FEASIBILITY AND PLAN OF OPERATION REPORT

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

MENOMONEE FALLS, WISCONSIN

07/03/13

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

FEASIBILITY AND PLAN OF OPERATION REPORT

U.S. EPA ID NO. W ID003967148

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SECTION I

PART A PERMIT APPLICATION INTRODUCTION

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

MENOMONEE FALLS, WISCONSIN

1.0 PART A PERMIT APPLICATION INTRODUCTION

This section presents components that are required and essential to the completeness of the

submittal of this Feasibility and Plan of Operation Report for the Veolia ES Technical Solutions, L.L.C. facility located in Menomonee Falls, WI.

1.1 Transmittal Letter and Additional Correspondence

A copy of the Transmittal Letter dated December 20, 2012 that was included with the Feasibility and Plan of Operation Report submittal and additional correspondence is attached on the following pages.

VEOLIA
ENVIRONMENTAL SERVICES

GREEN TIER

TECHNICAL SOLUTIONS
NORTH AMERICA

December 20, 2012

Hand Delivered and received by:
Mike Ellenbecker
12-21-2012

Michael Ellenbecker
9531 Rayne Road, Suite 4
Sturtevant, WI 53177

Re: File No. FID268224880
EPA ID No. WID003967148
Feasibility and Plan of Operation Report

Dear Mr. Ellenbecker:

Pursuant to the Feasibility and Plan of Operation Report Call-in letter issued by Franklin Schultz, dated December 22, 2011, Veolia ES Technical Solutions, L.L.C. (Veolia) is submitting to the Wisconsin Department of Natural Resources (WDNR) a Feasibility and Plan of Operation Report for its facility located in Menomonee Falls, WI.

Veolia requests that WDNR approve this FPOR and correspondingly modify WDNR Hazardous waste License Numbers 3135, 6012, and 6013 to authorize the waste management activities detailed in this submission.

The modification that have been made to the FPOR have been limited to revisions to the RCRA Part A Permit Application to include additional storage capacity in the Hazardous Drum Storage Building, the ability to store three – 6,000 gallon road semi-trailer tankers, the ability to stabilize liquid characteristic hazardous waste in the Stabilization Unit, the ability to solidify non-RCRA regulated waste in the Stabilization Unit, and to store non-bulk containers of RCRA hazardous waste in the Stabilization and Southeast Container Storage Unit (Formerly called the 48 Unit).

Further, as required by s. NR 670.014(2)(x)1, the facility is currently operating within the requirements of the current plan of operation and license and has no open compliance orders at the time of this submittal.

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

I trust that the information provided by the Feasibility and Plan of Operation Report is both complete and sufficient for WDNR approval. However, if you have any questions regarding this information, please contact me or Tom Daly, of my staff, at (262)255-6655.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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.

Sincerely,

John Flaminio
General Manager

Cc: Heidi Jasso, WDNR
Jae Lee, USEPA (Electronic copy of FPOR)

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John Flaminio
General Manager

Cc: Heidi Jasso, WDNR
Jae Lee, USEPA (Electronic copy of FPOR)

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W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel 262-255-6655 fax. 262-255-6655
www.VeoliaES.com

1.2 Hazardous Waste Facility Operating License Application

The completed RCRA Subtitle C Site Identification Form (EPA Form 8700-12) is attached on the following pages.

OMB# 2050-0024; Expires 12/31/2014

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.	United States Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION FORM**

1. Reason for Submittal (MARK ALL BOX(ES) THAT APPLY)

Reason for Submittal:

- ☐ To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)
- ☐ To provide a Subsequent Notification (to update site identification information for this location)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☒ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #_____)
- ☐ As a component of the Hazardous Waste Report (If marked, see sub-bullet below)
  - ☐ Site was a TSD facility and/or generator of ≥1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)

2. Site EPA ID Number

EPA ID Number WID003967148

3. Site Name

Name: Veolia ES Technical Solutions, L.L.C.

4. Site Location Information

Street Address: W124 N9451 Boundary Road

City, Town, or Village: Menomonee Falls | **County:** Waukesha

State: WI | **Country:** USA | **Zip Code:** 53051

5. Site Land Type

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

NAICS Code(s) for the Site (at least 5-digit codes)

A. 562211 | C. | B. | D.

7. Site Mailing Address

Street or P.O. Box: W124 N9451 Boundary Road

City, Town, or Village: Menomonee Falls

State: WI | **Country:** USA | **Zip Code:** 53051

8. Site Contact Person

First Name: Tom | **MI:** S | **Last:** Daly

Title: Branch EHS Manager

Street or P.O. Box: W124 N9451 Boundary Road

City, Town or Village: Menomonee Falls

State: WI | **Country:** USA | **Zip Code:** 53051

Email: tom.daly@veoliaes.com

Phone: 262-255-6655 | **Ext.:** 72609 | **Fax:** 262-255-7990

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner: Waste Management of WI | **Date Became Owner:**

Owner Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

Street or P.O. Box: W124 N8925 Boundary Road

City, Town, or Village: Menomonee Falls | **Phone:** 262-251-7257

State: WI | **Country:** USA | **Zip Code:** 53051

B. Name of Site's Operator: Veolia ES Technical Solutions, L.L.C. | **Date Became Operator:** 07/01/1999

Operator Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

10. Type of Regulated Waste Activity (at your site)
Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-10.

Y ☑ N ☐ **1. Generator of Hazardous Waste**
If "Yes", mark only one of the following – a, b, or c.

- ☑ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; **or** Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; **or** Generates, in any calendar month, **or** accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.
- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

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

Y ☐ N ☑ **2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.

Y ☐ N ☑ **3. United States Importer of Hazardous Waste**

Y ☐ N ☑ **4. Mixed Waste (hazardous and radioactive) Generator**

Y ☑ N ☐ **5. Transporter of Hazardous Waste**
If "Yes", mark all that apply.

- ☑ a. Transporter
- ☑ b. Transfer Facility (at your site)

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

Y ☐ N ☑ **7. Recycler of Hazardous Waste**

Y ☐ N ☑ **8. Exempt Boiler and/or Industrial Furnace**
If "Yes", mark all that apply.

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☑ **9. Underground Injection Control**

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

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

Y ☑ N ☐ **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.**

a. Batteries	☑
b. Pesticides	☑
c. Mercury containing equipment	☑
d. Lamps	☑
e. Other (specify) Antifreeze	☑
f. Other (specify) _____	☐
g. Other (specify) _____	☐

Y ☐ N ☑ **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

Y ☑ N ☐ **1. Used Oil Transporter**
If "Yes", mark all that apply.

- ☑ a. Transporter
- ☑ b. Transfer Facility (at your site)

Y ☐ N ☑ **2. Used Oil Processor and/or Re-refiner**
If "Yes", mark all that apply.

- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☑ **3. Off-Specification Used Oil Burner**

Y ☐ N ☑ **4. Used Oil Fuel Marketer**
If "Yes", mark all that apply.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

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

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

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

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

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

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D010	D019	D028	D037	F003	F012
D002	D011	D020	D029	D038	F004	F019
D003	D012	D021	D030	D039	F005	F020
D004	D013	D022	D031	D040	F006	F021
D005	D014	D023	D032	D041	F007	F022
D006	D015	D024	D033	D042	F008	F023
D007	D016	D025	D034	D043	F009	F024
D008	D017	D026	D035	F001	F010	F025
D009	D018	D027	D036	F002	F011	F026

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☑ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

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

13. Comments

9) Waste Management of WI is the legal owner of the land, Veolia ES Technical Solutions, L.L.C. is the legal owner of the buildings and operations on site.

11A) Please see attached list of waste codes that the facility may handle.

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	JOHN FLAMINIO GENERAL MANAGER	12-19-2012

EPA ID Number | W | I | D | 0 | 0 | 3 | 9 | 6 | 7 | 1 | 4 | 8 | OMB#: 2050-0024; Expires 12/31/2014

ADDENDUM TO THE SITE IDENTIFICATION FORM:
NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY

ONLY fill out this form if:

- You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent). See http://www.epa.gov/epawaste/hazard/dsw/statespf.htm for a list of eligible states; **AND**
- You are or will be managing excluded HSM in compliance with 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent) **or** you have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section.

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

☐ Facility will begin managing excluded HSM as of _____ (mm/dd/yyyy).

☐ Facility is still managing excluded HSM/re-notifying as required by March 1 of each even-numbered year.

☐ Facility has stopped managing excluded HSM as of _____ (mm/dd/yyyy) and is notifying as required.

2. Description of excluded HSM activity. Please list the appropriate codes and quantities in **short tons** to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

a. Facility code (answer using codes listed in the Code List section of the instructions)	**b. Waste code(s) for HSM**	**c. Estimated short tons of excluded HSM to be managed annually**	**d. Actual short tons of excluded HSM that was managed during the most recent odd-numbered year**	**e. Land-based unit code** (answer using codes listed in the Code List section of the instructions)

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

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

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EPA ID Number: WID003967148

EPA HAZARDOUS WASTE CODES

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

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

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

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

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

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

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

1.3 Professional Engineer Certification

A copy of certification by a Professional Engineer who is registered in the state of Wisconsin is attached on the following page.

"I, Kevin D. McGrath, 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."

Kevin D McGrath
Signature

Senior Manager of Environmental Affairs
Title

30493-6
P.E. Number

12-17-12
Date

P.E. Stamp

1.4 Statement of Needs

A statement of need for the Veolia-Menomonee Falls facility is attached in the following pages.

STATEMENT OF NEEDS

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

W124 N9451 BOUNDARY ROAD

MENOMONEE FALLS, WISCONSIN

NEED FOR A HAZARDOUS WASTE TREATMENT AND STORAGE FACILITY

This feasibility Report and Plan of Operation (FRPO) submitted to WDNR for review includes a statement explaining the need for approval of the Veolia ES Technical Solutions, L.L.C. facility permit and the hardships which may occur without the renewal. Market analysis have been conducted by Veolia to determine the stabilization and waste processing demand in the market area, which mainly includes the State of Wisconsin along with neighboring states. This needs analysis will attempt to explain current volumes and the consequences in taking the facility off-line. The Veolia – Menomonee Falls facility serves more than 400 State of Wisconsin businesses, agencies, high schools, and secondary education facilities. In addition, the facility has provided a cost effective in-state option for the treatment of hazardous waste materials for many remedial projects.

Wisconsin Capacity and Demand

Overall, Wisconsin's demand for Hazardous Waste Treatment and Disposal exceeds its in-state capacity with the exception of solvent recovery. The Veolia – Menomonee Falls facility stabilized a total of more than 32,000 tons of hazardous waste material in the years of 2007-2011, with the majority from Wisconsin generators. This in itself demonstrates the need for the stabilization treatment technology. The Veolia – Menomonee Falls facility specializes in the decharacterization of metal containing solids and has been able to provide generators in the State of Wisconsin a cost effective facility for the treatment of hazardous wastes. The process renders the material non-hazardous and thus keeps the residuals in-state in a more environmentally friendly Subtitle D landfill facility. In addition, the Veolia – Menomonee Falls facility provides a consolidation and distribution point for drummed waste materials for the generators of hazardous waste materials in the State. Each year, the facility handles upwards of 80,000 containers of hazardous waste for treatment, consolidation, and transshipment.

Although the volume of hazardous waste treated via stabilization has declined over the last five years, it remains a much needed option for many generators in the Midwest Region. In 2011, the Veolia – Menomonee Falls facility received hazardous waste that was treated by stabilization from nearly 200 generators. In addition, many of these customers have expressed a need for the stabilization of liquid characteristic hazardous wastes as well. The

Land Disposal Restrictions specify stabilization treatment prior to land disposal for many wastestreams. USEPA Region V was especially affected by the Third Third Landban. This is due to the density of primary and secondary metal industries in the Great Lakes Region. These industries generate large volumes of metal bearing sludges and dusts. Since many of these wastes are already end-of-the-line waste residues, waste minimization is very limited. Furthermore, Stabilization is the best demonstrated available technology (BDAT) for these wastes prior to ultimate disposal. Additionally, the facility has participated in many corrective remedial actions and provided a local/regional solution for those clean-ups.

