O.D. mg/l				Cyanides, as CN Total mg/l			
B.O.D. mg/l				Cyanides, as CN Free mg/l	0.14		5/20/86
Total Solids @ 105°C	99.2%		5/15/86				
Total Dissolved Solids mg/l				Nitrogen Ammonia, as N mg/l			
Residue on Evaporation @ 180°C				Total Kjeldahl Nitrogen as N mg/l			
Flash Point F° (closed cup)	No Flash		5/8/86	Total Alkalinity, P as $CaCO_3$ mg/l			
Ash Content, on ignition (%)	33.3%		5/15/86	Total Alkalinity M as $CaCO_3$, mg/l			
Heating Value, BTU/lb				Total Hardness as $CaCO_3$, mg/l			
"Acid Scrub," gNaOH/g				Calcium Hardness, as CaCO mg/l			
				Magnesium Hardness, as $CaCO_3$ mg/l			
Arsenic, as As, mg/l	<0.1		5/18/86				
Barium, as Ba, mg/l	<2.0		5/19/86				
Bromium as Br, mg/l				Oil and Grease, mg/l			
Cadmium, as Cd, mg/l	3.84	<0.01	6/9/86				
Chromium, Total as Cr, mg/l	<1.50		5/13/86				
Hexavalent Chromium as Cr, mg/l				Aldrin, mg/l			
Copper, as Cu, mg/l	<1.50		5/13/86	Chlorides, mg/l			
Iron, Total as Fe, mg/l				DDT, mg/l			
Iron, dissolved, as Fe, mg/l				Dieldrin, mg/l			
Lead, as Pb, mg/l	<5.00		5/13/86	Endrin, mg/l			
Manganese, as Mn, mg/l				Heptachlor, mg/l			
Magnesium, as Mg, mg/l				Lindane, mg/l			
Mercury, as Hg, mg/l	<0.009		5/15/86	Methoxychlor, mg/l			
Nickel, as Ni, mg/l	<2.0		5/14/86	Toxaphene, mg/l			
Selenium, as Se, mg/l	<0.03		5/18/86	Parathion, mg/l			
Silver as Ag, mg/l	<0.40		5/14/86	2,4, D, mg/l			
Zinc, as Zn, mg/l	1.28		5/19/86	2, 4, 5 TP (Silvex), mg/l			
				PCB's, mg/l			
				2, 3, 7, 8, TCDD, ug/l			
Bicarbonates, as HCO_3, mg/l							
Carbonates, as CO_3, mg/l				Chlorine	0.71		6/16/86
Chlorides, as Cl, mg/l							
Flourides, as F, mg/l	0.08		5/8/86				
Nitrates, as NO_3, mg/l							
Nitrite, as NO, mg/l							
Phosphate, as P, mg/l							
Sulfate, as SO_4, mg/l							
Sulfides, as S, mg/l	5.86		5/20/86				

Donohue

Brillion Iron Works
200 Park Avenue
Brillion, WI 54110

ATTN: Mr. Leonard Kopidlansky

PROJECT NUMBER: 65311.007
COLLECTION DATA: Submitted by Client
SAMPLE COLLECTED: 01-13-87
SAMPLE RECEIVED: 01-14-87

SAMPLE NO: 34233
DESCRIPTION: Reacted Poly Pattern Waste

Methylene chloride	2,208,661	ug/l
1,1 - Dichloroethylene	< 20	ug/l
1,1 - Dichloroethane	< 20	ug/l
Chloroform	< 20	ug/l
Carbon tetrachloride	< 20	ug/l
1,2 - Dichloropropane	< 20	ug/l
Trichloroethylene (TCE)	4,655	ug/l
1,1,2 - Trichloroethane	< 20	ug/l
Dibromochloromethane	< 20	ug/l
Tetrachloroethylene	918	ug/l
Chlorobenzene	669	ug/l
Trans-1,2-Dichloroethylene	< 20	ug/l
1,2 - Dichloroethane	< 20	ug/l
1,1,1 - Trichloroethane	< 20	ug/l
Bromodichloromethane	< 20	ug/l
Benzene	108	ug/l
Bromoform	< 20	ug/l
1,1,2,2-Tetrachloroethane	< 20	ug/l
Toluene	3,495	ug/l
Ethylbenzene	657	ug/l
Trichlorofluoromethane	< 20	ug/l
2-Chloroethylvinyl Ether	< 20	ug/l
trans-1,3-dichloropropene	< 20	ug/l
cis-1,3-dichloropropene	< 20	ug/l
Total Xylene	3,843	ug/l
Cis-1,2-Dichloroethylene	< 20	ug/l

Donohue Analytical
4738 North 40th Street
Sheboygan, Wisconsin 53083

Analytical & Field Services
414-458-8711

Analyses performed in accordance with procedures approved by the U.S. EPA.

Jerome F. Keh 1/16/87
Project Manager Date

Donohue

Brillion Iron Works
200 Park Avenue
Brillion, WI 54110

ATTN: Mr. Leonard Kopidlansky

PROJECT NUMBER: 65311.007
COLLECTION DATA: Submitted by Client
SAMPLE COLLECTED: 05-01-86
SAMPLE RECEIVED: 05-06-86

SAMPLE NO: 28293
DESCRIPTION: Reacted Polyurethane

Percent Total Solids	99.2	percent
% Ash	33.3	percent
Arsenic	<0.1	mg/l
Barium	<2.0	mg/l
Cadmium	3.84	mg/l
Total Chromium	<1.5	mg/l
Copper	<1.5	mg/l
Lead	<5.0	mg/l
Mercury	<0.009	mg/l
Nickel	<2.0	mg/l
Selenium	<0.03	mg/l
Silver	<0.40	mg/l
Zinc	1.28	mg/l
pH	6.42	units
Fluoride	0.08	mg/l
Sulfide	5.86	mg/l
Color	Tan/Yellow	
Free Cyanide	0.14	mg/l
Flashpoint	No Flash	
Oil & Grease	NA	
Odor	None	
Physical Description	Not Layered.	
Total Phenol	0.983	mg/l
Specific Gravity	1.22	
Physical State at 70 F	Solid	
Free Liquids	No	
Reactivity	Not Reactive	
Cadmium EP TOX	<0.01	mg/l
Chlorine	0.71	mg/l

Analyses performed in accordance with procedures approved by the U.S. EPA.

James A. Beley
Project Manager

6/17/86
Date

Donohue Analytical
4738 North 40th Street
Sheboygan, Wisconsin 53081

Analytical & Field Services
414-458-8711

Donohue

INITIAL ANALYSIS REQUIRED FOR GENERATOR'S WASTE MATERIAL PROFILE SHEET FOR WASTE MANAGEMENT OF WISCONSIN, CONTROLLED WASTE DIVISION

Client: Brillion Iron Works

Waste Identification: Lab No. CW230, Spray Booth Water

Sample Received in Lab: 3/18/81

Sampling Information: Grab Sample of Liquid from Spray Booth Pit

Total Solids (percent)	2.04
Dissolved Solids (percent)	1.58
Specific Gravity (g/cubic cm)	1.01
pH	9.51
Acidity if pH $\leq$ 4 (to pH 8.2 mg/l as $CaCO_3$)	-
Alkalinity if pH $\geq$ 10 (to pH 4.5 mg/l as $CaCO_3$)	-
Flash Point (°F)	212 No Flash, No Boil
Silver (mg/l)	<1
Arsenic (mg/l)	1.0
Barium (mg/l)	17.2
Cadmium (mg/l)	4.5
Chromium (mg/l)	100
Copper (mg/l)	1.3
Mercury (mg/l)	0.02
Nickel (mg/l)	1.3
Lead (mg/l)	330
Selenium (mg/l)	<0.05
Zinc (mg/l)	1.0
Total Cyanide (mg/l)	0.60
Free Cyanide (mg/l)	0.60
Sulfide (mg/l)	7.0
Sulfite (includes Bisulfite, mg/l)	<40
Phenol (mg/l)	5.0

Physical Description

Bilayered X Multilayered ____ Not layered ____

Physical State at 70° F

Solid X Semi-Solid ____ Liquid X

Powder ____ Other: ____

Color Brown Odor Paint

James C Bird
Manager, Analytical Services

Ron Morkelz
Project Coordinator, Analytical Services

04/14/81
Date

Donohue & Associates, Inc.
4738 North 40th Street
Sheboygan, Wisconsin 53081
Engineers & Architects

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Chapter NR 615

LARGE QUANTITY GENERATOR STANDARDS

NR 615.01	Purpose.	NR 615.08	Manifest system.
NR 615.02	Applicability.	NR 615.09	Waste minimization.
NR 615.03	Definitions.	NR 615.10	Pre-transport requirements.
NR 615.04	Exemptions.	NR 615.11	Reporting.
NR 615.05	General requirements.	NR 615.12	Exports of hazardous waste.
NR 615.06	Hazardous waste determination.	NR 615.13	Imports of hazardous waste.
NR 615.07	Identification numbers.	NR 615.14	International agreements.

NR 615.01 Purpose. The purpose of this chapter is to specify the requirements that apply to the generators of large quantities of hazardous waste.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 615.02 Applicability. Except as otherwise provided, this chapter applies to generators of greater than or equal to 1,000 kilograms (2,205 pounds) of non–acute hazardous waste in a calendar month. This chapter also applies to generators of less than 1,000 kilograms (2,205 pounds) of non–acute hazardous waste in a calendar month and who do not meet the requirements in s. NR 610.07 or 610.08. This chapter applies to generators of acute hazardous waste that do not meet the requirements in s. NR 610.09. Except as otherwise provided, this chapter does not apply to solid waste generators that generate only:

(1) Non–hazardous solid waste,

(2) Metallic mining wastes resulting from a mining operation as defined in s. 293.01 (9), Stats.; or

(3) A combination of wastes described in subs. (1) and (2).

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction made under s. 13.93 (2m) (b) 1., Stats., Register, August, 1992, No. 440; am. (2), r. (3), renum. (4) to be (3) and am., Register, May, 1995, No. 473, eff. 6–1–95; **correction in (2) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509, eff. 6–1–98.**

NR 615.03 Definitions. The definitions in s. NR 600.03 apply to this chapter.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 615.04 Exemptions. (1) SMALL AND VERY SMALL QUANTITY GENERATORS. Any generator who generates or accumulates hazardous waste in quantities less than those specified in ss. NR 610.07 (1), 610.08 and 610.09 is exempt from the requirements of this chapter, except as otherwise provided in ch. NR 610.

(2) PESTICIDE CONTAINER RINSATE. Farmers who generate waste pesticide containers which are a hazardous waste and who triple rinse each emptied pesticide container in accordance with s. NR 605.06 (5) and dispose of the pesticide rinsate on their own farm in accordance with the prescribed dosage rate, in a manner which is consistent with the disposal instructions on the pesticide label and which shall not contaminate the waters of the state or create a hazard to persons or property, including fish and wildlife, are not required to comply with the requirements of ss. NR 600.04, 620.15 and chs. NR 630 to 685 or any of the requirements of this chapter except s. NR 615.06.

(3) WASTE LEAD ACID BATTERIES. A person who generates, transports or stores waste lead–acid batteries that are destined for off–site recycling is exempt from the requirements of this chapter if:

(a) The waste lead–acid batteries shall be managed to protect public health, safety, welfare and the environment.

(b) Handling techniques shall be used to prevent the waste lead–acid batteries from being damaged or broken.

(c) Any hazardous waste generated during the management of waste lead–acid batteries such as acid from any spills or discharges, lead plates or battery cases shall be sent to a facility which is approved to accept this waste.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 615.05 General requirements. (1) GENERAL. (a) All generators of solid waste shall determine if their waste is hazardous using the procedures specified in s. NR 615.06.

(b) Except as provided in s. NR 615.04 (1), a generator of solid waste which is determined to be a hazardous waste under s. NR 605.07 shall comply with the requirements of this chapter.

(c) Except as provided in s. NR 620.14, the owner or operator of a hazardous waste facility who initiates a shipment of hazardous waste from that facility shall comply with the requirements of this chapter, regardless of whether the waste was originally generated at that facility.

(2) INFORMATION ON HAZARDOUS CHARACTERISTICS. A generator shall inform the owner or operator of a storage, treatment or disposal facility of the known hazardous characteristics of the waste prior to offering the hazardous waste to a transporter for delivery to the storage, treatment or disposal facility to enable the owner or operator of the storage, treatment or disposal facility to comply with the requirements of chs. NR 600 to 699 or with the conditions of the license issued under the provisions of ch. NR 680.

(3) STORAGE, TREATMENT AND DISPOSAL AND TRANSPORTATION. (a) Except as provided in s. NR 615.04, all generators shall either:

1. Store, treat, dispose or recycle all hazardous waste in an on–site hazardous waste facility or recycling facility which has received an operating license, interim license, variance or waiver, or is exempt from licensing under sub. (4) or (5), or under s. NR 630.04; or

2. Ensure delivery to an off–site hazardous waste facility or recycling facility which:

a. For facilities located outside of Wisconsin, is permitted by the EPA, is exempt from permitting or has interim status under 42 USC 6925 (e); or

Note: The publication containing Title 42 USC may be obtained from:
The Superintendent of Documents
U.S. Government Printing Office
Washington, D.C. 20402

b. Has been issued an operating license as a hazardous waste facility under chs. NR 600 to 685, or has an interim license, variance, waiver, or exemption from licensing under s. NR 630.04.

(b) If the generator sends the hazardous waste to an on–site hazardous waste facility or an off–site hazardous waste facility within Wisconsin which the generator owns or operates, the generator shall comply with the requirements of chs. NR 600 to 685, except as provided in subs. (4) and (5) and s. NR 630.04.

(c) Except as provided in s. NR 620.04, generators may offer hazardous waste for transportation only to a person who has obtained a transportation service license from the department in accordance with ch. NR 620.

(4) ACCUMULATION OF WASTES BY GENERATORS FOR 90 DAYS OR LESS. (a) *On–site accumulations.* A generator who accumulates

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

hazardous waste on–site, in containers or tanks, without a storage license, for 90 days or less shall comply with the requirements of this subsection:

1. Within 90 days, all waste shall be either:

a. Shipped off–site to a facility which meets the requirements of sub. (3) (a) 2.; or

b. Treated, stored or disposed of in an on–site hazardous waste facility or an on–site recycling facility that has received an operating license, interim license, variance or waiver, or is exempt from licensing under s. NR 630.04 (1) to (16) and is approved to accept the waste under the operating license, interim license, variance, waiver or exemption.

2. If the waste is placed in containers, the generator shall comply with the container requirements in ss. NR 633.09, 640.08 to 640.12, 640.14 and 640.15. In addition, the generator is exempt from the closure and longterm care requirements of s. NR 685.05, except s. NR 685.05 (1) and (8), and ss. NR 685.06 and 685.07. The generator shall meet the following requirements:

a. The generator shall comply with the packaging, labeling, marking and placarding requirements in s. NR 615.10.

b. The generator shall inspect all areas where containers are stored as well as all containers used for storing hazardous waste at least weekly for evidence of leakage, corrosion or deterioration of the containers or discharge confinement structures, such as dikes.

c. The generator shall record the inspections under subpar. b. in an inspection log or summary. These records shall be kept for at least 3 years from the date of the inspection. At a minimum, these records shall include the date and time of inspection, the name of the inspector, a notation of the observation made, and the date and name of any repairs or other remedial actions.

d. If a container is not in good condition or if the contents of the storage container begin to leak, the hazardous waste in the container shall be recontainerized in a storage container in good condition.

e. A container holding hazardous waste shall always be closed during storage except when it is necessary to add or remove waste.

f. A container holding hazardous waste may not be opened, handled or stored in a manner which may rupture the container or cause it to leak.

g. Containers holding ignitable or reactive waste shall be located at least 50 feet from the generation site's property line.

h. Storage containers holding hazardous waste which is incompatible with any waste or other materials stored nearby in other containers, waste piles, open tanks or surface impoundments shall be separated from them by means of a dike, berm, wall or other device.

i. Hazardous waste may not be placed in an unwashed container that previously held an incompatible waste or material, unless s. NR 630.17 (2), is complied with.

j. The container shall be made or lined with materials which will not react with, and are otherwise compatible with the hazardous waste to be stored.

3. If the waste is placed in tanks, the generator shall comply with the tank system requirements of ch. NR 645, except the provisions of ss. NR 633.07, 645.06, 645.15, 645.16 and 645.17 (1) (a) 3. In addition, a generator is exempt from the closure and long–term care requirements of s. NR 685.05, except s. NR 685.05 (1) and (8), and ss. NR 685.06 and 685.07. The generator shall meet the following requirements:

a. The generator shall inspect all tanks used for storing hazardous waste at least weekly for evidence of leakage, or corrosion or deterioration of the tank or discharge confinement structures, such as dikes.

b. The generator shall inspect tanks used to store hazardous waste once each operating day to ensure that discharge control equipment, such as the waste feed cutoff, is in good working order, to ensure that the tank is being operated according to its design by gathering data from monitoring equipment, such as pressure or temperature gauges, and to ensure that the level of the waste in the tank complies with subpar. f.

c. The generator shall record the inspections under subpar. a. in an inspection log or summary. These records shall be kept for at least 3 years from the date of the inspection. At a minimum, these records shall include the date and time of inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

d. Incompatible waste may not be placed in the same tank unless s. NR 630.17 (2) is complied with.

e. Storage tanks which contain volatile waste shall be operated in compliance with all appropriate air management rules contained in chs. NR 400 to 499, regarding the control of organic compound emissions.

f. Uncovered tanks shall be operated to ensure at least 2 feet of freeboard.

g. Hazardous waste may not be placed in a tank if the waste could cause the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life.

h. Ignitable or reactive waste may not be placed in a tank unless the waste is treated, rendered or mixed before or immediately after placement in the tank so that the resulting waste mixture or dissolution of material no longer meets the criteria of ignitable or reactive waste in s. NR 605.08 (2) or (4); unless compliance with s. NR 630.17 (2) is ensured; or unless the waste is stored or treated in such a way that it is protected from any condition which may cause the waste to ignite or react; or the tank is used solely for emergencies.

i. The owner or operator of a facility which stores ignitable or reactive waste in covered tanks shall comply with the buffer zone requirements for tanks in ch. Comm 10.

j. Where hazardous waste is continuously fed into a tank, the tank shall be equipped with a means to stop this inflow, such as a waste feed cutoff system or a bypass system to a stand–by tank.

4. On drip pads and the generator complies with ch. NR 656 and maintains the following records at the facility:

a. A description of procedures that will be followed to ensure that all wastes are removed from the drip pad and associated collection system at least once every 90 days; and

b. Documentation of each waste removal, including the quantity of waste removed from the drip pad and the sump or collection system and the date and time of removal.

5. The date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container or tank.

6. The generator shall comply with the contingency plan and emergency procedures in s. NR 630.22, the personnel training requirements in s. NR 630.16, the preparedness and prevention requirements in s. NR 630.21 and the waste analysis requirements in s. NR 675.07 (1) (i).

7. The identity and location of all stored hazardous waste shall be known throughout the entire accumulation period.

8. The storage of hazardous waste shall be conducted in such a manner that no discharge of hazardous waste occurs.

9. As provided in s. NR 600.07, the department may require a generator to comply with all or part of the requirements of chs. NR 630 to 685, if the department determines that there is a potential for discharge of the hazardous waste or hazardous constituents or determines that a discharge has occurred at the generation site.

10. While being accumulated on site, each container and tank shall be labeled or marked clearly with the words "Hazardous Waste".

11. The generator complies with the requirements for owners or operators in ch. NR 630 and ss. NR 675.07 (1) (d) and 680.22.

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(b) *Extension of 90–day period.* A generator who accumulates hazardous waste for more than 90 days in containers or tanks is an operator of a hazardous waste storage facility and is subject to the facility requirements of s. NR 600.04 and chs. NR 630 to 685 and the licensing requirements of s. NR 620.15 and ch. NR 680, unless the generator has been granted an extension to the 90–day period. An extension may be granted by the department if hazardous wastes must remain on–site for longer than 90 days due to unforeseen, temporary and uncontrollable circumstances. An extension of up to 30 days may be granted at the discretion of the department on a case–by–case basis. Extensions:

1. Shall be applied for in writing. Written requests shall be submitted to the department and shall state the unforeseen, temporary and uncontrollable circumstances that caused the generator to apply.

2. Shall be issued in written form.

3. May be revoked by the department at any time if it is determined that revocation is appropriate to protect human health and the environment.

(c) *Satellite accumulation.* A generator without a storage license may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in s. NR 605.09 (2) (a), table II or (b), table III, or identified in s. NR 605.09 (3) (b), table IV in containers at or near any point of generation under the control of the generator of the waste where wastes initially accumulate if the following requirements are met:

1. If a container is not in good condition or if the contents of the storage container begin to leak, the hazardous waste in the container shall be recontainerized in a storage container in good condition.

2. A container holding hazardous waste shall always be closed during storage except when it is necessary to add or remove waste.

3. A container holding hazardous waste may not be opened, handled or stored in a manner which may rupture the container or cause it to leak.

4. The container shall be made or lined with materials which shall not react with and are otherwise compatible with the hazardous waste to be accumulated.

5. The generator shall mark the containers either with the words"Hazardous Waste" or with other words that identify the contents of the containers.

6. A generator who accumulates either hazardous waste or acutely hazardous wastes listed in s. NR 605.09 (2) (a), table II or (b), table IV in excess of the amounts allowed under this paragraph at or near the point of generation shall immediately mark each container holding this excess accumulation with the date the excess amount began accumulating, and with respect to that amount of excess waste, comply within 3 days with all other provisions of par. (a) or other applicable provisions of chs. NR 600 to 685. During the 3–day period, the generator shall continue to comply with subds. 1. to 5.

7. Any hazardous waste removed from the accumulation area shall be managed in accordance with par. (a) or other applicable provisions of chs. NR 600 to 685.

(5) TREATMENT WITH ABSORBENT MATERIAL BY GENERATORS. A generator who combines absorbent material with a waste generated on–site in a container for the purpose of eliminating free liquids without a hazardous waste treatment license shall comply with the requirements of this subsection:

(a) The requirements of s. NR 630.17 (2) for ignitable, reactive and incompatible wastes;

(b) The requirements of sub. (4) (a) 2. d. for containers not in good condition;

(c) The requirements of sub. (4) (a) 2. j. for container materials;

(d) The generator shall combine absorbent material with a waste generated on–site only at the time that the waste is first placed in a container;

(e) The treatment shall be performed in such a way as to not allow any spillage of waste or treated waste. If spillage is unavoidable, the treatment shall take place in an area where all spilled waste can be contained and collected for immediate placement in the container in which the treatment is taking place.

(f) The generator shall manage any hazardous waste which is treated in accordance with the requirements of this chapter.

(6) STORAGE AND TREATMENT LICENSE REQUIREMENTS FOR GENERATORS. (a) A generator may accumulate hazardous waste on–site in containers or tanks for 90 days or less without a storage license if the generator meets the requirements of sub. (4).

(b) A generator who accumulates hazardous waste on–site in containers or tanks for 90 days or less without a storage license and who does not meet the requirements of sub. (4) is an operator of a hazardous waste storage facility and is subject to the storage facility requirements in ch. NR 630 and the licensing requirements for storage facilities in ch. NR 680.

(c) A generator may combine absorbent material with a waste generated on–site without a treatment license if the generator meets the requirements of sub. (5).

(d) A generator who combines absorbent material with a waste generated on site without a treatment license and who does not meet the requirements of sub. (5) is an operator of a hazardous waste treatment facility and is subject to the treatment facility requirements in ch. NR 630 and the licensing requirements for treatment facilities in ch. NR 680.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (4) (a) 5. and (5) (c), Register, August, 1992, No. 440, eff. 9–1–92; correction in (4) (a) 3. made under s. 13.93 (2m) (b) 7., Stats., Register, August, 1992, No. 440; correction in (4) (a) 3. made under s. 13.93 (2m) (b) 7., Stats., Register, March, 1993, No. 447; renum. (4) (a) 4. to 9., (6) and (7) to be (4) (a) 5. to 10., (5) and (6) and am. (6) (b) to (d), cr. (4) (a) 4., 11., am. (4) (c) (intro.) and 6., r. (5) and (7) (b), Register, May, 1995, No. 473, eff. 6–1–95; am. (3) (a) 1., 2. b., and (b), (4) (a) 2. (intro.), 2.a., 3. (intro.) and (c) (intro.), Register, May, 1998, No. 509, eff. 6–1–98; correction in (4) (a) 3. i. made under s. 13.93 (2m) (b) 7., Stats.

NR 615.06 Hazardous waste determination. A person who generates a solid waste shall use the following procedure to determine if that waste is a hazardous waste:

(1) The generator shall first determine if the solid waste is excluded from regulation under s. NR 605.05.

(2) The generator shall then determine if the solid waste is listed as a hazardous waste in s. NR 605.09.

(3) For purposes of compliance with ch. NR 675 or if the waste is not listed as a hazardous waste in s. NR 605.09, the generator shall determine whether the waste is identified in s. NR 605.08 by either:

(a) Testing the waste according to the methods in s. NR 605.08; or

(b) Applying knowledge of the hazardous characteristic of the solid waste considering the materials or the processes used.

(4) If a generator changes any processes in a way that could affect the characteristics of any solid waste produced, the generator shall again follow the hazardous waste determination procedures of this section.

(5) A generator shall keep records of any test results, waste analyses or other determinations made in accordance with the requirements of this section for at least 3 years from the date that the waste was last sent to an on–site or off–site storage, treatment or disposal facility. Upon written notice from the department to the generator, the period of retention may be extended beyond 3 years. The notice shall specify the records or types of records that are to be retained.

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(6) If the waste is determined to be hazardous, the generator shall refer to chs. NR 600 to 690 for possible exclusions pertaining to the management of the generator's specific waste.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (3) (intro.), Register, August, 1992, No. 440, eff. 9–1–92; **am. (6), Register, May, 1998, No. 509, eff. 6–1–98.**

NR 615.07 Identification numbers. (1) A generator may not treat, store, dispose of, recycle, transport or offer for transportation, hazardous waste without an identification number.

(2) A generator who has not received an identification number may obtain one by applying to EPA using the notification form specified in s. NR 600.05.

(3) A generator may not offer hazardous waste to transporters or to storage, treatment, disposal or recycling facilities that have not received an identification number.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 615.08 Manifest system. (1) Any generator who transports, or offers for transportation, hazardous waste for off–site storage, treatment, disposal or recycling shall prepare a uniform manifest form before the waste is transported.

Note: The department shall not provide the Wisconsin uniform manifest form for use by generators for shipments of only non–hazardous solid waste, except for the shipment of PCBs. The uniform manifest form should not be used for shipments of only non–hazardous solid waste, except for PCBs.

(2) (a) If the state to which the shipment is consigned and manifested, supplies the uniform manifest form and requires its use, then the generator shall use that manifest form.

(b) If the consignment state does not supply the uniform manifest form but Wisconsin supplies a manifest form and requires its use, then the generator shall use the Wisconsin uniform manifest form.

(3) A generator shall specify on the manifest one designated facility, which if in Wisconsin has received an operating license, interim license, variance, waiver or is exempt from licensing under s. NR 630.04 (1) to (16) and is approved to accept the waste shipment under the operating license, interim license, variance, waiver or exemption. If the designated facility is outside of Wisconsin, the generator shall specify on the manifest a facility which has an EPA permit, interim status or is exempt from permitting under the resource conservation and recovery act, or a permit or approval from an authorized state, to handle the waste described on the manifest.

(4) A generator may also specify on the manifest one alternate facility which meets the requirements of sub. (3) in accordance with sub. (2) and which is licensed to handle the generator's waste in the event an emergency prevents delivery of the waste to the primary designated facility. If the alternate facility is located in a different state than the designated facility under sub. (3), and the state in which the alternate facility is located supplies a uniform manifest form and requires its use, the generator shall provide the transporter with a second uniform manifest form from the alternate facility state which is completed in accordance with sub. (8) or (9). When the second uniform manifest is completed, the generator shall void the original manifest.

(5) If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator shall either designate another facility or instruct the transporter to return the waste.

(6) The generator shall initiate the use of the manifest. The generator shall fill out all required information and sign and date the manifest by hand. After the transporter signs and dates the manifest, the generator shall retain one copy, shall, within 5 business days, send a copy to the department and a copy to the consignment state, if the consignment state is not Wisconsin and shall give the remaining copies to the transporter to accompany the hazardous waste shipment.

Note: An employe of the generator need not be an authorized representative to sign a manifest on behalf of the generator.

(7) The generator shall maintain on file the copy of the manifest retained in accordance with sub. (6) and the copy received from the operator of the designated facility to which the hazardous waste is shipped. These copies shall be retained for a period of 3 years from the date that the waste was accepted by the initial transporter, and shall be available at reasonable times for inspection by the department. Upon written notice from the department to the generator, the period of retention may be extended beyond 3 years. The notice shall specify the records or types of records that are to be retained.

(8) If the generator uses the Wisconsin uniform manifest form, the form shall contain, at a minimum, the following information, in accordance with the instructions included in the manifest form:

(a) The manifest document number which is the EPA 12 digit identification number assigned to the generator plus a unique 5 digit document number assigned to the uniform manifest form by the generator for recording and reporting purposes.

(b) The generator's name and mailing address.

(c) The generator's phone number.

(d) The identification number, name and phone number of each transporter.

(e) The EPA identification number, phone number, name and address of the designated facility and the alternative facility, if applicable.

(f) The U.S. DOT description of the waste including the proper shipping name, hazard class and identification number required by 49 CFR 172.101, 172.102, 172.202 and 172.203, October 1, 1993.

Note: The publication containing the CFR references may be obtained from:
Superintendent of Documents
U.S. Government Printing Office
P.O. Box 371954
Pittsburgh, PA 15250–7954
(202) 783–3238

(g) The number and type of containers used to transport the waste.

(h) The total quantity of the waste with the appropriate unit of measure (weight or volume).

(i) Any special handling instructions or any other additional information.

(j) One primary hazardous waste number corresponding to the name of the waste being shipped, selected using the following criteria where more than one waste number may correspond to the name of the waste:

1. If the waste displays the characteristic of reactivity in s. NR 605.08 (4), and is not listed in s. NR 605.09, the number shall be D003.

2. If subd. 1. does not apply, the waste displays a characteristic in s. NR 605.08, and is not listed in s. NR 605.09, the number selected shall be based on the prevalent hazardous waste characteristic displayed.

3. If more than one hazardous waste number listed in s. NR 605.09 may describe the waste, the number selected shall be the one for which the basis for listing is the reactivity characteristic, if it exists.

4. If subd. 3. does not apply, the number selected shall be the one which has more than one characteristic as a basis for listing, if it exists.

5. If subds. 3. and 4. do not apply, the number selected shall be based on the preponderant source of the waste mixtures.

(k) Certification that the uniform manifest form is accurately filled out, that the material is properly described, packaged, marked, labeled and in proper condition to be transported or has been received and accepted in accordance with chs. NR 600 to 685 and the generator has complied with the waste minimization requirements of s. NR 615.09 (1).

Note: The publication containing Title 42 USC may be obtained from:
Superintendent of Documents

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U.S. Government Printing Office
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(202) 783–3238

(L) Any additional description for the materials and any handling codes for the wastes listed.

(9) If the generator uses a manifest from the consignment state, the generator shall complete the manifest in accordance with the consignment state's requirements and shall, at the time the generator provides a copy of the manifest to the department in accordance with sub. (6), provide the department with the following information:

(a) The transporter's phone number.

(b) The designated facility's phone number.

(c) One primary hazardous waste number corresponding to the name of the waste being shipped, selected based on the criteria specified in sub. (8) (j).

(d) Any additional description for the materials and any handling codes for the wastes listed.

(10) A generator subject to sub. (9) who uses a manifest from a consignment state that is not Wisconsin shall send a photocopy of the copy received from the operator of the facility to which the hazardous waste is shipped, to the department within 5 business days of receiving the copy from that facility.

(11) For bulk shipments of hazardous waste within the United States solely by water, the generator shall send 3 copies of the manifest dated and signed in accordance with this section and s. NR 615.08 to the owner or operator of the designated facility or the last transporter to handle the waste in the United States. Copies of the manifest are not required for each transporter.

(12) For rail shipments of hazardous waste within the United States that originate at the site of generation, the generator shall send at least 3 copies of the manifest dated and signed in accordance with this section to:

(a) The next non–rail transporter, if any; or

(b) The designated facility if transported solely by rail; or

(c) The last rail transporter to handle the waste in the United States if exported by rail.

(13) In the case of exports, a transporter may not accept hazardous waste from a primary exporter or other person if:

(a) The transporter knows the shipment does not conform to the EPA acknowledgement of consent; and

(b) Unless, in addition to a manifest signed in accordance with the provisions of this section, the waste is also accompanied by an EPA acknowledgement of consent which, except for shipment by rail, is attached to the manifest, or shipping paper for exports by water.

(14) In the case of exports, a transporter shall provide a copy of the manifest to the U.S. customs official at the point the waste leaves the United States, and shall ensure that a copy of the EPA acknowledgement of consent accompanies the hazardous waste.

(15) For shipments of hazardous waste to a designated facility in an authorized state which has not yet obtained authorization to regulate that particular waste as hazardous, the generator shall assure that the designated facility agrees to sign and return the manifest to the generator, and that any out–of–state transporter signs and forwards the manifest to the designated facility.

Note: See s. NR 620.07 (8) and (9) for special provisions for rail or water (bulk shipment) transporters.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (4) and (8) (f), Register, August, 1992, No. 440, eff. 9–1–92; am. (8) (f), (k), (12) (intro.), cr. (15), Register, May, 1995, No. 473, eff. 6–1–95.