In addition, the Depack/Bulking/Decant unit allows smaller volumes of materials to be consolidated with like materials for a more focused and economical disposal option. The Depack process allows customers to designate the labpack waste they generate for different types of disposal following the EPA's hierarchy of recycling first. Wastes consolidated by this process are sent off site for recycling, treatment, incineration or landfill. The bulking of containers into tanker trucks for disposal at incinerators or cement kilns allows for an increase in the volume of waste that is sent for recycling options as opposed to strictly destruction.

The Veolia – Menomonee Falls facility also houses a permanent household hazardous waste collection facility which is a drop-off location for hazardous chemicals from the residents of Waukesha and Milwaukee Counties. The facility also receives waste from very small quantity generators who chose to self-transport their waste to the disposal facility. This allows the facility to act as an outlet for these types of waste to ensure they are not being poured down the drain, applied to the land or thrown out with the regular trash. In addition the facility receives household hazardous wastes from permanent and temporary collections throughout Wisconsin and the Midwest Region. The facility then processes these wastes for again following the EPA's hierarchy of recycling first. Wastes consolidated by this process are sent off site for recycling, treatment, incineration or landfill.

In conclusion, the Veolia – Menomonee Falls facility has become a vital part in the proper management of hazardous waste in the State of Wisconsin and Midwest. The facility has provided cost effective solutions to the treatment, consolidation and transshipment of waste materials, while maintaining the highest compliance and safety standards in the industry. The elimination of the facility would force many of the customers from the State to explore out-of-state options that would be more inefficient and costly for them.

1.5 Waste Facility Siting Board Submittal / Local Municipalities Notification

Attached are copies of the submittal to the State of Wisconsin Waste Siting Board as well as copies of the written notifications that were submitted to the local affected communities.

VEOLIA
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NORTH AMERICA

November 29, 2012 Certified Mail No. 70122210000120417040

State of Wisconsin
Waste Facility Siting Board
5005 University Avenue, Suite 201
Madison, WI 53705-5400

Re: Veolia ES Technical Solutions, L.L.C. – Menomonee Falls Facility
EPA ID No. WID003967148

Dear Sir or Madam:

Veolia ES Technical Solutions, L.L.C. (Veolia) operates a licensed hazardous waste treatment and storage facility. The initial hazardous waste operating license for this facility was approved on June 1, 1988. On June 30, 2003, the Wisconsin Department of Natural Resources re-issued to Veolia an operating license for storing hazardous waste in containers and tanks, and treating hazardous waste in a miscellaneous unit. Veolia plans to submit a revised feasibility and plan of operation report in order to renew this operating license.

One requirement is to notify local municipalities to determine if any new or additional requirements apply to the facility. Attached, please find a copy of the letters (eight total) that were mailed to local municipalities. In addition, a copy of the returned certified mail receipt that demonstrates the receipt of the letter by each affected municipality.

If you have any questions regarding this submittal, please contact me, at (262)255-6655.
Sincerely,

Tom Daly

Tom Daly
Branch EHS&T Manager

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

State of Wisconsin
Waste Facility Siting Board
5005 University Ave, Ste 201
Madison, WI 53705-5400

COMPLETE THIS SECTION ON DELIVERY

A. Signature
x Tom Putnam ☒ Agent ☐ Addressee

B. Received by (Printed Name) | C. Date of Delivery 12-3

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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3. Service Type
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☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7012 2210 0001 2041 7040

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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NORTH AMERICA

September 20, 2012 Certified Mail No. 70112970000410855244

Ms. Barbara Goeckner
Germantown Village Clerk
N112 W17001 Mequon Road
Germantown, WI 53022

Re: Veolia ES Technical Solutions, L.L.C. – Menomonee Falls Facility
EPA ID No. WID003967148
File No. FID268224880

Dear Ms. Goeckner:

Veolia ES Technical Solutions, L.L.C. (Veolia) operates a licensed hazardous waste treatment and storage facility. The initial hazardous waste operating license for this facility was approved on June 1, 1988. In accordance with s. NR 670.050, Wis. Adm. Code, the Wisconsin Department of Natural Resources (WDNR) may issue a renewal of the hazardous waste operating license annually for up to ten years. In order to continue to operate the facility after the ten year period Veolia must submit all of the plans and reports (Feasibility Report and Plan of Operation) which are required for a new operating license, as specified in ss. NR 670.007 and 670.010, and the applicable chapters of chs. NR 660 through 679, Wis. Adm. Code. Veolia intends to submit the required plans and reports by December 31, 2012, as requested by the WDNR.

The purpose of this letter is to comply with the provisions of Wisconsin Statute 289.22, addressing the approval process for an operating license. You will find enclosed a copy of a printed notice prepared by the Wisconsin Waste Facility Siting Board as required by Section 289.22(2), Wis. Stats.. Veolia requests the specification of all applicable local approvals which will be necessary for the continued operation of the hazardous waste treatment and storage facility. Please note that the statute requires that each affected municipality respond within fifteen (15) days upon receipt of this letter. Veolia also formally requests that Germantown, and all other affected municipalities, wave the 120 day waiting period prerequisite to the WDNR's acceptance and processing of the Feasibility Report and Plan of Operation.

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

If you have any questions regarding this information, please contact me or Tom Daly, of my staff, at (262)255-6655. Additionally, either the Waste Facility Siting Board or Michael Ellenbecker, Specialist - WDNR, at (262)884-2342, can provide further information.

Sincerely,

John Flaminio
General Manager

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Barbara Goeckner
Germantown Village Clerk
N112 W 17001 Mequon Rd.
Germantown, WI 53022

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Colleen Wirth ☐ Agent ☐ Address

B. Received by (Printed Name) Colleen Wirth
C. Date of Deliv 9-24-1

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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SEP 26 2012

3. Service Type
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☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7011 2970 0004 1085 5244

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1

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September 20, 2012

Certified Mail No. 70112970000410855237

Ms. Diane Kowalchuk
City of Mequon Clerk
11333 N. Cedarburg Rd.
Mequon, WI 53092

Re: Veolia ES Technical Solutions, L.L.C. – Menomonee Falls Facility
EPA ID No. WID003967148
File No. FID268224880

Dear Ms. Kowalchuk:

Veolia ES Technical Solutions, L.L.C. (Veolia) operates a licensed hazardous waste treatment and storage facility. The initial hazardous waste operating license for this facility was approved on June 1, 1988. In accordance with s. NR 670.050, Wis. Adm. Code, the Wisconsin Department of Natural Resources (WDNR) may issue a renewal of the hazardous waste operating license annually for up to ten years. In order to continue to operate the facility after the ten year period Veolia must submit all of the plans and reports (Feasibility Report and Plan of Operation) which are required for a new operating license, as specified in ss. NR 670.007 and 670.010, and the applicable chapters of chs. NR 660 through 679, Wis. Adm. Code. Veolia intends to submit the required plans and reports by December 31, 2012, as requested by the WDNR.

The purpose of this letter is to comply with the provisions of Wisconsin Statute 289.22, addressing the approval process for an operating license. You will find enclosed a copy of a printed notice prepared by the Wisconsin Waste Facility Siting Board as required by Section 289.22(2), Wis. Stats.. Veolia requests the specification of all applicable local approvals which will be necessary for the continued operation of the hazardous waste treatment and storage facility. Please note that the statute requires that each affected municipality respond within fifteen (15) days upon receipt of this letter. Veolia also formally requests that Mequon, and all other affected municipalities, wave the 120 day waiting period prerequisite to the WDNR's acceptance and processing of the Feasibility Report and Plan of Operation.

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

If you have any questions regarding this information, please contact me or Tom Daly, of my staff, at (262)255-6655. Additionally, either the Waste Facility Siting Board or Michael Ellenbecker, Specialist - WDNR, at (262)884-2342, can provide further information.

Sincerely,

John Flaminio
General Manager

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Diane Kwalchuk
City of Mequon Clerk
11333 N. Cedarburg Rd.
Mequon, WI 53092

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X A. Erskine ☐ Agent ☐ Address

B. Received by (Printed Name) D ERSKINE | C. Date of Deliv

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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3. Service Type
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☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7011 2970 0004 1085 5237

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-15

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September 20, 2012 Certified Mail No. 70112970000410855220

Mr. Jim Owczarski
City of Milwaukee Clerk
200 E. Wells Street, Rm 205
Milwaukee, WI 53202

Re: Veolia ES Technical Solutions, L.L.C. – Menomonee Falls Facility
EPA ID No. WID003967148
File No. FID268224880

Dear Mr. Owczarski:

Veolia ES Technical Solutions, L.L.C. (Veolia) operates a licensed hazardous waste treatment and storage facility. The initial hazardous waste operating license for this facility was approved on June 1, 1988. In accordance with s. NR 670.050, Wis. Adm. Code, the Wisconsin Department of Natural Resources (WDNR) may issue a renewal of the hazardous waste operating license annually for up to ten years. In order to continue to operate the facility after the ten year period Veolia must submit all of the plans and reports (Feasibility Report and Plan of Operation) which are required for a new operating license, as specified in ss. NR 670.007 and 670.010, and the applicable chapters of chs. NR 660 through 679, Wis. Adm. Code. Veolia intends to submit the required plans and reports by December 31, 2012, as requested by the WDNR.

The purpose of this letter is to comply with the provisions of Wisconsin Statute 289.22, addressing the approval process for an operating license. You will find enclosed a copy of a printed notice prepared by the Wisconsin Waste Facility Siting Board as required by Section 289.22(2), Wis. Stats.. Veolia requests the specification of all applicable local approvals which will be necessary for the continued operation of the hazardous waste treatment and storage facility. Please note that the statute requires that each affected municipality respond within fifteen (15) days upon receipt of this letter. Veolia also formally requests that Milwaukee, and all other affected municipalities, wave the 120 day waiting period prerequisite to the WDNR's acceptance and processing of the Feasibility Report and Plan of Operation.

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

If you have any questions regarding this information, please contact me or Tom Daly, of my staff, at (262)255-6655. Additionally, either the Waste Facility Siting Board or Michael Ellenbecker, Specialist - WDNR, at (262)884-2342, can provide further information.

Sincerely,

John Flaminio
General Manager

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Jim Owczarski
City of Milwaukee Clerk
200 E. Wells St, Rm 205
Milwaukee, WI 53202

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Gloria Ware ☐ Agent ☐ Address

B. Received by (Printed Name) G. WARE C. Date of Deliv 9-26-12

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7011 2970 0004 1085 5220

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1

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September 20, 2012 Certified Mail No. 70112970000410855206

Ms. Brenda Jaszewski
Washington County Clerk
432 East Washington Street, Suite 2027
West Bend, WI 53095

Re: Veolia ES Technical Solutions, L.L.C. – Menomonee Falls Facility
EPA ID No. WID003967148
File No. FID268224880

Dear Ms. Jaszewski:

Veolia ES Technical Solutions, L.L.C. (Veolia) operates a licensed hazardous waste treatment and storage facility. The initial hazardous waste operating license for this facility was approved on June 1, 1988. In accordance with s. NR 670.050, Wis. Adm. Code, the Wisconsin Department of Natural Resources (WDNR) may issue a renewal of the hazardous waste operating license annually for up to ten years. In order to continue to operate the facility after the ten year period Veolia must submit all of the plans and reports (Feasibility Report and Plan of Operation) which are required for a new operating license, as specified in ss. NR 670.007 and 670.010, and the applicable chapters of chs. NR 660 through 679, Wis. Adm. Code. Veolia intends to submit the required plans and reports by December 31, 2012, as requested by the WDNR.

The purpose of this letter is to comply with the provisions of Wisconsin Statute 289.22, addressing the approval process for an operating license. You will find enclosed a copy of a printed notice prepared by the Wisconsin Waste Facility Siting Board as required by Section 289.22(2), Wis. Stats.. Veolia requests the specification of all applicable local approvals which will be necessary for the continued operation of the hazardous waste treatment and storage facility. Please note that the statute requires that each affected municipality respond within fifteen (15) days upon receipt of this letter. Veolia also formally requests that Washington County, and all other affected municipalities, wave the 120 day waiting period prerequisite to the WDNR's acceptance and processing of the Feasibility Report and Plan of Operation.

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

If you have any questions regarding this information, please contact me or Tom Daly, of my staff, at (262)255-6655. Additionally, either the Waste Facility Siting Board or Michael Ellenbecker, Specialist - WDNR, at (262)884-2342, can provide further information.

Sincerely,

John Flaminio
General Manager

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

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1. Article Addressed to:

Ms. Brenda Jaszewski
Washington County Clerk
432 E. Washington St, Steet 2

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Bob Guth ☐ Agent ☐ Address

B. Received by (Printed Name) Bob Guth C. Date of Deliv 9/24/1

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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3. Service Type
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☐ Registered ☒ Return Receipt for Merchandi
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4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number
(Transfer from service label) 7011 2970 0004 1085 5206

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September 20, 2012 Certified Mail No. 70112970000410855190

Ms. Julianne Winkelhorst
Ozaukee County Clerk
121 W. Main St, Rm 128
Port Washington, WI 53074

Re: Veolia ES Technical Solutions, L.L.C. – Menomonee Falls Facility
EPA ID No. WID003967148
File No. FID268224880

Dear Ms. Winkelhorst:

Veolia ES Technical Solutions, L.L.C. (Veolia) operates a licensed hazardous waste treatment and storage facility. The initial hazardous waste operating license for this facility was approved on June 1, 1988. In accordance with s. NR 670.050, Wis. Adm. Code, the Wisconsin Department of Natural Resources (WDNR) may issue a renewal of the hazardous waste operating license annually for up to ten years. In order to continue to operate the facility after the ten year period Veolia must submit all of the plans and reports (Feasibility Report and Plan of Operation) which are required for a new operating license, as specified in ss. NR 670.007 and 670.010, and the applicable chapters of chs. NR 660 through 679, Wis. Adm. Code. Veolia intends to submit the required plans and reports by December 31, 2012, as requested by the WDNR.

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Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

If you have any questions regarding this information, please contact me or Tom Daly, of my staff, at (262)255-6655. Additionally, either the Waste Facility Siting Board or Michael Ellenbecker, Specialist - WDNR, at (262)884-2342, can provide further information.

Sincerely,

John Flaminio
General Manager

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

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- Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:

Ms. Julianne Winkelhost
Ozaukee County Clerk
121 W. Main St., Rm 128
Port Washington, WI 53074

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [signature] ☒ Agent ☐ Address

B. Received by (Printed Name) [illegible] C. Date of Deliv 9/24/1

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7011 2970 0004 1085 5190

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1

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NORTH AMERICA

September 20, 2012 Certified Mail No. 70112970000410855183

Ms. Kathy Nickolaus
Waukesha County Clerk
515 W. Moreland Blvd., Room 120
Waukesha, WI 53188

Re: Veolia ES Technical Solutions, L.L.C. – Menomonee Falls Facility
EPA ID No. WID003967148
File No. FID268224880

Dear Ms. Nickolaus:

Veolia ES Technical Solutions, L.L.C. (Veolia) operates a licensed hazardous waste treatment and storage facility. The initial hazardous waste operating license for this facility was approved on June 1, 1988. In accordance with s. NR 670.050, Wis. Adm. Code, the Wisconsin Department of Natural Resources (WDNR) may issue a renewal of the hazardous waste operating license annually for up to ten years. In order to continue to operate the facility after the ten year period Veolia must submit all of the plans and reports (Feasibility Report and Plan of Operation) which are required for a new operating license, as specified in ss. NR 670.007 and 670.010, and the applicable chapters of chs. NR 660 through 679, Wis. Adm. Code. Veolia intends to submit the required plans and reports by December 31, 2012, as requested by the WDNR.

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Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

If you have any questions regarding this information, please contact me or Tom Daly, of my staff, at (262)255-6655. Additionally, either the Waste Facility Siting Board or Michael Ellenbecker, Specialist - WDNR, at (262)884-2342, can provide further information.

Sincerely,

John Flaminio
General Manager

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Kathy Nickolaus
Waukesha County Clerk
515 W. Moreland Blvd. Rm 120
Waukesha, WI 53188

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Address

B. Received by (Printed Name) Jose E Rodriguez C. Date of Deliv 9-24-12

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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SEP 27 2012

3. Service Type
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☐ Registered ☒ Return Receipt for Merchandi
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7011 2970 0004 1085 5183

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1

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NORTH AMERICA

September 20, 2012 Certified Mail No. 70112970000410855213

Ms. Janice Moyer
Menomonee Falls Clerk
W156 N8480 Pilgrim Road
Menomonee Falls, WI 53051

Re: Veolia ES Technical Solutions, L.L.C. – Menomonee Falls Facility
EPA ID No. WID003967148
File No. FID268224880

Dear Ms. Moyer:

Veolia ES Technical Solutions, L.L.C. (Veolia) operates a licensed hazardous waste treatment and storage facility. The initial hazardous waste operating license for this facility was approved on June 1, 1988. In accordance with s. NR 670.050, Wis. Adm. Code, the Wisconsin Department of Natural Resources (WDNR) may issue a renewal of the hazardous waste operating license annually for up to ten years. In order to continue to operate the facility after the ten year period Veolia must submit all of the plans and reports (Feasibility Report and Plan of Operation) which are required for a new operating license, as specified in ss. NR 670.007 and 670.010, and the applicable chapters of chs. NR 660 through 679, Wis. Adm. Code. Veolia intends to submit the required plans and reports by December 31, 2012, as requested by the WDNR.

The purpose of this letter is to comply with the provisions of Wisconsin Statute 289.22, addressing the approval process for an operating license. You will find enclosed a copy of a printed notice prepared by the Wisconsin Waste Facility Siting Board as required by Section 289.22(2), Wis. Stats.. Veolia requests the specification of all applicable local approvals which will be necessary for the continued operation of the hazardous waste treatment and storage facility. Please note that the statute requires that each affected municipality respond within fifteen (15) days upon receipt of this letter. Veolia also formally requests that Menomonee Falls, and all other affected municipalities, wave the 120 day waiting period prerequisite to the WDNR's acceptance and processing of the Feasibility Report and Plan of Operation.

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

If you have any questions regarding this information, please contact me or Tom Daly, of my staff, at (262)255-6655. Additionally, either the Waste Facility Siting Board or Michael Ellenbecker, Specialist - WDNR, at (262)884-2342, can provide further information.

Sincerely,

John Flaminio
General Manager

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

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- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Janice Mayer
Menomonee Falls Clerk
W152 N. 8480 Pilgrim Rd
Menomonee Falls, WI 53051

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Address

B. Received by (Printed Name) MFPD

C. Date of Deliv 9/24/12

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PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-15

VEOLIA
ENVIRONMENTAL SERVICES

GREEN TIER

TECHNICAL SOLUTIONS
NORTH AMERICA

September 20, 2012

Certified Mail No. 70112970000410855176

Mr. Joseph Czarnezki
Milwaukee County Clerk
901 N. 9th Street
Milwaukee, WI 53233

Re: Veolia ES Technical Solutions, L.L.C. – Menomonee Falls Facility
EPA ID No. WID003967148
File No. FID268224880

Dear Mr. Czarnezki:

Veolia ES Technical Solutions, L.L.C. (Veolia) operates a licensed hazardous waste treatment and storage facility. The initial hazardous waste operating license for this facility was approved on June 1, 1988. In accordance with s. NR 670.050, Wis. Adm. Code, the Wisconsin Department of Natural Resources (WDNR) may issue a renewal of the hazardous waste operating license annually for up to ten years. In order to continue to operate the facility after the ten year period Veolia must submit all of the plans and reports (Feasibility Report and Plan of Operation) which are required for a new operating license, as specified in ss. NR 670.007 and 670.010, and the applicable chapters of chs. NR 660 through 679, Wis. Adm. Code. Veolia intends to submit the required plans and reports by December 31, 2012, as requested by the WDNR.

The purpose of this letter is to comply with the provisions of Wisconsin Statute 289.22, addressing the approval process for an operating license. You will find enclosed a copy of a printed notice prepared by the Wisconsin Waste Facility Siting Board as required by Section 289.22(2), Wis. Stats.. Veolia requests the specification of all applicable local approvals which will be necessary for the continued operation of the hazardous waste treatment and storage facility. Please note that the statute requires that each affected municipality respond within fifteen (15) days upon receipt of this letter. Veolia also formally requests that Milwaukee County, and all other affected municipalities, wave the 120 day waiting period prerequisite to the WDNR's acceptance and processing of the Feasibility Report and Plan of Operation.

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road, Menomonee Falls, WI 53051
tel: 262-255-6655 - fax: 262-255-6655
www.VeoliaES.com

If you have any questions regarding this information, please contact me or Tom Daly, of my staff, at (262)255-6655. Additionally, either the Waste Facility Siting Board or Michael Ellenbecker, Specialist - WDNR, at (262)884-2342, can provide further information.

Sincerely,

John Flaminio
General Manager

Veolia ES Technical Solutions, L.L.C.
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SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Joseph Czarnezki
Milwaukee County Clerk
901 N. 9th St.
Milwaukee, WI 53233

C ...CTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Address

B. Received by (Printed Name) | C. Date of Deliv

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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☒ Certified Mail ☐ Express Mail
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☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7011 2970 0004 1085 5176

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1

1.6 Photographs of the Facility

Photographs of the Veolia – Menomonee Falls facility which clearly delineate all existing structures, treatment and storage areas are found on the following pages.