NR 615.09 Waste minimization. (1) HAZARDOUS WASTE MINIMIZATION CERTIFICATION. In signing a manifest in accordance with s. NR 615.08 (8) (k) the generator, unless exempted under s. NR 610.07, shall certify that:

(a) The generator of the hazardous waste has a program in place to reduce the volume or quantity and toxicity of such waste to the degree determined by the generator to be economically practicable; and

(b) The proposed method of treatment, storage or disposal is that practicable method currently available to the generator which minimizes the present and future threat to human health and the environment.

Note: EPA Guidance to Hazardous Waste Generators on the Elements of a Waste Minimization Program 58 FR 31114, May 28, 1993, states that a generator or TSD should document its program (in writing) and that the program should be signed by the corporate officer who is responsible for ensuring RCRA compliance. While each element may be implemented in different ways depending on the needs and preferences of individual organizations or facilities the general elements that each waste minimization program should include are: A) Top management support; B) Characterization of waste generation and waste management costs; C) Periodic waste minimization assessments; D) A cost allocation system; E) Encourage technology transfer; and F) Program implementation and evaluation.

(2) HAZARDOUS WASTE MINIMIZATION REPORTING. A generator as part of the annual activity report required under s. NR 615.12 or a primary exporter under the reporting requirements of s. NR 615.12 shall provide:

(a) A description of the effort undertaken during the calendar year to reduce the volume and toxicity of hazardous waste generated; and

(b) A description of the changes in volume and toxicity of hazardous waste actually achieved during the calendar year in comparison to previous years to the extent information is available for the years prior to 1984.

History: Cr. Register, May, 1995, No. 473, eff. 6–1–95.

NR 615.10 Pre–transport requirements. (1) PACKAGING. Before transporting hazardous waste or offering hazardous waste for transportation, every generator shall package the hazardous waste to be shipped in accordance with U. S. DOT regulations on packaging in 49 CFR Parts 173, 178 and 179, October 1, 1993.

(2) LABELING AND MARKING. Before transporting hazardous waste or offering hazardous waste for transportation off–site, a generator shall label and mark each package in accordance with applicable U. S. DOT regulations on hazardous materials in 49 CFR Part 172, October 1, 1993.

(a) Before placing hazardous waste in an accumulation area pursuant to s. NR 615.05 (4) (a) or placing hazardous waste in an on–site storage facility pursuant to s. NR 615.05 (3) (a) 1., a generator shall mark each container in accordance with par. (b), with the words "HAZARDOUS WASTE", or with other words that identify the contents of the container as hazardous waste.

(b) Before transporting, or offering hazardous waste for transportation off–site, a generator shall mark each container used to transport hazardous waste with the following words:"HAZARDOUS WASTE – state and federal law prohibits improper disposal. If found contact the nearest police department, division of emergency government, or department of natural resources. Generator's name and address Manifest document number ". In addition to placing the manifest document number on the container in the space indicated, a generator shall also place the state manifest document number on the container in the space indicated, if the manifest has such a number. For the purpose of this section, "state manifest document number" means the document number printed on the manifest in item A by the state that provides the manifest.

(3) PLACARDING. Before transporting hazardous waste, or offering hazardous waste for transportation off–site, a generator shall offer the initial transporter the appropriate placards required by U. S. DOT regulations for hazardous materials in 49 CFR Part 172, Subpart F, October 1, 1993.

Note: The publications containing the CFR references may be obtained from:
Superintendent of Documents
U.S. Government Printing Office
P.O. Box 371954

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History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (1) to (3), Register, August, 1992, No. 440, eff. 9–1–92; renum. from 615.09, am. (1), (2) (intro.), (3), Register, May, 1995, No. 473, eff. 6–1–95.

NR 615.11 Reporting. (1) ANNUAL ACTIVITY REPORT. (a) Except as provided in par. (b), a generator who ships any hazardous waste off–site to a treatment, storage or disposal facility within the United States shall prepare and submit an activity report to the department by March 1 of each year. The activity report shall be submitted on department forms, shall cover generator activities during the previous calendar year and shall, at a minimum, include the following information:

1. The identification number, name and address of the generator;

2. The calendar year covered by the report;

3. The identification number, name and address for each off–site waste treatment, storage or disposal facility in the United States to which hazardous waste was shipped during the calendar year;

4. The name and identification number of each transporter used during the calendar year for shipments to a treatment, storage or disposal facility within the United States;

5. A description, hazardous waste number from s. NR 605.09, U. S. DOT hazard class and quantity of each hazardous waste shipped off–site. This information shall be listed by identification number of each offsite facility to which hazardous waste was shipped;

6. A waste minimization report as specified in s. NR 615.09 (2).

7. A certification signed by the generator or the generator's authorized representative as specified in s. NR 620.15 (2), 680.41 or 680.05 (2), stating that "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 fine and imprisonment for knowing violations."

Note: Reporting for exports of hazardous waste is not required on the activity report forms. A separate annual export report requirement is in s. NR 615.12.

Note: The activity report forms may be obtained from the Department of Natural Resources, P.O. Box 8094, Madison, Wisconsin 53708 at no charge.

(b) Any generator who treats, stores or disposes of hazardous waste on–site, except for waste managed solely in an on–site accumulation area in accordance with s. NR 610.08 (1) (L) or 615.05 (4), shall submit an activity report covering those wastes in accordance with s. NR 630.40.

(c) A generator shall retain a copy of each activity report for a period of at least 3 years from the due date of the report. Upon written notice from the department to the generator, the period of retention may be extended beyond 3 years. The notice shall specify the records or types of records to be retained.

(2) EXCEPTION REPORT. (a) A generator who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter shall contact the transporter or owner or operator of the designated facility to determine the status of the hazardous waste.

(b) A generator shall submit an exception report to the department if a copy of the manifest with the handwritten signature of the owner or operator of the designated facility is not received by the generator within 45 days of the date the waste was accepted by the initial transporter. The exception report shall include:

1. A legible copy of the manifest for which the generator does not have confirmation of delivery; and

2. A cover letter signed by the generator, or an authorized representative, explaining the efforts taken to locate the hazardous waste and the results of those efforts.

(c) Generators shall keep a copy of each exception report for a period of at least 3 years. Upon written notice from the department to the generator, the period of retention may be extended beyond 3 years. The notice shall specify the records or types of records to be retained.

(3) ADDITIONAL REPORTS. The department may require generators to furnish additional reports concerning the quantities and disposition of wastes identified or listed in s. NR 605.09.

(4) ENVIRONMENTAL REPAIR FEE. Generators shall pay an environmental repair fee as specified in s. NR 685.09 (2) (b).

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; r. and recr. (1) (a) 6., r. (1) (a) 7., renum. (1) (a) 8. to be (1) (a) 7., cr. (4), Register, May, 1995, No. 473, eff. 6–1–95.

NR 615.12 Exports of hazardous waste. When shipping hazardous waste outside the United States, the primary exporter shall:

(1) The primary exporter shall notify the department and the EPA administrator in writing 60 days before the initial shipment of hazardous waste to each country in each calendar year. This notification may cover export activity that extends over a 12 month or lesser period. Notices sent to the EPA administrator shall be sent to:

Office of Enforcement and Compliance Assurance
Office of Compliance, Enforcement Planning, Targeting, and Data Division (2222A)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Hand–delivered notifications should be sent to:

Office of Enforcement and Compliance Assurance,
Office of Compliance, Enforcement Planning, Targeting, and Data Division (2222A),
Environmental Protection Agency,
Ariel Rios Bldg.,
12th St. and Pennsylvania Ave., NW.,
Washington, D.C.

In both cases, the phrase "Attention: Notification of Intent to Export" shall be prominently displayed on the front of the envelope.

(a) The notification shall be in writing, signed by the primary exporter, and include the information in this paragraph:

1. Name, mailing address, telephone number and EPA ID number of the primary exporter;

2. By consignee, for each hazardous waste type the notification shall include:

a. A description of the hazardous waste and the hazardous waste number from ss. NR 605.08 and 605.09, U.S. DOT proper shipping name, hazard class and ID number for each hazardous waste as identified in 49 CFR Parts 171 to 177, October 1, 1993;

Note: The publication containing the CFR references may be obtained from:
The Superintendent of Documents
U.S. Government Printing Office
Washington, D.C. 20402

b. The estimated frequency or rate at which waste is to be exported and the period of time over which waste is to be exported.

c. The estimated total quantity of the hazardous waste in units as specified in the instructions to the Wisconsin uniform hazardous waste manifest form (4400–66);

d. All points of entry to and departure from each foreign country through which the hazardous waste will pass;

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

e. A description of the means by which each shipment of the hazardous waste shall be transported, such as mode of transportation vehicle including air, highway, rail or water and type of container, such as drums, boxes and tanks;

f. A description of the manner in which the hazardous waste shall be treated, stored or disposed of in the receiving country, such as land or ocean incineration, other land disposal, ocean dumping or recycling;

g. The name and site address of the consignee and any alternate consignee; and

h. The name of any transit countries through which the hazardous waste will be sent and a description of the approximate length of time the hazardous waste will remain in each country and the nature of its handling while there;

(b) Except for changes to the primary exporter's telephone number, the mode of transportation used, such as air, rail or water, and decreases in the quantity indicated on the manifest, when the conditions specified on the original notification change, including any quantity of hazardous waste that exceeds the estimate specified in the original notification, the primary exporter shall meet the requirements of this subdivision;

1. The primary exporter shall provide the department and EPA with a written renotification of the change.

2. The shipment may not take place unless;

a. The primary exporter obtains the consent of the receiving country to the changes as well as the consent to the change from all points of entry and departure located in transit countries, except for changes to par. (a) 2. d. and h., and

b. The primary exporter receives an EPA acknowledgment of consent reflecting the receiving country's consent to the changes.

c. Upon request by the department or EPA, a primary exporter shall furnish to EPA any additional information which a receiving country requests in order to respond to a notification.

Note: In conjunction with the department of state, EPA will provide a complete notification to the receiving country and any transit countries. A notification is complete when EPA receives a notification which EPA determines satisfies the requirements of sub. (1). Where a claim of confidentiality is asserted with respect to any notification information required by sub. (1), EPA may find the notification not complete until any claim is resolved in accordance with s. NR 2.19.

Where the receiving country consents to the receipt of the hazardous waste, EPA will forward an EPA acknowledgment of consent to the primary exporter for purposes of sub. (1p). Where the receiving country objects to receipt of the hazardous waste or withdraws a prior consent, EPA will notify the primary exporter in writing. EPA will also notify the primary exporter of any responses from transit countries.

(1c) When a shipment cannot be delivered for any reason to the designated or alternate consignee the primary exporter shall comply with the requirements of this subsection:

(a) The primary exporter shall renotify the department and EPA of the change in the conditions of the original notification to allow shipment to a new consignee in accordance with sub. (1) (b) and obtain an EPA acknowledgement of consent prior to delivery; or

(b) 1. The primary exporter shall instruct the transporter to return the waste to the primary exporter in the United States or designate another facility within the United States; and

2. The primary exporter shall instruct the transporter to revise the manifest in accordance with the primary exporter's instructions.

(1e) The primary exporter shall require that the foreign consignee confirm in writing the delivery of the hazardous waste to the facility in the foreign country and to describe any significant discrepancies between the manifest and the shipment. A copy of the manifest signed by the foreign consignee may be used for this purpose.

(1g) The primary exporter shall meet the requirements under s. NR 615.08 for the manifest, except that:

(a) In place of the name, site address and identification number of the designated facility, the name and address of the foreign consignee shall be used.

(b) In place of the name, site address and identification number of a licensed alternate facility, the primary exporter may enter the name and site address of any alternate consignee.

(c) The primary exporter shall identify the point of departure from the United States through which the hazardous waste shall travel before entering a foreign country, and shall identify the point of departure in box 15 of the manifest, special handling instructions and additional information.

(d) The primary exporter shall obtain and use the Wisconsin uniform manifest form if Wisconsin supplies the manifest and requires its use.

(1i) The primary exporter shall have consent of the receiving country to accept the hazardous waste.

(1k) The primary exporter shall require a copy of the EPA acknowledgement of consent that accompanies the hazardous waste shipment. The EPA acknowledgement of consent shall be attached to the manifest or shipping paper for exports by bulk shipment by water vessel. The EPA acknowledgement of consent for exports by rail shall accompany the hazardous waste shipment but need not be attached to the manifest.

(1m) The hazardous waste shipment shall conform to the terms of the receiving country's written consent as reflected in the EPA's acknowledgement of consent.

(1p) The primary exporter shall add the following statement to the end of the first sentence of the certification in box 16, generator's certification on the Wisconsin uniform hazardous waste manifest form, 4400–66: "and conforms to the terms of the attached EPA acknowledgement of consent".

(1r) The primary exporter shall provide the transporter with an additional copy of the manifest for delivery to the U.S. customs official at the point the hazardous waste leaves the United States.

(1t) Primary exporters of hazardous waste shall file with the department and the EPA no later than March 1 of each year, a report summarizing the types, quantities, frequency and ultimate destination of all hazardous waste exported during the previous calendar year. Reports shall include the following:

(a) The identification number, name and mailing and site address of the exporter;

(b) The calendar year covered by the report;

(c) The name and site address of each consignee;

(d) By consignee, for each hazardous waste exported, a description of the hazardous waste, the hazardous waste number from ss. NR 605.08 and 605.09, U. S. DOT hazard class, the name and EPA ID number, where applicable, for each transporter used, the total amount of waste shipped and number of shipments pursuant to each notification;

(e) Except for hazardous waste produced by exporters of greater than 100 kg but less than 1000 kg in a calendar month, unless provided pursuant to s. NR 615.12 (1) and (2), a waste minimization report as specified in s. NR 615.09 (2).

(f) A certification signed by the primary exporter which states:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

(g) Reports shall be sent to both the Environmental Protection Agency (EPA) and the department. Reports sent to EPA shall be sent to the following address: Office of Enforcement and Compliance Assurance, Office of Compliance, Enforcement Planning, Targeting, and Data Division (2222A), Environmental Protection Agency, 401 M Street, SW., Washington, D.C. 20460, or hand–delivered to: Office of Enforcement and Compliance Assurance,

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

Office of Compliance, Enforcement Planning, Targeting, and Data Division (2222A), Environmental Protection Agency, Ariel Rios Bldg., 12th St. and Pennsylvania Ave., NW., Washington, D.C. Reports shall also be sent to: Wisconsin Department of Natural Resources, Bureau of Solid and Hazardous Waste Management, P.O. Box 7921, Madison, WI 53707.

(1u) The primary exporter shall keep a copy of each notification of intent to export for a period of at least 3 years from the date the hazardous waste was accepted by the initial transporter;

(1w) The primary exporter shall keep a copy of each EPA acknowledgment of consent for a period of at least 3 years from the date the hazardous waste was accepted by the initial transporter;

(1x) The primary exporter shall keep a copy of each confirmation of delivery of the hazardous waste from the consignee for at least 3 years from the date the hazardous waste was accepted by the initial transporter; and

(1z) The primary exporter shall keep a copy of each annual export report for a period of at least 3 years from the due date of the report.

(2) The generator shall file an exception report with the department and the EPA pursuant to s. NR 615.11 (1) (b), if:

(a) The generator has not received a copy of the manifest signed by the transporter stating the date and place of departure from the United States within 45 days from the date it was accepted by the initial transporter; or

(b) Within 90 days from the date the hazardous waste was accepted by the initial transporter, the generator has not received written confirmation from the foreign consignee that the hazardous waste was received.

(c) The waste is returned to the United States.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; corrections made under s. 13.93 (2m) (b) 1., Stats., Register, August, 1992, No. 440; am. (1) (intro.), (a) 2. a., (1t) (g), Register, August, 1992, No. 440, eff. 9–1–92; am. (1) (a) 2. a., (1t) (e) (intro.), r. (1t) (e) 1., 2., Register, May, 1995, No. 473, eff. 6–1–95; **am. (1) (intro.) and (1t) (g), Register, May, 1998, No. 509, eff. 6–1–98.**

NR 615.13 Imports of hazardous waste. (1) Except as provided in sub. (2), any person who imports hazardous waste from abroad into Wisconsin shall comply with the requirements of this section.

(2) When importing a hazardous waste, all the requirements of s. NR 615.08 for the manifest shall be met except that:

(a) In place of the generator's name, address and identification number, the name and address of the foreign generator and the importer's name, address and identification number shall be used.

(b) In place of the generator's signature on the certification statement, the U.S. importer or agent thereof shall sign and date the certification and obtain the signature of the original transporter.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 615.14 International agreements. (1) Any person who exports or imports hazardous waste subject to the manifest requirements of ss. NR 610.08 (1) (d) and 615.08, or subject to the universal waste management standards of ch. NR 690, to or from designated member countries of the Organization for Economic Cooperation and Development (OECD) for purposes of recovery is subject to 40 CFR part 262 subpart H. The requirements of ss. NR 615.12 and 615.13 do not apply.

(a) For the purposes of this section and 40 CFR part 262 subpart H, the designated OECD countries consist of Australia, Austria, Belgium, Denmark, Finland, France, Germany, Greece, Iceland, Ireland, Italy, Japan, Luxembourg, Netherlands, New Zealand, Norway, Portugal, Spain, Sweden, Switzerland, Turkey, United Kingdom, and the United States.

(b) For the purposes of this section and 40 CFR part 262 subpart H, Canada and Mexico are considered OECD member countries only for the purpose of transit.

(2) Notwithstanding sub. (1), ss. NR 615.12 and 615.13 apply to both of the following:

(a) Any person who exports hazardous waste to or imports hazardous waste from a designated OECD member country for purposes other than recovery.

Note: Purposes other than recovery include incineration and disposal.

(b) Any person who exports hazardous waste to or imports hazardous waste from Mexico or Canada for any purpose.

History: Cr. Register, May, 1998, No. 509, eff. 6–1–98.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

Chapter NR 630

STORAGE, TREATMENT AND DISPOSAL FACILITY GENERAL STANDARDS

NR 630.01 Purpose.
NR 630.02 Applicability.
NR 630.03 Definitions.
NR 630.04 Exemptions.
NR 630.05 Environmental and health standards.
NR 630.10 Required notices.
NR 630.11 Identification numbers.
NR 630.12 General waste analysis.
NR 630.13 Waste analysis plan.
NR 630.14 Security.
NR 630.15 General inspection requirements.
NR 630.16 Personnel training.
NR 630.17 General requirements for ignitable, reactive or incompatible wastes.
NR 630.18 Location standards.
NR 630.20 Additional facility standards.
NR 630.21 Preparedness and prevention.
NR 630.22 Contingency plan and emergency procedures.
NR 630.30 Manifest requirements.
NR 630.31 Recordkeeping.
NR 630.32 Waste minimization.
NR 630.40 Reporting.

NR 630.01 Purpose. The purpose of this chapter is to specify the general requirements that apply to the storage, treatment and disposal of hazardous waste.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 630.02 Applicability. This chapter applies to the owners and operators of storage, treatment or disposal facilities. This chapter does not apply to solid waste facilities that store, treat or dispose of only:

(1) Non–hazardous solid waste,

(2) Metallic mining wastes resulting from a mining operation as defined in s. 293.01 (5), Stats., or

(3) A combination of wastes described in subs. (1) and (2).

Note: Additional requirements for specific facilities are given in chs. NR 640 to 670.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction made under s. 13.93 (2m) (b) 1., Stats., Register, August, 1992, No. 440; am. (2), r. (3), renum. (4) to be (3) and am., Register, May, 1995, No. 473, eff. 6–1–95; correction in (2) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509.

NR 630.03 Definitions. The definitions in s. NR 600.03 apply to this chapter.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 630.04 Exemptions. The requirements of this chapter do not apply to the following, except to the extent they are specifically included:

(1) The owner or operator of a wastewater treatment unit that treats waste from on–site. This exemption also applies to a wastewater treatment unit that treats waste from off–site if the owner or operator of a unit that treats waste from off–site complies with pars. (a) to (d). This exemption does not apply to the treatment, storage or disposal of sludges, residues or other hazardous waste produced during the treatment process when this material is removed from the wastewater treatment unit or when the treatment process ceases. This exemption shall apply to the wastewater treatment units which treat waste from off–site if the owner or operator complies with the following requirements:

(a) The notification requirements specified in s. NR 630.10.

(b) The manifest system requirements specified in s. NR 630.30;

(c) The recordkeeping requirements specified in s. NR 630.31 (1) (a) and (b); and

(d) The reporting requirements specified in s. NR 630.40 (1) and (2).

(2) The owner or operator of a POTW which accepts hazardous waste for treatment or recycling, if the owner or operator complies with pars. (a) to (g). This exemption does not apply to the treatment, storage or disposal of sludges, residues or other hazardous waste produced during the treatment process when the material is removed from the POTW treatment units or when the treatment process ceases. To be exempt under this subsection, the owner or operator shall:

(a) Have a WPDES permit;

(b) Comply with the conditions of that permit;

(c) Comply with the notification requirements specified in s. NR 630.11, the manifest system requirements specified in s. NR 630.30, the recordkeeping requirements specified in s. NR 630.31 (1) (a) and (b), the reporting requirements specified in s. NR 630.40 (1) and (2); and

(d) Except for spent pickle liquor that is accepted for recycling, meet all federal, state and local pretreatment requirements which would be applicable to the waste if it were discharged into the POTW through a sewer, pipe or similar conveyance.

(e) Except as provided in par. (f), if a hazardous waste is stored prior to treatment or recycling, the storage shall be in a wastewater treatment unit as specified in sub. (1) or in a storage facility which has received an operating license, interim license, variance or waiver.

(f) If spent pickle liquor is stored prior to recycling, the storage shall be in accordance with par. (e), or shall be in a tank which is approved under s. 281.41, Stats.

(g) If the WPDES permit was issued after November 8, 1984, the POTW shall comply with the corrective action requirements of s. NR 635.17.

(3) The owner or operator of a surface impoundment which has its discharges regulated under ch. 283, Stats., which accepts hazardous waste for treatment, if the owner or operator complies with pars. (a) to (c). This exemption does not apply to the treatment, storage or disposal of sludges, residues or other hazardous waste produced during the treatment process when this material is removed from the impoundment or impoundments or when the treatment process ceases. To be exempt under this subsection, the owner or operator shall:

(a) Have a WPDES permit for the discharge from the impoundment or have the discharge from the impoundment conveyed to a POTW directly through a sewer or pipe or similar conveyance;

(b) Comply with the conditions of the WPDES permit or all the federal, state and local pretreatment requirements which are applicable for direct discharges to a POTW; and

(c) Comply with all the requirements of s. NR 660.24.

(4) A generator accumulating waste on–site in containers, in tanks or on drip pads in compliance with s. NR 615.05 (4), except to the extent that the requirements of s. NR 600.04 and chs. NR 630 to 685 are made applicable in s. NR 615.05 (4).

(5) The owner or operator of a totally enclosed treatment facility.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

(6) The owner or operator of a recycling facility, if the owner or operator complies with the requirements specified in ch. NR 625.

(7) The owner or operator of an elementary neutralization unit, if the owner or operator of the elementary neutralization unit complies with the following requirements:

(a) Obtains an identification number as specified in s. NR 630.11.

(b) The security requirements specified in s. NR 630.14 (1).

(c) The inspection requirements specified in s. NR 630.15.

(d) Operation requirements as specified in s. NR 630.17 (2).

(e) Manifest, recordkeeping and reporting requirements specified in ss. NR 630.30, 630.31 and 630.40.

(f) The hazardous waste discharge reporting requirement specified in s. NR 630.22 (2) (c).

(g) At closure, the owner or operator of an elementary neutralization unit shall remove all hazardous waste and hazardous waste residue from the unit and comply with the applicable requirements of chs. NR 600 to 685 for this waste.

(h) Any sludges, residues or other hazardous waste produced during the neutralization process are subject to the applicable requirements of chs. NR 600 to 685 when this material is removed from the elementary neutralization unit or when the neutralization process ceases.

(i) The elementary neutralization unit shall be constructed of sturdy, leakproof material and shall be designed, constructed and operated so as to prevent hazardous waste from being discharged during the operating life of the unit.

(8) The owner or operator of a facility operating under an interim license except to the extent that the requirements are listed in ss. NR 680.21 (4) and (5) and 680.22.

(9) A small quantity generator accumulating waste on–site in compliance with s. NR 610.08.

(10) A very small quantity generator accumulating waste on–site in compliance with s. NR 610.07.

(11) A generator who combines absorbent material with a waste generated on–site in a container for the purpose of eliminating free liquids, if the generator complies with s. NR 615.05 (5).

(12) A person who stores waste lead–acid batteries that are destined for recycling and who complies with s. NR 625.12.

(13) A licensed transporter accumulating manifested shipments of waste at a transfer facility in compliance with s. NR 620.14.

(14) The owner or operator of a solid waste disposal facility licensed under chs. NR 500 to 524, if s. NR 605.05 (1) to (4) excludes the only hazardous waste the facility manages from regulation under chs. NR 630 to 685 by s. NR 610.05 (1) and the facility has been approved under ch. NR 506 to accept these wastes.

(15) A person who treats used oil filters generated on–site, or received from household do–it–yourself used oil filter generators, to meet the exemption from hazardous waste regulation in s. NR 605.05 (1) (v).

(16) The owner or operator of an elementary neutralization unit or a POTW, provided that if the owner or operator is diluting hazardous ignitable (D001) wastes, other than the D001 High TOC Subcategory defined in s. NR 675.20, Table Treatment Standards for Hazardous Wastes, or reactive (D003) waste, to remove the characteristic before land disposal, the owner or operator shall comply with the requirements in s. NR 630.17 (2).

(17) Universal waste handlers and universal waste transporters handling universal wastes. These handlers are subject to regulation under ch. NR 690, when handling universal wastes.

(18) A person accumulating waste in tanks or containers in accordance with subs. (4), (9) and (10) may treat the waste in the accumulation tank or container within the requirements of chs. NR 610, 615, 633, 640 and 645.

Note: This subsection exempts the facility from the provisions of ch. NR 630 only. It does not allow any method of treatment otherwise restricted or prohibited, and it does not exempt the facility from any other requirements in chs. NR 600 to 690, or any department rules applicable to solid waste management, air pollution control, or water pollution control, or other department rules.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (1) (intro.), Register, August, 1992, No. 440, eff. 9–1–92; am. (2) (intro.), (g), (4), r. (12), renum. (13) to (15) to be (12) to (14) and am. (14), cr. (15), Register, May, 1995, No. 473, eff. 6–1–95; am. (3) (c), (11) and (14), cr. (16) to (18), Register, March, 1998, No. 507, eff. 4–1–98; correction in (2) (f) and (3) (intro.) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509.

NR 630.05 Environmental and health standards. (1) GROUNDWATER, HUMAN HEALTH AND ENVIRONMENTAL STANDARDS. A hazardous waste facility may not be located, designed, constructed or operated in a manner that the department after investigation or review finds that there is a reasonable probability that management of hazardous waste within the area will have a detrimental effect on groundwater quality or will cause a violation of groundwater standards under ch. NR 140.

(2) SURFACE WATER, HUMAN HEALTH AND ENVIRONMENTAL STANDARD. A hazardous waste facility may not be located, designed, constructed or operated in a manner allowing any surface or subsurface discharge from the facility into navigable waters to cause a violation of water quality standards established in chs. NR 102 to 105, or a violation of s. 292.11, Stats., nor in a manner that the department after investigation or review finds that there is a reasonable probability that the management of hazardous waste within the area will have a detrimental effect on surface water quality.

(3) AIR, HUMAN HEALTH AND ENVIRONMENTAL STANDARD. A hazardous waste facility shall be located, designed, constructed and operated in a manner preventing air emissions from the facility from causing a violation of standards or regulations in chs. NR 400 to 499.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (2), Register, May, 1995, No. 473, eff. 6–1–95; correction in (2) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509.

NR 630.10 Required notices. (1) The owner or operator of a hazardous waste facility that has arranged to receive hazardous waste from a foreign source shall notify the department in writing at least 4 weeks in advance of the date the waste is expected to arrive at the facility. Notice of subsequent shipments of the same waste from the same foreign source is not required.

(1m) The owner or operator of a recovery facility that has arranged to receive hazardous waste subject to 40 CFR part 262, subpart H shall provide a copy of the tracking document bearing all required signatures to the notifier to EPA and to the competent authorities of all other concerned countries within 3 working days of receipt of the shipment. The original of the signed tracking document shall be maintained at the facility for at least 3 years. The copy of the tracking document to be sent to EPA shall be sent to:

Office of Enforcement and Compliance Assurance
Office of Compliance, Enforcement Planning
Targeting and Data Division (2222A)
Environmental Protection Agency
401 M St., S.W.
Washington, D.C. 20460

(2) Before transferring ownership or operation of a hazardous waste facility during its operating life, or of a disposal facility during the long–term care period, the owner or operator shall notify the new owner or operator in writing of the requirements of ss. NR 600.04 and 620.15 and chs. NR 630 to 685.

Note: An owner or operator's failure to notify the new owner or operator of the requirements of ss. NR 600.04 and 620.15 and chs. NR 630 to 685 in no way relieves the new owner or operator of obligation to comply with all applicable requirements.

(3) The owner or operator of a hazardous waste facility that receives hazardous waste from an off–site source, except where the owner or operator is also the generator, shall inform the generator in writing that the hazardous waste facility has the appropriate

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

license for, and will accept, the waste the generator is shipping. The owner or operator shall keep a copy of this written notice as part of the operating record.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; cr. (1m), Register, May, 1998, No. 509, eff. 6–1–98.

NR 630.11 Identification numbers. A facility owner or operator who does not have an identification number shall obtain one by applying to the department using the notification form specified in s. NR 600.05. The identification number shall be included on the manifest and hazardous waste summary report.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 630.12 General waste analysis. (1) Before an owner or operator treats, stores or disposes of any hazardous waste, a detailed chemical and physical analysis of a representative sample of the waste shall be obtained from the generator. At a minimum, this analysis shall contain all the information which must be known in order to treat, store or dispose of the waste in accordance with the requirements of chs. NR 600 to 685 or the conditions of an interim license, variance or approved plan of operation.

(2) The analysis may include data developed under chs. NR 605, 610 and 625 and existing published or documented data on the hazardous waste or on waste generated from similar processes.

(3) The analysis shall be repeated as necessary to ensure that it is accurate and up to date. At a minimum, the analysis shall be repeated:

(a) When the owner or operator is notified, or has reason to believe, that the process or operation generating the hazardous waste has changed; and

(b) For off–site facilities, when the results of the inspection required in sub. (4) indicate that the hazardous waste shipment received at the facility does not match the waste designated on the accompanying manifest or shipping paper.

(4) The owner or operator of an off–site facility shall inspect and if necessary, analyze in accordance with the waste analysis plan required by s. NR 630.13, each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 630.13 Waste analysis plan. (1) WASTE ANALYSIS PLAN. The owner or operator shall develop and follow a written waste analysis plan which describes the procedures which will be carried out to comply with s. NR 630.12. The owner or operator shall keep this plan at the facility. At a minimum, the plan shall specify:

(a) The parameters for which each hazardous waste shall be analyzed and the rationale for the selection of these parameters, and why analysis for these parameters will provide sufficient information on the waste's properties to comply with s. NR 630.12;

(b) The test methods which will be used to test for these parameters;

(c) The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:

1. One of the sampling methods described in Appendix I of ch. NR 605; or

2. An equivalent sampling method, approved by the department.

(d) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up to date;

(e) For off–site facilities, the waste analyses that hazardous waste generators have agreed to supply; and

(f) Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in ss. NR 630.17 (3), 631.07 (4), 632.08 (4), 633.06, 645.06 (3) (b) 2., 655.09, 660.18 (6) to (9), 665.06 (1) (d) and (2), 665.09 (14) and (15) and 670.11 (2) (a).

(g) For off–site facilities, the waste analysis plan required in this subsection shall also specify the procedures which will be used to inspect and, if necessary, analyze each shipment of hazardous waste received at the facility to ensure that it matches the identity of the waste designated on the accompanying manifest or shipping paper. At a minimum, the plan shall describe:

1. The procedures which will be used to determine the identity of each shipment of waste managed at the facility;

2. The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling; and

3. The procedures that the owner or operator of an off–site landfill receiving containerized hazardous waste will use to determine whether a hazardous waste generator or treater has added a biodegradable sorbent to the waste in the container.

(h) For surface impoundments exempted from land disposal restrictions under s. NR 675.04 (1), the procedures and schedules for:

1. The sampling of impoundment contents;

2. The analysis of test data; and

3. The annual removal of residues which do not exhibit a characteristic of hazardous waste, and which do not meet the treatment standards of ss. NR 675.20 to 675.24 or, where no treatment standards have been established, the annual removal of residues which do not meet the applicable prohibition levels of ss. NR 675.11 to 675.13 or 42 USC 6924 (d).

Note: The publication containing Title 42 USC may be obtained from:
The Superintendent of Documents
U.S. Government Printing Office
Washington, D.C. 20402

(i) For owners and operators seeking an exemption to the air emission standards of ch. NR 633 in accordance with s. NR 633.05:

1. If direct measurement is used for the waste determination, the procedures and schedules for waste sampling and analysis, and the results of the analysis of test data to verify the exemption.

2. If knowledge of the waste is used for the waste determination, any information prepared by the facility owner or operator or by the generator of the hazardous waste, if the waste is received from off–site, that is used as the basis for knowledge of the waste.

(2) REQUIREMENTS FOR CERTIFIED OR REGISTERED LABORATORY. Chemical and physical samples shall be analyzed by a laboratory certified or registered under ch. NR 149. The following tests are excluded from this requirement:

(a) Physical tests of soil,

(b) Air quality tests,

(c) Gas tests,

(d) Field pH tests,

(e) Field conductivity,

(f) Turbidity tests,

(g) Water elevation,

(h) Temperature,

(i) Leachate–liner compatibility testing.

(3) BACTERIAL AND RADIOLOGICAL SAMPLES. Bacteriological and radiological samples shall be analyzed by the state laboratory of hygiene or at a laboratory approved or certified by the department of agriculture, trade and consumer protection.