Photo #: 1

Location:
Employee
parking lot

Photo Direction:
West

Date: 6/12/2013

Photo #: 2

Location:
Laboratory

Photo Direction:
West

Date: 6/11/2013

Photo #: 3

Location: Vehicle Scale

Photo Direction: West

Date: 6/11/2013

Photo #: 4

Location: Southeast Container Storage Unit

Photo Direction: South

Date: 6/11/2013

Photo #: 5

Location:
Stabilization
Building

Photo Direction:
Southwest

Date: 6/11/2013

Photo #: 6

Location:
Stabilization
Mixing Bin

Photo Direction:
South

Date: 6/13/2013

Photo #: 7

Location:
Reagent Silo (left) and Waste Silo (right)

Photo Direction:
South

Date: 6/13/2013

Photo #: 8

Location:
Stabilization Baghouse

Photo Direction:
West

Date: 6/13/2013

Photo #: 9

Location: Stabilization Air Emission Stack

Photo Direction: Southeast

Date: 6/11/2013

Photo #: 10

Location: 12 unit 90 day Area

Photo Direction: South

Date: 6/11/2013

Photo #: 11

Location: 800 Unit Exterior

Photo Direction: Southwest

Date: 6/11/2013

Photo #: 12

Location: Interior of 800 Unit

Photo Direction: West

Date: 6/11/2013

Photo #: 13

Location: Frac Tank next to 31 Unit

Photo Direction: South

Date: 6/11/2013

Photo #: 14

Location: 31 Unit 90 day Area

Photo Direction: Southwest

Date: 6/11/2013

Photo #: 15

Location: Nonhazardous Waste Mixing Pit

Photo Direction: East

Date: 6/11/2013

Photo #: 16

Location: Household Hazardous Waste Processing

Photo Direction: Northeast

Date: 6/11/2013

Photo #: 17

Location: Nonhazardous Waste Building Exterior

Photo Direction: West

Date: 6/11/2013

Photo #: 18

Location: Nonhazardous Waste Building Interior

Photo Direction: North

Date: 6/11/2013

Photo #: 19

Location: Drum Repack/Bulking/ Decant Unit Interior

Photo Direction: East

Date: 6/12/2013

Photo #: 20

Location: Drum Repack/Bulking/ Decant Unit Interior

Photo Direction: West

Date: 6/12/2013

Photo #: 21

Location: Drum Repack/Bulking/ Decant Unit Interior

Photo Direction: West

Date: 6/12/2013

Photo #: 22

Location: Drum Repack/Bulking/ Decant Unit Exterior

Photo Direction: South

Date: 6/13/2013

Photo #: 23

Location:
Household Hazardous Waste Accumulation Area

Photo Direction:
West

Date: 6/11/2013

Photo #: 24

Location:
Household Hazardous Waste Redistribution Shelves

Photo Direction:
South

Date: 6/11/2013

1.7 Public Meeting Summary

A pre-application meeting was held on Tuesday, November 20, 2012 at 9:00 AM at the Radisson Hotel located at N88 W14750 Main Street in Menomonee Falls. A public notice of the meeting was published in the Milwaukee Journal Sentinel on October 16, 2012. Attending the meeting were Charles Elliott and Tom Daly of Veolia. There were no other people in attendance at the meeting and therefore no comments or material were received. A copy of the sign-in sheet, Affidavit of Publication, and a copy of the Public Notice as it appeared in the Milwaukee Journal Sentinel are included in the following pages.

PUBLIC MEETING SIGN-IN
VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
WID003967148
Tuesday, November 20, 2012 9:00 Am - 10:00 AM

NAME	ADDRESS	SIGNATURE
Tom Daly, Veolia	W1924N9451 Boundary Rd, Men. falls	
Charles Elliott, Veolia	"	

MILWAUKEE JOURNAL SENTINEL
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VEOLIA ES TECHNICAL SOLUTION, LLC
W124 N9451 BOUNDRY ROAD

Menomonee Falls, WI 53051

Patti Guerrero hereby states that she is authorized by Journal Communications Inc. to certify on behalf of Journal Sentinel Inc., publisher of the Milwaukee Journal Sentinel and The Sunday Journal Sentinel, public newspapers of general circulation, printed and published in the city and county of Milwaukee; published in the Daily Edition of the Milwaukee Journal Sentinel on **10/16/2012**; that the Milwaukee Journal Sentinel and The Sunday Journal Sentinel are newspapers printed in the English language and that said printed copy was taken from said printed newspaper(s).

Patti Guerrero

State of Wisconsin

County of Milwaukee

Subscribed and sworn before me this 16 day of Oct ,2012.

Terri Rose

Notary Public State of Wisconsin

My Commission Expires 1-25-15

TERRI ROSE NOTARY PUBLIC STATE OF WISCONSIN

For Office Use Only
Preparer's Initials: MS

PUBLIC NOTICE

Feasibility and Plan of Operation Report

Veolia ES Technical Solutions, L.L.C., located at W124 N9451 Boundary Road, Menomonee Falls, WI, 53051 will be hosting a public meeting to discuss the forthcoming submittal of their Feasibility and Plan of Operation Report (FPOR) to the WDNR. The meeting will take place from 9:00 – 10:00 AM on Tuesday, November 20, 2012, at the Radisson Hotel located at N88 W14750 Main Street, Menomonee Falls WI 53051. The FPOR submittal is required by WDNR regulations to renew the operating license of the Veolia Treatment Storage Disposal Facility. The license renewal application will be discussed at the meeting.

If you have any questions regarding the meeting or would like to request special access to participate in the meeting, please contact:

Tom Daly
Veolia ES Technical Solutions, L.L.C.
W124N9451 Boundary Road
Menomonee Falls, WI 53051
(262) 255-6655

4113245-01

Date: 10/16/12

Sales Order

Station: WJMR-FM
Contract Name: Veolia WJMR Public Notice
Contract#: 303662
Start Date: 10/18/12 End Date: 10/18/12
Revenue Type: Local Direct Type: Cash
Advertiser: VEOLIA ES TECHNICAL SOLUTIONS
Address: W124 N9451 BOUNDARY RD
City: MENOMONEE
FALLS State: WI Zip: 53031
Phone: (262) 255-6655
Product Name: Feasibility and Plan of O
Competitive Code: Construction/Builders/Con

Buyer: Tom Daly
Tax Schedule: (None)
Agency Commission %: 0
Billing Cycle: Standard
Salesperson: 2783tnor Comm %: 20
Makegood Policy: Within Contract Dates

No	DATES		Alt	TIMES		LEN	DISTRIBUTION									RATE	TOTALS		PTY
	START	END	wks	START	END		M	T	W	T	F	SA	SU	Per Wk	D/W		SPOTS	$$	
1	10/18/12	10/18/12		7:00 AM	8:00 AM	60				1				1	D	250.00	1	250.00	2

Billing Projections: By Month

	Oct 12
CA	250.00
ST	250.00

☑ Print Spot Prices

Name of Event

TOTAL SPOTS 1
GROSS TOTAL $ 250.00
ADJUSTED SPOTS 1
ADJUSTED TOTAL $ 250.00

APPROVE	DECLINE	
○	○	Director of Sales
☑	○	2783tnor, 10/16/12 @11:46AM
○	○	National Sales Manager
○	○	Local Sales Manager

* Sent to the traffic system by 2783cgri, 10/16/12 @11:48AM

Broadcast Contract

Start Date	Contract#	Mod#
10/18/12	303662	0
End Date	**Date Entered**	**Date Last Modified**
10/18/12	10/16/12	10/16/12
Advertiser		**Station Market**
VEOLIA ES TECHNICAL		WJMR-FM
Product		**SalesRep/Office**
Feasibility and Plan of O		Traci Northrop

VEOLIA ES TECHNICAL SOLUTIONS
W124 N9451 BOUNDARY RD
MENOMONEE FALLS, WI 53031

Attn: Tom Daly

Standard Billing Cycle Estimate#

LN	DATE	TIMES/PROGRAMS	LEN	MO	TU	WE	TH	FR	SA	SU	SPOTS /WK	RATE
			LINE	REMARK								
1	TH 10/18/12 TH 10/18/12	07:00A-08:00A	60	--	--	--	1	--	--	--	1	$250.00

----------Additional Comments----------	Total Spots	Spots Total$	Net	Gross
	1	250.00	$ 250.00	$ 250.00

Billing Projections: By Month

	Oct 12
CA	250.00
ST	250.00

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Saga Communications, Inc. and all its subsidiaries and station prohibits all forms of discrimination in advertising contracts. We do not, and shall not discriminate on the basis of race, ethnicity or gender regarding advertising practices. All advertising agencies warrant, where applicable, that all radio commercials provided to our stations are properly licensed to be broadcast on radio stations and the associated internet streams.

Accepted for Station

Name Title

Accepted for advertiser OR agency(and MBS, if any) as agent for the advertiser

Name Title

See reverse for accepted terms and conditions, if any

1.8 Feasibility and Plan of Operation Completeness Checklist

The Feasibility and Plan of Operation Completeness Checklist is attached on the following pages.

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

Facility Name: Veolia ES Technical Solutions, L.L.C.	Date Application Received: 12/20/2012(rev. 07/03/2013)
FID #: 268224880	DNR Reviewer:
US EPA ID#: WID003967148	Review Dates:

Use this checklist as a guide to determine if the Feasibility and Plan of Operation Report (FPOR) is complete and technically adequate for the storage or treatment of hazardous waste in containers, tanks, or miscellaneous units. The license applicant should indicate the location of the required information in the FPOR. The DNR license reviewer will review the information provided and determine if it is complete and technically adequate.

Note: More detailed information is given in the Wisconsin Administrative Code citation listed for each item. The inspection forms at http://www.dnr.state.wi.us/org/aw/wm/publications/index.html may also be used as a guide for AA/BB/CC requirements.

PART I - GENERAL REQUIREMENTS				
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
Section A. General Requirements NR 670.010 to NR 670.014				
A.1. Two copies of license application submitted. NR 670.010(1)				Hand delivered to Mike Ellenbecker and Heidi Jasso
A.2. Appropriate plan review and license fees submitted. NR 670.010(12)				WDNR to invoice Veolia
A.3. Report signed by a president, secretary, treasurer or vice president of a corporation or other approved signatory. NR 670.011(1)	Vol. I, Section 1.1			
A.4. Signature includes certification statement. NR 670.011(4)	Vol. I, Section 1.1			
A.5. Claims of confidentiality are met. NR 670.012		N/A		Veolia does not make any claims of confidentiality
A.6. Summary of pre-application meeting, list of attendees/addresses and copies of written comments or materials submitted during meeting. NR 670.014(2)(v)	Vol. I, Section 1.7			
A.7. Documentation showing compliance with local approval requirements. NR 670.014(2)(w)	Vol. I, Section 1.5			
A.8. Complete Part A application. NR 670.013	Vol. I, Section 1.2			
A.9. Technical data, such as design drawings and specifications and engineering studies are certified by WI registered PE. NR 670.014(1)	Vol. I, Section 1.3			
A.10. General description of facility. NR 670.014(2)(a)	Vol. I, Sect. 2.0			

A.11. Description of procedures, structures or equipment used to prevent hazards in unloading operations. NR 670.014(2)(h)1.	Vol. III, Sect. 5.1.8			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
A.12. Description of procedures, structures or equipment used to prevent runoff from hazardous waste handling areas or to prevent flooding. NR 670.014(2)(h)2.	Vol. III, Sect. 5.0			
A.13. Description of procedures, structures or equipment used to prevent contamination of water supplies. NR 670.014(2)(h)3.	Vol. III, Sect. 5.2			
A.14. Description of procedures, structures or equipment used to mitigate effects of equipment failure or power outages. NR 670.014(2)(h)4.	Vol. III, Sect. 5.2			
A.15. Description of procedures, structures or equipment used to prevent exposure of personnel. NR 670.0014(2)(h)5.	Vol. III, Sect. 5.2			
A.16. Description of procedures, structures or equipment used to the atmosphere. NR 670.0014(2)(h)6.	Vol. II, Sect. 4.3 Vol. III, Sect. 5.2			
A.17. Traffic patterns, estimated traffic volume, traffic control, access road surfacing and load bearing capacity. NR 670.014(2)(j)	Vol. I, Sect. 2.4			
A.18. Chemical and physical analyses of the hazardous waste and debris to be handled at the facility. NR 670.014(2)(b)	Vol. I, Sect. 3.3			
A.19. Chemical and physical analyses contains all information that must be known to treat, store or dispose of the waste according to NR 664 requirements. NR 670.014(2)(b)	Vol. I, Sect. 3.3			
A.20. Justification of any request for a waiver of the preparedness and prevention requirements of NR 664 subch. C. NR 670.014(2)(f)	N/A			Veolia has not made any request for a waiver.
A.21. Description of precautions taken to prevent accidental ignition or reaction of ignitable, reactive or incompatible wastes, including A.22 to A.24. NR 670.014(2)(i)	Vol. III, Sect. 5.3			
A.22. Ignitable and reactive waste is separated and protected from sources of ignition or reaction. NR 664.0017(1)	Vol. III, Sect. 5.3			
A.23. Smoking and open flame are confined to specially designated locations when handling ignitable or reactive waste. NR 664.0017(1)	Vol. III, Sect. 5.3			
A.24. “No Smoking” signs are conspicuously placed where there is a hazard from ignitable or reactive waste. NR 664.0017(1)	Vol. III, Sect. 5.3.1			

Licensing Standard and Code Citation	Location In Report (Page, Section or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
A.25. Documentation demonstrating compliance with A.22. to A.24., including references to published scientific or engineering literature, data from trial tests, waste analysis or the results of treatment of similar waste by similar treatment under similar operating conditions. NR 664.0017(3)	Vol. III, Sect. 5.3			
Section B. Noncompliance with Plans or Orders NR 670.014(2)(x)1.				
B.1. Identification of all persons owning ≥10% legal or equitable interest in the applicant or their assets. NR 670.014(2)(x)1.a	Vol. I, Section 2.1			
B.2. Identification of all WI solid or hazardous waste facilities for which applicant or other identified person is named in or subject to a department order or plan approval. NR 670.014(2)(x)1.b.	Vol. I, Section 2.1			
B.3. Identification of all WI solid or hazardous waste facilities owned by the applicant or other identified person who owns or previously owned ≥10% interest in the assets. NR670.014(2)(x)1.c.	Vol. I, Section 2.1			
B.4. Statement regarding whether or not all plan approvals and orders relating to all identified facilities are being complied with. NR 670.014(2)(x)1.d.	Vol. I, Section 2.1			
Section C. Environmental Impact Review NR 670.014(2)(x)2.				
C.1. Purpose, history, background, relevant local, state and federal permits or approvals and zoning changes for the project. NR 670.014(2)(x)2.a.	Vol. I, Sect. 2.0			
C.2. Description of proposed physical changes related to terrestrial resources, such as soil placement, construction of roads, surface water drainage and sedimentation controls. NR 670.014(2)(x)2.b.1)	Vol. I, Sect. 2.10			
C.3. Description of proposed physical changes related to aquatic resources, such as impacts to streams, wetlands or other water bodies. NR 670.014(2)(x)2.b.2)	Vol. I, Sect. 2.10			
C.4. Description of proposed physical changes related to the construction of buildings and other structures. NR 670.014(2)(x)2.b.3)	Vol. I, Sect. 2.10			
C.5. Description of proposed physical changes related to air emissions and water discharges during facility construction, operation and closure. NR 670.014(2)(x)2.b.4)	Vol. I, Sect. 2.8			

Licensing Standard and Code Citation	Location In Report (Page, Section or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
C.6. Description of proposed physical changes related to any other changes anticipated with facility development. NR 670.014(2)(x)2.b.5)	Vol. II Sect. 4.0 & Vol. I, Sect. 2.10			
C.7. Maps, plans or other materials needed to clarify the information provided for C.2. to C.6. NR 670.014(2)(x)2.b.6)	Vol. I, Sect. 2.0, Figures 2-1 through 2-13			
C.8. Description of the affects on the existing physical environment, such as topography, surface water drainage, hydrogeologic conditions, geology. NR 670.014(2)(x)2.c.1)	Vol. I, Sect. 2.8			
C.9. Description of the affects on existing dominant aquatic and terrestrial plant and animal species and habitats. NR 670.014(2)(x)2.c.2)	Vol. I, Sect. 2.8			
C.10. Description of the affects on existing land use, dominant features, and zoning in the area. NR 670.014(2)(x)2.c.3)	Vol. I, Sect. 2.8			
C.11. Description of the affects on existing social and economic conditions, such as ethnic or cultural groups. NR 670.014(2)(x)2.c.4)	Vol. I, Sect. 2.8			
C.12. Description of the affects on other existing special resources, such as archaeological, historical, state natural areas, or prime agricultural lands. NR 670.014(2)(x)2.c.5)	Vol. I, Sect. 2.8 & 2.11			
C.13. Discussion of the probable adverse and beneficial physical impacts associated with facility design, construction and operation. NR 670.014(2)(x)2.d.1)	Vol. I, Sect. 2.11			
C.14. Discussion of the probable adverse and beneficial biological impacts such as destruction and creation of habitat, alteration of physical environment and impacts to endangered or threatened species. NR 670.014(2)(x)2.d.2)	Vol. I, Sect. 2.8			
C.15. Discussion of the probable adverse and beneficial impacts on land use. NR 670.014(2)(x)2.d.3)	Vol. I, Sect. 2.11			
C.16. Discussion of the probable adverse and beneficial social and economic impacts to local residents, cultural groups and communities and industries served by the facility. NR 670.014(2)(x)2.d.4)	Vol. I, Sect. 2.8 & 2.10			
C.17. Discussion of probable adverse and beneficial impacts on other special resources, such as archaeological, historical, state	Vol. I, Sect. 2.11			

natural areas and prime agricultural lands. NR 670.014(2)(x)2.d.5)				
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
C.18. Discussion of probable adverse impacts that cannot be avoided, such as groundwater and surface water impacts, modifications of topography, loss of agricultural or forest land, displacement of wildlife and adverse aesthetic impacts for people in and around the facility. NR 670.014(2)(x)2.d.6)	Vol. I, Sect. 2.11			
C.19. Identify, describe and discuss feasible alternatives such as taking no action, enlargement, reduction or modification of the project. NR 670.014(2)(x)2.e.	Vol. I, Sect. 2.9			
C.20. Needs determination, per s. 289.28, Wis. Stat. NR 670.014(2)(x)3.	Vol. I, Sect. 1.4			
Section D. Groundwater Protection NR 670.014(3)				
D.1. If all regulated units meet NR 664.0090(2), this Section is not applicable.				
D.2. Summary of groundwater monitoring data from interim license period. NR 670.014(3)(a)	Vol. III, App. H			
D.3. Uppermost aquifer and aquifers hydraulically interconnected beneath the facility property, groundwater flow direction and rate, and basis of identification. NR 670.014(3)(b)	Vol. III, App. H			
D.4. Topographic map delineating waste management area, property boundary, point of compliance and proposed location of monitoring wells. NR 670.014(3)(c)	Vol. III, App. H			
D.5. Description of contamination plume that entered the groundwater from a regulated unit at the time of the application, delineation of the extent of the plume on the topographic map and identification of hazardous constituent concentrations in the plume. NR 670.014(3)(d)	Vol. III, App. H & Section 2.8			
D.6. Detailed plans and engineering report describing the proposed groundwater monitoring program to be implemented per NR 664.0097. NR 670.014(3)(e)	Vol. III, App. H			
D.7. If hazardous constituents have not been detected in the groundwater at the time of the license application, sufficient information, supporting data and analyses to establish a detection monitoring program which meets NR 664.0098. NR 670.014(3)(f)	N/A			Please see Appendix H for the Construction Documentation and Operation, Maintenance , and Monitoring Plan for the site.

Licensing Standard and Code Citation	Location In Report (Page, Section or N/A)	Complete? (Y/N/N/A)	Technically Adequate? (Y/N/N/A)	Comments
D.8. If hazardous constituents have been detected in the groundwater at the point of compliance at the time of the license application, sufficient information, supporting data and analyses to establish a compliance monitoring program meeting NR 664.0099. NR 670.014(3)(g)	Vol. III, App. H			
D.9. If hazardous constituents have been measured in the groundwater exceeding concentration limits in NR 664.0094 Table 1 or if groundwater monitoring conducted at the time of the license application at the waste boundary indicates the presence of hazardous waste constituents from the facility, sufficient information, supporting data and analyses to establish a corrective action program meeting NR 664.0100. NR 670.014(3)(h)	Vol. III, App. H			
Section E. Corrective Action and Solid Waste Management Units NR 670.014(4)				
E.1. If applicable, information regarding groundwater protection if there is a release from a SWMU. NR 670.014(3)	N/A			Vol. III, App H contains information regarding the clean-up of a low level VOC impact area that is not attributed to any SWMU at the facility.
E.2. Topographic map showing location of SWMU. NR 670.014(4)(a)1.	N/A			Vol. III, App H contains information regarding the clean-up of a low level VOC impact area that is not attributed to any SWMU at the facility.
E.3. Designate type of SWMU. NR 670.014(4)(a)2.	N/A			Vol. III, App H contains information regarding the clean-up of a low level VOC impact area that is not attributed to any SWMU at the facility.
E.4. General dimensions and structural description of SWMU. NR 670.014(4)(a)3.	N/A			Vol. III, App H contains information regarding the clean-up of a low level VOC impact area that is not attributed to any SWMU at the facility.
E.5. When the SWMU was operated. NR 670.014(4)(a)4.	N/A			Vol. III, App H contains information regarding the clean-up of a low level VOC impact area that is not attributed to any SWMU at the facility.
E.6. All wastes managed at the SWMU are specified. NR 670.014(4)(a)5.	N/A			Vol. III, App H contains information regarding the clean-up of a low level VOC impact area that is not attributed to any SWMU at the facility.
E.7. All available information pertaining to releases of hazardous waste constituents from hazardous waste units. NR 670.014(4)(b)	N/A			Vol. III, App H contains information regarding the clean-up of a low level VOC impact

				area that is not attributed to any SWMU at the facility.
E.8. Results of sampling and analysis of surface or groundwater, soil and air sampling if the department determines a RFA is necessary. NR 670.014(4)(c)	N/A			Vol. III, App H contains information regarding the clean-up of a low level VOC impact area that is not attributed to any SWMU at the facility.
Section F. Location Standards NR 670.014(2)(k) and NR 670.014(2)(s)				
F.1. Identify if facility is in a 100-year floodplain and source of data. NR 670.014(2)(k)3.	Vol. I, Sect. 2.0			
F.2. Copy of federal insurance administration flood map, or calculations and maps if FIA map is not available. NR 670.014(2)(k)3.	Vol. I, Sect. 2.0, Figure 2-11			
F.3. Identify 100-year flood level and other flooding factors (wave action) considered in design, construction, operation or maintenance of facility to withstand washout from 100 year flood. NR 670.014(2)(k)3.	Vol. I, Sect. 2.0, Figure 2-11			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
F.4. If facility is located in 100 year flood plain, engineering analysis of various hydrodynamic and hydrostatic forces. NR 670.014(2)(k)4.a. AND	N/A			The facility is not located in a 100 year flood plain.
F.5. Structural or other engineering studies showing design of operational units and flood protection devices and how they will prevent washout. NR 670.014(2)(k)4.b. OR	N/A			The facility is not located in a 100 year flood plain.
F.6. Description of procedures to move hazardous waste before flooding, including timing; new approved or licensed location; resources needed; and, potential of discharge during move. NR 670.014(2)(k)4.c.	N/A			The facility is not located in a 100 year flood plain.
F.7. If a facility located in a 100-year floodplain is not designed, constructed, operated and maintained to prevent washout, a demonstration that procedures in effect to move the waste safely to a location that is not vulnerable to flood waters before flood waters reach the facility. NR 664.0018(2)(a)	N/A			The facility is not located in a 100 year flood plain.
F.8. If an existing facility is not in compliance with F.7., a plan and schedule to bring the facility into compliance. NR 670.014(2)(k)5.	N/A			The facility is not located in a 100 year flood plain.
F.9. A dated topographic map showing a distance of 1,000 feet around the facility, with a scale of no more than 1 inch to 200 feet, and contour intervals that clearly shows pattern of surface water flow of waste management unit. NR 670.014(2)(s)	Vol. I, Sect. 2.0, Figure 2-3			
F.10. Map shows map scale and date. NR	Vol. I,			