(4) OTHER FACILITIES. Other chemical and physical samples shall be analyzed by a laboratory certified or registered under ch. NR 149. The department may require, on a case–by–case basis, facilities to submit analytical test results from a laboratory that has

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

not been certified, registered or approved by the department of agriculture, trade and consumer protection.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (1) (h) 3., Register, August, 1992, No. 440, eff. 9–1–92; am. (1) (g) 1., 2., cr. (1) (g) 3., Register, May, 1995, No. 473, eff. 6–1–95; am. (1) (f), Register, March, 1998, No. 507, eff. 4–1–98; correction in (1) (g), (3) and (4) made under s. 13.93 (2m) (b) 6. and 7., Stats., Register, May, 1998, No. 509.

NR 630.14 Security. (1) The owner or operator shall prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of the facility, unless the owner or operator can successfully demonstrate to the department that:

(a) Physical contact with the waste, structures or equipment within the active portion of the facility will not injure unknowing or unauthorized persons or livestock which may enter the active portion of a facility, and

(b) Disturbance of the waste or equipment, by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility, will not cause a violation of the requirements of chs. NR 630 to 685 and s. NR 600.04.

(2) Unless exempt under sub. (1), a facility shall have:

(a) A 24–hour surveillance system, such as television monitoring or surveillance by guards or facility personnel to continuously monitor and control entry onto the active portion of the facility; or

(b) 1. An artificial or natural barrier, such as a fence in good repair or a fence combined with a cliff, surrounding the active portion of the facility, and

2. A means to control entry, at all times, through gates or other entrances to the active portion of the facility, such as an attendant, television monitor, locked entrance or controlled roadway access to the facility.

(3) Unless exempt under sub. (1), a sign with the legend, "Danger Unauthorized Personnel Keep Out", shall be posted at each entrance to the active portion of a facility, and at other locations, in sufficient numbers to be seen from any approach to the active portion. The legend shall be legible from a distance of at least 25 feet. Existing signs with a legend other than "Danger Unauthorized Personnel Keep Out" may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the active portion, and that entry onto the active portion can be dangerous.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 630.15 General inspection requirements. (1) GENERAL. The owner or operator shall inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing, or may lead to, a discharge of hazardous waste or hazardous waste constituents to the environment or a threat to human health. The owner or operator shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.

(2) INSPECTION SCHEDULE. (a) The owner or operator shall develop and follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment, such as dikes and sump pumps, that are important to preventing, detecting or responding to environmental or human health hazards.

(b) The schedule shall be kept at the facility.

(c) The schedule shall identify the types of problems, such as malfunctions or deterioration, which are to be looked for during the inspection.

Note: Examples of what to look for include inoperative sump pump, leaking fitting and eroding dike.

(d) The frequency of inspection may vary for the items on the schedule. However, it should be based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, shall be inspected daily when in use. At a minimum, the inspection schedule shall include the items and frequencies called for in ch. NR 630, and ss. NR 631.06 (2), 632.06 (1), (2) and (7), 633.11, 640.12 (1), 645.09, 645.11, 655.08, 660.18 (13), (31) (b), (32), and 670.09 where inspection requirements are specified.

(3) REMEDY. The owner or operator shall remedy any deterioration or malfunction of equipment or structures which the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.

(4) INSPECTION LOG SUMMARY. The owner or operator shall record inspections in an inspection log or summary. These records shall be kept for at least 3 years from the date of inspection. At a minimum, these records shall include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (2) (d), Register, May, 1995, No. 473, eff. 6–1–95; am. (2) (d), Register, May, 1998, No. 509, eff. 6–1–98; correction in (2) (d) made under s. 13.93 (2m) (b) 7., Stats.

NR 630.16 Personnel training. (1) Facility personnel shall successfully complete a program of classroom instruction or on–the–job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of s. NR 600.04 and chs. NR 630 to 685. The owner or operator shall ensure that this program includes all the elements described in the document required under sub. (4) (c).

(a) This program shall be directed by a person trained in hazardous waste management procedures, and shall include instruction which teaches facility personnel hazardous waste management procedures, including contingency plan implementation, relevant to the positions in which they are employed.

(b) At a minimum, the training program shall be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems, including where applicable:

1. Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment;

2. Key parameters for automatic waste feed cut–off systems;

3. Communications or alarm systems;

4. Response to fires or explosions;

5. Response to groundwater contamination incidents; and

6. Shutdown of operations.

(2) Facility personnel employed at the facility as of August 1, 1981, shall successfully complete the program required in sub. (1) by February 1, 1982. Personnel assigned to the facility or to a new position at the facility after August 1, 1981 shall successfully complete the program required in sub. (1) within 6 months after their date of assignment to a facility or to a new position at a facility. Personnel may not work in unsupervised positions until they have completed the training requirements of sub. (1).

(3) Facility personnel shall take part in an annual review of the initial training required in sub. (1).

(4) The owner or operator shall maintain the following documents and records at the facility:

(a) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(b) A written job description for each position listed under par. (a). This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company, location or bargaining unit, but shall include the requisite skill, education or other qualifications, and duties of facility personnel assigned to each position.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

(c) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in par. (a).

(d) Records that document that the training or job experience required under subs. (1), (2) and (3) has been given to, and completed by, facility personnel.

(5) Training records on current personnel shall be kept until closure of the facility. Training records on former employees shall be kept for at least 3 years from the date the employee last worked at the facility. Personnel training records shall accompany personnel transferred within the same company.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 630.17 General requirements for ignitable, reactive or incompatible wastes. (1) The owner or operator shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste shall be separated and protected from sources of ignition or reaction including but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks, spontaneous ignition and radiant heat. While ignitable or reactive waste is being handled, the owner or operator shall confine smoking and open flame to specially designated locations. "No Smoking" signs shall be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

(2) Where specifically required by s. NR 600.04 and chs. NR 610 to 685, the treatment, storage or disposal of ignitable or reactive waste, and the mixture or commingling of incompatible wastes or materials shall be conducted so that it does not:

(a) Generate extreme heat or pressure, fire or explosion or violent reaction;

(b) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment;

(c) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;

(d) Damage the structural integrity of the device or facility containing the waste; or

(e) Threaten human health or the environment.

Note: See Appendix I for examples.

(3) When required to comply with sub. (1) or (2), the owner or operator shall document that compliance. This documentation may be based on references to published scientific or engineering literature, data from trial tests, such as bench scale or pilot scale tests, waste analyses as specified in s. NR 630.13 (1), or the results of the treatment of similar wastes by similar treatment processes and under similar operating conditions.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction in (2) (intro.) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1995, No. 473.

NR 630.18 Location standards. (1) Except as provided in s. NR 680.06 (3) for facilities operating under an interim license, variance or waiver, a hazardous waste facility may not be located in a floodplain.

(2) A hazardous waste facility may not be located in a wetland.

(3) A hazardous waste facility may not be located in a habitat determined by the department to be critical to the continued existence of any endangered species listed in ch. NR 27.

(4) The department may require that active portions of a facility be located up to 200 feet away from the property line of the facility.

(5) Portions of new facilities where treatment, storage or disposal of hazardous waste will be conducted may not be located within 61 meters (200 feet) of a fault which has had displacement in Holocene time.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 630.20 Additional facility standards. (1) OPEN BURNING AND DETONATION OF EXPLOSIVES. Open burning of hazardous waste is prohibited except for the open burning and detonation of waste explosives. Waste explosives include waste which has the potential to detonate and bulk military propellants which cannot safely be disposed of through other modes of treatment. Detonation is an explosion in which chemical transformation passes through the material faster than the speed of sound. Owners or operators choosing to open burn or detonate waste explosives shall do so in accordance with table VII and in a manner that does not threaten human health or the environment. The department may require distances greater than the minimum distances listed in table VII be used if, based on the specific material being burned or detonated and site specific conditions, it is determined that the burning or detonation may potentially endanger human health or the environment, or create nuisance conditions.

Table VII

Minimum Distance from Open Burning or Detonation of Waste Explosives or Propellants to the Property Line of Property Owned by Other Persons

Pounds of waste explosives or propellants	Minimum distance
0 to 100	204 meters (670 feet)
101 to 1,000	380 meters (1,250 feet)
1,001 to 10,000	530 meters (1,730 feet)
10,001 to 30,000	690 meters (2,260 feet)

(2) POINT SOURCE DISCHARGES. All facilities with point source discharges to the waters of the state including discharges from leachate collection systems and surface water run–off collection systems, shall comply with all applicable regulations promulgated under ch. 283, Stats. Additionally, facilities with discharges to municipal sewer systems shall meet applicable pretreatment standards and have the approval of the municipal treatment system authority for that discharge.

(3) SURFACE WATER RUN–ON AND RUN–OFF. (a) All surface water run–on shall be diverted from active portions of a facility. At a minimum, dikes or equivalent structures shall be designed, constructed and properly maintained to divert all run–on from a 24–hour, 25–year storm.

(b) All surface water run–off from the active portions of the facility shall be collected and confined to a point source before discharge or treatment, as may be required by regulations promulgated under ch. 283 or 291, Stats. At a minimum, facilities shall be designed, constructed and operated to collect all run–off from active portions of the facility anticipated from the 24–hour, 25–year storm.

(4) GENERATION OR REMOVAL OF WASTE. Any person who generates or removes a hazardous waste from a hazardous waste facility shall comply with the requirements of ch. NR 615.

(5) CLOSURE OF NONCOMPLYING PORTIONS OF FACILITIES. Owners or operators shall close, in accordance with the requirements of s. NR 685.05, all portions of a facility which do not comply with the applicable requirements of s. NR 600.04 and chs. NR 630 to 685.

(6) WATER QUALITY. All owners or operators shall comply with applicable requirements of state water quality management plans approved under ch. 283, Stats.

(7) NONPOINT SOURCE DISCHARGES. Nonpoint source discharges from hazardous waste facilities into navigable waters may not cause or contribute to the violation of water quality standards specified in chs. NR 102 to 104.

(8) POTENTIAL FOR DISCHARGE. Under s. NR 600.07, an owner or operator of a storage or treatment facility may be required by the department to comply with all or part of the requirements of s. NR 600.04 and chs. NR 630 to 685, including the groundwater

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

and leachate monitoring requirements of ch. NR 635, if the department determines that there is a potential for discharge of the hazardous waste or hazardous constituents to the environment.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (8), Register, May, 1995, No. 473, eff. 6–1–95; cr. (2) (c), Register, March, 1998, No. 507, eff. 4–1–98; correction in (2), (3) and (6) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509, eff. 6–1–98.

NR 630.21 Preparedness and prevention. (1) Facilities shall be designed, constructed, maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non–sudden discharge of hazardous waste or hazardous waste constituents to the air, land or surface water which could be harmful to human health or the environment.

(2) All facilities shall be equipped with the following unless it can be demonstrated to the department by the owner or operator that none of the waste handled at the facility could require a particular kind of equipment specified below:

(a) An alarm, a telephone immediately available at the scene of operations, a 2–way radio or similar device capable of summoning emergency assistance from local police departments, fire departments or state or local emergency response teams;

(b) An internal communications system capable of providing immediate emergency instructions, voice or signal, to facility personnel;

(c) Portable fire extinguishers, fire control equipment, including special extinguishing equipment, such as that using foam, inert gas or dry chemicals, spill control equipment and decontamination equipment that is applicable to the type of hazardous waste handled at the facility; and

(d) Extinguishing agents with adequate volume and adequate delivery systems.

(3) At any time that hazardous waste is being poured, mixed, spread or otherwise handled, all employees involved in the operation shall have immediate access to an internal or external alarm or emergency communication device, either directly or through visual or voice contact with another employee unless the department has determined that a device is not required under sub. (2). If at any time during operation of the facility there is a sole employee on the premises, that person shall have immediate access to an alarm, a telephone which is immediately available at the scene of operation, a hand–held 2–way radio or a similar device capable of summoning external emergency assistance unless the department has determined that a device is not required under sub. (2).

(4) All facility communication or alarm systems, fire protection equipment, spill control equipment and decontamination equipment where required, shall be tested and maintained to ensure its proper operation in time of emergency.

(5) The owner or operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of facility operation in an emergency, unless it can be demonstrated to the department that aisle space is not needed for any of these purposes.

(6) The owner or operator shall attempt to make service arrangements, as appropriate, for the type of waste handled at the facility and the potential need for the services. Where state or local authorities decline to participate in these arrangements, the owner or operator shall document their refusal in the operating record. These arrangements are:

(a) Familiarize police, fire departments and emergency response teams with the layout of the facility, properties of the hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility and possible evacuation routes;

(b) Where more than one police and fire department may respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(c) Agreements with state emergency response teams, emergency response contractors and equipment suppliers; and

(d) Familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or discharges at the facility.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 630.22 Contingency plan and emergency procedures. (1) CONTINGENCY PLAN. (a) The owner or operator of a facility shall develop a contingency plan so as to prevent or minimize human health or environmental damage in the event of fire, explosion or any unplanned sudden or nonsudden discharge of hazardous waste or hazardous waste constituents to air, land, groundwater or surface water. The provisions of the plan shall be implemented immediately in the event of a fire, explosion or discharge of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

(b) A copy of the contingency plan and all revisions of the plan shall be:

1. Kept at the facility office;

2. Sent to all local police departments, fire departments, hospitals and emergency response teams who may be called on to provide emergency services; and

3. Filed with the department.

(c) The plan shall be reviewed and immediately amended, if necessary, whenever:

1. The facility operating license, interim license, variance or waiver is amended;

2. The contingency plan fails in an emergency;

3. The facility changes in its design, construction, operation, maintenance or other circumstances in a way that materially increases the potential for fire, explosion or discharge of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

4. The list of emergency coordinators changes; or

5. The list of emergency equipment changes.

(d) At all times when the facility is in operation there shall be at least one person present with the responsibility of coordinating all emergency response measures. When the facility is not in operation, the facility emergency coordinator shall be present or on call and available to respond to an emergency by reaching the facility in a short period of time. The facility emergency coordinator shall be thoroughly familiar with all aspects of the facility's contingency plan, all operations activities at the facility, the location and characteristics of waste handled, the location of manifests within the facility, and the facility layout. In addition, the person shall have the authority to commit the resources needed to carry out the contingency plan.

(e) The contingency plan shall, as a minimum, contain the following:

1. The name, position, address and phone number, office and home, of all persons qualified to act as facility emergency coordinator as described in par. (d), and this list shall be kept up to date. Where more than one person is listed, one shall be designated as the primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates. For new facilities, this information shall be supplied to the department at the time an operating license application is submitted.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

2. A description of the facility layout, types of waste handled and its associated hazards, places where facility personnel would normally be working and entrances to and roads inside the facility.

3. An evacuation plan for facility personnel where necessary. This plan shall describe signals to be used to begin evacuation, evacuation routes and alternate evacuation routes.

4. Procedures for emergency shutdown of facility operations, and the actions facility personnel shall take to comply with subs. (1) and (2) in response to fires, explosions or any unplanned sudden or non–sudden discharge of hazardous waste or hazardous waste constituents to the air, land or surface water at the facility.

5. A description of the procedures that will be used to notify local police departments, fire departments, hospitals and emergency response teams of the discharge of hazardous waste, fire or explosion at the facility.

6. A current list of all emergency equipment at the facility, such as fire extinguishing equipment, spill equipment, internal and external alarms, and decontamination equipment where this equipment is required. The list shall include the location, physical description and the capabilities of each item.

7. A description of the arrangements agreed to under s. NR 630.21 (6) by local police departments, fire departments, hospitals, contractors and emergency response teams to coordinate emergency services.

(f) Facility employees shall be familiarized with all emergency procedures, equipment and systems contained in the contingency plan.

(g) If the owner or operator has already prepared a spill prevention, control and countermeasures (SPCC) plan in accordance with 40 CFR 112, July 1, 1990, this plan need only be amended to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of s. NR 600.04 and chs. NR 630 to 685.

Note: The publication containing the CFR reference may be obtained from:
The Superintendent of Documents
U.S. Government Printing Office
Washington, D.C. 20402

(2) EMERGENCY PROCEDURES. (a) In the event that a facility has, or there is an imminent threat that the facility may have, a discharge of hazardous waste or hazardous substance, a fire, explosion or other emergency which has the potential for damaging human health or the environment, the facility's emergency coordinator shall:

1. Activate internal facility alarms or communication systems to notify all personnel of an imminent or actual emergency situation, where applicable.

2. Telephone the division of emergency government and comply with the requirements of s. 292.11, Stats., and ch. NR 706.

Note: The division of emergency government's 24–hour toll– free number is 1–800–943–0003.

3. Immediately identify the character, source, amount and areal extent of any discharged materials. This may be done by observation or review of facility records or manifests, and, if necessary, by chemical analysis.

4. Assess possible hazards to human health or the environment which may result from the discharge, fire or explosion. This assessment shall consider both direct and indirect effects of the discharge, fire or explosion such as the effects of any toxic, irritating or asphyxiating gases that are generated, or the effects of any hazardous surface water run–off from water or chemical agents used to control fire and heat induced explosions.

5. Immediately notify appropriate authorities, if an assessment indicates that a discharge, fire or explosion could threaten human health or the environment outside the facility, and that evacuation of local areas may be advisable. The emergency coordinator shall be available to help appropriate officials decide whether local areas shall be evacuated. The emergency coordinator shall notify either the division of emergency government or the national response center. The report shall include:

a. Name and telephone number of the person who is reporting;

b. Name and address of the facility;

c. Name and type of incident;

d. Name and quantity of material or materials involved, to the extent known;

e. The extent of injuries, if any; and

f. The possible hazards to human health or the environment, outside the facility.

Note: The division of emergency government's 24–hour toll–free telephone number is 1-800-943-0003.

Note: The national response center's toll–free telephone number is (800) 424–8802.

6. Take all reasonable measures necessary to ensure that fires, explosions and discharges do not occur, recur or spread to other hazardous waste at the facility. These measures shall include, where applicable, stopping processes and operations, collecting and containing discharge waste, and removing or isolating containers.

7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, where appropriate, if the facility stops operation in response to a fire, explosion or discharge.

8. Provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a discharge, fire or explosion at the facility, immediately after an emergency.

9. Ensure that, in the affected areas of the facility, no waste that may be incompatible with the discharged material is treated, stored or disposed of until cleanup procedures are completed; and all emergency equipment listed in the contingency plan is clean and fit for its intended use before operations are resumed.

(b) The owner or operator shall notify the department and the appropriate local authorities that the facility is in compliance with par. (a) 9. before operations are resumed in the affected areas of the facility.

(c) The owner or operator shall note in the operating record the time, date and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, the owner or operator shall submit a written report on the incident to the department. The report shall include:

1. Name, address and telephone number of the owner or operator;

2. Name, address and telephone number of the facility;

3. Date, time and type of incident, such as fire or explosion;

4. Name and quantity of materials involved;

5. The extent of injuries, if any;

6. An assessment of actual or potential hazards to human health or the environment, where this is applicable;

7. Estimated quantity and disposition of recovered material that resulted from the incident;

8. A narrative describing the known or suspected causes of the incident and a statement describing the measures taken to investigate the cause. The narrative shall also describe any necessary measures which have been or shall be taken to prevent incidents in the future; and

9. Any amendments to the contingency plan as required in sub. (1) (b) and (c).

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (1) (g), Register, August, 1992, No. 440, eff. 9–1–92; am. (2) (a) 2., (b), Register, May, 1995, No. 473, eff. 6–1–95; am. (2) (a) 2, Register, May, 1998, No. 509, eff. 6–1–98.

NR 630.30 Manifest requirements. (1) The operator of a hazardous waste facility is responsible for all the requirements

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

of this chapter, including requiring the generator to initiate a Wisconsin manifest.

(2) No hazardous waste facility operator shall accept a manifested shipment of hazardous waste that does not meet the following requirements:

(a) The manifest is complete.

(b) Each container and portable tank containing hazardous waste is properly marked and labeled.

(c) The manifests, the markings and the labels are consistent.

(3) No hazardous waste facility operator may accept a hazardous waste that the facility operator is not allowed to manage under that hazardous waste facility's license, interim license, variance, waiver or licensing exemption under chs. NR 600 to 685.

(4) If a facility receives hazardous waste accompanied by a manifest, the owner, operator or an employee shall:

(a) Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received;

(b) Note any significant manifest discrepancies in the manifest that meets the criteria of sub. (6) on each copy of the manifest;

(c) Immediately give the transporter at least one copy of the signed manifest;

(d) Within 30 days after the delivery, send a copy of the manifest to the generator; and

(e) Retain at the facility a copy of each manifest for at least 3 years from the date of delivery.

(f) Send a copy of each manifest, which contains all the information required in s. NR 615.08 (8) or (9), as appropriate, to the department within 5 working days. A fee of $2 shall be charged for each manifest submitted. The department will bill each facility for accumulated manifest review fees.

(5) If a hazardous waste facility receives, from a rail or water bulk shipment transporter, hazardous waste which is accompanied by a shipping paper containing all the information required on the manifest, excluding the identification number, generator's certification and signature, the owner or operator, or an employee shall:

(a) Sign and date each copy of the shipping paper to certify that the hazardous waste covered by the shipping paper was received;

(b) Note any significant discrepancies in the shipping paper that meet the criteria of sub. (6) on each copy of the shipping paper;

(c) Immediately give the rail or water bulk shipment transporter at least one copy of the shipping paper;

(d) Within 30 days after the delivery, send a copy of the signed and dated shipping paper to the generator; however, if a manifest is received within 30 days after the delivery, the owner or operator, or an employee shall sign and date the manifest and return it to the generator in lieu of the shipping paper;

(e) Retain at the facility a copy of each shipping paper and manifest for at least 3 years from the date of delivery; and

(f) Send a copy of the shipping paper to the department within 5 working days.

(5m) Within 3 working days of the receipt of a shipment subject to 40 CFR part 262, subpart H, the owner or operator of the facility shall provide a copy of the tracking document bearing all required signatures to the notifier, to EPA, to the department, and to competent authorities of all other concerned countries. The original copy of the tracking document shall be maintained at the facility for at least 3 years from the date of signature.

Note: The copy of the tracking document to be sent to EPA shall be sent to:
Office of Enforcement and Compliance Assurance
Office of Compliance, Enforcement Planning
Targeting and Data Division (2222A)
Environmental Protection Agency
401 M St., S.W.
Washington, D.C. 20460

(6) Upon discovering a significant manifest discrepancy, the owner or operator shall attempt to reconcile the discrepancy with the waste generator or transporter, such as with telephone conversations. If the discrepancy is not resolved within 15 days after receiving the waste, the owner or operator shall immediately submit to the department a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue.

(7) Whenever a shipment of hazardous waste is initiated from a facility, the owner or operator of that facility shall comply with the requirements of ch. NR 615.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (1), (4) (f), Register, May, 1995, No. 473, eff. 6–1–95; cr. (5m), Register, May, 1998, No. 509, eff. 6–1–98.

NR 630.31 Recordkeeping. (1) The owner or operator shall keep a written operating record at the facility. The following information shall be recorded, as it becomes available, and maintained in the operating record until closure of the facility:

(a) A description of the waste including its common name, hazardous waste number, physical form and quantity;

(b) The method and date of the waste's storage, treatment or disposal at the facility;

(c) The location where each hazardous waste was placed within the facility and the quantity at each location. For disposal facilities, the location and quantity of each hazardous waste shall be recorded on a map or diagram of each cell or disposal area. For all facilities, this information shall include cross–references to specific manifest document numbers, if the waste was accompanied by a manifest;

(d) Records and results of waste analyses performed as specified in ss. NR 630.12, 630.13 (1) 630.17, 631.07, 632.08, 633.06, 660.16 (6), (7) and (9), 665.06 (1) (d) and (2), 665.09 (14), 675.04 and 675.07;

Note: There is no NR 660.16 (6), (7) or (9).

(e) Summary reports and details of all incidents that required implementing the contingency plan as specified in s. NR 630.22 (2);

(f) Records and results of inspections as required by s. NR 630.15 (4), although this data need be kept only 3 years;

(g) For off–site facilities, notices to generators as specified in s. NR 630.10 (3);

(h) Monitoring, testing or analytical data, and corrective action where required by chs. NR 635 and 645 and ss. NR 631.07(3) to (6), 631.08, 632.08 (4) to (9), 632.09, 633.11, 633.12, 640.06, 640.13(3), 645.07, 645.09(3) to (11), 645.11, 655.08, 660.14, 660.18 (13), (14), (31) (b) and (32), 665.09 (10) and 670.09.

(i) Closure, and for disposal facilities, long–term care cost estimates required by s. NR 685.07 (2);

(j) A waste minimization certification statement in accordance with s. NR 630.32 (1);

(k) Records of the quantities and date of placement for each shipment of hazardous waste placed in land disposal units under an extension to the effective date of any land disposal restriction granted or a petition pursuant to ch. NR 675, and the notice required by a generator under s. NR 675.05;

(L) For an off–site treatment facility, a copy of the notice required by a generator under s. NR 675.05.

(m) For an on–site treatment facility, the information contained in the notice required by a generator under s. NR 675.05, except for the manifest number;

(n) For an off–site land disposal facility, a copy of the notice and certification required by the owner or operator of a treatment facility under s. NR 675.05, or a copy of the notice and certification required by the generator under s. NR 675.05, whichever is applicable; and

(o) For an on–site land disposal facility, the information contained in the notice required under s. NR 675.05, except for the

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

manifest number, or the information contained in the notice required by a treater under s. NR 675.05, except for the manifest number, whichever is applicable.

(2) All records including plans required under chs. NR 630 to 685 shall be furnished upon request, and made available at all reasonable times for inspection, by any officer or employee of the department.

(3) The retention period for all records required under chs. NR 630 to 685 may be extended upon written notice from the department to the owner or operator of the facility, specifying the records or types of records that are to be retained.

(4) A copy of records of waste disposal locations and quantities under sub. (1) (c) shall be submitted to the department and the local municipality upon closure of the facility.

(5) The identity and location of all stored hazardous waste shall be known throughout the entire storage period.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (1) (h), (j), Register, May, 1995, No. 473, eff. 6–1–95; am. (1) (d) and (h), Register, May, 1998, No. 509, eff. 6–1–98; **correction in (1) (h) made under s. 13.93 (2m) (b) 7., Stats.**

NR 630.32 Waste minimization. (1) WASTE MINIMIZATION CERTIFICATION. A waste minimization certification signed by the owner or operator no less often than annually shall be maintained in the operating record of the facility in accordance with s. NR 630.31. This certification shall state that a program is in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the owner or operator to be economically practicable. This certification shall further state that the proposed method of treatment, storage or disposal is the practicable method currently available to the owner or operator which minimizes the present and future threat to human health and the environment.

Note: EPA Guidance to Hazardous Waste Generators on the Elements of a Waste Minimization Program, 58 FR 31114, May 28, 1993, states that a generator or TSD should document its program, in writing, and that the program should be signed by the corporate officer who is responsible for ensuring RCRA compliance. While each element may be implemented in different ways depending on the needs and preferences of individual organization or facilities the general elements that each waste minimization program should include are: A) Top management support; B) Characterization of waste generation and waste management costs; C) Periodic waste minimization assessments; D) A cost allocation system; E) Encourage technology transfer; and F) Program implementation and evaluation.

(2) WASTE MINIMIZATION REPORTING. Generators who treat, store or dispose of hazardous waste on–site shall include, as part of their annual activity report required under s. NR 630.40 (1):

(a) A description of the effort undertaken during the calendar year to reduce the volume and toxicity of hazardous waste generated.

(b) A description of the changes in volume and toxicity of hazardous waste actually achieved during the calendar year in comparison to previous years to the extent information is available for the years prior to 1984.

History: Cr. Register, May, 1995, No. 473, eff. 6–1–95.

NR 630.40 Reporting. (1) ANNUAL ACTIVITY REPORT. The owner or operator shall prepare and submit an annual report to the department by March 1 of each year. The annual report shall be submitted on department forms, shall cover facility activities during the previous calendar year and shall, at a minimum, include the following information:

(a) The identification number, name and address of the facility;

(b) The calendar year covered by the report;

(c) For off–site facilities, the identification number of each hazardous waste generator from which hazardous waste was received during the calendar year. For imported shipments, the report shall include the name and address of the foreign generator;

(d) A description and the quantity of each hazardous waste received during the calendar year. For off–site facilities, this information shall be listed by identification number of each generator;

(e) The method of treatment, storage or disposal for each hazardous waste;

(f) The most recent closure and, for disposal facilities, the most recent long–term care cost estimates required by s. NR 685.07 (2);

(g) A waste minimization report as specified in s. NR 630.32 (2);

(h) A certification signed by the owner or operator of the facility, or its authorized representative as specified in ss. NR 680.05 (2) and 680.41, stating that "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, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Note: The forms may be obtained from the Department of Natural Resources, P.O. Box 8094, Madison, Wisconsin 53708 at no charge.

(2) UNMANIFESTED WASTE REPORT. If a facility accepts for treatment, storage or disposal any hazardous waste from an off–site source without an accompanying manifest, or without an accompanying shipping paper as described in s. NR 620.07, and if the waste is not excluded from the manifest requirement by s. NR 610.05 (1), then the owner or operator shall prepare and submit a report to the department within 15 days of receiving the waste. The report shall, at a minimum, contain the following information:

(a) The identification number, name and address of the facility;

(b) The date the facility received the waste;

(c) The identification number, name and address of the generator and transporter, if available;

(d) The date that the unmanifested hazardous waste was transported from the point of generation, if known;

(e) A description, such as by waste code under ss. NR 605.08, 605.09 and 605 – Appendix IV, and

(f) U.S. DOT shipping name, hazard class and ID number, if known, and

(g) The quantity of each unmanifested hazardous waste received;

(h) The method of treatment, storage or disposal for each hazardous waste;

(i) A brief explanation of why the waste was unmanifested, if known;

(j) The name and address of the waste's final destination; and

(k) A certification signed by the owner or operator of the facility, or its authorized representative as specified in s. NR 680.05 (2) or 680.41, stating that "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, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

(3) ADDITIONAL REPORTS. In addition to submitting the annual activity reports and unmanifested waste reports described in subs. (1) and (2), the owner or operator shall also report the following to the department:

(a) Discharges, fires and explosions as specified in s. NR 630.22 (2);

(b) Facility closures specified in s. NR 685.05 (10) (b); and

(c) As otherwise required by chs. NR 631, 632, 633, 635, 655 and 660, or by a license, variance or plan approval for surface

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

impoundments, waste piles, landfills and other sites or facilities where the department may require additional information.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; r. and recr. (1) (g), r. (1) (h), renum. (1) (i) to be (1) (h), Register, May, 1995, No. 473, eff. 6–1–95; am. (3) (c), Register, May, 1998, No. 509, eff. 6–1–98.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

Chapter NR 680

PLAN REVIEW AND LICENSING

NR 680.01	Purpose.
NR 680.02	Applicability.
NR 680.03	Definitions.
NR 680.04	Alternative requirements.
NR 680.05	General report and plan submittal requirements.
NR 680.06	General feasibility report, plan of operation, and feasibility and plan of operation report requirements.
NR 680.07	Facility expansions and modifications of licenses and plan of operation approvals.
NR 680.08	Construction documentation.
NR 680.09	Construction inspections.
NR 680.10	Retention of records.
NR 680.20	Eligibility for an interim license.
NR 680.21	Application for an interim license.
NR 680.22	Interim license requirements.
NR 680.23	Operation while interim license is pending.
NR 680.24	Advisement of interim license.
NR 680.30	Eligibility for an operating license.
NR 680.31	Application and requirements for an operating license.
NR 680.32	Operating license issuance.
NR 680.40	Effect of a license.
NR 680.41	Signatories to license applications.
NR 680.42	Conditions applicable to all licenses.
NR 680.43	Revocation or denial of licenses.
NR 680.44	Transfer of licenses.
NR 680.45	License periods and fees.
NR 680.50	Variances.
NR 680.51	Research, development and demonstration licenses.
NR 680.52	Treatability study exemption.
NR 680.60	Termination of a regulated activity.

NR 680.01 Purpose. The purpose of this chapter is to ensure that environmentally acceptable hazardous waste management procedures are practiced in Wisconsin and to establish minimum standards for reports, plan submittals and the issuance of licenses and variances for facilities which recycle, treat, store or dispose of hazardous waste.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 680.02 Applicability. Except as otherwise provided, this chapter applies to recycling, storage, treatment or disposal facilities that manage hazardous waste. This chapter does not apply to solid waste facilities that manage only non–hazardous solid waste or metallic mining waste resulting from a mining operation as defined in s. 293.01 (9), Stats., or to universal waste handlers and universal waste transporters. These handlers and transporters are subject to regulation under ch. NR 690, when handling these universal wastes.

Note: The provisions of this chapter are consistent with, and in some instances identical to, federal regulations found in 40 CFR parts 124, 260 to 265, 270 and 273, July 1, 1996.

Note: The publication containing the CFR references may be obtained from:

Superintendent of Documents
U.S. Government Printing Office
P.O. Box 371954
Pittsburgh, PA 15250–7954
(202) 512–1800

This document is available for inspection at the offices of the department, the secretary of state, and the revisor of statutes.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. Register, May, 1995, No. 473, eff. 6–1–95; am. Register, May, 1998, No. 509, eff. 6–1–98.

NR 680.03 Definitions. The definitions in s. NR 600.03 apply to this chapter. In addition, the following definitions also apply to this chapter:

(1) "Class 1 modification" means a minor modification of a license or plan of operation approval for a hazardous waste facility that is subject to an operating license issued by the department.

(2) "Class 2 modification" means a major modification of a license or plan of operation approval for a hazardous waste facility that is subject to an operating license issued by the department.

(3) "Class 3 modification" means an expansion of a hazardous waste facility that is subject to an operating license issued by the department.