670.014(2)(s)1.	Sect. 2.0, Figure 2-3			
F.11. Map shows 100 year flood plain area. NR 670.014(2)(s)2.	Vol. I, Sect. 2.0, Figure 2-11			
F.12. Map shows surface waters, including intermittent streams. NR 670.014(2)(s)3	Vol. I, Sect. 2.0, Figure 2-3 & 2-11			
F.13. Map shows surrounding land uses (residential, commercial, agricultural, recreational). NR 670.014(2)(s)4	Vol. I, Sect. 2.0, Figures 2-4, 2-5, 2-6, 2-7, & 2-8			
F.14. Map shows wind rose (prevailing wind speed and direction). NR 670.014(2)(s)5	Vol. I, Sect. 2.0, Figure 2-10			
F.15. Map shows map orientation. NR 670.014(2)(s)6	Vol. I, Sect. 2.0 Figure 2-2			
F.16. Map shows legal boundaries of the hazardous waste facility. NR 670.014(2)(s)7	Vol. I, Sect. 2.0 Figure 2-2			
F.17. Map shows access control (fence, gates). NR 670.014(2)(s)8	Vol. I, Sect. 2.0 Figure 2-2			
F.18. Map shows location of injection or supply wells on-site and off-site. NR 670.014(2)(s)9	Vol. I, Sect. 2.0 Figure 2-9			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
F.19. Map shows buildings and storage, treatment or disposal operations. NR 670.014(2)(s)10.	Vol. I, Sect. 2.0 Figure 2-2			
F.20. Map shows other structures such as recreation areas, runoff control systems, roads, sewers, loading, unloading areas, etc. NR 670.014(2)(s)10.	Vol. I, Sect. 2.0 Figure 2-2			
F.21. Map shows barriers for drainage or flood control. NR 670.014(2)(s)11.	Vol. I, Sect. 2.0 Figure 2-1 & 2-9			
F.22. Map shows location of operational units where hazardous waste will be treated, stored or disposed. NR 670.014(2)(s)12.	Vol. I, Sect. 2.0 Figure 2-2			
F.23. Facility is not located in a wetland. NR 670.014(2)(k)6.b.	Vol. I, Sect. 2.3			
F.24. Facility is not located in a critical habitat for threatened or endangered species. NR 670.014(2)(k)6.a.	Vol. I, Sect. 2.3			

Section G: Waste Analysis Plan Requirements NR 670.014(2)(c)				
G.1. Procedures for obtaining chemical and physical analyses of hazardous waste managed at facility. NR 664.0013(1)(a)	Vol. I, Sect. 3.2			
G.2. Analysis by WI certified labs. NR 664.0013(1)(a)1.	Vol. I, Sect. 3.3			
G.3. Description of other data to be used rather than lab analysis. NR 664.0013(1)(b)	Vol. I, Sect. 3.4			
G.4. For off-site waste, analysis upon receipt to verify waste matches description on manifest. NR 670.0013(1)(d)	Vol. I, Sect. 3.5			
G.5. Parameters for which waste will be analyzed and rationale. NR 664.0013(2)(a)	Vol. I, Sect. 3.3			
G.6. Test methods that will be used. NR 664.0013(2)(b)	Vol. I, Sect. 3.3			
G.7. Sampling methods to obtain representative sample. NR 664.0013(2)(c)	Vol. I, Sect. 3.2			
G.8. Frequency of repeating initial analysis to ensure it is accurate and up to date. NR 664.0013(2)(d)	Vol. I, Sect. 3.5			
G.9. At a minimum, analysis is repeated if the process generating the waste has changed or when the inspection upon receiving the waste does not match the description on the manifest. NR 664.0013(1)(c).	Vol. I, Sect. 3.4			
G.10. For off-site waste, the waste analysis generators agree to supply. NR 664.0013(2)(e)	Vol. I, Sect. 3.4			
G.11. If ignitable, reactive or incompatible wastes are managed, the waste analysis methods used to comply with NR 664.0017(3). NR 664.0013(2)(f)	Vol. I, Sect. 3.2			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
G.12. If the facility is subject to NR 664 subch. AA standards for process vents, the test methods and procedures used to comply with NR 664.1034(4). NR 664.0013(2)(f)	N/A			The Veolia facility does not have any process vents.
G.13. If the facility is subject to NR 664 subch. BB standards for equipment leaks, the test methods and procedures used to comply with NR 664.1063(4). NR 664.0013(2)(f)	N/A			The Veolia facility does not have any process equipment that is covered by NR 664 subch. BB standards.
G.14. If the facility is subject to NR 664 subch. CC standards for containers or tanks, the waste determination procedures in NR 664.1083. NR 664.0013(2)(f)	Vol. II, Sect. 4.4			
G.15. The testing performed to determine if the waste meets or exceeds LDR standards, as required by NR 668.07. NR 664.0013(2)(f)	Vol. I, Sect. 3.6 & Vol. I, App. C.			
G.16. Information if seeking exemption to subch. CC requirements. NR 664.0013(2)(h)	N/A			Veolia is not seeking exemption from subch. CC requirements.
G.17. For off-site waste, procedures used to	Vol. I,			

inspect, and if necessary, analyze each movement of waste to ensure it matches the identity of the waste designated on the manifest. NR 664.0013(3)	Sect. 3.4			
Section H: Security Requirements NR 670.014(2)(d)				
H.1. Security procedures to prevent unknowing entry by a 24 hour surveillance system which continuously monitors and controls entry. NR 664.0014(2)(a) OR,	Vol. III, Sect. 5.1			
H.2. The artificial or natural barrier surrounding active portions of facility and other means of controlled entry, such as gates or locked entrance AND NR 664.0014(2)(b)	Vol. III, Sect. 5.1			
H.3. The placement of "Danger – Unauthorized Persons Keep Out"signs at entrances and other locations. NR 664.0014(3)	Vol. III, Sect. 5.1			
H.4. Demonstration that the above security requirements are not necessary. NR 664.0014(1)	N/A			Veolia is not stating that the security requirements are not necessary.
I. General Inspection Requirements NR 670.014(2)(e)				
I.1. Description of the equipment and devices inspected. NR 664.0015(2)(a)	Vol. III, App. A			
I.2. Description of problems checked during the inspection. NR 664.0015(2)(c)	Vol. III, App. A			
I.3. Inspection schedule for closed vent system and control device, required by NR 664.1033. NR 670.014(2)(d)	N/A			The Veolia facility does not have any process vents.
I.4. Inspection schedule for subch. BB pumps in light liquid service, required by NR 664.1052. NR 670.014(2)(d)	N/A			The Veolia facility does not have any subch. BB pumps in light liquid service.
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
I.5. Inspection schedule for subch. BB compressors, required by NR 664.1053. NR 670.014(2)(d)	N/A			The Veolia facility does not have any subch. BB compressors.
I.6. Inspection schedule for subch. BB pumps and valves in heavy liquid service, pressure relief devices and connectors, required by NR 664.1058. NR 670.014(2)(d)	N/A			The Veolia facility does not have any subch. BB pumps or valves in heavy liquid service, pressure relief devices or connectors.
I.7. The inspection frequency for pumps, valves, pressure relief devices or connectors subject to subch. BB is adequate to prevent environmental or human health incidents. NR 664.0015(2)(d)	N/A			The Veolia facility does not have any subch. BB pumps, valves, pressure relief devices or connectors.
I.8. Areas subject to spills inspected daily when in use. NR 664.0015(2)(d)	Vol. III, App. A			
I.9. Inspection frequency for other areas based on deterioration of equipment and probability of environmental or human health incident if problem goes undetected between inspections. NR 664.0015(2)(d)	Vol. III, App. A			

I.10. Schedule to remedy ensures problem does not lead to environmental or health hazard. NR 664.0015(3)	Vol. III, App. A			
I.11. Inspection log will be kept for at least 3 years and includes date and time of inspection; inspector name; observations made; date and type of remedial actions. NR 664.0015(4)	Vol. III, App. A			
Section J. Contingency Plan Requirements NR 670.014(2)(g)				
J.1. Copy of Contingency Plan. NR 670.014(2)(g)	Vol. III, Sect. 7.0			
J.2. Plan is designed to minimize hazards to human health or the environment in the event of a release. NR 664.0051(1)	Vol. III, Sect. 7.1			
J.3. Provisions in the plan will be carried out immediately if release threatens human health or the environment. NR 664.0051(2)	Vol. III, Sect. 7.3			
J.4. Describes actions facility personnel will take if a release. NR 664.0052(1)	Vol. III, Sect. 7.4			
J.5. If using SPCC, it has been amended to incorporate hazardous waste provisions. NR 664.0052(2)	N/A			Veolia maintains a SPCC plan separate from their contingency plan.
J.6. Describes arrangements with local emergency agencies, hospitals and contractors. NR 664.0052(3)	Vol. III, Sect. 7.9			
J.7. Current list of emergency coordinator (primary and alternate) names, addresses and home/office phone numbers. NR 664.0052(4)	Vol. III, Sect. 7.0 Table 7-2			
J.8. Current list of emergency equipment, describing location, physical description and capability of each item. NR 664.0052(5)	Vol. III, Sect. 7.5			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
J.9. Evacuation plan, signals to begin evacuation and alternate routes. NR 664.0052(6)	Vol. III, Sect. 7.7			
J.10. Copy of plan kept at facility and copy sent to police and fire depts., hospital, and state and local response teams. NR 664.0053	Vol. III, Sect. 7.1, Table 7-5			
J.11. Plan will be reviewed and amended, as necessary. NR 664.0054	Vol. III, Sect. 7.11			
J.12. Emergency coordinator always on premises or on call. NR 664.0055	Vol. III, Sect. 7.3			
J.13. Emergency coordinator is thoroughly familiar with plan, site operations, waste types handled, facility records and layout. NR 664.0055	Vol. III, Sect. 7.3			
J.14. Emergency coordinator has authority to commit resources to carry out contingency plan. NR 664.0055	Vol. III, Sect. 7.3			
J.15. Emergency coordinator activates alarms and notifies state or local agencies. NR 664.0056(1)	Vol. III, Sect. 7.3			

J.16. Emergency coordinator identifies the character, sources, amount and extent of release. NR 664.0056(2)	Vol. III, Sect. 7.3			
J.17. Emergency coordinator assesses possible hazards to human health and environment. NR 664.0056(3)	Vol. III, Sect. 7.3			
J.18. Emergency coordinator notifies local authorities if evacuation is necessary. NR 664.0056(4)(a)	Vol. III, Sect. 7.10			
J.19. Emergency coordinator notifies emergency response officials of release outside of facility. NR 664.0056(4)(b)	Vol. III, Sect. 7.10			
J.20. Emergency coordinator takes reasonable measures to ensure fire, explosion or release do not occur or spread to other hazardous waste. NR 664.0056(5)	Vol. III, Sect. 7.8			
J.21. Emergency coordinator monitors for leaks, pressure build-up, and gas generation if operations stop. NR 664.0056(6)	Vol. III, Sect. 7.8			
J.22. Emergency coordinator arranges for treatment, storage, or disposal of materials after emergency. NR 664.0056(7)	Vol. III, Sect. 7.8			
J.23. Emergency coordinator ensures no incompatible waste is treated, stored or disposed until cleanup is completed. NR 664.0056(8)(a)	Vol. III, Sect. 7.8			
J.24. Emergency coordinator ensures all emergency equipment is clean and fit for use before operations resume. NR 664.0056(8)(b)	Vol. III, Sect. 7.8			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
J.25. Owner or operator notifies department and state and local authorities before resuming operations. NR 664.0056(9)	Vol. III, Sect. 7.10			
J.26. Implementation of plan will be noted in operating log and incident report sent to WDNR in 15 days. NR 664.0056(10)	Vol. III, Sect. 7.10			
Section K. Training Plan Requirements NR 670.014(2)(L)				
K.1. Outline of both introductory and continuing training programs to prepare persons to operate or maintain facility in a safe manner. NR 670.014(2)(L)	Vol. III, Sect. 6.3			
K.2. Training program teaches personnel hazardous waste management procedures relevant to the positions in which they are employed. NR 664.0016(1)(b)	Vol. III, Sect. 6.3			
K.3. Training program ensures facility personnel can respond effectively to emergencies by familiarizing them with emergency procedures, equipment and systems. NR 664.0016(1)(c)	Vol. III, Sect. 6.2			
K.4. Personnel complete training within 6 months of being in new position and before	Vol. III, Sect. 6.3			

working in unsupervised positions. NR 664.0016(2)				
K.5. Training documentation includes job title, job description, type and amount of training to be given and training that is completed. NR 664.0016(4)	Vol. III, Sect. 6.3			
K.6. Brief description of how training will be designed to meet actual job tasks. NR 670.014(2)(L)	Vol. III, Sect. 6.3			
L. Closure Plan Requirements NR 670.014(2)(m)				
L.1. Copy of Closure Plan. NR 670.014(2)(m)	Vol. III, Sect. 8.0			
L.2. Description of how each unit will close during partial or final closure to minimize the need for further maintenance. NR 664.0112(2)(a)	Vol. III, Sect. 8.1			
L.3. Description of how each unit will close during partial or final closure to control, minimize or eliminate post-closure escape of hazardous waste constituents. NR 664.0112(2)(a)	Vol. III, Sect. 8.1			
L.4. Description of the maximum extent of operations during the active life of the facility. NR 664.0112(2)(b)	Vol. III, Sect. 8.1			
L.5. Estimate of maximum inventory during active life of facility. NR 664.0112(2)(c)	Vol. III, Sect. 8.1			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
L.6. Description of methods used to remove, transport, treat, store, and dispose of all hazardous waste during partial and final closure. NR 664.0112(2)(c)	Vol. III, Sect. 8.1			
L.7. Identification of the types of off-site hazardous waste management units to be used. NR 664.0112(2)(c)	Vol. III, Sect. 8.1			
L.8. Detailed description of steps needed to remove or decontaminate all hazardous waste residues and contaminated equipment, structures and soils during partial and final closure. NR 664.0112(2)(d)	Vol. III, Sect. 8.1			
L.9 Detailed description of other activities necessary to ensure all partial and final closures satisfy the closure performance standards. NR 664.0112(2)(e)	Vol. III, Sect. 8.1			
L.10. During closure of container areas, all hazardous waste and residues will be removed from the containment system; remaining contaminated structures and soil will be decontaminated or removed. NR 664.0178	Vol. III, Sect. 8.1			
L.11. During closure of tank systems, all waste residues, contaminated containment system components, soils, structures and	Vol. III, Sect. 8.1			

equipment is decontaminated or removed. NR 664.0197(1)				
L.12. Schedule for closure of each hazardous waste management unit and final closure of the facility. NR 664.0112(2)(f)	Vol. III, Sect. 8.3			
L.13. The estimated year of final closure if the financial mechanism is a trust fund and the facility expects to close before the operating license expires. NR 664.0112(2)(g)	N/A			The Veolia facility does not expect to close prior to the expiration of the operation license.
L.14. Alternative requirements for closure established by the department. NR 664.0112(2)(h)	N/A			There are no alternative closure requirements established by WDNR.
L.15. Department will be notified at least 180 days prior to partial or final closure. NR 664.0112(4)(a)	Vol. III, Sect. 8.1			
L.16. Within 90 days of receiving the final volume of hazardous waste, all hazardous waste is treated, or removed from the unit or facility. NR 664.0113(1)	N/A			This date is to be determined in the future.
L 17. Partial and final closure activities are completed within 180 days after receiving the final volume of hazardous waste. NR 664.0113(2)	Vol. III, Sect. 8.3			
L.18. All contaminated equipment, structures, and soils will be properly disposed of or decontaminated. NR 664.0114	Vol. III, Sect. 8.1			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
L.19. Within 60 days of completing final closure, a certification of closure will be sent to the department. NR 664.0115	Vol. III, Sect. 8.1			
Section M: Closure cost estimate and financial responsibility NR 670.014(2)(o)				
M.1. The most recent detailed written closure cost estimate in current dollars for closing the facility in accordance with the approved closure plan. NR 664.0142(1)	Vol. III, Table 8-3			
M.2. Cost estimate equals the cost of final closure when facility operations make closure the most expensive. NR 664.0142(1)(a)	Vol. III, Sect. 8.1			
M.3. Cost estimate is based on hiring a third party to close the facility. NR 664.0142(1)(b)	Vol. III, Sect. 8.1			
M.4. Cost estimate does not incorporate any salvage value of hazardous waste, structures, equipment, land or assets. NR 664.0142(1)(c)	N/A			The closure cost estimate does not incorporate any salvage value of hazardous wastes.
M.5. Closure estimate does not include a zero cost for hazardous waste that might have economic value. NR 664.0142(1)(d)	N/A			The closure cost estimate does not include a zero cost for any hazardous waste with economic value.
M.6. Facility has established financial assurance that covers the closure cost estimate. NR 664.0143	Vol. III, App. I			
M.7. The financial assurance mechanism meets all applicable requirements in NR	Vol. III, App. I			

664.0143.				
M.8. If a new facility, the financial assurance is submitted 60 days prior to initial receipt of waste. NR 670.014(2)(o)	N/A			The Veolia facility is not a new facility.
Section N: Pollution Liability Insurance NR 670.014(2)(q)				
N.1. Copy of the insurance policy or other documentation demonstrating liability coverage. NR 670.014(2)(q)	Vol. III, App. G			
N.2. Financial responsibility covers bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility. NR 664.0147(1)	Vol. III, App. G			
N.3. Coverage for sudden accidental occurrences of at least $1 million per occurrence with annual aggregate of at least $2 million. NR 664.0147(1)	Vol. III, App. G			
N.4. If a new facility, documentation showing the amount of insurance to be in place before the initial receipt of waste. NR 670.014(2)(q).	N/A			The Veolia facility is not a new facility.

PART 2 – UNIT SPECIFIC REQUIREMENTS

Licensing Standard and Code Citation	Location In Report (Page Or Section)	Complete (Y/N)	Technically Adequate (Y/N)	Comments
Section A: Container Standards – Inspections NR 670.014(2)(e)				
A.1. Container storage areas inspected at least weekly for leaking containers and the deterioration of containers and containment system. NR 664.0174	Vol. III, App. A			
A.2. Inspection frequency of container storage areas is adequate to prevent environmental or human health incident. NR 664.0015(2)(d)	Vol. III, App. A			
A.3. Inspection schedule for subch. CC containers, as required by 664.1086. NR 670.014(2)(e)	Vol. II, Sect. 4.0			
A.4. Inspection schedule includes inspection and monitoring requirements in NR 664.1088 for containers. NR 670.014(2)(e)	Vol. II, Sect. 4.0			
A.5. The inspection frequencies required by subch. CC for containers are adequate to prevent environmental or human health incidents. NR 664.0015(2)(d)	Vol. II, Sect. 4.0			
Section B. Container Standards – Containment NR 670.015(1)				
B.1. Base of containment system is designed and operated to be free of cracks or gaps and sufficiently impervious to leaks and precipitation until material is removed. NR 664.0175(2)(a)	Vol. II, Sect. 4.0			

B.2. Base is sloped or containment system is designed and operated to drain and remove liquids from leaks or precipitation OR containers are elevated or otherwise protected from contacting accumulated liquids. NR 664.0175(2)(b)	Vol. II, Sect. 4.0			
B.3. Capacity of containment system is 10% of the volume of containers or the volume of the largest container, which ever is greater. Containers without free liquids need not be considered. NR 664.0175(2)(c)	Vol. II, Sect. 4.0			
B.4. Run-on into the containment system is prevented unless the containment system has sufficient excess capacity to contain it. NR 664.0175(2)(d)	Vol. II, Sect. 4.0			
B.5. Spilled waste and precipitation are removed from sump or collection area in a timely manner to prevent overflow. NR 664.0175(2)(e)	Vol. II, Sect. 4.0			
B.6. The design and operation of the containment structure complies with B.1. to B.5. for containers of F020-F023 and F026-F027 wastes that do not contain free liquids. NR 664.0175(4)	Vol. II, Sect. 4.0			
B.7. Description of basic design parameters, dimensions and materials of construction of the containment system. NR 670.015(1)(a)	Vol. II, Sect. 4.0			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
B.8. Description of how the design of the containment system promotes drainage or how containers are kept from contacting standing liquids. NR 670.015(1)(b)	Vol. II, Sect. 4.0			
B.9. Description of the capacity of the containment system relative to the number and volume of containers to be stored. NR 670.015(1)(c)	Vol. II, Sect. 4.0			
B.10. Provisions for preventing or managing run-on. NR 670.015(1)(d)	Vol. II, Sect. 4.0			
B.11. How accumulated liquids will be analyzed and removed to prevent overflow. NR 670.015(1)(e)	Vol. II, Sect. 4.0			
B.12. Other than B.6., if all containers do not contain free liquids, either the storage area is sloped or otherwise designed to drain and remove precipitation; or, the containers are elevated or otherwise protected from contact with accumulated liquid. NR 670.015(2)	Vol. II, Sect. 4.0			
B.13. Test procedures and results or other documentation or information showing waste in B.12. does not contain free liquids. NR 670.015(2)(a)	Vol. I, Sect. 3.3 & 3.6			

B.14. Description of how the storage area for waste in B.12. is designed or operated to drain and remove liquids, or how containers with no free liquids are kept from contacting standing liquids. NR 670.015(2)(b)	Vol. II, Sect. 4.3			
Section C: Container Standards – Incompatible, Reactive, Ignitable Waste NR 670.015(3) and NR 670.015(4)				
C.1. Sketches, drawings or data demonstrating containers of ignitable or reactive waste are located at least 50 feet from the facility property line. NR 664.0176	Vol. II, Sect. 4.0			
C.2. Sketches, drawings or data demonstrating storage containers of hazardous waste that are incompatible with other waste or materials stored nearby in other containers, piles or open tanks are separated or protected by a dike, berm, wall or other device. NR 664.0177(3)	Vol. II, Sect. 4.0			
C.3. Description of procedures to ensure incompatible wastes are not placed in the same container unless the requirements in C.4. to C.10. are met. NR 670.0015(4)	Vol. III, Sect. 5.0			
C.4. Precautions taken to prevent reactions generating extreme heat or pressure, fire or explosions or violent reactions. NR 664.0017(2)(a)	Vol. III, Sect. 5.0			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
C.5. Precautions taken to prevent reactions producing uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment. NR 664.0017(2)(b)	Vol. III, Sect. 5.0			
C.6. Precautions taken to prevent reactions producing uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion. NR 664.0017(2)(c)	Vol. III, Sect. 5.0			
C.7. Precautions taken to prevent reactions damaging the structural integrity of the device or facility. NR 664.0017(2)(d)	Vol. III, Sect. 5.0			
C.8. Precautions taken to prevent reactions through other means to threaten human health or the environment. NR 664.0017(2)(e)	Vol. III, Sect. 5.0			
C.9. Documentation of compliance with C.4. to C.8., based on references to published scientific or engineering literature, data from trial tests, waste analyses or the results of treatment of similar wastes or similar treatment processes and under similar operating conditions. NR 664.0017(3)	Vol. III, Sect. 5.3 & 5.4			

C.10. Description of procedures to ensure hazardous waste is not placed in an unwashed container that previously held an incompatible waste or material. NR 664.0177(2)	Vol. III, Sect. 5.4			
Section D: Tank Standards – General NR 670.016				
D.1. Dimensions and capacity of each tank. NR 670.016(2)	Vol. II, Sect. 4.0			
D.2. Description of feed systems, safety cutoff, bypass systems and pressure controls. NR 670.016(3)	Vol. II, Sect. 4.0			
D.3. Diagram of piping, instrumentation and process flow for each tank system. NR 670.016(4)	Vol. II, Sect. 4.0			
D.4. Description of spill prevention controls, such as check valves, dry disconnect couplings. NR 664.0194(2)(a)	Vol. II, Sect. 4.0			
D.5. Description of overfill prevention controls, such as level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank. NR 664.0194(2)(b)	Vol. II, Sect. 4.0			
D.6. Description of how sufficient freeboard in uncovered tanks will be maintained to prevent overtopping by wave or wind action or precipitation. NR 664.0194(2)(c)	Vol. II, Sect. 4.0			
Section E: Tank Standards – Inspections NR 670.014(2)(e)				
E.1. Inspection schedule for tank overfill controls. NR 664.0195(1).	Vol. III, App. A			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
E.2. Aboveground portions of tank systems inspected at least once each operating day to detect corrosion or releases of waste. NR 664.1095(2)(a)	Vol. III, App. A			
E.3. Construction materials and area immediately surrounding tank systems inspected at least once each operating day to detect erosion or signs of releases. NR 664.1095(2)(c)	Vol. III, App. A			
E.4. Data gathered from monitoring and leak detection equipment inspected at least once each operating day to ensure the tank system is operated according to design. NR 664.1095(2)(b)	N/A			The facility does not have leak detection equipment for tanks.
E.5. Proper operation of the cathodic protection system is confirmed by inspection within 6 months of initial installation and annually thereafter. NR 664.1095(3)(a)	N/A			The facility does not employ a cathodic protection system.
E.6. All sources of impressed current inspected and/or tested, as appropriate, at least every other month. NR 664.1095(3)(b)	N/A			The facility does not employ a cathodic protection system.