Note: Examples of class 1, 2 and 3 modifications are listed in appendix I of this chapter.

(3m) "Facility mailing list" means the mailing list for a facility maintained by the department in accordance with s. NR 680.06 (10) (a) 3.

(4) "Reconstruction" means changes to a hazardous waste facility where the capital investment in the changes to the facility exceeds 50% of the capital cost of a comparable entirely new hazardous waste facility.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; r. and recr., Register, May, 1995, No. 473, eff. 6–1–95; cr. (3m), Register, May, 1998, No. 509, eff. 6–1–98.

NR 680.04 Alternative requirements. (1) GENERAL. Exemptions from the requirements of chs. NR 600 to 685 may be granted under this section by the department for hazardous waste facilities in relation to location, engineering design and operations, except as otherwise provided in those chapters. A person may apply for an exemption by providing the department with a written request and documentation justifying the need for an exemption. A person applying for an exemption has the burden of showing and documenting that the proposed alternative requirement provides the same level of control and protection as the requirements of chs. NR 630 to 685. Prior to granting an exemption, the department shall find that the proposed alternative requirement does not pose an increased threat to human health or the environment, taking into consideration factors such as the quantity, composition and degree of hazard of the waste to be managed, any potential degradation of the environment and potential nuisance conditions. All exemptions pertaining to a hazardous waste facility shall be granted in writing by the department. Exemptions shall be reviewed periodically by the department regarding any potential nuisance, hazard to public health and safety, or potential degradation of the environment.

(2) FEASIBILITY REPORTS AND FEASIBILITY AND PLAN OF OPERATION REPORTS. Persons who wish to request an exemption at the time reports and plans for an operating license are submitted shall include the request in the applicant's feasibility report or feasibility and plan of operation report to allow the department to provide sufficient public notice as required by ss. 289.26 and 289.27, Stats. Exemptions may only be granted in writing by the department in the final determination of feasibility.

(3) CERTIFICATION. Alternative requirements exemption requests shall meet the certification requirements of s. NR 680.05 (1) (c) 1.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction in (3) made under s. 13.93 (2m) (b) 7., Stats., Register, March, 1993, No. 447; am. (1), (3), Register, May, 1995, No. 473, eff. 6–1–95; correction in (2) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509.

NR 680.05 General report and plan submittal requirements. (1) GENERAL REQUIREMENTS. Unless otherwise specified, all submittals for review and approval of any initial site report, feasibility report, feasibility and plan of operation report, plan of operation, construction observation report, closure plan, groundwater monitoring plan, alternative requirements exemption request, variance, plan modification, recycling exemption ora

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submittal providing information to demonstrate that a facility meets the locational requirements of s. NR 680.06 (3) (i) 4. b., c. and d. or, if appropriate, a request for an exemption from the requirements of s. NR 680.06 (3) (i) 4. b. according to s. NR 680.04, shall include the following:

(a) *Review fees.* The review fees specified in s. NR 680.45 in check or money order payable to the department, to be sent to the appropriate district or area office of the department.

(b) *Cover letter.* A letter detailing the desired department action or response. If applicable, this letter shall list each participating municipality and specify whether a copy has been submitted to it pursuant to s. NR 680.06 (2).

(c) *Number of copies.* Five copies of the plan or report prepared pursuant to the appropriate rule. Two copies shall be submitted to the appropriate department district or area office and 3 copies shall be submitted to the department's bureau of waste management. Review time starts when copies are received. The plans and reports and all methods and procedures used to prepare them shall conform to the following:

1. Certification. All reports and all plan sheets shall be under the seal of and certified by a registered professional engineer, unless a written exemption is granted by the department. Reports where interpretation of geology or hydrogeology is necessary shall be signed by a hydrogeologist. Modifications and subsequent submittals shall also meet this certification requirement. Engineering certification may be demonstrated by using the following language;

"I, , hereby certify that I am a registered Professional Engineer in the State of Wisconsin in accordance with ch. A–E 4, Wis. Adm. Code and that this report has been prepared in accordance with the Rules Of Professional Conduct in ch. A–E 8, Wis. Adm. Code."

signature, title and P.E. number P. E. Stamp

Note: Hydrogeologist certification may be demonstrated by using the following language;

"I, , hereby certify that I am a hydrogeologist as defined in s. NR 600.03, Wis. Adm. Code, and that to the best of my knowledge all information contained in this document is correct."

signature and title

2. Technical procedures. All technical procedures used to investigate a hazardous waste facility shall be the current standard procedures as specified by the ASTM or the USGS, standard methods for the examination of water or wastewater, or other equivalent or appropriate methods approved by the department. Test procedures used shall be specified. Any deviation from a standard method shall be explained in detail, with reasons provided.

3. Required information. The required technical information as specified in chs. NR 600 to 685.

4. Visuals. Maps, figures, photographs and tables, where applicable, to clarify information or conclusions. The visuals shall be legible. All maps, plan sheets, drawings, isometrics, cross–sections and aerial photographs shall meet the following requirements:

a. Be of appropriate scale to show all required details in sufficient clarity.

b. Be numbered, referenced in the narrative, titled, have a legend of all symbols used, contain horizontal and vertical scales where applicable, and specify drafting or origination dates.

c. Use uniform scales as much as practical.

d. Contain a north arrow.

e. Use USGS data as basis for all elevations.

f. Plan sheets showing site construction, operation or closure topography shall also show original topography.

g. Plan sheets for hazardous waste facilities shall indicate a survey grid based on monuments established in the field specifically for that purpose.

h. Plan sheets shall be no smaller than 24 inches x 36 inches. All other documents shall be no larger than 24 inches x 36 inches and no smaller than 8½ inches by 11 inches.

i. All cross–sections shall show survey grid location and be referenced to major plan sheets.

5. Table of contents. A table of contents listing all sections of the submittal.

6. Appendix. An appendix listing names of all references, all necessary data, procedures and calculations.

(2) SIGNATORIES TO REPORTS. All reports required by the department, other than manifests, shall be signed by a person described in this subsection or by a duly authorized representative as designated in par. (d):

(a) For a corporation, by a responsible corporate officer. For the purpose of this paragraph a responsible corporate officer means:

1. A president, secretary, treasurer or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision–making functions for the corporation; or

2. The manager of one or more manufacturing, production or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million, in second–quarter 1980 dollars, if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

Note: The department does not require specific assignments or delegations of authority to responsible corporate officers identified in subd. 1. The department will presume that these responsible corporate officers have the requisite authority to sign permit applications unless the corporation has notified the department to the contrary. Corporate procedures governing authority to sign permit applications may provide for assignment or delegation to applicable corporate positions under subd. 2. rather than to specific individuals.

(b) For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or

(c) For a government or public agency, by either a principal executive officer or ranking elected official. For the purposes of this paragraph, a principal executive officer of a federal agency includes:

1. The chief executive officer of the agency; or

2. A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.

(d) A person is a duly authorized representative if:

1. The authorization is made in writing by the person designated under pars. (a) to (c);

2. The authorization specifies an individual or position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, superintendent or position of equivalent responsibility; and

3. The written authorization is submitted to the department.

(e) If an authorization under par. (d) is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of par. (d) shall be submitted to the department prior to or together with any reports to be signed by an authorized representative.

(f) Any person signing a document under this subsection shall make the following 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

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am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction in (1) (c) 4. made under s. 13.93 (2m) (b) 7., Stats., Register, March, 1993, No. 447; am. (1) (c) 1., 3., Register, May, 1995, No. 473, eff. 6–1–95; correction in (1) (c) made under s. 13.93 (2m) (b) 6., Stats., Register, May, 1998, No. 509.

NR 680.06 General feasibility report, plan of operation, and feasibility and plan of operation report requirements. (1) LOCAL APPROVALS. An applicant proposing to obtain a final operating license for an interim licensed hazardous waste facility or construct a new hazardous waste facility or expand an existing facility shall submit a feasibility report or a feasibility and plan of operation report in accordance with this section and applicable portions of chs. NR 600 to 685. The owner or operator of a hazardous waste disposal facility shall submit a feasibility report followed by a plan of operation. All other hazardous waste treatment and storage facilities shall submit a feasibility and plan of operation report. An applicant shall submit a written request including the standard notice developed under s. 289.22 (2), Stats., to each affected municipality for the specification of all applicable local approval requirements under s. 289.22 (1m), Stats. An applicant subject to s. 289.33, Stats., shall apply for all applicable local approvals specified by a municipality under s. 289.22 (1m), Stats., at least 120 days prior to submitting the feasibility and plan of operation report to the department. If the municipality either fails to respond within 15 days after the receipt of the written request from the applicant or indicates that there are no applicable local approval requirements, the applicant may submit the feasibility report or feasibility and plan of operation report 135 days after receipt by the municipality of the written request from the applicant or 120 days after receipt of the response from the municipality indicating that there are no local approval requirements, whichever occurs first. The feasibility report or feasibility and plan of operation report shall contain documentation that this subsection has been complied with.

(1m) PRE–APPLICATION PUBLIC MEETING AND NOTICE. (a) This subsection applies to all feasibility reports or feasibility or plan of operation reports for hazardous waste management units. This subsection also applies to feasibility reports or feasibility or plan of operation reports seeking renewal of licenses for the units, where the renewal application is proposing a significant change in facility operations. This subsection does not apply to modifications of licenses or plan approvals under s. NR 680.07 or to applications that are submitted for the sole purpose of conducting post–closure activities or post–closure activities and corrective action at a facility.

Note: For the purposes of this section, a "significant change" is any change that would qualify as a class 3 modification under s. NR 680.07 (3).

(b) Prior to the submission of a feasibility report or feasibility or plan of operation report for a facility, the applicant shall hold at least one public meeting in order to solicit questions from the community and inform the community of proposed hazardous waste management activities. The applicant shall post a sign–in sheet or otherwise provide a voluntary opportunity for attendees to provide their names and addresses.

(c) The applicant shall submit a summary of the meeting, along with the list of attendees and their addresses developed under par. (b), and copies of any written comments or materials submitted at the meeting, to the permitting agency as a part of the feasibility report or feasibility or plan of operation report, in accordance with this section.

(d) The applicant shall provide public notice of the pre–application meeting at least 30 days prior to the meeting. The applicant shall maintain, and provide to the department upon request, documentation of the notice.

1. The applicant shall provide public notice in all of the following forms:

a. *A newspaper advertisement.* The applicant shall publish a notice, fulfilling the requirements in subd. 2., in a newspaper of general circulation in the county or equivalent jurisdiction in which the proposed facility would be located. In addition, the department shall instruct the applicant to publish the notice in newspapers of general circulation in adjacent counties or equivalent jurisdictions, where the department determines that such publication is necessary to inform the affected public. The notice shall be published as a display advertisement.

b. *A visible and accessible sign.* The applicant shall post a notice on a clearly marked sign at or near the facility, fulfilling the requirements of subd. 2. If the applicant places the sign on the facility property, then the sign shall be large enough to be readable from the nearest point where the public would pass by the site.

c. *A broadcast media announcement.* The applicant shall broadcast a notice, fulfilling the requirements in subd. 2., at least once on at least one local radio station or television station. The applicant may employ another medium with prior approval of the department.

d. *A notice to the permitting agency.* The applicant shall send a copy of the newspaper notice to the permitting agency and to the appropriate units of state and local government, in accordance with sub. (12) (a) 4.

2. The notices required by subd. 1. shall include all of the following:

a. The date, time and location of the meeting.

b. A brief description of the purpose of the meeting.

c. A brief description of the facility and proposed operations, including the address or a map of the facility location.

Note: A map of the facility location may be either a sketched or copied street map.

d. A statement encouraging any person who needs special access to participate in the meeting to contact the facility at least 72 hours before the meeting.

e. The name, address and telephone number of a contact person for the applicant.

(2) SUBMISSION OF REPORTS. An applicant shall submit a feasibility report or feasibility and plan of operation report to the department in accordance with ss. 289.23 to 289.29, Stats. At the same time the applicant shall submit a copy of the feasibility report or feasibility and plan of operation report to each participating municipality under s. 289.33 (6) (b), Stats. The applicant shall notify the department of when and to whom the copies of the feasibility report or feasibility and plan of operation report were submitted.

(2m) NONCOMPLIANCE WITH PLANS OR ORDERS. A feasibility report, plan of operation, feasibility report and plan of operation report and an application for initial licensing of a new or expanded hazardous waste facility shall contain the following information:

(a) Identification of all persons owning a 10% or greater legal or equitable interest in the applicant or in the assets of the applicant, including shareholders of a corporation which is an applicant and partners of a partnership which is an applicant.

(b) Identification of all other Wisconsin solid or hazardous waste facilities for which the applicant or any person identified in par. (a), is named in, or subject to an order or plan approval issued by the department.

(c) Identification of all other Wisconsin solid or hazardous waste facilities which are owned by persons, including corporations and partnerships, in which the applicant or person identified in par. (a) owns or previously owned a 10% or greater legal or equitable interest or a 10% or greater interest in the assets.

(d) A statement indicating whether or not all plan approvals and orders relating to all facilities identified in pars. (b) and (c) are being complied with.

Note: If noncompliance with an order or plan approval occurs while the applicant has or had a 10% or greater legal or equitable interest in the facility and is continuing, the Department is prohibited from issuing a favorable determination of feasibility, approving a plan of operation, and licensing the new or expanded hazardous waste

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

facility, unless the applicant provides proof of financial responsibility under s. 289.34 (3), Stats., to assure that compliance is achieved.

(3) GENERAL CONTENTS OF FEASIBILITY REPORT OR FEASIBILITY AND PLAN OF OPERATION REPORT. Unless otherwise specified, the following information shall be included in any feasibility report or feasibility and plan of operation report, in addition to the information specified in subs. (4) and (5):

(a) A general description of the facility and a Part A of the application for an EPA hazardous waste permit, completed with the most recent information, as required in s. NR 680.21 (1) (a).

(b) Chemical and physical analyses of the hazardous waste and hazardous debris to be handled at the facility. At a minimum, these analyses shall contain all the information which must be known to treat, store or dispose of the wastes in accordance with chs. NR 600 to 685.

(c) A copy of the waste analysis plan required by s. NR 630.13 (1).

(d) A description of the security procedures and equipment required by s. NR 630.14 or a justification demonstrating the reasons for requesting a waiver of this requirement.

(e) A copy of the general inspection schedule required by s. NR 630.15 (2). Include where applicable, as part of the inspection schedule, specific requirements in ss. NR 631.06 (2), 632.06 (1), (2) and (7), 633.11, 640.12 (1), 645.09 (11), 645.11, 655.08, 660.18 (13), (31) (a) and (32), and 670.09.

(f) A description of procedures, structures or equipment used at the facility to:

1. Prevent hazards in unloading operations through the use of equipment such as ramps, special forklifts;

2. Prevent runoff from hazardous waste handling areas to other areas of the facility or environment, or to prevent flooding such as berms, dikes, trenches;

3. Prevent contamination of water supplies;

4. Mitigate effects of equipment failure and power outages; and

5. Prevent undue exposure of personnel to hazardous waste.

Note: An example of a method to prevent undue exposure of personnel is protective clothing.

(g) A description of precautions to prevent accidental ignition or reaction of ignitable, reactive or incompatible wastes as required to demonstrate compliance with s. NR 630.17 including documentation demonstrating compliance with s. NR 630.17 (3).

(h) A description of vicinity and site traffic patterns, estimated volume and controls. If applicable, show turns across traffic lanes and stacking lanes, describe access road and bearing capacity and traffic control signals.

(i) Facility location information:

1. Owners and operators of all facilities shall identify whether the facility is located within a 100–year floodplain. This identification shall indicate the source of data for the determination and include a copy of the relevant federal insurance administration (FIA) flood map, if used, or the calculations and maps used where an FIA map is not available. Information shall also be provided identifying the 100–year flood level and any other special flooding factors, such as wave action, which shall be considered in designing, constructing, operating or maintaining the facility to withstand washout from a 100–year flood.

2. Owners and operators of facilities operating under an interim license, variance or waiver located in the 100–year floodplain shall prepare and provide to the department the following information:

a. Engineering analysis to indicate the various hydrodynamic and hydrostatic forces expected to result at the site as consequence of a 100–year flood.

b. Structural or other engineering studies showing the design of operational units and flood protection devices such as floodwalls and dikes at the facility and how these will prevent washout.

c. If applicable, and in lieu of subd. 2. a. and b., a detailed description of procedures to be followed to remove hazardous waste to safety before the facility is flooded, including timing of movement relative to flood levels, including estimated time to move the waste, to show that the movement can be completed before floodwaters reach the facility; a description of the location to which the waste will be moved and demonstration that those facilities will be eligible to receive hazardous waste in accordance with the requirements of chs. NR 600 to 685; the planned procedures, equipment, and personnel to be used and the means to ensure that resources will be available in time for use; and the potential for accidental discharges of the waste during movement.

3. Owners and operators of facilities operating under an interim license, variance or waiver and which are not in compliance with subd. 2. shall provide a plan and schedule demonstrating how the facility will come into compliance with the requirements of subd. 2.

4. Information to demonstrate that the facility meets the following locational requirements or, if appropriate, a request for an exemption from these requirements according to s. NR 680.04:

a. Except as provided in this paragraph for facilities operating under an interim license, a hazardous waste facility may not be located in a floodplain.

b. A hazardous waste facility may not be located in a wetland.

c. A hazardous waste facility may not be located in a habitat determined by the department to be critical to the continued existence of any endangered species listed in ch. NR 27.

d. The department may require that active portions of a facility be located up to 200 feet away from the property line of the facility.

(j) An outline of both the introductory and continuing training programs by owners or operators to prepare persons to operate or maintain the facility in a safe manner as required to demonstrate compliance with s. NR 630.16 and a brief description of how training will be designed to meet actual job tasks in accordance with requirements in s. NR 630.16 (1) (b).

(k) For facilities or units where hazardous wastes were disposed of before the submittal of the feasibility report, a copy of the survey plat and record of the type, location and quantity of those wastes, and documentation that this was submitted to the register of deeds, as required by s. NR 685.05 (10).

(L) An existing site condition topographic plan sheet which meets the requirements of s. NR 660.09 (2).

(m) For hazardous debris, a description of the debris categories and contaminant categories to be treated, stored or disposed at the facility.

(n) A summary of the pre–application meeting, along with a list of attendees and their addresses, and copies of any written comments or materials submitted at the meeting, as required under s. NR 680.06 (1m) (c).

(4) FACILITY SPECIFIC REQUIREMENTS. Depending upon the facility type, the applicant shall also specifically address the following in the feasibility and plan of operation report:

(a) The feasibility and plan of operation report requirements of s. NR 640.06 in addition to the other requirements of ch. NR 640 for containers.

(b) The feasibility and plan of operation report requirements of s. NR 645.06 in addition to the other requirements of ch. NR 645 for tank systems.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

(c) The feasibility and plan of operation report requirements of s. NR 655.06 in addition to the other requirements of ch. NR 655 for waste piles.

(d) The feasibility and plan of operation report requirements of s. NR 665.06 in addition to the other requirements of ch. NR 665 for incinerators.

(e) The feasibility and plan of operation report requirements of s. NR 670.06 in addition to the other requirements of ch. NR 670 for miscellaneous units.

(5) LANDFILL AND SURFACE IMPOUNDMENT REQUIREMENTS. (a) In addition to the requirements found in sub. (3), when siting a landfill or surface impoundment, the applicant shall also specifically address the location criteria requirements of s. NR 660.06, the initial site inspection requirements of s. NR 660.07, the initial site report requirements of s. NR 660.08, and the feasibility report requirements of ss. NR 660.09 to 660.11. A separate plan of operation shall be prepared addressing the requirements of ss. NR 660.12 to 660.15 in addition to the other landfill and surface impoundment requirements of ch. NR 660.

Note: A person applying for approval of a landfill or surface impoundment may submit the feasibility report and plan of operation at the same time, however, the department may not be able to review the plan of operation portion until after a favorable feasibility determination is made.

(b) 1. Any feasibility report for a landfill or surface impoundment that stores, treats or disposes of hazardous waste shall include information on the potential for the public to be exposed to hazardous wastes or hazardous constituents through releases related to the hazardous waste unit. At a minimum, this information shall address:

a. Reasonably foreseeable potential releases from both normal operations and accidents at the unit, including releases associated with transportation to or from the hazardous waste unit;

b. The potential pathways of human exposure to hazardous waste or constituents as a result of releases described under subd. 1. a.; and

c. The potential magnitude and nature of human exposure as a result of releases.

2. By March 1, 1991, all owners or operators of a landfill or surface impoundment shall submit the information required in subd. 1. b. as supplemental information to their feasibility reports.

(6) ENVIRONMENTAL REVIEW. To aid the department in determining the need for an environmental impact report or environmental impact statement, the feasibility report or feasibility and plan of operation report shall include an environmental assessment section. This assessment shall address the following items:

(a) *Project summary.* A brief summary of the project shall be included. Particular attention shall be given the following areas:

1. The purpose and need for the proposed project including the history and background on the project.

2. A listing of the statutory authority and other relevant local, state and federal permits or approvals required as well as a discussion of the need for exemptions, zoning changes and any other special permits.

3. The estimated cost and funding source for the project.

(b) *Proposed physical changes.* A brief description of the proposed physical changes including:

1. The changes in terrestrial resources. This discussion shall cover the quantity of material to be excavated and the lateral extent of soil removal; the quantity and source of materials to be imported for construction of the liner, final cover system, drainage blanket and perimeter berms. Any other significant terrestrial modifications such as soil placement necessary to reach the proposed sub–base grades, construction of access roads, surface water drainage features and sedimentation controls shall also be outlined.

2. The changes in aquatic resources including the potential impacts to streams, wetlands, lakes and flowages. This discussion shall include discharge rates and volumes for groundwater control structures, leachate collection systems and surface water runoff under existing conditions as well as that anticipated during active operations and following closure.

3. Buildings, treatment units, roads and other structures to be constructed in conjunction with the facility. This discussion shall include the size of the facilities and the number of miles of road to be constructed.

4. Emissions and discharges such as dust, diesel exhaust, odors, gases, leachate, surface water runoff and collected groundwater associated with facility preparation, construction, operation, closure and following closure of the facility.

5. Other changes anticipated with facility development.

6. Maps, plans and other descriptive material to clarify the discussion such as a county map showing the general area of the project, a USGS topographic map, a plat map, zoning map, county wetlands map and a facility development plan.

(c) *Existing environment.* A brief description of the existing environment that may be affected shall be included. At a minimum this shall contain:

1. A description of the physical environment including the regional and local topography, geology, surface water drainage features, hydrogeologic conditions, air, wetlands and earth borrow sources as well as an evaluation of the groundwater quality data and overall performance of any existing solid or hazardous waste units.

2. The dominant aquatic and terrestrial plant and animal species and habitats found in the area including threatened or endangered species and amount, type and hydraulic value of wetlands.

3. Land use including dominant features and zoning in the area.

4. Social and economic conditions including any ethnic or cultural groups.

5. Other special resources such as archaeological, historical, state natural areas and prime agricultural lands.

(d) *Environmental consequences.* A brief discussion of the probable adverse and beneficial impacts including primary, indirect and secondary impacts shall include:

1. The physical impacts which would be associated with facility design, construction and operation, including visual impacts, if applicable.

2. The biological impacts including destruction and creation of habitat, alteration of the physical environment and any impacts to endangered or threatened species.

3. The impacts on land use.

4. The social and economic impacts to local residents and cultural groups and the communities and industries served by the facility.

5. Other special resources such as archaeological, historical, state natural areas and prime agricultural lands.

6. Probable adverse impacts that cannot be avoided including groundwater and surface water impacts, modifications of topography and any borrow source limitations on development around the facility, any loss of agricultural or forest land, displacement of wildlife and adverse aesthetic impacts for people in and around the facility.

(e) *Alternatives.* Identify, describe and discuss feasible alternatives including taking no action; enlargement, reduction or modification of the project; other facilities, locations or methods to the proposed action and their impacts. Particular attention shall be given to alternatives which might avoid some or all adverse environmental impacts, including proposed and existing hazardous waste treatment, storage or disposal, recycling and incineration facilities that may serve to handle the waste expected to be disposed of at the proposed facility, taking into account the economics of waste collection, transportation and disposal.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

(7) SMALL STORAGE FACILITIES. Small storage facilities are exempt from the requirements of sub. (6) if they have the following characteristics:

(a) Hazardous waste storage is entirely in an enclosed and roofed structure having access limited or restricted to employees or other authorized personnel;

(b) Hazardous waste storage is confined to a floor area of 1500 sq. ft. or less;

(c) Hazardous waste storage does not exceed 10,000 gallons at any time;

(d) Hazardous waste is stored generally for the purpose of accumulating a sufficient quantity for a more economical transfer for treatment or disposal; and

(e) All hazardous waste is stored in either containers or above ground tanks.

(8) NEEDS. The feasibility report or feasibility and plan of operation report shall contain an evaluation to justify the need for the proposed facility in accordance with s. 289.28 (1), Stats., unless the facility is exempt under s. 289.28 (2), Stats.

(8m) PUBLIC NOTICE REQUIREMENTS AT THE APPLICATION STAGE. (a) *Applicability.* This subsection applies to all feasibility report or feasibility or plan of operation reports seeking initial licenses for hazardous waste management units. This subsection applies to feasibility report or feasibility or plan of operation reports seeking renewal of licenses for the units under s. NR 680.45 (3). This subsection does not apply to modifications of licenses or plan approvals under s. NR 680.07 or plan modification applications submitted for the sole purpose of conducting post–closure activities or post–closure activities and corrective action at a facility.

(b) *Notification at application submittal.* 1. The department shall provide public notice as set forth in s. NR 680.06 (10) (a) 3., and notice to appropriate units of state and local government as set forth in s. NR 680.06 (12) (a) 4., that a feasibility report or feasibility or plan of operation report has been submitted to the department and is available for review.

2. The notice shall be published within a reasonable period of time after the application is received by the department. The notice shall include all of the following:

a. The name and telephone number of the applicant's contact person.

b. The name and telephone number of the department's contact office, and a mailing address to which information, opinions and inquiries may be directed throughout the application review process.

c. An address to which a person may write in order to be put on the facility mailing list.

d. The location where copies of the application and any supporting documents can be viewed and copied.

e. A brief description of the facility and proposed operations, including the address or a map of the facility location on the front page of the notice.

Note: The map of the facility location may be either a sketched or copied street map.

f. The date that the application was submitted.

(c) *Public access to application.* Concurrent with the notice required by par. (b), the department shall place the application and any supporting documents in a location accessible to the public in the vicinity of the facility or at the department's office.

(9) COMPLETENESS. (a) Within 60 days after a feasibility and plan of operation report for a storage or treatment facility is submitted, the department shall determine whether or not the report is complete. If the report is complete, the department shall publish a class I public notice in accordance with s. 289.25, Stats., and issue a preliminary determination stating whether or not an environmental impact statement is required. If the report is incomplete, the department shall notify the applicant in writing and specify the information which must be submitted to complete the report. The department shall determine the completeness of the report by determining whether or not the minimum requirements of this chapter have been met. The department may require the applicant to submit additional information after determining that the report is complete if the department establishes that the feasibility of the facility cannot be determined without the additional information.

(b) For hazardous waste disposal facilities feasibility report and plan of operation completeness and decision making requirements found in subs. (11) and (12) apply in lieu of the requirements found in par. (a) and sub. (10).

(10) ADDITIONAL FEASIBILITY AND PLAN OF OPERATION REPORT PUBLIC PARTICIPATION PROCEDURES. This subsection applies to the feasibility and plan of operation report stage of the approval process under ss. 289.23 to 289.30, Stats., for expansions of existing hazardous waste treatment or storage facilities under s. NR 680.07 (3) and for new hazardous waste treatment or storage facilities.

(a) *Preliminary determination and notice.* 1. Immediately after determining that a complete feasibility and plan of operation report has been submitted and issuing a preliminary determination that an environmental impact statement is not required or, if it is required, immediately after the department issues the environmental impact statement, the department shall, at the same time it issues the notice required by s. 289.25, Stats., issue its preliminary determination to approve, conditionally approve or disapprove the report. If the preliminary determination is to approve or conditionally approve a report for a new facility or an expansion or to disapprove a report for a new facility, it shall include but need not be limited to the information required to be contained in RCRA draft permits under 40 CFR 124.6 (d) as of July 1, 1990.

2. If the preliminary determination is to approve or conditionally approve a report for a new facility or an expansion or to disapprove a report for a new facility, the notice required by s. 289.25, Stats., shall also provide notice of the department's preliminary determination on the report and shall include the information required to be contained in RCRA notices under 40 CFR 124.10 (d) as of July 1, 1990.

Note: The publication containing the CFR references may be obtained from:

The Superintendent of Documents
U.S. Government Printing Office
Washington, D.C. 20402

3. In addition to distributing the notice to the persons specified under s. 289.32, Stats., if the department proposes to approve or conditionally approve a report for a new facility or an expansion or to disapprove a report for a new facility, it shall also publish the notice by broadcast over local radio stations and it shall also distribute the notice by mailing a copy of it to the applicant, the U. S. environmental protection agency, the U. S. fish and wildlife service, the advisory council on historic preservation, other state agencies having any authority with respect to the construction or operation of the facility, and persons on a mailing list. The mailing list shall be developed by including those who request in writing to be on the list, by soliciting persons for "area lists" from participants in past approval proceedings in that area and by notifying the public of the opportunity to be put on the mailing list. In addition, the department may distribute the notice by any other method likely to give actual notice to persons potentially affected by it.

4. Notice of a preliminary determination to disapprove a report for an expansion need not be issued to anyone other than the persons specified in s. 289.32, Stats.

5. Notice of a preliminary determination to approve or conditionally approve a report for a new facility or an expansion or to disapprove a report for a new facility shall invite the submission of written comments by any person within 45 days after the notice is published and shall describe the method by which an informational hearing under par. (c) 3. may be requested by any person as

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

well as describing the methods by which a hearing may be requested under ss. 289.26 and 289.27, Stats.

(b) *Fact sheet.* The department shall prepare a fact sheet that briefly sets forth the principal facts and the significant factual, legal, methodological and policy questions considered in preparing a proposed approval or conditional approval of a report for a new facility or an expansion or disapproval of a report for a new facility. The department shall send the fact sheet to the applicant and, on request, to any other person. The fact sheet shall include:

1. A brief description of the type of facility or activity which is the subject of the preliminary determination;

2. The type and quantity of wastes which are being or are proposed to be treated or stored;

3. A brief summary of the basis for the proposed conditions of approval including references to applicable statutory or administrative code provisions and appropriate supporting references to the administrative record required by par. (e);

4. Reasons why any requested variances or alternatives to required standards do or do not appear justified;

5. A description of the procedures for reaching a final determination including:

a. The beginning and ending dates of the comment period under par. (a) 5.,

b. The address where comments will be received,

c. Procedures for requesting a hearing and the nature of the hearing,

d. Any other procedures by which the public may participate in the final determination; and

6. The name and telephone number of a person to contact for additional information.

(c) *Informational hearing.* 1. Under s. 227.42 (5), Stats., informational hearings under this paragraph are not contested cases. Hearings under this paragraph are held as part of the process for approving a feasibility report, plan of operation or license under subch. III of ch. 289, Stats., or ch. 291, Stats., and are therefore exempt from s. 227.42 (1), Stats.

2. The department shall hold an informational hearing whenever it finds, on the basis of requests, a significant degree of public interest in a preliminary determination to approve or conditionally approve a report for a new facility or an expansion or to disapprove a report for a new facility.

3. Unless the department holds an informational hearing under s. 289.26, Stats., the department shall hold an informational hearing under this subdivision if during the 45 day written comment period the department receives written notice of opposition to the application and its proposed approval or conditional approval of a report for a new facility or an expansion or disapproval of a report for a new facility accompanied by a request for an informational hearing. Requests for a hearing shall be in writing and state the nature of the issues to be raised in the hearing. Hearings under this subdivision shall be held after at least 30 days notice but no sooner than 30 days after the issuance of the notice under par. (a) and no later than 45 days after the close of the written comment period. The hearing shall be held in the area where the facility is or is proposed to be located.

4. Notwithstanding s. NR 2.135, the conduct of hearings under this paragraph shall be governed by the procedures of this subdivision. At a hearing held under this paragraph, the presiding officer shall open the hearing and make a concise statement of its scope and purposes. Appearances may be entered on the record. Persons entering an appearance may make statements, present arguments or opinions, offer evidence and ask questions concerning the matter being heard, but the presiding officer may limit oral presentations if the hearing would be unduly lengthened by repetitious testimony. The presiding officer may continue the hearing on another date if it appears there will not be enough time for all who wish to speak. Statements may be submitted in oral or written form. Any person may submit a written statement within the time period allowed by the presiding officer. Statements need not be made under oath. The hearing shall be recorded by use of an electronic recording device. The recording is a public record under s. 19.35, Stats.

(d) *Response to comments.* The department shall issue a response to comments received during the written comment period and at any informational hearing. The department shall indicate any provisions in its preliminary determination that were changed in the final determination and the reason for the change and it shall briefly describe and respond to all significant comments.

(e) *Administrative record; final determination to consider comments and response.* 1. If a contested case hearing under s. 289.27, Stats., is not held, the department's final determination shall be based on an administrative record which includes the feasibility and plan of operation report and any supporting data furnished by the applicant; the preliminary determination; the fact sheet; all documents cited in the fact sheet; other documents contained in the supporting file for the preliminary determination; the notice; all comments received during the written comment period and at any informational hearing; the department's response to comments; and any other information which the department considered.

2. If a contested case hearing under s. 289.27, Stats., is held on a feasibility and plan of operation report, the department's determination shall consider all comments received during the written comment period and at any informational hearing, including an informational hearing held under par. (c) 2. or 3., and shall consider the department's response to comments.

(11) FEASIBILITY REPORT PUBLIC PARTICIPATION PROCEDURES. This subsection applies to the feasibility report stage of the approval process under subch. III of ch. 289, Stats., for expansions of existing hazardous waste disposal facilities under s. NR 680.07 (3) and for new hazardous waste disposal facilities.

(a) *Preliminary determination and notice for feasibility reports.* 1. Immediately after determining that a complete feasibility report has been submitted and issuing a preliminary determination that an environmental impact statement is not required or, if it is required, immediately after the department issues the environmental impact statement, the department shall issue the notice required by s. 289.25, Stats.

2. The notice shall be published by the department as a class 1 notice under ch. 985, Stats., in the official newspaper designated under s. 985.04 or 985.05, Stats., or, if none exists in a newspaper likely to give notice in the area of the proposed facility.

3. Copies of the notice shall also be mailed to:

a. The clerk of each affected municipality.

b. The main public library in each affected municipality.

c. The applicant if the notice is not required to be distributed by the applicant.

4. The notice shall state that the feasibility report and environmental impact statement process are complete and shall invite the submission of written comments by any person within 45 days after the notice is published. The notice shall also describe the methods by which a hearing may be requested under pars. (c) and (d).

(b) *Fact sheet.* The department shall prepare a fact sheet that briefly sets forth the principal facts and the significant factual, legal, methodological and policy questions considered in a determination of feasibility. The department shall send the fact sheet to the applicant and, on request, to any other person. The fact sheet shall include:

1. A brief description of the type of facility or activity which is the subject of the proposed determination,

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2. The type and quantity of wastes which are being or are proposed to be disposed of,

3. A brief summary of the basis for the proposed conditions of approval including references to applicable statutory or administrative code provisions and appropriate supporting references to the administrative record required by par. (i),

4. Reasons why any requested variances or alternatives to required standards do or do not appear justified;

5. A description of the procedures for reaching a final determination including:

a. The beginning and ending dates of the comment period under par. (a) 4.,

b. The address where comments will be received,

c. Procedures for requesting a hearing and the nature of the hearing,

d. Any other procedures by which the public may participate in the final determination; and

6. The name and telephone number of a person to contact for additional information.

(c) *Request for an informational hearing.* Within 45 days after the notice under par. (a) is published, any county, city, village or town, the applicant or any 6 or more persons may file a written request for an informational hearing on the matter with the department. The request shall indicate the interests of the municipality or persons who file the request and state the reasons why the hearing is requested.

(d) *Request for treatment as a contested case.* Within 45 days after the notice under par. (a) is published, any county, city, village or town, the applicant or any 6 or more persons may request that the hearing under par. (c) be treated as a contested case, as provided under s. 227.42, Stats. A hearing may be treated as a contested case only if:

1. A substantial interest of the person requesting the treatment of the hearing as a contested case is injured in fact or threatened with injury by the department's action or inaction on the matter;

2. The injury to the person requesting the treatment of the hearing as a contested case is different in kind or degree from injury to the general public caused by the department's action or inaction on the matter; and

3. There is a dispute of material fact.

(e) *Issuance of final determination of feasibility.* If no hearing is conducted under par. (f) or (g), the department shall issue the final determination of feasibility within 60 days after the 45 day period under par. (d) has expired.

(f) *Informational hearing.* This paragraph applies if no request for the treatment of a hearing as a contested case is granted and if an informational hearing is requested under par. (c) within the 45 day period, or if no hearing is requested under par. (c) within the 45 day period but the department determines there is substantial public interest in holding a hearing.

1. The department shall conduct the informational hearing within 60 days after the expiration of the 45 day period under par. (c). The hearing shall be conducted in an appropriate place designated by the department in a county, city, village or town which would be substantially affected by the operation of the proposed facility.

2. The department shall issue a final determination of feasibility within 60 days after the informational hearing under this paragraph is adjourned.

(g) *Hearing conducted as a contested case.* This paragraph applies only if a person or party requests the treatment of the hearing as a contested case under par. (d) within the 45 day period and has a right to a hearing under that paragraph. Any denial of a request for treatment of the hearing as a contested case received within the 45 day period under par. (d) shall be in writing, shall state the reasons for denial and is an order reviewable under ch. 227, Stats. If the department does not enter an order granting or denying the request for the treatment of the hearing as a contested case within 20 days after the written request is filed, the request is deemed denied.

1. The division of hearings and appeals in the department of administration shall schedule the hearing to be held within 120 days after the expiration of the 45 day period under par. (d).

2. The final determination of feasibility shall be issued within 90 days after the hearing is adjourned.

3. If a contested case hearing is conducted under this paragraph, the secretary shall issue any decision concerning the determination of need, notwithstanding s. 227.46 (2) to (4), Stats. The secretary shall direct the hearing examiner to certify the record of the contested case hearing to him or her without an intervening proposed decision. The secretary may assign responsibility for reviewing this record and making recommendations concerning the decision to any employee of the department.

(h) *Response to comments.* The department shall issue a response to comments received during the written comment period and at any informational hearing. The department shall indicate any provisions in its preliminary determination that were changed in the final determination and the reason for the change and the department shall briefly describe and respond to all significant comments.

(i) *Determination based on administrative record.* The department's final determination shall be based on an administrative record which includes the feasibility report and any supporting data furnished by the applicant; the preliminary determination; the fact sheet; all documents cited in the fact sheet; other documents contained in the supporting file for the preliminary determination; the notice; all comments received during the written comment period and at any informational hearing; the department's response to comments; and any other information which the department considered.

(12) PLAN OF OPERATION APPROVAL AND PUBLIC PARTICIPATION PROCEDURES. This subsection applies to the plan of operation stage of the approval process under s. 289.30, Stats., for expansions of existing hazardous waste disposal facilities under s. NR 680.07 (3) and for new hazardous waste disposal facilities.

(a) *Preliminary determination and notice.* 1. Upon determining that a complete plan of operation has been submitted, the department shall issue its preliminary determination to approve, conditionally approve or disapprove the plan. If the preliminary determination is to approve or conditionally approve a plan for a new facility or an expansion or to disapprove a plan for a new facility it shall include but need not be limited to the information required to be contained in RCRA draft permits under 40 CFR 124.6 (d) as of July 1, 1990.

2. Upon issuing its preliminary determination, the department shall also issue notice of its preliminary determination.

3. If the preliminary determination is to approve or conditionally approve a plan for a new facility or an expansion or to disapprove a plan for a new facility the notice shall include but need not be limited to the information required to be contained in RCRA notices under 40 CFR 124.10 (d) as of July 1, 1990.

Note: The publication containing the CFR references may be obtained from:

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U.S. Government Printing Office
Washington, D.C. 20402

4. Notice of a preliminary determination to approve or conditionally approve a plan for a new facility or an expansion or to disapprove a plan for a new facility shall be published by the department as a class I notice under ch. 985, Stats., in the official newspaper designated under s. 985.04 or 985.05, Stats., if one exists, in a major local newspaper of general circulation in the area of the facility and by broadcast over local radio stations and it shall distribute the notice by mailing a copy of it to the applicant, the U.S. environmental protection agency, the U.S. fish and wildlife

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

service, the advisory council on historic preservation, other state agencies having any authority with respect to the construction or operation of this facility, the clerk of each affected municipality, the main public library in each affected municipality and persons on a mailing list, which shall be developed by including those who request in writing to be on the list, by soliciting persons for "area lists" from participants in past approval proceedings in that area and by notifying the public of the opportunity to be put on the mailing list. In addition, the department may distribute the notice by any other method likely to give actual notice to persons potentially affected by it.

5. Notice of a preliminary determination to disapprove a plan for an expansion need not be issued to anyone other than the applicant.

6. Notice of a preliminary determination to approve or conditionally approve a plan for a new facility or an expansion or to disapprove a plan for a new facility shall invite the submission of written comments by any person within 45 days after the notice is published and shall describe the method by which an informational hearing under par. (c) 3. may be requested by any person.

(b) *Fact sheet.* The department shall prepare a fact sheet that briefly sets forth the principal facts and the significant factual, legal, methodological and policy questions considered in preparing a proposed approval or conditional approval of a plan for a new facility or an expansion and a disapproval of a plan for a new facility. The department shall send the fact sheet to the applicant and, on request, to any other person. The fact sheet shall include:

1. A brief description of the type of facility or activity which is the subject of the proposed determination;

2. The type and quantity of wastes which are being or are proposed to be disposed of;

3. A brief summary of the basis for the proposed conditions of approval including references to applicable statutory or administrative code provisions and appropriate supporting references to the administrative record required by par. (e);

4. Reasons why any requested variances or alternatives to required standards do or do not appear justified;

5. A description of the procedures for reaching a final determination including:

a. The beginning and ending dates of the comment period under par. (a) 6.;

b. The address where comments will be received;

c. Procedures for requesting a hearing and the nature of the hearing;

d. Any other procedures by which the public may participate in the final determination; and

6. The name and telephone number of a person to contact for additional information.

(c) *Informational hearing.* 1. Under s. 227.42 (5), Stats., informational hearings under this paragraph are not contested cases. Hearings under this paragraph are held as part of the process for approving a feasibility report, plan of operation or license under subch. III of ch. 289, Stats., or ch. 291, Stats., and are therefore exempt from s. 227.42 (1), Stats.

2. The department shall hold an informational hearing whenever it finds, on the basis of requests, a significant degree of public interest in a preliminary determination to approve or conditionally approve a plan for a new facility or an expansion or to disapprove a plan for a new facility.

3. If, during the 45 day written comment period the department receives written notice of opposition to the application and its proposed approval or conditional approval of a plan for a new facility or an expansion or disapproval of a plan for a new facility accompanied by a request for an informational hearing, it shall hold an informational hearing on the preliminary determination. Requests for a hearing shall be in writing and state the nature of the issues to be raised in the hearing. Hearings under this subdivision shall be held after at least 30 days notice but no sooner than 30 days after the close of the written comment period. The hearing shall be held in the area where the facility is or is proposed to be located.

4. Notwithstanding s. NR 2.135, the conduct of hearings under this paragraph shall be governed by the procedures of this subdivision. At a hearing held under this paragraph, the presiding officer will open the hearing and make a concise statement of its scope and purposes. Appearances may be entered on the record. Persons entering an appearance may make statements, present arguments or opinions, offer evidence or ask questions concerning the matter being heard, but the presiding officer may limit oral presentations if the hearing would be unduly lengthened by repetitious testimony. The presiding officer may continue the hearing on another date if it appears there will not be enough time for all who wish to speak. Statements may be submitted in oral or written form. Any person may submit a written statement within the time period allowed by the presiding officer. Statements need not be under oath. The hearing shall be recorded by use of an electronic recording device. The recording is a public record under s. 19.35, Stats.

(d) *Response to comments.* The department shall issue a response to comments received during the written comment period and at any informational hearing. The department shall indicate any provisions in its preliminary determination that were changed in the final determination and the reason for the change and it shall briefly describe and respond to all significant comments.

(e) *Determination based on administrative record.* The department's final determination shall be based on an administrative record which includes the plan of operation and any supporting data furnished by the applicant; the preliminary determination; the fact sheet; all documents cited in the fact sheet; other documents contained in the supporting file for the preliminary determination; the notice; all comments received during the written comment period and at any informational hearing; the department's response to comments and any other information which the department considered.

(13) TIMING OF RADIO ANNOUNCEMENT PRIOR TO ISSUANCE OF INITIAL OPERATING LICENSES. The department shall arrange for the radio broadcast required by s. 289.31 (4) (b), Stats., to be made at least 45 days prior to license issuance.

(14) RESPONSE TO COMMENTS UPON ISSUANCE OF INITIAL OPERATING LICENSE. The department shall issue a response to comments it receives following issuance of the notice of intent to issue an initial operating license under s. 289.31 (4), Stats.

(15) INFORMATION REPOSITORY. This subsection applies to all feasibility reports or feasibility or plan of operation reports seeking operating licenses for hazardous waste management units.

(a) The department may assess the need, on a case–by–case basis, for an information repository. When assessing the need for an information repository, the department shall consider a variety of factors, including the level of public interest; the type of facility; the presence of an existing repository; and the proximity to the nearest copy of the administrative record. If the department determines, at any time after submittal of a permit application, that there is a need for a repository, then the department shall notify the facility that it shall establish and maintain an information repository.

Note: See s. NR 680.06 (18m) for similar provisions relating to the information repository during the life of a license.

(b) The information repository shall contain all documents, reports, data and information deemed necessary by the department to fulfill the purposes for which the repository is established. The department shall have the discretion to limit the contents of the repository.

(c) The information repository shall be located and maintained at a site chosen by the facility. If the department finds the site

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

unsuitable for the purposes and persons for which it was established, due to problems with the location, hours of availability, access or other relevant considerations, then the department shall specify a more appropriate site.

(d) The department shall specify requirements for informing the public about the information repository. At a minimum, the department shall require the facility to provide a written notice about the information repository to all individuals on the facility mailing list.

(e) The facility owner or operator shall be responsible for maintaining and updating the repository with appropriate information throughout a time period specified by the department. The department may close the repository at his or her discretion, based on the factors in par. (a).

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (10) (a) 1., 2., (12) (a) 1. and 3., Register, August, 1992, No. 440, eff. 9–1–92; correction in (3) (l) and (5) (a) made under s. 13.93 (2m) (b) 7., Stats., Register, August, 1992, No. 440; correction in (5) (a) made under s. 13.93 (2m) (b) 7., Stats., Register, March, 1993, No. 447; am. (3) (b), cr. (3) (m), Register, May, 1995, No. 473, eff. 6–1–95; corrections made under s. 13.93 (2m) (b) 1. and 7., Stats., Register, May, 1995, No. 473; cr. (1m), (3) (n), (8m) and (15), am. (3) (e) and (k), Register, March, 1998, No. 507, eff. 4–1–98; correction in (1) to (3), (8) to (14), made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509; cr. (2m), Register, September, 1998, No. 513, eff. 10–1–98; **correction in (3) (e) made under s. 13.93 (2m) (b) 7., Stats.**

NR 680.07 Facility expansions and modifications of licenses and plan of operation approvals. (1) CLASS 1 MODIFICATIONS. For facilities with operating licenses issued under this chapter, class 1 or minor modifications of licenses and plan of operation approvals include only the changes listed in appendix I of this chapter as class 1 modifications and changes identified as class 1 modifications by the department under sub. (5). Class 1 modifications of licenses and plan of operation approvals may be made only with the consent of the owner or operator of the facility. If the owner or operator of the facility does not consent to a class 1 modification, the change shall be a class 2 modification under sub. (2).

(2) CLASS 2 MODIFICATIONS. For facilities with operating licenses issued under this chapter, class 2 modifications of licenses and plan of operation approvals include the changes listed in appendix I of this chapter as class 1 modifications which are not consented to by the owner or operator of the facility; changes listed in appendix I as class 2 modifications; changes identified as class 2 modifications by the department under sub. (5) and changes made for the following reasons, but do not include changes which are also class 1 modifications under sub. (1):

(a) The owner or operator proposes to change the facility's operation in such a way so as to not constitute an expansion or class 3 modification.

(b) The department determines that good cause exists for modification of a compliance schedule at the licensee's request, such as an act of God, strike, flood or materials shortage or other events over which the licensee has little or no control and for which there is no reasonably available remedy.

(c) The department establishes that one or more of the conditions in s. 289.30 (8), Stats., exists, necessitating a modification of the design or construction requirements of the facility's plan of operation approval.

(d) The operational requirements on which the license, plan of operation approval or interim license were based have been changed by statute, through promulgation of amendments or revisions to chs. NR 600 to 685, or by judicial decision after the license, plan of operation approval or interim license was issued.

(e) The department receives new information that was not available previously, such as information revealed in monitoring results, reports, plans, submittals, records and inspection results, if the cause specified in par. (f) also exists.

(f) The department determines that a modification is necessary for the licensee to meet the conditions of the facility's plan of operation approval, the requirements of chs. NR 600 to 685, or any of the additional requirements specified in s. NR 680.42 (5).

(g) Notwithstanding any other provisions of this chapter, when a plan submittal or license renewal application is received by the department in accordance with s. NR 680.45 (8), the department shall condition the plan of operation approval or operating license as necessary to ensure that the facility continues to comply with all applicable requirements of chs. NR 600 to 685.

(3) CLASS 3 MODIFICATIONS. No person may modify a hazardous waste facility by expanding it without first obtaining written approval from the department of the necessary plans and reports required in s. NR 680.06. Any change which is not a class 3 modification is a class 1 or 2 modification. For facilities with operating licenses issued under this chapter, class 3 modifications include the changes listed in appendix I of this chapter as class 3 modifications, changes identified as class 3 modifications by the department under sub. (5) and the following changes:

(a) Material and substantial alterations or additions to a facility or activity, including the addition of any new treatment, storage or disposal process or unit.

(b) Increases in the design capacity of any treatment, storage or disposal process or unit.

(c) Any addition of any new hazardous waste to the list of hazardous wastes that the facility is authorized by the department to manage. This change may not be considered an expansion if the department determines that the new waste to be managed is not substantially different than any of the wastes which the facility is already authorized to manage, and the addition of the new waste will not significantly affect the facility's operation any other way.

(d) Increases in the maximum inventory of waste specified in the facility's closure plan, if the increase causes an increase in the design capacity of any treatment, storage or disposal process or unit.

(e) Reconstruction.

(4) MODIFICATIONS OF FACILITIES WITHOUT OPERATING LICENSES. (a) Modifications of interim licenses and plan of operation approvals for facilities may be made by the department if the change is for a facility without an operating license issued under this chapter. Modifications of facilities without operating licenses may authorize or require any change at the facility if the change would not be an expansion or class 3 modification if the facility had an operating license. Modifications made under this paragraph shall be treated as minor or class 1 modifications.

(b) No person may modify a facility without an operating license by expanding it without first obtaining written approval from the department of the necessary plans and reports required in s. NR 680.06. For facilities without an operating license, expansions include all changes which would be class 3 modifications if the facility had an operating license.

(5) CLASSIFICATION OF MODIFICATIONS. (a) Pursuant to s. NR 680.42 (5), the department shall advise the owner or operator of an existing facility, in writing, of the receipt of and the department's findings on any request for a determination of whether a proposed change at a facility or in a license or plan of operation approval constitutes a class 1, class 2 or class 3 modification. The department shall advise the owner or operator, in writing, of whether the request is complete and of its determination in accordance with sub. (6) (a). No person may implement a class 1, 2 or 3 modification without prior written approval from the department. Class 3 modifications of existing facilities under sub. (3) are subject to the public participation procedures of s. NR 680.06 (10) for storage or treatment facilities or s. NR 680.06 (11) and (12) for disposal facilities. Class 2 modifications of licenses and plan of operation approvals under sub. (2) and class 1 modifications of licenses and plan of operation approvals under subs. (1) and (4) are subject to the procedures of sub. (6).

(b) In the case of changes not listed in appendix I of this chapter, the owner or operator of a facility may request that the change be reviewed and approved as a class 3 modification or may request a determination by the department that the change be reviewed

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

and approved as a class 1 or class 2 modification. If the owner or operator requests that the change be reviewed and approved as a class 1 or 2 modification, the person shall provide the department with information necessary to support the requested classification.

(c) The department shall determine if a request under par. (b) is complete within 65 business days after receiving it. Within 65 business days after completeness has been determined, the department shall determine whether the change is a class 1, 2 or 3 modification. In determining the appropriate class for a specific modification, the department shall consider the similarity of the modification to other modifications in appendix I and the following criteria:

1. Class 1 modifications include changes that keep the license or plan of operation approval current with routine changes to the facility or its operation. These changes do not substantially alter the license or plan of operation approval conditions or reduce the capacity of the facility to protect human health or the environment.

2. Class 2 modifications include changes that are necessary for a facility to respond in a timely manner to:

a. Common variations in the types and quantities of the wastes managed under the facility's license,

b. Technological advancements, and

c. Changes necessary to comply with new rules where these changes can be implemented without substantially changing design specifications or management practices in the license or plan of operation approval.

3. Class 3 modifications include changes that substantially alter the facility or its operation, including facility expansions.

(6) PROCEDURES. In addition to any procedures required or authorized by s. 289.07 (1), Stats., and subch. III of ch. 289, Stats., for modification of licenses or plan of operation approvals, the following procedures apply to class 1 and 2 modifications:

(a) *Requests and time for department response.* Licenses, including interim licenses, and plan of operation approvals may be modified either at the request of any interested person, including the licensee, or upon the department's initiative. All requests shall be in writing and shall contain facts or reasons supporting the request. The department shall determine if a request is complete within 65 business days after receiving the request. The department shall review and approve, conditionally approve or deny a request and issue its final determination within 65 business days after receiving a complete request. The department shall advise, in writing, the requestor and the owner or operator if the owner or operator is a different person, of the receipt of the request and its determination on the request.

(b) *Preliminary determination and notice.* 1. Upon determining that a request is complete or upon initiating a modification, the department shall issue its preliminary determination on the modification. If the department initiates or proposes to approve or conditionally approve a class 2 modification, the preliminary determination shall include, but need not be limited to the information required to be contained in RCRA draft permits under 40 CFR 124.6 (d) as of July 1, 1993.

2. Upon issuing its preliminary determination on a modification, the department also shall issue a notice of its preliminary determination.

3. If the department initiates or proposes to approve or conditionally approve a class 2 modification, the notice shall include but need not be limited to, the following information:

a. Name and address of the office processing the modification action for which notice is being given;

b. Name and address of the licensee or applicant and, if different, of the facility or activity regulated by the license;

c. A brief description of the business conducted at the facility or activity described in the modification request or preliminary determination;

d. Name, address and telephone number of a person from whom interested persons may obtain further information, including copies of the preliminary determination, fact sheet and the modification request;

e. A brief description of the comment procedures required by subd. 5. and par. (d), the time and place of any hearing that will be held, including a statement of procedures to request a hearing unless a hearing has already been scheduled.

f. The location of relevant public records, the times at which the records will be open for public inspection, and a statement that all nonconfidential data submitted by the applicant are available for public inspection;

g. Any additional information the department considers necessary or proper; and,

h. In addition to the requirements of subd. 3. a. to g., when the department gives notice of a public hearing under par. (d), the notice shall contain: references to the date of previous public notices relating to the plan of operation approval and license; date, time and place of the hearing; and a brief description of the nature and purpose of the hearing, including the applicable rules and procedures.

4. Notice of a preliminary determination to disapprove a request need not be issued to anyone other than the requestor and the owner or operator. If the department initiates or proposes to approve or conditionally approve a class 2 modification, it shall publish a class I notice under ch. 985, Stats., in the official newspaper designated under s. 985.04 or 985.05, Stats., if one exists, in a major local newspaper of general circulation in the area of the facility and by broadcast over local radio stations and it shall distribute the notice by mailing a copy of it to the requestor, the owner or operator of the facility, the U. S. environmental protection agency, the U. S. fish and wildlife service, the advisory council on historic preservation, other state agencies having any authority with respect to the construction or operation of the facility, the clerk of each affected municipality, the main library in each affected municipality and persons on a mailing list which shall be developed by including those who request in writing to be on the list, by soliciting persons for "area lists" from participants in past approval proceedings in that area, and by notifying the public of the opportunity to be put on the mailing list. In addition, the department may distribute the notice by any other method to give actual notice to persons potentially affected by it.

5. If the department initiates or proposes to approve or conditionally approve a class 2 modification, the notice shall invite the submission of written comments by any person within 45 days after the notice is published and shall describe the method by which an informational hearing under par. (d) 3. may be requested by any person.

6. The department may disapprove class 2 modifications and make class 1 modifications of licenses and plan of operation approvals without inviting written comment or offering an opportunity for a public informational hearing. Notice of preliminary determinations on class 1 modifications and on disapprovals of class 2 modifications shall be sent by first class mail to the owner or operator and the requestor.

(c) *Fact sheet.* The department shall prepare a fact sheet that briefly sets forth the principal facts and the significant factual, legal, methodological and policy questions considered in initiating or preparing the proposed approval or conditional approval of a class 2 modification. The department shall send the fact sheet to the requestor, the owner or operator and, on request, to any other person. The fact sheet shall include:

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

1. A brief description of the type of facility or activity which is the subject of the preliminary determination;

2. The type and quantity of wastes which are being or are proposed to be treated, stored or disposed of;

3. A brief summary of the basis for the proposed conditions of approval including references to applicable statutory or administrative code provisions and appropriate supporting references to the administrative record required by par. (f);

4. Reasons why any requested variances or alternatives to required standards do or do not appear justified;

5. A description of the procedures for reaching a final determination including the beginning and ending dates of the comment period under par. (b) 5., the address where comments shall be received, procedures for requesting a hearing and the nature of the hearing, and any other procedures by which the public may participate in the final determination; and

6. The name and telephone number of a person to contact for additional information.

(d) *Informational hearing.* 1. Under s. 227.42 (5), Stats., informational hearings under this paragraph are not contested cases. Hearings under this subdivision are held as part of the process for approving a feasibility report, plan of operation or license under subch. III of ch. 289, Stats., or ch. 291, Stats., and are therefore exempt from s. 227.42 (1), Stats.

2. The department shall hold an informational hearing whenever it finds, on the basis of requests, a significant degree of public interest in a proposed class 2 modification of a license or plan of operation approval.

3. If, during the 45 day written comment period the department receives written notice of opposition to a class 2 modification initiated by the department or to a request for a class 2 modification and its proposed approval or conditional approval accompanied by a request for an informational hearing, it shall hold an informational hearing on the proposed class 2 modification of the license or plan of operation approval. Requests for a hearing shall be in writing and state the nature of the issues to be raised in the hearing. Hearings under this subdivision shall be held after at least 30 days notice but no sooner than 30 days after the issuance of the notice under par. (b) 2., and no later than 45 days after the close of the written comment period. The hearing shall be held in the area where the facility is located.

4. Notwithstanding s. NR 2.135, the conduct of hearings under this paragraph shall be governed by the procedures of this subdivision. At a hearing held under this paragraph, the presiding officer shall open the hearing and make a concise statement of its scope and purposes. Appearances may be entered on the record. Persons entering an appearance may make statements, present arguments or opinions, offer evidence or ask questions concerning the matter being heard, but the presiding officer may limit oral presentations if the hearing would be unduly lengthened by repetitious testimony. The presiding officer may continue the hearing on another date if it appears there will not be enough time for all who wish to speak. Statements may be submitted in oral or written form. Any person may submit a written statement within the time period allowed by the presiding officer. Statements need not be made under oath. The hearing shall be recorded by use of an electronic recording device. The recording is a public record under s. 19.35, Stats.

(e) *Response to comments.* The department shall issue a response to comments received during the written comment period and at any informational hearing. The department shall indicate any provisions in its preliminary determination that were changed in the final determination and the reason for the change and it shall briefly describe and respond to all significant comments.

(f) *Determination based on administrative record.* The department's final determination shall be based on an administrative record which includes the request and any supporting data furnished by the requestor; the preliminary determination; the fact sheet; all documents cited in the fact sheet; other documents contained in the supporting file for the preliminary determination; the notice; all comments received during the written comment period and at any informational hearing; the department's response to comments; and any other information which the department considered.

(7) TEMPORARY AUTHORIZATIONS. (a) Upon request of an owner or operator of a hazardous waste facility which has an operating license, the department may, without prior public notice and comment, temporarily authorize a modification of the facility's license or plan of operation approval in accordance with this subsection. Temporary authorizations may not exceed 180 days in duration and may not be granted to unlicensed facilities.

(b) An owner or operator may request a temporary authorization for:

1. Any class 1 or 2 modification that meets the criteria in par. (c).

2. Any class 3 modification that meets the criteria in par. (e) 2. c., d. or e. and provides improved management or treatment of a hazardous waste already listed in the facility's plan of operation approval and license or that meets the criteria in par. (e) 2. a. or b.

(c) Temporary authorization requests shall include:

1. A description of the activities to be conducted under the temporary authorization;

2. An explanation of why the temporary authorization is necessary; and

3. Sufficient information to ensure compliance with ch. NR 630 and the facility–specific requirements of chs. NR 625 and 640 to 670.

(d) The owner or operator shall send a notice about the temporary authorization request in the manner described for notices in sub. (6) (b) 4. within 7 days after submission of the request.

(e) The department shall approve, conditionally approve or deny the request as soon as is practical. The department may not grant a temporary authorization unless it finds:

1. The authorized activities are in compliance with the standards of ch. NR 630 and the facility–specific requirements of chs. NR 625 and 640 to 670.

2. The temporary authorization is necessary to achieve one of the following objectives before action is likely to be taken on a modification request:

a. To facilitate timely implementation of closure or corrective action activities;

b. To allow treatment or storage in tanks or containers of restricted wastes in accordance with ch. NR 675;

c. To prevent disruption of ongoing waste management activities;

d. To enable the owner or operator to respond to sudden changes in the types or quantities of the wastes managed under the facility's plan of operation approval or license; or

e. To facilitate other changes to protect human health and the environment.

(f) A temporary authorization may be reissued for one additional term of up to 180 days if the owner or operator has requested a class 1, 2 or 3 modification for the activity covered in the temporary authorization, and:

1. The reissued temporary authorization constitutes the department's decision on a class 1 or 2 modification request in accordance with sub. (6) (b), or

2. The temporary authorization is for a class 3 modification and the department determines that reissuance of the temporary authorization is warranted to allow the authorized activities to continue while the modification procedures of sub. (6) for expansions are being conducted.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

(g) Department determinations under this subsection are made as part of the process for approving a feasibility report, plan of operation or license under subch. III of ch. 289, Stats., or ch. 291, Stats., and are therefore exempt from s. 227.42 (1), Stats.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (5) (b) 1. and 3., Register, August, 1992, No. 440, eff. 9–1–92; r. and recr., Register, May, 1995, No. 473, eff. 6–1–95; correction in (2) (c), (5) (c) 2., (6) and (d), (7) (g) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509.

NR 680.08 Construction documentation. (1) The department may require a license applicant to submit a construction observation report under s. NR 680.05. Factors that the department will consider before requiring the submission of a construction observation report include the types and quantities of hazardous wastes to be stored, treated, recycled or disposed of, the methods of storage, treatment, recycling or disposal and the potential for degradation of the environment and possible adverse human health effects should a discharge of hazardous waste occur.

(2) A registered professional engineer shall document facility construction and render an opinion whether the facility has been constructed in substantial conformity with the plan of operation or has conducted all closure activities in substantial conformity with the closure plan. The department shall review, and approve, deny or deem incomplete the request for approval of facility construction documentation within 65 business days after receiving the request. Operation of the facility may not commence until the construction documentation report is approved by the department, and, if necessary, a license to operate the facility has been issued by the department.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (2), Register, May, 1995, No. 473, eff. 6–1–95.

NR 680.09 Construction inspections. (1) NEW LANDFILLS AND SURFACE IMPOUNDMENTS. All new landfill and surface impoundment facilities and expansions of existing landfill and surface impoundment facilities for which the plan of operation was not approved prior to March 1, 1991, shall be continuously inspected by a registered professional engineer employed by the department at all times critical construction is ongoing at the facility. Critical construction includes items such as liner and final cover placement, leachate collection system construction, leachate storage and transfer device construction, drainage material placement, gas collection and control device installation, clay borrow source excavation and any other construction items deemed appropriate by the department. In addition, the drilling of all borings, the installation and development of all wells and all infield hydraulic conductivity tests shall be inspected by a hydrogeologist employed by the department. The owner or operator shall pay inspection fees under sub. (3) (a).

(2) OTHER FACILITIES. The department may require as a condition of the approval of a feasibility and plan of operation report, groundwater monitoring plan, closure plan, closure and long term care plan or any report dealing with investigation or remedial actions at solid waste management units, or as a modification to any approval that critical construction steps be inspected by the department. The owner or operator shall pay the inspection fee under sub. (3) (b).

(3) CONSTRUCTION INSPECTION FEES. (a) The owner or operator of a facility subject to sub. (1) shall pay an inspection fee of $50.00 per hour for each hour of time incurred by the department technical staff in conducting inspections and any associated work. Payment shall be made within 60 days of receipt of an itemized statement documenting the time spent and work performed.

(b) A construction inspection fee of $500.00 per inspection required under sub. (2) shall be paid to the department by the owner or operator at the time a construction documentation report is submitted or as specified in the plan approval.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (3) (a), Register, May, 1998, No. 509, eff. 6–1–98.

NR 680.10 Retention of records. Any person who submits any report or plan under this chapter shall keep records of all data used to complete the report or plan and any supplemental information submitted for a period of at least 3 years from the date the report or plan is signed under s. NR 680.05 (2), sealed under s. NR 680.05 (1) (c) 1., or submitted to the department, or for the duration of the time period in which the license, variance or approval is in force, whichever is longer.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 680.20 Eligibility for an interim license. (1) GENERAL. Any person who operates a hazardous waste facility which may be authorized by the department, under s. 291.25 (4), Stats., to receive hazardous waste pending the issuance of a hazardous waste facility operating license, and which was in existence on November 19, 1980, or on a later date which is the original effective date of the statute or rule which first required the facility to obtain an operating license, may continue the regulated activity prior to the issuance of an operating license only if an interim license application was submitted to the department within 3 months after the original effective date of a statute or rule that first rendered the facility subject to the requirement to obtain an operating license.

(2) LATE APPLICATIONS. The department may, by granting a written exemption under par. (b), allow a person who did not terminate a regulated activity under s. NR 680.60 and did not complete, sign or submit an interim license application to the department by the date referred to in sub. (1) to complete, sign and submit an interim license application to the department after the date referred to in sub. (1), if:

(a) The facility for which the application is prepared was in existence on November 19, 1980; and

(b) 1. The owner and operator of the facility for which the application is prepared have submitted, to the EPA, part A of the application for an EPA hazardous waste permit, as required under the resource conservation and recovery act and have qualified for interim status, or have been allowed to continue to operate by a compliance order issued by EPA under 42 USC 6928 (a);

Note: The publication containing Title 42 of the United States Code may be obtained from:

The Superintendent of Documents
U.S. Government Printing Office
Washington, D.C. 20402

2. The facility for which the application is prepared is exempt from permitting or has a final permit under the resource conservation and recovery act; or

3. The requirements of s. NR 680.21 (3) are met.

(3) Subsection (1) does not apply to any facility which has been previously denied a hazardous waste operating license or if authority to operate the facility under this chapter has been previously terminated.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction in (1) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509.

NR 680.21 Application for an interim license. (1) An interim license application shall contain the following:

(a) Two current part A forms of the application for an EPA hazardous waste permit, as required under the resource conservation and recovery act, including all the required maps, drawings and photographs.

Note: The part A application form and instructions may be obtained from the department of natural resources district offices at no charge.

(b) Two copies of the facility's closure plan as required in s. NR 685.05 and the most recent closure cost estimate as required in s. NR 685.07 (2), (3) (a) and (4) (a).

(c) Two copies of the facility's long–term care plan as required in s. NR 685.06 and the most recent long–term care cost estimate as required in s. NR 685.07 (2).

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

(d) Two copies of the facility's contingency plan as required in ss. NR 630.21 and 630.22 (1) and (2).

(e) The required fee as specified in s. NR 680.45.

(f) The department may require that the owner or operator submit copies of all available drawings, specifications, any prior plan approval letters, any applicable solid waste licenses and license applications, monitoring data, including groundwater monitoring, waste analysis, waste analysis plans and any other existing information which is necessary to complete the interim license application. The department shall request information in writing at the time the application is requested under s. NR 680.21, or after the application is received. The department shall specify a reasonable amount of time for the owner or operator to submit the information.

(g) The department may require that the interim license application include a description of how the facility meets the interim license requirements of s. NR 680.22. The department may also gather the necessary information to determine how the facility complies through an inspection.

(h) The application shall be submitted under the signature of the owner and operator as specified in s. NR 680.05 (2).

(2) The department shall grant or deny any request for an exemption under s. NR 680.20 (2) within 45 business days of receipt of a request. If the department denies the exemption request under s. NR 680.20 (2), the owner or operator of the facility shall terminate the regulated activity in accordance with ss. NR 680.60 and 685.04. If the department grants the exemption under s. NR 680.20 (2), the owner and operator of the exempted facility shall complete, sign and submit an interim license application to the department, in accordance with sub. (1), within 30 days after the owner or operator is notified that the exemption is granted, and the owner or operator of the exempted facility shall:

(a) Submit to the department proof of financial responsibility for closure, and if applicable, long–term care, as required by s. NR 685.07, within 60 days after the owner or operator is notified that the exemption is granted;

(b) Submit to the department a signed duplicate original of the hazardous waste facility liability endorsement or a certificate of liability insurance, for each insurance policy, as required by s. NR 685.08, within 180 days after the owner or operator is notified that the exemption is granted.

(3) Facilities which do not meet the conditions of s. NR 680.20 (1) and (2) shall submit the reports and plans needed for the issuance of an operating license as specified in ss. NR 680.05 and 680.31 according to a compliance schedule established by the department as a condition of an interim license, if the interim license application submitted under s. NR 680.21 is approved.

(4) PROOF OF FINANCIAL RESPONSIBILITY. An owner or operator who submits an interim license application to the department shall submit to the department proof of financial responsibility for closure, and if applicable, long–term care, as required by s. NR 685.07.

(5) LIABILITY INSURANCE. An owner or operator who has submitted an interim license application to the department shall submit to the department a signed duplicate original of the hazardous waste facility liability endorsement or a certificate of liability insurance, for each insurance policy, as required by s. NR 685.08, or within the time periods specified in s. NR 660.19 (4) for surface impoundments with discharges regulated under ch. 283, Stats.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction in (5) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509.

NR 680.22 Interim license requirements. No person may operate or maintain a hazardous waste facility after an interim license application has been submitted to the department in accordance with s. NR 680.21, or after an interim license has been granted to the facility under s. NR 680.24, unless the facility meets the requirements of this section which apply until an operating license under s. NR 680.32 is issued, where applicable to the type of hazardous waste management that takes place at the facility:

(1) Environmental and health standards in s. NR 630.05.

(2) Underground injection and land treatment requirements in s. NR 600.04.

(3) Identification number requirements in s. NR 630.11.

(4) Notice requirements in s. NR 630.10.

(5) General waste analysis requirements in s. NR 630.12.

(6) Waste analysis plan requirements in s. NR 630.13 (1).

(7) Open burning and detonation requirements in s. NR 630.20 (1).

(8) Generation and removal requirements in s. NR 630.20 (4).

(9) Closure of noncomplying portions requirement in s. NR 630.20 (5).

(10) General requirements for ignitable, reactive or incompatible wastes in s. NR 630.17 except s. NR 630.17 (3).

(11) General site selection requirements in s. NR 630.18.

(12) Security requirements in s. NR 630.14.

(13) Contingency plan requirements in ss. NR 630.21 and 630.22 (1) and (2).

(14) Personnel training requirements in s. NR 630.16.

(15) Manifest, recordkeeping and reporting requirements in ss. NR 630.30, 630.31 and 630.40, except s. NR 630.31 (1) (j).

(16) General inspection requirements in s. NR 630.15.

(17) Closure requirements in ss. NR 640.16 (2), 645.17 (1) and (2), 655.11 (2), 660.20 (3), 660.21 (5), 660.24 (14), 665.10, 670.09 and 685.05.

(18) Long–term care requirements in ss. NR 660.17, 660.24 (15) and 685.06.

(19) Proof of financial responsibility for closure, and if applicable, long–term care requirements in s. NR 685.07, except as provided in s. NR 680.21 (4).

(20) Facility liability requirements in s. NR 685.08, except as provided in s. NR 680.21 (5).

(21) General storage standards in ss. NR 640.11 (1), 640.12 (1), 640.13 (2) and (3), 640.15 (2) and 640.16 (2).

(22) Tank storage and treatment standards in ch. NR 645.

Note: An interim license application that includes a request for a variance from the secondary containment requirements of s. NR 645.09 shall include the information required by s. NR 645.09 (9) and the applicant shall follow the procedures required by s. NR 645.09 (10).

(23) Container storage and treatment standards in ss. NR 640.09, 640.11 (2) and (3), 640.14, 640.15 (1), (2), (a) and (b) and 640.10.

(24) Waste pile storage standards in ch. NR 655 except s. NR 655.05 (2) and, notwithstanding this exception, s. NR 660.18 (3).

(25) Landfill and surface impoundment operational requirements in ss. NR 660.12 to 660.17, except as provided under ch. 283, Stats. In addition, landfills and surface impoundments are not required to comply with s. NR 660.18 (10), (27), (35) and (36) except landfills and surface impoundments shall comply with s. NR 660.18 (10) for each new unit, replacement of an existing unit or lateral expansion of an existing unit.

(26) Landfill and surface impoundment closure requirements in ss. NR 660.15 and 660.16.

(27) Landfill and surface impoundment long–term care requirements in s. NR 660.17.

(28) Groundwater, leachate, other monitoring requirements and corrective action requirements in ch. NR 635. Pursuant to s. NR 600.07, the department may require the owner or operator of hazardous waste facilities to comply with all or part of the requirements of ch. NR 635.

(29) Incinerator operational requirements in s. NR 665.09 (3), (4), (5), (13) (b), (16), (17) and (11) (d).

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

(30) Treatment facility operational requirements in s. NR 640.06 and ss. NR 645.10 and 670.08. For the purpose of this section, these treatment facility operational requirements shall apply to incinerators.

(31) For surface impoundments with discharges regulated under ch. 283, Stats., surface impoundment operational requirements in s. NR 660.24 (4), (10) and (11), except (11) (b). In addition, the facilities are not required to comply with s. NR 660.18 (5) to (16) and (23) to (25).

(32) For owners or operators of facilities which treat, store or dispose of the hazardous wastes in ch. NR 675, the ch. NR 675 requirements.

(33) Drip pad requirements in ch. NR 656 for wood preserving facilities.

(34) Air emission standards for process vents in ch. NR 631, except s. NR 631.09.

(35) Air emission standards for equipment leaks in ch. NR 632, except s. NR 632.10.

(36) Air emission standards for tanks, surface impoundments, and containers in ch. NR 633, except s. NR 633.13.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (23), cr. (32), Register, August, 1992, No. 440, eff. 9–1–92; am. (28), cr. (33) to (35), Register, May, 1995, No. 473, eff. 6–1–95; cr. (36), Register, March, 1998, No. 507, eff. 4–1–98; correction in (25) and (31) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509; **corrections in (17), (18), (24), (25) and (31) made under s. 13.93 (2m) (b) 7., Stats.**

NR 680.23 Operation while interim license is pending. The timely submission of an interim license application to the department allows an existing hazardous waste facility to continue to operate until the applicant is advised that the interim license application has been approved or disapproved. The facility may not treat, store or dispose of hazardous waste not specified in the interim license application; employ processes not specified in the interim license application; or exceed the design capacities specified in the interim license application.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 680.24 Advisement of interim license. (1) The department shall advise the applicant of the receipt of a complete interim license application within 20 business days and shall notify the applicant that the application has been approved or disapproved within 130 business days of the date on which a complete application is received by the department.

(1m) If the department fails to approve or deny an application for a hazardous waste facility interim license within 130 business days after a complete application is received by the department, the department shall refund fees paid by the applicant for the hazardous waste facility interim license.

(2) Advisement of the approval of an interim license application shall signify the beginning of the interim license period, and shall, unless the interim license is later revoked, allow an operator of an existing hazardous waste facility or operational unit within a facility to operate the facility until a final determination on the issuance of an operating license under s. NR 680.32 is made by the department. The owner or operator of a hazardous waste facility or operational unit within a facility shall terminate the regulated activity and close the facility or operational unit in accordance with ss. NR 680.60 and 685.04 if its interim license application is disapproved, if its interim license is revoked prior to the issuance of an operating license under s. NR 680.32, if any of the reports or plans required under s. NR 680.21 (3) or 680.22 are disapproved or an application for an operating license is denied. The department may issue an interim license for one or more operational units within a facility without affecting the license status of any other operational unit within that facility.

(3) The owner or operator of a hazardous waste disposal facility operating under an interim license shall pay to the department waste management fund fees under s. NR 685.09.

(4) Except as provided in s. NR 680.21 (3), dates for the submission of reports and plans needed for the issuance of an operating license as specified in ss. NR 680.05 and 680.06 may be established by the department in a compliance schedule at any time during the interim license period. However, the department shall provide at least 6 months notice for the submission of all plans and reports required in the compliance schedule.

(5) The owner or operator of a hazardous waste facility operating under an interim license shall submit to the department a signed duplicate original of the hazardous waste facility liability endorsement or a certificate of liability insurance, for each insurance policy, as required by s. NR 685.08, by December 28, 1985, or within the time periods specified in s. NR 660.24 (4) for surface impoundments with discharges regulated under ch. 283, Stats.

(6) Prior to approving an interim license application from an owner or operator of a storage or treatment tank system who is are seeking a variance under s. NR 645.09 (9) from secondary containment requirements, the department shall:

(a) Inform the public, through a newspaper notice, of the availability of the demonstration in support of a variance, as allowed by s. NR 645.09 (9) and (10). The notice shall be placed in a daily or weekly major local newspaper of general circulation and shall provide at least 30 days from the date of the notice for the public to review and comment upon the demonstration in support of a variance. The department also may hold a public hearing, in response to a request or at its own discretion, whenever a hearing might clarify one or more issues concerning the demonstration in support of a variance. Notice of the hearing shall be given at least 30 days prior to the date of the hearing and may be given at the same time as the notice of the opportunity to review and comment upon the demonstration. These 2 notices may be combined.

(b) Approve or disapprove the request for a variance within 65 business days of receipt of the demonstration from the owner or operator and shall notify in writing the owner or operator and each person who submitted written comments or requested notice of the variance decision. If the demonstration for a variance is incomplete or does not include sufficient information, the 65 business day period begins when the department receives a complete demonstration, including all information necessary to make a final determination. If the public comment period in par. (a) is extended, the 65 business day period will be similarly extended.

(7) The owner or operator of a facility which has not obtained an interim license due to the withdrawal or denial of the interim license application or which no longer has an interim license or a variance and has not received a written determination from the department that closure was completed in accordance with ss. NR 680.60 and 685.04 shall either:

(a) Submit the signed duplicate original of the hazardous waste facility liability endorsement or the certificate of liability insurance, by December 28, 1985, or within the time periods specified in s. NR 660.24 (4) for surface impoundments with discharges regulated under ch. 283, Stats.; or

(b) Apply for department authorization to cancel the liability insurance requirement in accordance with s. NR 685.08 (4), if that closure has been completed in accordance with ss. NR 680.60 and 685.04 by December 28, 1985.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction in (5) and (7) (a) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509; cr. (1m), Register, September, 1998, No. 513, eff. 10–1–98; **corrections in (5) and (7) (a) made under s. 13.93 (2m) (b) 7., Stats.**

NR 680.30 Eligibility for an operating license. For a new facility, the applicant may not commence treatment, storage or disposal of hazardous waste, and for a facility being modified or expanded the licensee may not treat, store or dispose of hazardous waste in the modified or expanded portion of the facility, until the licensee has received written approval from the department in the form of an operating license. Changes in the types of hazardous wastes handled or changes in the processes used to treat, store or dispose of hazardous wastes may constitute a facility modifica-

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tion or expansion. The owner or operator shall give prior written notice to the department of any plans to change facility operation so the department can determine whether a change constitutes a facility modification or expansion. The licensee may not treat, store or dispose of hazardous waste in any newly constructed, modified or expanded portion of a facility, if the department has determined that the construction requires submittal of a plan report and subsequent approval, until:

(1) The requirements of s. NR 680.31 are met for a newly constructed facility;

(2) The licensee has submitted to the department, by certified mail or hand delivery, a construction observation report signed by the licensee and sealed by a registered professional engineer, documenting that the construction is in compliance with the license and any department plan approval; and

(3) (a) The department has inspected the newly constructed, modified or expanded portion of the facility and finds it in compliance with the license and any department plan approval; or

(b) The department has notified the licensee in writing that the inspection requirement under par. (a) is waived.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction in (3) (b) made under s. 13.93 (2m) (b) 7., Stats., Register, March, 1993, No. 447.

NR 680.31 Application and requirements for an operating license. (1) The initial operating license for a facility or hazardous waste management unit within a facility may not be issued until all of the plans, reports and requirements of chs. NR 600 to 685 have been satisfied and approved by the department. Plans, reports and requirements include, but are not limited to, items such as initial site reports, feasibility reports, plans of operation, construction observation reports, closure and long–term care plans, contingency plans and emergency procedures, financial requirements for closure and long–term care and facility liability requirements. The department may issue an initial operating license for one or more operational units within a facility without affecting the license status of any other operational unit within that facility.

(2) An application for an operating license shall be submitted on forms available from by the department and shall be accompanied by the fee specified in s. NR 680.45.

Note: Application forms for licenses may be obtained from the Department of Natural Resources, Bureau of Waste Management, 101 S. Webster St., P.O. Box 8094, Madison, Wisconsin 53708, at no charge.

(3) The license application shall be signed in accordance with s. NR 680.41.

(4) If the department fails to approve or deny an application for issuance of a hazardous waste facility operating license within 65 business days after a complete application is received by the department, the department shall refund fees paid by the applicant for the hazardous waste facility operating license.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; cr. (4), Register, September, 1998, No. 513, eff. 10–1–98.

NR 680.32 Operating license issuance. (1) The issuance of an operating license for a facility engaged in the treatment, storage or disposal of hazardous waste is regulated by ss. 289.31 and 291.25, Stats.

(2) The owner or operator of facility engaged in the treatment, storage or disposal of hazardous waste may not operate the facility prior to receiving a final license unless the facility is operating under an interim license, variance or waiver, or is exempt from licensing.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction in (1) made under s. 13.93 (2m) 9b) 7., Stats., Register, May, 1998, No. 509.

NR 680.40 Effect of a license. (1) The issuance of a license does not authorize any injury to persons or private property, any invasion of other private rights, or any infringement of federal, state or local law.

(2) Compliance with a license during its term constitutes compliance with ch. 291, Stats., except for the following requirements:

(a) Those requirements not included in the license which become effective by statute.

(b) Those requirements in chs. NR 600 to 699 restricting the placement of hazardous wastes in or on the land.

(c) Those requirements in ch. NR 633 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, CQA programs, monitoring, action leakage rates, and response action plans, and will be implemented through the procedures of s. NR 680.07 Class 1 permit modifications.

(d) Those requirements in chs. NR 631, 632 and 633 limiting air emissions.

Note: A license may be revoked during its term or its renewal may be denied for any of the reasons in s. NR 680.43 (1) and (3). A license or a plan approval may be modified for cause, as set forth in s. NR 680.07 (3).

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; am. (2), Register, March, 1998, No. 507, eff. 4–1–98.

NR 680.41 Signatories to license applications. (1) All license applications including interim license applications, shall be signed as follows, by both the operator and the owner where a facility is operated by one person and owned by another:

(a) For a corporation, by a responsible corporate officer. For the purpose of this paragraph a responsible corporate officer means:

1. A president, secretary, treasurer or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation; or

2. The manager of one or more manufacturing, production or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million, in second–quarter 1980 dollars, if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

Note: The department does not require specific assignments or delegations of authority to responsible corporate officers identified in par. (a) 1. The department will presume that these responsible corporate officers have the requisite authority to sign permit applications unless the corporation has notified the department to the contrary. Corporate procedures governing authority to sign permit applications may provide for assignment or delegation to applicable corporate positions under par. (a) 2. rather than to specific individuals.

(b) For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or

(c) For a government or public agency, by either a principal executive officer or ranking elected official. For the purposes of this paragraph, a principal executive officer of a federal agency includes:

1. The chief executive officer of the agency; or

2. A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.

(2) Any person signing a document under sub. (1) shall make the following 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 fine and imprisonment for knowing violations."

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

NR 680.42 Conditions applicable to all licenses. All of the conditions applicable to a license shall be incorporated into the license either expressly or by reference. The following conditions shall apply to all licenses, including interim licenses:

(1) The licensee shall comply with all conditions of the license, the provisions of ch. 291, Stats., the applicable requirements of chs. NR 600 to 685, any plan approval and modifications thereof and any special order and modifications thereof issued by the department, except as otherwise authorized by the department under ss. NR 680.50 and 680.51.

(2) If a licensee wishes to continue an activity regulated by a license after the expiration date of the license, the licensee shall apply for a new license. Section 227.51 (2), Stats., provides: "When a licensee has made timely and sufficient application for the renewal of a license or a new license with reference to any activity of a continuing nature, the existing license does not expire until the application has been finally acted upon by the agency, and, if the application is denied or the terms of the new license are limited, until the last day for seeking review of the agency decision or a later date fixed by order of the reviewing court."

(3) It is not a defense for a licensee in an enforcement action that it would have been necessary to halt or reduce the licensed activity in order to maintain compliance with the conditions of the license.

(4) All renewal applications, and all reports or other information submitted to the department by the licensee shall be signed and certified as specified in s. NR 680.41.

(5) For a new facility, the licensee may not commence treatment, storage or disposal of hazardous waste, and for a facility being modified or expanded the licensee may not treat, store or dispose of hazardous waste in the modified or expanded portion of the facility, until the licensee has received written approval from the department. Changes in the types of hazardous wastes handled or changes in the processes used to treat, store or dispose of hazardous wastes may constitute a facility modification or expansion. The owner or operator shall give prior written notice to the department of any plans to change facility operation so the department can determine whether the change constitutes a facility modification or expansion. The licensee may not treat, store or dispose of hazardous waste in any newly constructed, modified or expanded portion of a facility, if the department has determined that the construction requires a plan or report submittal and subsequent approval, until:

(a) The requirements of s. NR 680.31 are met for a newly constructed facility;

(b) The licensee has submitted to the department, by certified mail or hand delivery, a construction observation report signed by the licensee and sealed by a registered professional engineer, documenting that the construction is in compliance with the license and any department plan approval; and

(c) 1. The department has inspected the newly constructed, modified or expanded portion of the facility and finds it in compliance with the license and any department plan approval; or

2. The department has notified the licensee in writing that the inspection requirement under subd. 1. is waived.

(6) The licensee shall at all times maintain in good working order and operate efficiently all facilities and systems of treatment or control and related appurtenances which are installed or used by the licensee to achieve compliance with the terms and conditions of the license. Proper operation and maintenance includes, but is not limited to, effective performance based on designed facility removals, adequate funding, effective management, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures.

(7) The licensee shall, upon the request of any officer or employee of the department, allow departmental personnel, at reasonable times and with notice no later than upon arrival, to:

(a) Enter the licensee's premises where a regulated facility or activity is located or conducted or where hazardous waste records are kept;

(b) Have access to, and copy at reasonable times, records or labels that are being kept;

(c) Inspect at reasonable times any facility's equipment, including monitoring equipment, or operations regulated under the license; and

(d) Sample or monitor any substance or parameters at any location where a regulated facility or activity is located or conducted, in compliance with the requirements of s. 291.91 (2), Stats.

(8) The licensee shall report to the department any noncompliance which may endanger human health or the environment. The information which is required to be included in a written report under this subsection shall be provided orally to the appropriate district office of the department within 24 hours from the time the licensee becomes aware of the circumstances. A written report shall be submitted within 5 days of the time the licensee becomes aware of the circumstances. The department may allow the licensee up to 15 days to submit a written report if an extension is requested by the licensee. The written report shall contain:

(a) Name, address and telephone number of the owner or operator.

(b) Name, address and telephone number of the facility.

(c) A description of the noncompliance and the period of noncompliance, including exact date and time, and if the noncompliance has not been corrected, the anticipated time the noncompliance is expected to continue.

(d) Name and quantity of material involved.

(e) The extent of injuries, if any.

(f) An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable, including information concerning the release of any substance which may cause contamination of a drinking water supply.

(g) Estimated quantity and disposition of recovered material that resulted from the incident.

(h) The known or suspected causes of the noncompliance and a statement describing the measures taken to investigate the noncompliance to determine its cause.

(i) Steps taken, or planned, to reduce or eliminate and prevent recurrence of the noncompliance.

(9) The licensee shall notify the division of emergency government and comply with the requirements of s. NR 630.22 (2), s. 292.11, Stats., and ch. NR 158 if a discharge of hazardous waste or hazardous substance, or a fire or explosion occurs at the licensed facility.

(10) In the event of noncompliance with the license, the licensee shall take all necessary steps to minimize discharges to the environment, and shall take all necessary steps to minimize any adverse impacts on human health or the environment.

(11) (a) Monitoring results shall be reported at the intervals and format specified in the approved plan of operation or license and in accordance with s. NR 630.40.

(b) The licensee shall meet all requirements specified in the plan of operation or license concerning the proper use, maintenance and installation, when appropriate, of monitoring equipment or methods, including biological monitoring methods, when appropriate.

(c) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.

(d) The licensee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the license, records of all data used to complete the application for the license, and, except for facilities operating under an interim license, the waste minimization certification required by s. NR 630.32 (1) for a

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

period of at least 3 years from the date of the sample, measurement, report, application or certification. This period may be extended by request of the department at any time. The licensee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the long–term care period as well.

(e) Records for monitoring information shall include;

1. The date, exact place and time of sampling or measurements;

2. The individuals who performed the sampling or measurements;

3. The dates analyses were performed;

4. The individuals who performed the analyses;

5. The analytical techniques or methods used; and

6. The results of the analyses.

(f) The licensee shall report, at the time monitoring results are submitted, all instances of noncompliance not reported under sub. (8). Reports shall contain the information required in sub. (8) (a) to (i).

(12) Reports of compliance with, and any progress on, interim and final requirements contained in any compliance schedule under the license shall be submitted no later than 14 days following each schedule date.

(13) The licensee shall within a reasonable time furnish information to the department needed to determine whether cause exists to modify, suspend or revoke the license or to determine compliance with the license. The licensee shall also furnish to the department, upon request, copies of records required by the license.

(14) The license does not convey any property rights of any sort, or any exclusive privilege.

(15) The following reports shall be submitted to the department:

(a) *Manifest discrepancy report.* If a significant discrepancy in a manifest as explained in s. NR 630.30 (6) is discovered, the licensee shall attempt to reconcile the discrepancy. If not resolved within 15 days, the licensee shall submit a report, including a copy of the manifest, to the department as required by s. NR 630.30 (6).

(b) *Unmanifested waste report.* An unmanifested waste report shall be submitted to the department within 15 days of receipt of unmanifested waste as required by s. NR 630.40 (2).

(c) *Annual report.* An annual report shall be submitted covering facility activities during the previous calendar year as specified in s. NR 630.40 (1).

(d) *Additional reports.* Additional reports as specified in s. NR 630.40 (3) shall be submitted if necessary.

(16) The licensee shall submit required documentation and take any action necessary to ensure protection of human health and the environment. The department may require documentation or action after inspecting the facility or reviewing any submittals, reports or plans.

(17) The license may be modified, suspended or revoked for the reasons outlined in ss. NR 680.43 and 680.45. The submittal of a request by the licensee for license modification, suspension or revocation or a notification of planned changes or anticipated noncompliance, does not stay the effectiveness of any license condition.

(18) Where the licensee becomes aware that there was a failure to submit relevant facts in any reports, plans or other information submittal, or that incorrect information was submitted, the licensee shall promptly submit the facts or information to the department.

(18m) INFORMATION REPOSITORY. The department may require the licensee to establish and maintain an information repository at any time, based on the factors in s. NR 680.06 (15) (a). The information repository will be governed by s. NR 680.06 (15) (b) through (e).

(19) In addition to the conditions required for all licenses, the department may establish conditions, as required on a case–by–case basis, to ensure compliance with chs. NR 600 to 685.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction in (11) (d) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1995, No. 473; cr. (18m), Register, May, 1998, No. 509, eff. 6–1–98.

NR 680.43 Revocation or denial of licenses. (1) A hazardous waste facility operating license may be revoked during its term, or its renewal may be denied, for any one of the following reasons:

(a) Failure of the licensee to pay the waste management fees specified in s. NR 685.09 or the license fees specified in s. NR 680.45.

(b) Failure to operate the facility in accordance with the facility's approved plan of operation.

(c) Failure to comply with chs. NR 600 to 685.

(d) Failure to disclose fully all relevant facts in a feasibility report, plan of operation or license application or in a review of a feasibility report, plan of operation or license.

(e) Misrepresentation of any relevant fact at any time.

(f) Operation of the facility in a way that endangers human health or the environment to the extent that revocation of the license is the only way to provide an acceptable level of protection.

(2) An interim license may be revoked during its term for any of the following reasons:

(a) Failure to comply with the applicable interim license requirements set forth in s. NR 680.22.

(b) Failure to submit complete plans or reports required by a compliance schedule within 14 days following the date on which they are due under the schedule.

(c) Failure to pay the waste management fund fees specified in s. NR 685.09.

(d) Failure to disclose fully all relevant facts in a feasibility report, plan of operation or license application or in a review of a feasibility report, plan of operation or license.

(e) Misrepresentation of any relevant fact at any time.

(f) Operation of the facility in a way that endangers human health or the environment to the extent that revocation of the license is the only way to provide an acceptable level of protection.

(3) An interim license for a land disposal facility is revoked and authority to operate a hazardous waste facility under it terminates 12 months after the date on which the facility first becomes subject to the requirement to have a hazardous waste operating license unless the owner or operator:

(a) Submits a feasibility report and plan of operation for a hazardous waste operating license for the facility; and

(b) Certifies that the facility is in compliance with all applicable groundwater monitoring and financial responsibility requirements.

(4) An interim license is revoked and authority to operate a hazardous waste facility under it terminates for any facility other than incineration and land disposal on November 8, 1992, unless the owner or operator of the facility has submitted a feasibility report and plan of operation or a feasibility and plan of operation report for a hazardous waste operating license for the facility by November 8, 1988.

(5) Any person who owns or operates a hazardous waste facility which has had its operating license or interim license denied or revoked under sub. (1), (2), (3) or (4) shall close the facility in accordance with ss. NR 680.60 and 685.04.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

(6) The department may deny or revoke a license, including an interim license for one or more operational units within a facility, without affecting the license status of other operational units.

(7) The department shall review each license, other than interim licenses, every 2 years to determine whether the license shall be revoked for one or more of the reasons listed in sub. (1).

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 680.44 Transfer of licenses. (1) Whenever rights of ownership, possession or operation in a licensed hazardous waste facility, including facilities with interim licenses, are transferred, licensing shall be in accordance with s. 289.46, Stats.

(a) Written documentation of the acquisition of rights and a written agreement containing a specific date of transfer of responsibility shall be submitted to the department by the new owner or operator. Prior to the transfer of a license, including an interim license, the new owner or operator shall submit 2 revised part A forms in accordance with s. NR 680.21 (1) (a) and the required notifications to comply with s. NR 600.05, within 90 days prior to the scheduled transfer of responsibility.

(b) For facilities with operating licenses, the new owner or operator shall submit an application for an operating license within 90 days prior to scheduled transfer of responsibility, on a form available from the department.

(2) Transfer of responsibility requests shall be submitted to the department by the licensee as a request to modify a license or plan approval under s. NR 680.07 (6) (a). The previous owner shall be responsible for compliance with the closure, long–term care, financial responsibility and liability coverage requirements for the facility specified in s. NR 600.05 and chs. NR 630 to 685, including ss. NR 685.05, 685.06, 685.07 and 685.08, until the person acquiring the rights of ownership, possession or operation has demonstrated compliance with the closure, long–term care, financial responsibility and liability requirements for the facility specified in s. NR 600.05 and chs. NR 630 to 685, including ss. NR 685.05, 685.06, 685.07 and 685.08, to the department, and the department notifies the previous owner, in writing, that an adequate demonstration has been made.

(3) The person acquiring the rights of ownership, possession or operation shall demonstrate to the department compliance with the closure, long–term care, financial responsibility and liability coverage requirements in s. NR 600.05 and chs. NR 630 to 685, including ss. NR 685.05, 685.06, 685.07 and 685.08 within 6 months after the transfer of responsibility. The previous owner shall continue to be responsible for compliance with the closure, long–term care, financial responsibility and liability coverage requirements in s. NR 600.05 and chs. NR 630 to 685, including ss. NR 685.05, 685.06, 685.07 and 685.08, if the person acquiring the rights of ownership, possession or operation fails to demonstrate compliance with those requirements.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction in (2) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1995, No. 473; correction in (1) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509.

NR 680.45 License periods and fees. (1) FEES. (a) The plan review fee or license fee specified in Table XII or XIII shall accompany all license applications, plans, reports and other documents submitted to the department for approval. Except as provided in ss. NR 620.15 (1) (d), 680.24 (1m), 680.31 (4) and 680.31 (4) and sub. (4) (b), plan review fees and license fees are not transferable, proratable or refundable.

(b) Applicants who fail to submit an application for renewal of an operating license by the deadline specified on the application form shall pay a late processing fee of $150.00 in addition to the renewal fee.

(2) LICENSE DURATION. (a) Except as provided in par. (b), initial operating licenses and transportation service licenses are valid from October 1 or the date of issuance, whichever is later, until September 30, and operating licenses are valid from October 1 until September 30.

(b) The department may deny, suspend or revoke an operating license, including an initial operating license, under s. NR 680.43 or s. 291.87 (1m), Stats., and may deny, suspend or revoke a transportation service license under s. NR 620.15 (4) or s. 291.23 (3), Stats.

(3) APPLICATIONS FOR RENEWAL. The owner or operator of a storage, treatment or disposal facility shall submit an application to the department for renewal of the operating license by June 1 preceding the license period being applied for. Applications for initial operating licenses and for renewal of operating licenses shall be submitted to the department on forms available from the department.

(4) ACTION ON APPLICATIONS. (a) The department shall review and approve or deny an application for renewal of an operating license within 90 days after receiving the request or by the date of expiration of the current license, whichever occurs later.

(b) If the department fails to approve or deny an application for renewal of a hazardous waste facility operating license within 90 days after receiving the application or by the date of expiration of the current license, whichever occurs later, the department shall refund fees paid by the applicant for renewal of the hazardous waste facility operating license.

(5) CLOSURE AND LONG TERM CARE LICENSE REQUIRED. The owner or operator or any successor in interest shall have a license during the closure and long–term care period in accordance with s. 289.41 (1m), Stats. The license fees are specified in Tables XII or XIII.

(6) EFFECTIVE PERIOD. Except as provided in subs. (7) and (8), plan approvals and licenses shall be effective for purposes of annual license renewal, for a fixed period of up to 10 years from the date of the initial operating license issuance. If the licensee chooses to operate or maintain a hazardous waste facility after the effective period ends, then the licensee shall submit, at least 180 days before the end of the effective period, all of the plans and reports which are required before an application for a new operating license may be submitted, as specified in ss. NR 680.31 (1) and 600.05 and the applicable chapters of chs. NR 600 to 685.

(b) The department may modify a license to change the date that the necessary reports are due under s. NR 680.07 (1) and (2).

(c) The department may issue a plan approval or license with an effective period that is less than the 10 year maximum effective period specified in sub. (6).

(7) EXTENSION OF EFFECTIVE PERIOD OF LICENSE. (a) The department may modify a license to extend its effective period if the licensee has submitted, in a timely and complete manner, all of the reports and plans specified in sub. (6). The terms and conditions of the license shall remain in force during the extension period.

(8) PERIODIC REVIEW. Each plan approval for a land disposal facility shall be reviewed by the department 5 years after issuance of the initial operating license and at 5 year intervals thereafter while the facility remains licensed. The plan approval and license may be modified as necessary under s. NR 680.07.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

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Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

TABLE XII
FEE SCHEDULE – ALL FACILITIES EXCEPT LANDFILLS AND SURFACE IMPOUNDMENTS

			Plan Review Fees (1) (2)										License Fees (3) (8)			
													Commercial Fac. (10)		Non–Commercial Fac. (11)	
ADM CODE	Facility Type	License Required	Plan Review Required	Interim License Report	Variance Report	Feasibility and Plan of Operation Rpt. (5)	Const. Inspect	Site Const. Doc.	Closure Plan (6)	Class 2 Plan Mod. (4)	Class 1 Plan Mod. (4)	Corr. Action (7)	Variance and Final License	Interim License (9)	Variance and Final License	Interim License (9)
620	Transporters	Yes	No										300		300	
625	Recycling	No	Yes									1,200				
640	Container	Yes	Yes	600	1,200	3,000	600	300	1,200	1,200	300	1,200	2,400	4,800	600	1,200
645	Tanks	Yes	Yes	600	1,200	4,800	600	600	1,800	1,200	300	1,200	2,400	4,800	600	1,200
655	Waste Piles	Yes	Yes	600	1,200	4,800	600	600	2,400	1,800	300	1,200	3,600	7,200	1,800	3,600
665	Incinerators	Yes	Yes	600	3,000	15,000	600	1,200	2,400	2,400	300	1,200	4,800	9,600	2,400	4,800
670	Miscellaneous	Yes	Yes	600	1,200	3,000	600	300	1,200	1,200	300	1,200	2,400	4,800	600	1,200

(1)In accordance with s. NR 680.05, all reports and plan sheets shall be made under the seal of a registered professional engineer. Reports where interpretation of geology or hydrogeology is necessary shall be signed by a hydrogeologist.
(2)The plan review fees specified in Table XII cover the department's review from initial submittal through approval or denial of a report or plan. An applicant may revise or supplement a report or plan deemed incomplete and resubmit it without paying an additional review fee. The applicant shall pay a plan review fee as specified in Table XII for resubmittal of a plan which has been previously denied or withdrawn after having been determined to be complete. The department may waive any plan review fee if it determines that the total review time is not likely to exceed 4 hours.
(3)A facility must have a separate license for each hazardous waste management activity it conducts. Final licenses and variances must be renewed annually.
(4)A plan modification, as referred to in Table XII, is a submittal which proposes to modify a license, variance, or plan previously approved by the department.
(5)Certain small storage facilities may not be required to submit a feasibility and plan of operation report in accordance with s. NR 640.07.
(6)Applicants submitting a closure plan as part of a plan of operation or a feasibility and plan of operation report may not be required to pay the closure plan review fee.
(7)The owner or operator of the facility shall pay a total of $1,200 plan review fee for each phase of the corrective action program. The phases are facility investigation; selection of alternatives; and remedial design and operation.
(8)Any facility which cannot clean close will be required to obtain a closure and long–term care license and will be required to pay a $6,000 Closure and Long–Term Care License Fee. This is a one–time only fee to cover the entire 30–year long–term care period. Transportation services and recycling facilities are exempt from this requirement.
(9)This fee is a one–time only payment to cover the interim license period until a final determination on the issuance of an operating license is made by the department.
(10)A commercial facility has the definition in s. NR 600.03 (40).
(11)A non–commercial facility has the definition in s. NR 600.03 (172).

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

TABLE XIII
FEE SCHEDULE – LANDFILLS AND SURFACE IMPOUNDMENTS

			Plan Review Fees (1) (2)								License Fees (3)						
ADM CODE	Facility Type	License Req'd.	Plan Review Req'd.	Interim License Report	Initial Site Report	Feas. Report	Plan of Operation Report	Const. Inspect	Site Const. Doc	Closure Plan	Class 2 Plan Mod. (4)	Class 1 Plan Mod. (4)	Corr. Action (7)	Final License	Interim License (9)	Closure and Long–Term Care License (8)	Variance
660	Commercial Landfills & Surf Imp (10)	Yes	Yes	1,200	12,000	90,000	30,000	(6)	3,000	18,000	3,000	600	6,000	30,000	60,000	60,000	1,000
660	Non–Commercial Landfills & Surf Imp (11)	Yes	Yes	600	3,600	24,000	8,400	(6)	1,200	6,000	1,800	180	1,200	8,400	17,000	24,000	1,000

(1)In accordance with s. NR 680.05, all reports and plan sheets shall be made under the seal of a registered professional engineer. Reports where interpretation of geology or hydrogeology is necessary shall be signed by a hydrogeologist.
(2)The plan review fees specified in Table XIII cover the department's review from initial submittal through approval or denial of a report or plan. An applicant may revise or supplement a report or plan deemed incomplete and resubmit it without paying an additional review fee. The applicant shall pay a plan review fee as specified in Table XIII for resubmittal of a plan which has been previously denied or withdrawn after having been determined to be complete. The department may waive any plan review fee if it determines that the total review time is not likely to exceed 4 hours.
(3)A facility must have a separate license for each hazardous waste management activity it conducts. Final licenses must be renewed annually.
(4)A plan modification, as referred to in Table XIII, is a submittal which proposes to modify a license, variance, or plan previously approved by the department.
(5)Applicants submitting a closure plan with a feasibility and plan of operation report may not be required to pay the closure plan review fee.
(6)The owner or operator shall pay a construction inspection fee as required by s. NR 680.09.
(7)The owner or operator of the facility shall pay a total of $6000 (commercial facility) or $1200 (non–commercial facility) plan review fee for each phase of the corrective action program. The phases are facility investigation; selection of alternatives; and remedial design and operation.
(8)Facilities which clean close are not required to obtain a closure and long–term care license. This is a one–time only fee to cover the entire 30–year long–term care period. All facilities subject to this requirement must pay this one–time fee even if they previously obtained a long–term care license.
(9)This fee is a one–time only payment to cover the interim license period until a final determination on the issuance of an operating license is made by the department.
(10)A commercial facility has the definition in s. NR 600.03 (40).
(11)A non–commercial facility has the definition in s. NR 600.03 (172).

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; reprinted to correct Tables XII and XIII, Register, May, 1992, No. 437; am. Tables XII and XIII, Register, May, 1995, No. 473, eff. 6–1–95; correction in (6) (b) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1995, No. 473; am. Tables XII and XIII, Register, May, 1998, No. 509, eff. 6–1–98; correction in (2) (b) and (5) made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1998, No. 509; am. (1) (a) and cr. (4) (b), Register, September, 1998, No. 513, eff. 10–1–98.

Unofficial Text (See Printed Volume). Current through date and Register shown on Title Page.

NR 680.50 Variances. The department may issue a variance from the requirements of chs. NR 600 to 699 and s. 291.23 or 291.25, Stats., if the application for, or compliance with the terms or conditions of, any license required under chs. NR 600 to 699 would cause undue or unreasonable hardship to any person, and the variance would not result in undue harm to human health or the environment.

(1) LIMITATIONS. A variance under this section:

(a) Shall be issued in written form.

(b) May not exceed 5 years in duration.

(c) May be renewed or extended only after opportunity for a public hearing on each variance renewal or extension.

(d) May be revoked by the department at any time if the department determines that the revocation is appropriate to protect human health or the environment.

(e) May require that the person to whom a variance is issued comply with any appropriate requirements of chs. NR 600 to 699, as a condition of issuance, in order to protect human health or the environment.

(f) May not be issued for land treatment facilities.

(2) VARIANCE REQUEST. A person who wishes to obtain a variance shall submit to the department the variance fee specified in s. NR 680.45 and the following:

(a) Fees and materials meeting the general report and plan submittal requirements of s. NR 680.05 (1).

(b) A statement explaining the need for a variance and the effects of granting a variance.

1. Explain why application for or compliance with a required license under chs. NR 600 to 699 would cause undue or unreasonable hardship to any person. For purposes of this section, "undue or unreasonable hardship" means a hardship that is a result of unusual circumstances, which are not self-created. The delay, inconvenience or expense which are inherent in the facility approval process under subch. III of ch. 289, Stats., are not considered to be unreasonable.

2. Present the history of events that lead to the current situation, and demonstrate that the hardship results from events beyond the control of the person applying for the variance.

3. Demonstrate that the proposed variance would not result in undue harm to human health or the environment.

(c) General feasibility report and plan of operation information meeting the requirements of ss. NR 680.06 (3).

(d) Specific feasibility report and plan of operation information meeting the informational requirements of:

1. Section NR 640.07 (3) for a hazardous waste small storage facility meeting the characteristics of s. NR 640.07 (1).

2. Section NR 640.06 for a hazardous waste container facility.

3. Section NR 645.06 for a hazardous waste tank system.

4. Section NR 655.06 for a hazardous waste pile.

5. Section NR 665.06 for a hazardous waste incinerator.

6. Sections NR 670.06 and 670.07 for a hazardous waste miscellaneous unit facility.

7. Sections NR 660.09 to 660.15 for a hazardous waste landfill or surface impoundment.

Note: The applicant is encouraged to contact the department early for assistance in planning the content of a complete application.

(3) COMPLETENESS. The department shall advise the applicant in writing of the receipt of any variance request. The department shall determine, in writing, whether the variance application is complete or incomplete within 65 business days after receipt of the variance application. The department may require the applicant to provide additional information to document compliance with s. NR 600.04, and chs. NR 630 to 699.

(4) FINAL DETERMINATION. The department shall make a final written determination on the variance request within 65 business days after finding the application complete. The final determination may require construction inspection and fees under s. NR 680.09.

Note: The use of the variance authority is intended to promote activities such as the cleanup of hazardous waste contamination and the recycling of hazardous waste. For example, in order to clean up a contaminated site, it may be necessary to treat excavated soil that is hazardous. In this situation it may be an undue or unreasonable hardship to delay the cleanup of the contamination while awaiting the issuance of a hazardous waste treatment license. Further, in some situations a hazardous waste recycling activity may be exempt from the requirement to obtain a treatment license but the associated storage is subject to the storage license requirement. The requirement to obtain a storage license may create an undue or unreasonable hardship if it has the effect of precluding the recycling of hazardous waste.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction in (2) (d) 7. made under s. 13.93 (2m) (b) 7., Stats., Register, March, 1993, No. 447; correction in (intro.) and (2) (b) 1., Register, May, 1998, No. 509; **correction in (2) (d) 7. made under s. 13.93 (2m) (b) 7., Stats.**

NR 680.51 Research, development and demonstration licenses. (1) The department may issue a research, development and demonstration license for any hazardous waste treatment facility whose owner or operator proposes to utilize an innovative and experimental hazardous waste treatment technology or process for which standards are not contained in chs. NR 630 to 670. Licenses issued under this section shall include conditions that will assure protection of human health and the environment. Each license shall:

(a) Provide for the construction of any necessary facility and for operation of the facility for not longer than one year, but the license may be renewed under sub. (5);

(b) Provide for the receipt and treatment by the facility of only those types and quantities of hazardous waste which the department deems necessary for purposes of determining the efficacy and performance capabilities of the technology or process and the effects of the technology or process on human health or the environment; and

(c) Include requirements which the department deems necessary to protect human health and the environment, including, but not limited to requirements regarding monitoring, operation, proof of financial responsibility, closure, and remedial action, and requirements which the department deems necessary regarding testing, recordkeeping and reporting information to the department with respect to the operation of the facility.

(2) For the purpose of expediting review and issuance of licenses under this section, the department may, consistent with the protection of human health and the environment, modify or waive license application and issuance requirements in chs. NR 630 to 685 except that it may not modify or waive requirements regarding proof of financial responsibility, including insurance, or waive procedures for public participation.

(3) Research, development and demonstration licensing reports shall be prepared in accordance with the report preparation requirements in ss. NR 680.05 and 680.06.

(4) The department may order an immediate termination of all operations at the facility at any time if the department determines that termination is necessary to protect human health and the environment.

(5) Any license issued under this section may be renewed not more than 3 times. Each renewal shall be for a period of not more than one year.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91.

NR 680.52 Treatability study exemption. A treatability study of hazardous waste may be conducted without an operating license if the study is performed in accordance with s. NR 605.05 (8), (9), (10) and (11).

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction made under s. 13.93 (2m) (b) 7., Stats., Register, March, 1993, No. 447; correction made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1995, No. 473.

NR 680.60 Termination of a regulated activity. Any person who owns or operates a hazardous waste facility and who wishes or is required to terminate the regulated activity shall submit a closure plan for department approval and implement an

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approved closure plan that meets the requirements specified in s. NR 685.05. Any person who owns or operates a disposal facility and who wishes or is required to terminate the regulated activity shall submit a long–term care plan for approval and implement an approved long–term care plan that meets the requirements specified in s. NR 685.06. In accordance with ss. NR 655.10 (2), 660.20 (2) and 660.21 (4), long–term care plans may be required for certain waste piles or surface impoundments or tanks where the department approves in–place disposal of wastes.

History: Cr. Register, February, 1991, No. 422, eff. 3–1–91; correction made under s. 13.93 (2m) (b) 7., Stats., Register, May, 1995, No. 473.

One of the Family of Companies

Brillion Iron Works. Inc.

200 Park Ave.
Brillion, WI 54110

Dun # 12-213-2301
Transportation Technologies Industries 80-918-218

The company was first organized in 1890. It originated as a small machine shop manufacturing farm tools. In 1900 the plant was relocated and new buildings were constructed. The foundry was then added. In 1933 the former company ceased operation.

On January 1, 1934 the company was reorg th
R.D. Peters as General Manager. From 193
current employment has grown to approxin

3/7/05

BIW produces approximately 145,000 net t tings
annually. BIW ranks among the top ten inc ed
States. Constant plant improvements have ver
the past years.

This is D.12 – Company description

Brillion Iron Works, Inc. consists of two div
Equipment. Farm Equipment designs, manu the
tractor" farm implements such as primary a t,
agricultural seeders and turf management

1890 First organized in Brillion, WI as a sma farm tools
1900 Brillion begins foundry operations
1934 Company reorganized with R.D. Peters
1966 Switch to Induction Melting with gas fi
1968 Ductile Iron production
1969 Company became a Division of Beatrice Foods Company
1973 Start up of Plant 2, Ductile Facility, in Brillion
1977 Building a new Farm Equipment factory
1985 Company became part of the Robins Group
1988 Company became Subsidiary of Truck Components Inc.
1994 Truck Components Inc. acquired by Castle Harlan Partners II and taken public
1995 Truck Components Inc. stock acquired by Johnstown America Industries, Inc.
1999 Johnstown America Industries, Inc. sells Freight Car Operations and changes name to Transportation Technologies Industries, Inc.
2000 Company taken private by TTI management

One of the tti Family of Companies

GUNITE Corporation

Tabco Automotive Corporation

Bostrom Seating

Imperial Group

Brillion Iron Works. Inc.

200 Park Ave.
Brillion, WI 54110

Foundry Division

Brillion produces high-quality, complex castings in one of the largest and most technologically advanced foundries in the country. Customers include leading manufacturers of truck and automotive components, fluid power products, and other transportation, construction and agricultural equipment.

Market Segments

Heavy Trucks
Air Cooled Engines
Construction Equipment
Hydraulic Valves
Light Truck / Automotive
Agricultural
Industrial Trucks

Foundry Facilities

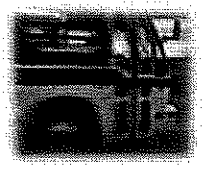
Total plant site in Brillion, WI – 132 acres
Plant 1: 181,000 square feet, melting capacity 550 tons per day
Plant 2. 163,000 square feet, melting capacity 1,200 tons per day
Plant 4: 148,000 square feet, Foundry cleaning and finishing
Molding: Eight mechanized/automated molding lines
Melting: Eleven coreless induction furnaces with preheaters and two channel induction furnaces
Core Making: In House – As required by type and volume
Finishing and Cleaning: As required by type and volume
Machining: Inside and outside subcontracted capabilities
Production: 550 – 650 net tons castings per day (60% ductile iron, 40% gray iron

Casting Weight Range: Less than 1 pound to 350 pounds

Company Background

The evolution of Transportation Technologies Industries:
In 1991, TMB Industries, a private equity buyout group headed by the current Chairman of Transportation Technologies Industries, Inc. (TTI), led the buyout of the freight car manufacturing business from Bethlehem Steel Corporation with equity partners Chemical Venture Capital and Onex Corporation. Johnstown America Industries, Inc. (JAII) was forme as an independent freight car manufacturer and completed an initial public offering in July 19 and a secondary offering in February 1994. JAII acquired Bostrom Seating (a manufacturer o air suspension seating systems for medium and heavy-duty trucks) in January 1995.

Truck Components, Inc., a manufacturer of truck components and iron castings, was acquired in August 1995. Truc Components consisted of Gunite Corporation (wheel-end components), Fabco Automotive Corporation (all wheel drive and power transfer components) and Brillion Iron Works (complex iron castings). The Imperial Group (a manufacturer of metal components for the heavy-duty truck and bus markets), was acquired in April 1999.



In June 1999, the freight car manufacturing business was sold to focus on the medium and heavy-duty truck and bus markets and Johnstown American Industries, Inc. became TTI. In late 1999 the Imperial Group acquired Clark Engineering and BMC of VA, both metal fabricators. In March 2000, senior management led a buyout of TTI and the company was taken private. TTI has an affiliation through TMB Industries companies Northern Tube, a supplier of large diameter tube, and Fuel Systems LLC, a supplier of fuel and hydraulic tanks, both also serving the medium and heavy duty truck market.

Today, TTI and its affiliates are a top ten supplier to the medium and heavy-duty truck and bus industries with revenues in excess of $500 million.

One of the TTI Family of Companies

Welcome to the home of Brillion Farm Equipment, manufacturers of a full line of tillage, seedbed preparation and planting equipment made for today's top producers. Brillion equipment is designed to be durable, long-lasting and productive in a wide range of environments.

Agricultural Seeders
BRH Cultivators
Chisel Plows
Coil Tine Harrow
Compaction Commander
Field Cultivator
Flail Shredder
Floating Ring Pulverizer
Full Line Literature
Soil Builders
Land Commander II
Landscape & Turfmaker Seeder
Optimizer Pulverizer
Overseeders
Pulverizers
Pulvi-Mulchers
S-Tine Harrow w/Basket
Soil Commander II
Sub-Soilers
Turfmaker Junior
Zone Commander

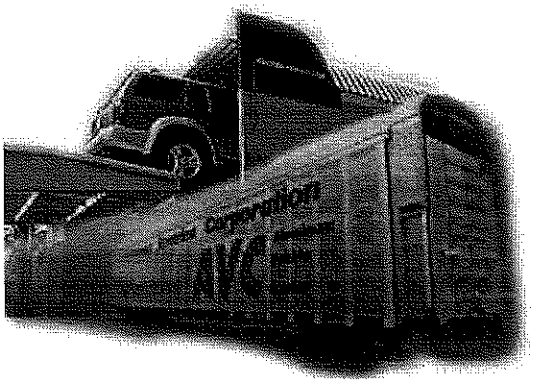
Johnstown America Corporation

CONTACT US

17 Johns Street
Johnstown, PA 15901
USA

Phone 800.458.2235
Fax 814.533.5010

Discover Johnstown America



Johnstown America's new Aluminum Vehicle Carrier is a true advancement in railroad industry practice for auto transportation. It has a 50-year interchange life and runs transparently in the National Reload Pool.

The AVC's superstructure *never* needs recertification. Why? The AAR has exempted it. It's made of aluminum-by the world's premier builder of aluminum railcars.

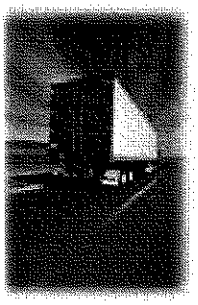
So here are the AVC's benefits you won't find in any other 89' bi-level:

- **Wider interior and the best door edge production** - *No nicks or dings*
- **Mechanically-fastened construction** - *Lower repair costs*
- **Softer suspension** - *Cushions the vehicles*
- **No superstructure recertification requirements** - *No rust spots*
- **Lower tare weight** - *Saves fuel*
- **Longer life** - *Conserves capital*

In addition to these features, you get the lowest operational cost of any multi-level.

Contact your friends at Johnstown America to find out more about the best new freight car anywhere, produced by the most innovative car builder!

About TTI



We're TTI. Together our family of companies makes the parts, subassemblies and component systems for North American major manufacturers and aftermarket suppliers of medium/heavy-duty trucks, transport buses, off-highway vehicles, construction and agricultural equipment, an we're growing larger every day. Providing everything from seats to bumpers and grills to brak drums and hubs to tubing and fuel tanks to battery boxes and cross members to complex iron castings and gearboxes and hundreds of other stamped and fabricated products. All designed t increase vehicle performance, reliability and serviceability through innovative technology.

Our customer base reads like a Who's Who...PACCAR, International, Freightliner, Mack, Vol Dana, Caterpillar, Cummins, Gillig, GM, Ford, Bluebird...and the list goes on and on.

Each of our companies is a successful and proven organization in its own right. Each has grown to a position of industry leadership as a result of technological expertise, ongoing investment in R & D, market-responsive products and excellence in quality and service. Together they sustain a commitment to continuous product improvement and 100% customer satisfaction that is second to none. So, expect nothing else.

We're TTI, the sum of all parts. Look for us...everywhere.

State of Wisconsin
Department of Natural Resources

Printed on
Recycled Paper

JASON W. MOELLER
Waste Management Specialist
Hazardous Waste Inspector

1125 N. Military Ave.
P.O. Box 10448
Green Bay, WI 54307-0448

(920) 492-5942
FAX (920) 492-5859
Jason.Moeller@dnr.state.wi.us

Brillion

Brillion Iron Works, Inc.

Leonard Kopidlansky
Mgr. of Environmental Affairs
email: kopidlansky@brillionironworks.com

200 Park Avenue
Brillion, Wisconsin 54110
Office: (920) 756-2121 Ext. 371
Fax: (920) 756-3409

A Business Unit of tti

RESIDUALS MANAGEMENT TECHNOLOGY, INC.

LABORATORY REPORT

CLIENT: Brillion Iron Works

DATE: 8/24/84

PROJECT #: 1082-L

P.O. #: 52713

SAMPLE #: 7452

SAMPLE DESCRIPTION: Wastewater/Sludge from paint hook stripping tank (7/6/84)

EP TOXICITY TEST

WEIGHT USED: 100.5 grs. FINAL PH: 5.3 ACID USED: 400 mls

PARAMETER	RESULT (mg/l)	HAZARDOUS WASTE LIMITS
ARSENIC	0.015	5.0 mg/l
BARIUM	9.2	100.0 mg/l
CADMIUM	0.02	1.0 mg/l
CHROMIUM-TOTAL	38.8	5.0 mg/l
LEAD	32.5	5.0 mg/l
MERCURY	< 0.0002	0.2 mg/l
SELENIUM	0.001	1.0 mg/l
SILVER	< 0.02	5.0 mg/l

Paul E. Duranceau

Paul E. Duranceau, Laboratory Director

All leaching tests and leachate analysis meet Environmental Protection Agency requirements as outlined in the May 19, 1980, Federal Register, 40 CFR 261.

D234

Donohue

Brillion Iron Works
200 Park Avenue
Brillion, WI 54110

ATTN: Mr. Leonard Kopidlansky

PROJECT NUMBER: 65311.007
COLLECTION DATA: Submitted by Client
SAMPLE COLLECTED: 05-25-88
SAMPLE RECEIVED: 05-31-88

SAMPLE NO: 48139
DESCRIPTION: Paint Booth Strip Water

Sample Volume	One quart	
Percent Total Solids	12.8	percent
% Ash	64.6	percent
Arsenic	<0.010	mg/l
Barium	0.01	mg/l
Cadmium	0.02	mg/l
Chromium	274	mg/l
Copper	1.12	mg/l
Lead	5.53	mg/l
Mercury	0.044	mg/l
Nickel	0.76	mg/l
Selenium	<0.010	mg/l
Silver	0.18	mg/l
Zinc	2.61	mg/l
pH	10.38	units
Reactive Sulfide	2.75	mg/l
Color	Brown	
Free Cyanide	0.025	mg/l
Flashpoint	No flash	F
Oil & Grease	82,050	mg/l
Odor	Mild	
Physical Description	Single phased	
Total Phenol	103	mg/l
Specific Gravity	1.16	
Physical State at 70 F	Liquid	
Free Liquids	Yes; 100 percent	
Total Chlorine by Bomb	0.18	percent
Reactivity	Non-Reactive	
Total Chromium EP TOX	4.05	mg/l
Lead EP TOX	10.6	mg/l

Donohue Analytical
4738 North 40th Street
Sheboygan, Wisconsin 53083

Analytical & Field Services
414-458-8711

Analyses performed in accordance with procedures approved by the U.S. EPA. Certified by the State of Wisconsin DNR Laboratory I.D. No. 460060920

Jerome F. Tech 7/10/88
Project Manager Date

Donohue

Brillion Iron Works
200 Park Avenue
Brillion, WI 54110

ATTN: Leonard Kopidlansky

PROJECT NUMBER: 65311.008
COLLECTION DATA: Submitted by Client
SAMPLE COLLECTED: 08-17-88
SAMPLE RECEIVED: 08-17-88

SAMPLE NO: 51563
DESCRIPTION: Spray Booth Water

Cadmium	<0.01	mg/l
Chromium	0.17	mg/l
Copper	<0.05	mg/l
Lead	0.50	mg/l
Nickel	<0.05	mg/l
Silver	<0.02	mg/l
Zinc	0.62	mg/l
Methylene chloride	<1	ug/l
1,1 - Dichloroethylene	<1	ug/l
1,1 - Dichloroethane	<1	ug/l
Chloroform	<1	ug/l
Carbon tetrachloride	<1	ug/l
1,2 - Dichloropropane	<1	ug/l
Trichloroethylene (TCE)	<1	ug/l
1,1,2 - Trichloroethane	<1	ug/l
Dibromochloromethane	<1	ug/l
Tetrachloroethylene	<1	ug/l
Chlorobenzene	<1	ug/l
Trans-1,2-Dichloroethylene	<1	ug/l
1,2 - Dichloroethane	<1	ug/l
1,1,1 - Trichloroethane	<1	ug/l
Bromodichloromethane	<1	ug/l
Benzene	23	ug/l
Bromoform	<1	ug/l
1,1,2,2-Tetrachloroethane	<1	ug/l
Toluene	5	ug/l
Ethylbenzene	37	ug/l
Vinyl chloride	<2	ug/l
Total Xylene	257	ug/l
1,2-Dichlorobenzene	<1	ug/l
1,3-Dichlorobenzene	<1	ug/l
1,4-Dichlorobenzene	<1	ug/l
2-Chloroethylvinyl Ether	<1	ug/l
Cis-1,2-Dichloroethylene	<1	ug/l

Analyses performed in accordance with procedures approved by the U.S. EPA.
Certified by the State of Wisconsin DNR
Laboratory I.D. No. 460060920

Jeanne F. Tech 10/17/88
Date

Donohue Analytical
4738 North 40th Street
Sheboygan, Wisconsin 53083

Analytical & Field Services
414-458-8711

Donohue

Brillion Iron Works
200 Park Avenue
Brillion, WI 54110

ATTN: Leonard Kopidlansky

PROJECT NUMBER: 65311.008
COLLECTION DATA: Submitted by Client
SAMPLE COLLECTED: 08-17-88
SAMPLE RECEIVED: 08-17-88

SAMPLE NO: 51563
DESCRIPTION: Spray Booth Water

trans-1,3-dichloropropene	<1	ug/l
cis-1,3-dichloropropene	<1	ug/l
Total Cyanide	<0.005	mg/l

Donohue Analytical
4738 North 40th Street
Sheboygan, Wisconsin 53083

Analytical & Field Services
414-458-8711

Analyses performed in accordance with procedures approved by the U.S. EPA.
Certified by the State of Wisconsin DNR
Laboratory I.D. No. 460060920

Leonard F. Kopidlansky 10/17/88

Donohue

Brillion Iron Works
200 Park Avenue
Brillion, WI 54110

ATTN: Leonard Kopidlansky

PROJECT NUMBER: 65311.008
COLLECTION DATA: Submitted by Client
SAMPLE COLLECTED: 10-24-88
SAMPLE RECEIVED: 10-24-88

SAMPLE NO: 54056
DESCRIPTION: Spray Paint Booth Water

Lead	0.46	mg/l

Analyses performed in accordance with procedures approved by the U.S. EPA. Certified by the State of Wisconsin DNI Laboratory I.D. No. 460060920

Jerome F. [signature] 11/8/88
Project Manager Date

Donohue Analytical
4738 North 40th Street
Sheboygan, Wisconsin 53083

Analytical & Field Services
414-458-8711

Waste Management, Inc.

GENERATOR'S WASTE MATERIAL PROFILE SHEET

WASTE PROFILE SHEET CODE: TSDR G 54761

A GENERAL INFORMATION

GENERATOR NAME: BRILLION IRON WORKS, INC.

TRANSPORTER:

FACILITY ADDRESS: 200 PARK AVE. BRILLION, WI 54110

TRANSPORTER PHONE:

GENERATOR USEPA I.D. WID048027734

GENERATOR STATE I.D. WID048027734

TECHNICAL CONTACT: LEONARD KOPIDLANSKY TITLE: PLANT PROJECT ENGR PHONE: 414-756-2121

NAME OF WASTE: SODIUM CYANIDE

PROCESS GENERATING WASTE: FORGE HARDENING OF METAL PARTS.

B PHYSICAL CHARACTERISTICS OF WASTE

COLOR: Whitish-Gray

ODOR: [x] NONE [ ] MILD [ ] STRONG

DESCRIBE:

PHYSICAL STATE @ 70°F: [x] SOLID [ ] SEMI-SOLID [ ] LIQUID [ ] POWDER

LAYERS: [x] MULTILAYERED [ ] BI-LAYERED [ ] SINGLE PHASED

FREE LIQUIDS: [ ] YES [x] NO VOLUME %

pH: [ ] < 2 [ ] 7.1-10 [ ] N/A [ ] 2-4 [x] 10.1-12.5 [ ] 4.1-6.9 [ ] > 12.5 [ ] 7 [ ] EXACT

SPECIFIC GRAVITY: [ ] < .8 [ ] 1.3-1.4 [ ] .8-1.0 [x] 1.5-1.7 [ ] 1.1-1.2 [ ] > 1.7 [ ] EXACT

FLASH POINT: [ ] < 70°F [ ] > 200°F [ ] CLOSED CUP [ ] 70°F-100°F [x] NO FLASH [ ] OPEN CUP [ ] 101°F-139°F [ ] EXACT [ ] 140°F-200°F

C CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)

SODIUM CYANIDE	75-100 %
REFRACTORY BRICK (BROKEN PARTS)	1-25 %
DIRT-RESIDUE ETC	<1 %

D METALS [ ] TOTAL (PPM) [x] EPA EXTRACTION PROCEDURE (mg/L)

ARSENIC (As)	< 2.5	SELENIUM (Se)	< 0.5
BARIUM (Ba)	< 50	SILVER (Ag)	< 2.5
CADMIUM (Cd)	< 0.5	COPPER (Cu)	< 2
CHROMIUM (Cr)	< 2.5	NICKEL (Ni)	< 2
MERCURY (Hg)	< 0.1	ZINC (Zn)	< 2
LEAD (Pb)	< 2.5	THALLIUM (Tl)	< 1
CHROMIUM-HEX (Cr + 6)			

E OTHER COMPONENTS - TOTAL (PPM)

CYANIDES	750,000-1,000,000	PCB'S	N/A
SULFIDES	< 10	PHENOLICS	N/A

F SHIPPING INFORMATION

D.O.T. HAZARDOUS MATERIAL? [x] YES [ ] NO

PROPER SHIPPING NAME: WASTE SODIUM CYANIDE, SOLID

HAZARD CLASS: POISON B I.D. NO. UN1689 R.Q. 10

METHOD OF SHIPMENT: [ ] BULK LIQUID [x] BULK SOLID [ ] DRUM (TYPE/SIZE)

ANTICIPATED VOLUME: 3 GALS. CUBIC YARDS OTHER FT^3

PER: [x] ONE TIME [ ] WEEK [ ] MONTH [ ] QUARTER [ ] YEAR

G HAZARDOUS CHARACTERISTICS

REACTIVITY: [ ] NONE [ ] PYROPHORIC [ ] SHOCK SENSITIVE [ ] EXPLOSIVE [x] WATER REACTIVE [x] OTHER ACIDS

OTHER HAZARDOUS CHARACTERISTICS: [x] NONE [ ] RADIOACTIVE [ ] ETIOLOGICAL [ ] PESTICIDE MANUFACTURING WASTE [ ] OTHER

USEPA HAZARDOUS WASTE? [x] YES [ ] NO

USEPA HAZARDOUS CODE(S): P106

STATE HAZARDOUS WASTE? [x] YES [ ] NO

STATE CODE(S): P106

SPECIAL HANDLING INFORMATION

MSDS [x] ADDITIONAL PAGE(S) ATTACHED

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS COMPLETE AND ACCURATE, AND THAT ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

AUTHORIZED SIGNATURE	TITLE	DATE
Leonard Kopidlansky	Plant Project Engr.	5/21/87

RESIDUALS MANAGEMENT TECHNOLOGY, INC.

LABORATORY REPORT

CLIENT: Brillion Iron Works DATE: 1-30-84

PROJECT #: 1082-L P. O. #: 48152

SAMPLE #: 5107

SAMPLE DESCRIPTION: Green Dip Paint Waste (Waterbase) 12-23-83

EP TOXICITY TEST

WEIGHT USED: 99.8 grs FINAL PH: 5.0 ACID USED: 20 mls

PARAMETER	RESULT (mg/l)	HAZARDOUS WASTE LIMITS
ARSENIC	< 0.001	5.0 mg/l
BARIUM	< 0.2	100.0 mg/l
CADMIUM	< 0.01	1.0 mg/l
CHROMIUM-TOTAL	0.39	5.0 mg/l
LEAD	10.8	5.0 mg/l
MERCURY	< 0.0008	0.2 mg/l
SELENIUM	< 0.001	1.0 mg/l
SILVER	< 0.02	5.0 mg/l

Paul E. Duranceau

Paul E. Duranceau, Laboratory Director

All leaching tests and leachate analysis meet Environmental Protection Agency requirements as outlined in the May 19, 1980, Federal Register, 40 CFR 261.

RESIDUALS MANAGEMENT TECHNOLOGY, INC.

LABORATORY REPORT

CLIENT: Brillion Iron Works

DATE: 8/17/81

PROJECT #: 1091X-2000

P.O. #: 1636

SAMPLE #: 1333

SAMPLE DESCRIPTION: Black enamel paint residue, #3 (~~6-8-81 to~~ 7-10-81)

EP TOXICITY TEST

WEIGHT USED: 100.1 grams

FINAL PH: 5.0

ACID USED: 25 mls

PARAMETER	RESULT	HAZARDOUS WASTE LIMITS
ARSENIC	< 0.001	5.0 mg/l
BARIUM	< 0.2	100.0 mg/l
CADMIUM	< 0.01	1.0 mg/l
CHROMIUM-TOTAL	9.36	5.0 mg/l
LEAD	0.1	5.0 mg/l
MERCURY	< 0.0004	0.2 mg/l
SELENIUM	< 0.001	1.0 mg/l
SILVER	< 0.02	5.0 mg/l
FLASH POINT	94	140° F

Paul E. Duranceau

Paul E. Duranceau, Laboratory Director

All leaching tests and leachate analysis meet Environmental Protection Agency requirements as outlined in the May 19, 1980, Federal Register, 40 CFR 261.

RESIDUALS MANAGEMENT TECHNOLOGY, INC.

LABORATORY REPORT

CLIENT: Brillion Iron Works

DATE: 8/17/81

PROJECT #: 1091X-2000

P.O. #: 1636

SAMPLE #: 1334

SAMPLE DESCRIPTION: Spray booth solids paint residue composite, #4 (6-17-81 to 7-10-81)

EP TOXICITY TEST

WEIGHT USED: 100.0 grams

FINAL PH: 4.8

ACID USED: 150 mls

PARAMETER	RESULT	HAZARDOUS WASTE LIMITS
ARSENIC	0.005	5.0 mg/l
BARIUM	1.2	100.0 mg/l
CADMIUM	< 0.01	1.0 mg/l
CHROMIUM-TOTAL	1.01	5.0 mg/l
LEAD	84	5.0 mg/l
MERCURY	< 0.0002	0.2 mg/l
SELENIUM	< 0.001	1.0 mg/l
SILVER	< 0.02	5.0 mg/l

Paul E. Duranceau

Paul E. Duranceau, Laboratory Director

All leaching tests and leachate analysis meet Environmental Protection Agency requirements as outlined in the May 19, 1980, Federal Register, 40 CFR 261.

RESIDUALS MANAGEMENT TECHNOLOGY, INC.

LABORATORY REPORT

CLIENT: Brillion Iron Works DATE: 8/17/81

PROJECT #: 1091X-2000 P.O. #: 1636

SAMPLE #: 1332

SAMPLE DESCRIPTION: Red Oxide primer paint residue composite, #2 (6-17-81 to 7-10-81)

EP TOXICITY TEST

WEIGHT USED: 100.0 grams FINAL PH: 5.1 ACID USED: 50 mls

PARAMETER	RESULT	HAZARDOUS WASTE LIMITS
ARSENIC	0.008	5.0 mg/l
BARIUM	1.6	100.0 mg/l
CADMIUM	< 0.01	1.0 mg/l
CHROMIUM-TOTAL	246	5.0 mg/l
LEAD	< 0.1	5.0 mg/l
MERCURY	< 0.0004	0.2 mg/l
SELENIUM	< 0.001	1.0 mg/l
SILVER	< 0.02	5.0 mg/l
FLASH POINT	131	140° F

Paul E. Duranceau

Paul E. Duranceau, Laboratory Director

All leaching tests and leachate analysis meet Environmental Protection Agency requirements as outlined in the May 19, 1980, Federal Register, 40 CFR 261.

RESIDUALS MANAGEMENT TECHNOLOGY, INC.

LABORATORY REPORT

CLIENT: Brillion Iron Works

DATE: 8/24/84

PROJECT #: 1082-L

P.O. #: 52713

SAMPLE #: 7453

SAMPLE DESCRIPTION: Red Oxide Waterbase Paint Waste (7/6/84)

EP TOXICITY TEST

WEIGHT USED: 100.0 grs. FINAL PH: 5.0 ACID USED: 25 mls

PARAMETER	RESULT (mg/l)	HAZARDOUS WASTE LIMITS
ARSENIC		5.0 mg/l
BARIUM		100.0 mg/l
CADMIUM		1.0 mg/l
CHROMIUM-TOTAL	72.8	5.0 mg/l
CHROMIUM-HEXAVALENT	61.0	5.0 mg/l
MERCURY		0.2 mg/l
SELENIUM		1.0 mg/l
SILVER		5.0 mg/l

Paul E. Duranceau

Paul E. Duranceau, Laboratory Director

All leaching tests and leachate analysis meet Environmental Protection Agency requirements as outlined in the May 19, 1980, Federal Register, 40 CFR 261.

D234

RESIDUALS MANAGEMENT TECHNOLOGY, INC.

LABORATORY REPORT

CLIENT: Brillion Iron Works

DATE: 8/17/81

PROJECT #: 1091X-2000

P.O. #: 1636

SAMPLE #: 1331

SAMPLE DESCRIPTION: Black primer paint residue, #1 (~~6-7-81 to~~ 7-10-81)

EP TOXICITY TEST

WEIGHT USED: 100.2 grams

FINAL PH: 5.0

ACID USED: 25 mls

PARAMETER	RESULT	HAZARDOUS WASTE LIMITS
ARSENIC	0.003	5.0 mg/l
BARIUM	0.2	100.0 mg/l
CADMIUM	< 0.01	1.0 mg/l
CHROMIUM-TOTAL	< 0.05	5.0 mg/l
LEAD	0.1	5.0 mg/l
MERCURY	0.0004	0.2 mg/l
SELENIUM	< 0.001	1.0 mg/l
SILVER	< 0.02	5.0 mg/l
FLASH POINT	124	140° F

Paul E. Duranceau

Paul E. Duranceau, Laboratory Director

All leaching tests and leachate analysis meet Environmental Protection Agency requirements as outlined in the May 19, 1980, Federal Register, 40 CFR 261.

Donohue

Ammended Report

Brillion Iron Works
200 Park Avenue
Brillion, WI 54110

ATTN: Mr. Leonard Kopidlansky

PROJECT NUMBER: 65311.007
COLLECTION DATA: Submitted by Client
SAMPLE COLLECTED: 05-25-88
SAMPLE RECEIVED: 05-31-88

SAMPLE NO: 48140
DESCRIPTION: Spray Paint Booth

Sample Volume	One quart	
Percent Total Solids	82.7	percent
% Ash	32.6	percent
Arsenic	<0.302	mg/l
Barium	1,790	mg/l
Cadmium	<0.01	mg/l
Chromium	17.3	mg/l
Copper	25.6	mg/l
Lead	106	mg/l
Mercury	0.073	mg/l
Nickel	<0.05	mg/l
Selenium	<0.302	mg/l
Silver	<0.49	mg/l
Zinc	160	mg/l
pH	6.23	units
Reactive Sulfide	1.93	mg/l
Color	Red	
Free Cyanide	0.312	mg/l
Flashpoint	No flash	F
Oil & Grease	10,555	mg/l
Odor	Mild; paint	
Physical Description	Bilayered	
Total Phenol	12.7	mg/l
Specific Gravity	1.51	
Physical State at 70 F	Semi-Solid	
Free Liquids	Yes; 2 percent	
Total Chlorine by Bomb	0.26	percent
Reactivity	Non-Reactive	
Total Chromium EP TOX	<0.05	mg/l
Lead EP TOX	0.28	mg/l
Zinc EP TOX	0.33	mg/l
Barium EP TOX	1.40	mg/l

Donohue Analytical
4738 North 40th Street
Sheboygan, Wisconsin 53083

Analytical & Field Services
414-458-8711

Analyses performed in accordance with procedures approved by the U.S. EPA. Certified by the State of Wisconsin DNR Laboratory I.D. No. 460060920

Project Manager — Date 8/31/88

RESIDUALS MANAGEMENT TECHNOLOGY, INC.

LABORATORY REPORT

CLIENT: Brillion Iron Works

DATE: 1-30-84

PROJECT #: 1082-L

P. O. #: 48152

SAMPLE #: 5106

SAMPLE DESCRIPTION: Red Dip Paint Waste (Waterbase) 12-23-83

EP TOXICITY TEST

WEIGHT USED: 100.3 grs FINAL PH: 4.9 ACID USED: 30 mls

PARAMETER	RESULT (mg/l)	HAZARDOUS WASTE LIMITS
ARSENIC	< 0.001	5.0 mg/l
BARIUM	< 0.2	100.0 mg/l
CADMIUM	< 0.01	1.0 mg/l
CHROMIUM-TOTAL	0.11	5.0 mg/l
LEAD	1.3	5.0 mg/l
MERCURY	< 0.0008	0.2 mg/l
SELENIUM	< 0.001	1.0 mg/l
SILVER	< 0.02	5.0 mg/l

Paul E. Duranceau

Paul E. Duranceau, Laboratory Director

All leaching tests and leachate analysis meet Environmental Protection Agency requirements as outlined in the May 19, 1980, Federal Register, 40 CFR 261.

CBC ENVIRONMENTAL SERVICES

09/14/87 LABORATORY REPORT

B067 8417400 W43

BRILLION IRON WORKS INC.
200 PARK AVENUE
BRILLION ,WI 54110
ATTN: LEONARD KOPIDLANSKY

SAMPLE 87240-B11207 EMISSION CONTROL DUST FULLER
DATE COLLECTED 08/28/87 DATE RECEIVED 08/28/87

TEST NAME	RESULT	UNITS	EP TOXICITY		EP LIMIT	HAZ.CODE
BARIUM - TOTAL	91	PPM				
CADMIUM - TOTAL	81	PPM	3.3	MG/L	1.0	D006
CHROMIUM - TOTAL	26	PPM	0.05	MG/L	5.0	
COPPER - TOTAL	160	PPM	0.42	MG/L	100.0	
LEAD - TOTAL	16000	PPM	370	MG/L	5.0	D008
NICKEL - TOTAL	30	PPM				
SILVER - TOTAL	0.6	PPM				
ZINC - TOTAL	9400	PPM	270	MG/L	200.0	
ARSENIC - TOTAL	8.2	PPM	0.001	MG/L	5.0	
SELENIUM - TOTAL	<0.020	PPM				
MERCURY - TOTAL	>1.0	PPM	0.0010	MG/L	0.2	
% CHLORINE	0.54	%				
COLOR	BLACK					
LAYERS	NONE					
ODOR	MILD					
PHYSICAL CHARACTERISTICS	SOLID					
FREE LIQUIDS	0.0	%				
FLASH POINT (FAHRENHEIT)	>210	DEG. F			140.0	
PH (UNITS)	9.1				2.0-12.5	
	PH DONE ON 10% SOLUTION.					
SPECIFIC GRAVITY	1.84	G/ML				
TOTAL SOLIDS	85	%				
PHENOLICS	21	PPM				
TOTAL CYANIDE	<10	PPM				
REACTIVE SULFIDE	<1.0	PPM				
BTU'S	1600	BTU'S/LB				

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
EST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS, 1982, EPA SW846.
ANNUAL BOOKS OF ASTM STANDARDS, 1982.
IF YOU HAVE ANY QUESTIONS PLEASE CONTACT OUR CLIENT SERVICE DEPARTMENT.FAX # 414-764-0486
ANY REMAINING WASTE SAMPLES WILL BE RETURNED TO THE ADDRESS LISTED ABOVE 8 WEEKS FROM THE RECEIVING DATE OF THIS REPORT. WI DNR LAB CERTIFICATION #241283020/A.I.H.A. ACCREDITED.

N/T = NOT TESTED N/A = NOT APPLICABLE APPROVAL

CHEM-BIO CORPORATION
140 E. RYAN ROAD OAK CREEK, WI 53154-4599 (414) 764-7005 (800) 592-5900 DT 332

Brillion

A SUBSIDIARY OF BEATRICE FOODS CO.

BRILLION IRON WORKS, INC.

200 PARK AVENUE • BRILLION, WISCONSIN 54110 • Phone: 414/756-2121

August 31, 1984

Ms. Lisa Pierard
U. S. Environmental Protection Agency
Region 5
230 South Dearborn St.
Chicago, Illinois 60604

RE: Request for information-Groundwater Monitoring Requirements
Facility Name: Brillion Iron Works, Inc., a Subsidiary of Beatrice Companies, Inc.
U.S. EPA ID No. WID980795215 (Landfill Site Only)
WID048027734 (Generator No.)

Dear Ms. Pierard:

This letter is sent to clarify our status as a hazardous waste generator/disposer in reply to your letter, No. 5HW-13 dated August 17, 1984 and telephone conservation of August 30, 1984.

Our initial notification of hazardous waste activity on August 12, 1980 indicated that we did not dispose of hazardous waste as a large quantity generator. At that time hazardous air pollution control was mixed dust with large quantities of nonhazardous waste sands from foundry operations during collection with the resultant mixture being nonhazardous. This material was disposed of in the landfill in question, ID No. WID980795215, between August 11, 1980 and approximately April 15, 1981. Further discussions with regulatory agency personnel during this period indicated that this practice would make the entire mixture hazardous under 40CFR 261.3 and/or a treatment process, therefore sampling was conducted and the hazardous waste streams were identified and separated. After April 15, 1981 all hazardous waste was transported and disposed of by a licensed waste handler at a licensed hazardous waste landfill site. As a result of this action, Brillion Iron Works was no longer a small quantity generator and we then indicated in a letter to EPA on May 6, 1981 that we were a temporary storage facility because of some small quantities of other wastes (less than 1000 kg. per month) that we had accumulated for over 90 days. Additionally, because we had disposed of the previously mentioned mixture in the landfill and because that landfill is located off site we were advised by the Wisconsin DNR to make a separate notification and application for permits for that disposal facility which resulted in U.S. EPA ID No. WID980795215 being assigned to that site.

Independent of all of the above mentioned activity, and as part of our license to construct and operate our foundry landfill from the Wisconsin Department of Natural Resources, we do conduct quarterly groundwater monitoring at the site, results of which are on file with the Wisconsin DNR Lake Michigan District office. Also on file with the WDNR are closure and post-closure plans as required for that site.

To summarize our current status, Brillion Iron Works, Inc.:

1. Is a generator of hazardous waste in quantities greater than 1000 kg. per month.
2. Does not currently dispose of any hazardous waste in its foundry landfill U.S. EPA ID No. WID980795215.
3. Did dispose of a mixture of hazardous and non hazardous waste as previously described between 8/11/80 and 4/25/81 in its landfill.
4. Disposes of all hazardous waste in licensed hazardous waste landfills handled by licensed hazardous waste transporters.
5. Does not currently treat any hazardous waste.

I hope this answers your questions at this time.

Sincerely,

BRILLION IRON WORKS, INC.

Leonard Kopidlansky

Leonard Kopidlansky
Plant Project Engineer

APPROVED FOR SUBMITTAL BY:

Edward L. Schlies

Edward L. Schlies
Dir. of Plant Eng. & Maintenance

Karl Gabler
President

pv
cc: Mr. Jim Reyburn-Wis. DNR

Engineers/Architects
2737 S. Ridge Road
P.O. Box 19012
Green Bay, Wisc. 54307-9012

LABORATORY ANALYSIS RESULTS

Client	Brillion Iron Works, Inc.	Sampled By	KAJ/TGR
Address	200 Park Ave.	Scope I.D.	86B28
	Brillion, WI 54110	Billing Line No.	
		Liaison	K. Joslyn
Name of Rep.	Leonard D. Kopidlansky	Supply Order No.	
Telephone No.	(000) 000-0000	Result Sheet No.	34373.10

Sample I.D.	Sample I RVW-G34803	Sample I E.P. Tox.
Date Collected	5/19/86	5/19/86
Date Received	5/21/86	5/21/86
Parameters, units	Results	
Specific Gravity	2.8842	
pH, std. units	8.40	
T. Solids, % @ 105 C	99.97	
Flash Point, *	>200	
Ash Content, %	94.44	
Sulfides, mg/kg	9.77	
Phenol, mg/kg	1.56	
Cyanide, Free, mg/kg	<1.0	
As, mg/kg	4.4	
Ba, mg/kg	3350	3.1 mg/l
Cd, mg/kg	<0.50	
T. Cr, mg/kg	210	<0.10 mg/l
Cu, mg/kg	140	<0.08 mg/l
Pb, mg/kg	83	<0.50 mg/l
Hg, mg/kg	<0.15	

comments: * Flash Point reported as Closed Cup - Degrees Fahrenheit. Sample I is a composite of ID # LS-1-19, FS-1-19, LS-2-19(T), LS-2-19(P), and FS-2-19. Results mg/kg dry weight unless noted.

Signed: [illegible] Date: 6/25/86

FOTH AND VAN DYKE
Engineers/Architects
2737 S. Ridge Road
P.O. Box 19012
Green Bay, Wisc. 54307-9012

LABORATORY ANALYSIS RESULTS

Client	Brillion Iron Works, Inc.	Sampled By	KAJ/TGR
Address	200 Park Ave.	Scope I.D.	86B28
	Brillion, WI 54110	Billing Line No.	
		Liaison	K. Joslyn
Name of Rep.	Leonard D. Kopidlansky	Supply Order No.	
Telephone No.	(000) 000-0000	Result Sheet No.	34373.20

Sample I.D.	Sample I RVW-G34803	Sample I E.P. Tox.
Date Collected	5/19/86	5/19/86
Date Received	5/21/86	5/21/86
Parameters, units	Results	
Ni, mg/kg	54	<0.14 mg/l
Se, mg/kg	<2.5	<0.05 mg/l
Ag, mg/kg	<2.5	
Zn, mg/kg	54	
Oil & Grease, mg/kg	60	
Free Liquids, %	0	

comments: Sample I is a composite of ID # LS-1-19, FS-1-19, LS-2-19(T), LS-2-19(P), and FS-2-19.
Results reported as mg/kg dry weight unless otherwise noted.

Signed: [illegible] Date: [illegible]

FOTH AND VAN DYKE
Engineers/Architects
2737 S. Ridge Road
P.O. Box 19012
Green Bay, Wisc. 54307-9012

LABORATORY ANALYSIS RESULTS

Client	Brillion Iron Works, Inc.	Sampled By	KAJ/TGR
Address	200 Park Ave.	Scope I.D.	86B28
	Brillion, WI 54110	Billing Line No.	
		Liaison	K. Joslyn
Name of Rep.	Leonard D. Kopidlansky	Supply Order No.	
Telephone No.	(000) 000-0000	Result Sheet No.	34377.10

Sample I.D.	Sample J RVW-G34804	Sample J E.P. Tox.
Date Collected	5/19/86	5/19/86
Date Received	5/21/86	5/21/86
Parameters, units	Results	
Specific Gravity	2.7755	
pH, std. units	7.95	
T. Solids, % @ 105 C	99.85	
Flash Point, *	>200	
Ash Content, %	99.64	
Sulfides, mg/kg	9.69	
Phenol, mg/kg	0.24	
Cyanide, Free, mg/kg	<1.0	
As, mg/kg	2.4	
Ba, mg/kg	250	<1.0 mg/l
Cd, mg/kg	<0.50	
T. Cr, mg/kg	39	<0.10 mg/l
Cu, mg/kg	92	<0.08 mg/l
Pb, mg/kg	26	<0.50 mg/l
Hg, mg/kg	<0.10	

comments: * Flash Point reported as Closed Cup - Degrees Fahrenheit.
Sample J is a composite of ID # SD-1-16, SD-2-41, SD-2-38.
Results reported as mg/kg dry weight unless otherwise noted.

Signed: [illegible] Date: 7/8/86

FOTH AND VAN DYKE
Engineers/Architects
2737 S. Ridge Road
P.O. Box 19012
Green Bay, Wisc. 54307-9012

LABORATORY ANALYSIS RESULTS

Client	Brillion Iron Works, Inc.	Sampled By	KAJ/TGR
Address	200 Park Ave.	Scope I.D.	86B28
	Brillion, WI 54110	Billing Line No.	
		Liaison	K. Joslyn
Name of Rep.	Leonard D. Kopidlansky	Supply Order No.	
Telephone No.	(000) 000-0000	Result Sheet No.	34377.20

Sample I.D.	Sample J RVW-G34804	Sample J E.P. Tox.
Date Collected	5/19/86	5/19/86
Date Received	5/21/86	5/21/86
Parameters, units	Results	
Ni, mg/kg	38	<0.14 mg/l
Se, mg/kg	<2.5	
Ag, mg/kg	<2.5	
Zn, mg/kg	21	
Oil & Grease, mg/kg	156	
Free Liquids, %	0	
Bulk Density, g/cc	1.238	

comments: Sample J is a composite of ID # SD-1-16, SD-2-41, SD-2-38.
Results reported as mg/kg dry weight, E. P. Tox. as mg/l.

Signed: [signature] Date: 7/8/86

FOTH AND VAN DYKE
Engineers/Architects
2737 S. Ridge Road
P.O. Box 19012
Green Bay, Wisc. 54307-9012

LABORATORY ANALYSIS RESULTS

Client	Brillion Iron Works, Inc.	Sampled By	KAJ/TGR
Address	200 Park Ave.	Scope I.D.	86B28
	Brillion, WI 54110	Billing Line No.	
		Liaison	K. Joslyn
Name of Rep.	Leonard D. Kopidlansky	Supply Order No.	
Telephone No.	(000) 000-0000	Result Sheet No.	34378.10

Sample I.D.	Sample K RVW-G34805	Sample K E.P. Tox.
Date Collected	5/19/86	5/19/86
Date Received	5/21/86	5/21/86
Parameters, units	Results	
Specific Gravity	2.0991	
pH, std. units	8.55	
T. Solids, % @ 105 C	98.87	
Flash Point, *	>200	
Ash Content, %	91.05	
Sulfides, mg/kg	9.86	
Phenol, mg/kg	5.7	
Cyanide, Free, mg/kg	<1.0	
As, mg/kg	3.4	<0.05 mg/l
Ba, mg/kg	91	<1.0 mg/l
Cd, mg/kg	7.9	0.07 mg/l
T. Cr, mg/kg	140	<0.10 mg/l
Cu, mg/kg	289	<0.08 mg/l
Pb, mg/kg	1760	<0.50 mg/l
Hg, mg/kg	0.50	<0.001mg/l

comments: * Flash Point reported as Closed Cup - Degrees Fahrenheit.
Sample K is a composite of ID # LR-1-20, FR-1-20, FR-2-20.
Results reported as mg/kg dry weight, E.P. Tox. as mg/l.

Signed: [illegible] Date: 7/8/86

FOTH AND VAN DYKE
Engineers/Architects
2737 S. Ridge Road
P.O. Box 19012
Green Bay, Wisc. 54307-9012

LABORATORY ANALYSIS RESULTS

Client	Brillion Iron Works, Inc.	Sampled By	KAJ/TGR
Address	200 Park Ave. Brillion, WI 54110	Scope I.D.	86B28
		Billing Line No.	
		Liaison	K. Joslyn
Name of Rep.	Leonard D. Kopidlansky	Supply Order No.	
Telephone No.	(000) 000-0000	Result Sheet No.	34378.20

Sample I.D.	Sample K RVW-G34805	Sample K E.P. Tox.
Date Collected	5/19/86	5/19/86
Date Received	5/21/86	5/21/86
Parameters, units	Results	
Ni, mg/kg	65	<0.14 mg/l
Se, mg/kg	<2.5	
Ag, mg/kg	<2.5	
Zn, mg/kg	850	8.9 mg/l
Oil & Grease, mg/kg	560	
Free Liquids, %	0	

comments: Sample K is a composite of ID # LR-1-20, FR-1-20, FR-2-20.
Results reported as mg/kg dry weight unless otherwise noted.

Signed: [signature] Date: 7/8/86

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P.O. Box 19012
Green Bay, WI 54307-9012

LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	33993.10

Sample I.D.	Sample A
	RVWG34816
Date Collected	2/4/86
Date Received	2/6/86

Parameters, units	Results
Specific Gravity	2.2255
pH, std. units	9.20
T. Solids, % @ 105 C	99.66
Flash Point, *	> 200 °F
Ash Content, %	97.61
Sulfides, mg/kg	5.23
Phenol, mg/kg	4.02
Cyanide, Free, mg/kg	< 1.89
As, mg/kg	< 2.5
Ba, mg/kg	<49
Cd, mg/kg	< 0.24
T. Cr, mg/kg	< 2.4
Cu, mg/kg	3.9
Pb, mg/kg	2.9
Hg, mg/kg	< 0.09

comments: * Flash Point reported as Closed Cup - Degrees Fahrenheit.
Sample A is a composite of ID Nos. 2, 3, 4, 5, and 27.
Results reported as mg/kg dry weight unless otherwise noted.

Signed: [signature] Date: 3/12/86

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Green Bay, WI 54307-9012

LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	33993.20

Sample I.D.	Sample A
	RVWG34816
Date Collected	2/4/86
Date Received	2/6/86

Parameters, units	Results
Ni, mg/kg	< 4.8
Se, mg/kg	0.64
Ag, mg/kg	< 2.4
Zn, mg/kg	64
Oil & Grease, mg/kg	1037
Free Liquids, %	0

Comments:

Signed: [signature] Date: 3/12/86

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Green Bay, WI 54307-9012

LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	33994.10

Sample I.D.	Sample B RVWG34817	Sample B E.P. Tox.
Date Collected	2/4/86	2/4/86
Date Received	2/6/86	2/6/86
Parameters, units	Results	
Specific Gravity	2.0182	
pH, std. units	9.35	
T. Solids, % @ 105 C	97.53	
Flash Point, *	> 200 F	
Ash Content, %	97.28	
Sulfides, mg/kg	< 10.01	
Phenol, mg/kg	7.35	
Cyanide, Free, mg/kg	0.26	
As, mg/kg	2.4	
Ba, mg/kg	< 48	
Cd, mg/kg	< 0.24	
T. Cr, mg/kg	2.9	
Cu, mg/kg	13	
Pb, mg/kg	5.3	< 0.5 mg/l
Hg, mg/kg	< 0.08	

Comments: * Flash Point reported as Closed Cup - Degrees Fahrenheit.
Sample B is a composite of ID Nos. 6, 8, 11, 14, and 23.
Results reported as mg/kg dry weight unless otherwise noted.

Signed: [illegible] Date: 3/13/86

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LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	33994.20

Sample I.D.	Sample B RVWG34817	Sample B E.P. Tox.
Date Collected	2/4/86	2/4/86
Date Received	2/6/86	2/6/86
Parameters, units	Results	
Ni, mg/kg	< 4.8	
Se, mg/kg	0.48	
Ag, mg/kg	< 2.4	
Zn, mg/kg	21	
Oil & Grease, mg/kg	215	
Free Liquids, %	0	

comments:

Signed: [signature] Date: 3/18/86

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LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	33995.10

Sample I.D.	Sample E RVWG34819	Sample E E.P. Tox.
Date Collected	2/4/86	2/4/86
Date Received	2/6/86	2/6/86
Parameters, units	Results	
Specific Gravity	2.1148	
pH, std. units	9.35	
T. Solids, % @ 105 C	96.45	
Flash Point, *	> 200 F	
Ash Content, %	92.45	
Sulfides, mg/kg	9.99	
Phenol, mg/kg	49.0	
Cyanide, Free, mg/kg	< 1.88	
As, mg/kg	< 2.5	
Ba, mg/kg	< 49	
Cd, mg/kg	0.60	
T. Cr, mg/kg	3.0	
Cu, mg/kg	12	
Pb, mg/kg	90	< 0.5 mg/l
Hg, mg/kg	< 0.10	

comments: * Flash Point reported as Closed Cup - Degrees Fahrenheit.
Sample E is a composite of ID Nos. 29, 31, 32, 33, 35, and 37.
Results reported as mg/kg dry weight unless otherwise noted.

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LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	33995.20

Sample I.D.	Sample E RVWG34819	Sample E E.P. Tox.
Date Collected	2/4/86	2/4/86
Date Received	2/6/86	2/6/86
Parameters, units	Results	
Ni, mg/kg	6.4	
Se, mg/kg	< 0.49	
Ag, mg/kg	< 2.4	
Zn, mg/kg	88.5	
Oil & Grease, mg/kg	603	
Free Liquids, %	0	

Comments:

Signed: [signature] Date: 3/18/86

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LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	34016.10

Sample I.D.	Sample F RVWG34820	Sample F E.P. Tox.
Date Collected	2/4/86	2/4/86
Date Received	2/6/86	2/6/86
Parameters, units	Results	
Specific Gravity	1.4650	
pH, std. units	7.85	
T. Solids, % @ 105 C	60.49	
Flash Point, *	> 200 F	
Ash Content, %	53.47	
Sulfides, mg/kg	6.76	
Phenol, mg/kg	8.32	
Cyanide, Free, mg/kg	< 1.38	
As, mg/kg	< 2.5	
Ba, mg/kg	< 49	
Cd, mg/kg	< 0.25	
T. Cr, mg/kg	8.9	< 0.05mg/l
Cu, mg/kg	21.7	
Pb, mg/kg	23	< 0.5 mg/l
Hg, mg/kg	< 0.13	

Comments: * Flash Point reported as Closed Cup - Degrees Fahenheit.
Sample F consists of ID No. 28.
Results reported as mg/kg dry weight unless otherwise noted.

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LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	34016.20

Sample I.D.	Sample F RVWG34820	Sample F E.P. Tox.
Date Collected	2/4/86	2/4/86
Date Received	2/6/86	2/6/86
Parameters, units	Results	
Ni, mg/kg	12	
Se, mg/kg	0.79	
Ag, mg/kg	< 2.4	
Zn, mg/kg	64.0	
Oil & Grease, mg/kg	1952	
Free Liquids, %	0	

comments:

Signed: [signature] Date: 3/13/86

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LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	33996.10

Sample I.D.	Sample G RVWG34821	Sample G E.P. Tox.
Date Collected	2/4/86	2/4/86
Date Received	2/6/86	2/6/86
Parameters, units	Results	
Specific Gravity	2.6507	
pH, std. units	9.30	
T. Solids, % @ 105 C	95.51	
Flash Point, *	> 200 F	
Ash Content, %	95.38	
Sulfides, mg/kg	11.92	
Phenol, mg/kg	1.7	
Cyanide, Free, mg/kg	< 1.73	
As, mg/kg	15	< 0.10mg/l
Ba, mg/kg	< 50	
Cd, mg/kg	< 0.25	
T. Cr, mg/kg	392	< 0.05mg/l
Cu, mg/kg	808	< 0.08mg/l
Pb, mg/kg	21	< 0.5 mg/l
Hg, mg/kg	< 0.10	

Comments: * Flash Point reported as Closed Cup - Degrees Fahrenheit.
Sample G is a composite of ID Nos. 42, 43, 44, and 45.
Results reported as mg/kg dry weight unless otherwise noted.

Signed: [signature] Date: 3/13/86

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LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	33996.20

Sample I.D.	Sample G RVWG34821	Sample G E.P. Tox.
Date Collected	2/4/86	2/4/86
Date Received	2/6/86	2/6/86
Parameters, units	Results	
Ni, mg/kg	308	0.69 mg/l
Se, mg/kg	< 0.49	
Ag, mg/kg	< 2.5	
Zn, mg/kg	43.5	
Oil & Grease, mg/kg	232	
Free Liquids, %	0	

Comments:

Signed: [signature] Date: 3/13/86

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LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	33997.10

Sample I.D.	Sample H RVWG34822	Sample H E.P. Tox.
Date Collected	2/4/86	2/4/86
Date Received	2/6/86	2/6/86
Parameters, units	Results	
Specific Gravity	2.7119	
pH, std. units	7.05	
T. Solids, % @ 105 C	99.84	
Flash Point, *	> 200 F	
Ash Content, %	98.44	
Sulfides, mg/kg	3.98	
Phenol, mg/kg	< 0.64	
Cyanide, Free, mg/kg	< 1.68	
As, mg/kg	< 2.5	
Ba, mg/kg	< 50	
Cd, mg/kg	< 0.25	
T. Cr, mg/kg	30	< 0.05mg/l
Cu, mg/kg	49	
Pb, mg/kg	7.0	< 0.5 mg/l
Hg, mg/kg	< 0.08	

Comments: * Flash Point reported as Closed Cup - Degrees Fahrenheit.
Sample H consists of ID #46.
Results reported as mg/kg dry weight unless otherwise noted.

Signed: [signature] Date: 3/13/86

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LABORATORY ANALYSIS RESULTS

Client	Waste Manag. of WI, Inc.	Sampled By	T. Ryan
Address	Ridgeview Landfill	Scope I.D.	86W9
	P.O. Box 217	Billing Line No.	1
	Whitelaw, WI 54247	Liaison	G. Berg
Name of Rep.	Chris Johnson		
Telephone No.	(000) 000-0000	Result Sheet No.	33997.20

Sample I.D.	Sample H RVWG34822	Sample H E.P. Tox.
Date Collected	2/4/86	2/4/86
Date Received	2/6/86	2/6/86
Parameters, units	Results	
Ni, mg/kg	24	
Se, mg/kg	< 0.50	
Ag, mg/kg	< 2.5	
Zn, mg/kg	110	
Oil & Grease, mg/kg	531	
Free Liquids, %	0	

comments:

Signed: [signature] Date: 2/13/86