E.7. Inspection schedule for subch. CC tank requirements, as stated in 664.1084 and 664.1088. NR 670.014(2)(e)	N/A			The facility does not have any tanks that are subject to subch. CC requirements.
E.8. Inspection frequencies required by subch. CC for tanks are adequate to prevent environmental or human health incidents. NR 664.0015(2)(d)	N/A			The facility does not have any tanks that are subject to subch. CC requirements.
Section F: Tank Standards – Existing Tanks NR 670.016(1)				
F.1. For each tank system installed before March 1, 1991, a written assessment reviewed and certified by an independent, qualified, registered PE as to the structural integrity and suitability for handling hazardous waste which includes the information in F.2. to F.8. NR 670.016(1)	Vol. III, App. C			A reagent silo in the Stabilization Unit is permitted to store hazardous waste but has never had hazardous waste stored in it.
F.2. Design standards for construction of the tank and ancillary equipment. NR 664.0191(2)(a)	Vol. II, Sect. 4.0			
F.3. Hazardous characteristics for the wastes handled. NR 664.0191(2)(b)	Vol. II, Sect. 4.0			
F.4. Existing corrosion protection measures. NR 664.0191(2)(c)	Vol. II, Sect. 4.0			
F.5. The age of the tank system, either documented or estimated. NR 664.0191(2)(d)	Vol. II, Sect. 4.0			
F.6. Results of a leak test, internal inspection or other tank integrity examination. NR 664.0191(2)(e)	Vol. III, App. C			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
F.7. If underground tanks cannot be entered, a leak test capable of taking into account the effects of temperature variations, tank end deflection, vapor pockets and high water table effects. NR 664.0191(2)(e)1.	N/A			The facility does not have an underground tank.
F.8. If other tanks cannot be entered, a leak test or other integrity examination certified by a PE that addresses cracks, leaks, corrosion, and erosion. NR 664.0191(2)(e)2.	Vol. III, App. C			
F.9. If, as a result of the assessment, the tank was found to be leaking or unfit for use, steps were taken to comply with F.10. to F.22. NR 664.0191(4)	N/A			The facility's tanks have not been found to be unfit for use.
F.10. Tank system or secondary containment system removed from service immediately. NR 664.0196	N/A			The facility's tanks have not been found to be unfit for use.
F.11. Flow of hazardous waste into the tank system or secondary containment system stopped immediately and the system inspected to determine the cause of the release. NR 664.0196(1)	N/A			The facility's tanks have not been found to be unfit for use.

F.12. If the release was from the tank system, as much waste as necessary wais removed to prevent further releases and to allow inspection and repair of the tank system within 24 hours after detection or at the earliest practicable time. NR 664.0196(2)(a)	N/A			The facility's tanks have not been found to be unfit for use.
F.13. If the material was released to a secondary containment system, all released material was removed within 24 hours or in a timely manner to prevent harm to human health and the environment. NR 664.0196(2)(b)	N/A			The facility's tanks have not been found to be unfit for use.
F.14. Visual inspection of the release conducted. NR 664.0196(3)	N/A			The facility's tanks have not been found to be unfit for use.
F.15. Further migration of the spill to soils or surface water was prevented. NR 664.0196(3)(a)	N/A			The facility's tanks have not been found to be unfit for use.
F.16. Visible contamination of the soil or surface water was removed and properly disposed. NR 664.0196(3)(b)	N/A			The facility's tanks have not been found to be unfit for use.
F.17. Release reported to the Department within 24 hours of its detection, unless less than one pound was released and material was contained and cleaned up immediately. NR 664.0196(4)	N/A			The facility's tanks have not been found to be unfit for use.
F.18. Written report submitted to the Department within 30 days of detecting the release. NR 664.0196(4)(c)	N/A			The facility's tanks have not been found to be unfit for use.
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
F.19. System was returned to service after cleanup and repairs if the integrity of the tank system was not damaged. NR 664.0196(5)(b)	N/A			The facility's tanks have not been found to be unfit for use.
F.20. If the leak was from the tank system into secondary containment, the system was repaired before the tank was returned to service. NR 664.0196(5)(c)	N/A			The facility's tanks have not been found to be unfit for use.
F.21. If the leak was from a component that did not have secondary containment, either secondary containment will be provided or repairs are made if the component can be visually inspected. NR 664.0196(5)(d)	N/A			The facility's tanks have not been found to be unfit for use.
F.22. If major repairs were made, a PE certification was submitted to the Department within 7 days of returning the tank system to use. NR 664.0196(6)	N/A			The facility's tanks have not been found to be unfit for use.
Section G: Tank Standards – New Tanks NR 670.016(1) and NR 670.016(6)				
G.1. For each new tank system, a written assessment reviewed and certified by an independent, qualified, registered PE as to the structural integrity and suitability for handling hazardous waste which includes the information in G.2. to G.19. NR 670.016(1)	Vol. II, Sect. 4.3, Vol. II, App. C			

G.2. Design standards to which the tanks and ancillary equipment are constructed. NR 664.0192(1)(a)	Vol. II, Sect. 4.3			
G.3. Hazardous characteristics of the wastes to be handled. NR 664.0192(1)(b)	Vol. II, Sect. 4.3			
G.4. If the external shell of the metal tank or any external metal component of the tank system will be in contact with soil or water, a determination by a corrosion expert of factors affecting the potential for corrosion, including G.5. to G.9, at a minimum. NR 664.0192(1)(c)	N/A			The facility's tanks are not in contact with soil or water.
G.5. Soil moisture content, pH, sulfides level, and resistivity. NR 664.0192(1)(c)1	N/A			The facility's tanks are not in contact with soil or water.
G.6. Structure to soil potential. NR 664.0192(1)(c)1	N/A			The facility's tanks are not in contact with soil or water.
G.7. Influence of nearby underground metal structures, such as piping. NR 664.0192(1)(c)1	N/A			The facility's tanks are not in contact with soil or water.
G.8. Existence of stray electric current. NR 664.0192(1)(c)1	N/A			The facility's tanks are not in contact with soil or water.
G.9. Existing corrosion-protection measures. NR 664.0192(1)(c)1	N/A			The facility's tanks are not in contact with soil or water.
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
G.10. A description of materials and equipment used to provide external corrosion protection to ensure the integrity of the tank system during its use, including one or more of those in G.11 to G.13. NR 664.0192(1)(c)2	N/A			The facility's tanks are not in contact with soil or water.
G.11. Corrosion-resistant materials of construction such as special alloys, fiberglass, reinforced plastic, etc. NR 664.0192(1)(c)2.a.	N/A			The facility's tanks are not in contact with soil or water.
G.12. Corrosion-resistant coating with cathodic protection. NR 664.0192(1)(c)2.b.	N/A			The facility's tanks are not in contact with soil or water.
G.13. Electrical isolation devices such as insulating joints, flanges, etc. NR 664.0192(1)(c)2.c.	N/A			The facility's tanks are not in contact with soil or water.
G.14. For underground tank system components that are likely to be adversely affected by vehicular traffic, the design or operational measures that will protect the tank system against potential damage. NR 664.0192(1)(d)	N/A			The facility's tanks are not located underground.
G.15. Design considerations to ensure tank foundations will maintain the load of a full tank. NR 664.0192(1)(e)1.	Vol. II, Sect. 4.3			

G.16. Design considerations to ensure tank systems will be anchored to prevent flotation or dislodgment when the tank system is placed in a saturated zone. NR 664.0192(1)(e)2.	Vol. II, Sect. 4.3			
G.17. Design considerations to ensure tank systems will withstand the effects of frost heave. NR 664.0192(1)(e)3.	Vol. II, Sect. 4.3			
G.18. Foundation, structural support, seams, connections and pressure controls, if needed, are adequately designed to ensure the tank system will not collapse, rupture or fail. NR 664.0192(1)	Vol. II, Sect. 4.3			
G.19. The tank system has sufficient structural strength, compatibility with the wastes to be stored or treated and corrosion protection to ensure it will not collapse, rupture or fail. NR 664.0192(1)	Vol. II, Sect. 4.3			
G.20. A detailed description of how the tank systems will be installed in compliance with G.21. to G.28. NR 670.016(6)	N/A			The facility's tanks are already installed.
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
G.21. Before covering, enclosing or placing a new tank system or component in use, an independent qualified installation inspector or registered PE who is trained and experienced in the proper installation of tank systems or components will inspect the system for the presence of weld breaks, punctures, scrapes of protective coatings, cracks, corrosion and other structural damage or inadequate construction or installation. NR 664.0192(2)	Vol. II, Sect. 4.3			
G.22. All structural damage or inadequate construction or installation will be remedied before the tank system is covered, enclosed or placed in use. NR 664.0192(2)	Vol. II, Sect. 4.3			
G.23. For tank systems or components placed underground, the backfill material is noncorrosive, porous and homogeneous, installed so the backfill is placed completely around the tank, and compacted to ensure the tank and piping are fully and uniformly supported. NR 664.0192(3)	N/A			The facility's tanks are not located underground.
G.24. All tanks and ancillary equipment will be tightness tested before being covered, enclosed or placed in use. NR 664.0192(4)	Vol. II, Sect. 4.3			

G.25. If the tank system is found not to be tight, all repairs necessary to remedy the leaks in the system will be performed before the tank system is covered, enclosed or placed into use. NR 664.0192(4)	N/A			The facility's tanks are not designed to operate as a tight system.
G.26. Ancillary equipment is supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction. NR 664.0192(5)	Vol. II, Sect. 4.3			
G.27. The type and degree of corrosion protection recommended by an independent corrosion expert is provided. NR 664.0192(6)	Vol. II, Sect. 4.3			
G.28. If field fabricated, a corrosion expert will supervise the installation of the corrosion protection system to ensure proper installation. NR 664.0192(6)	N/A			This item is not applicable to the Veolia facility as the steel bin has been in operation for greater than 20 years with no corrosion protection without any adverse effects.
Section H: Tank Standards – Secondary Containment NR 670.016(7) and NR 670.016(8)				
H.1. Detailed plans and description of how the secondary containment system for each tank system meets the requirements stated in H.2. to H.9. NR 670.016(7)	Vol. II, Sect. 4.3			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
H.2. Designed, constructed and operated to prevent the migration of wastes or accumulated liquid out of the system to the soil, groundwater or surface water at any time during use of the tank system. NR 664.0193(2)(a)	Vol. II, Sect. 4.3			
H.3. Designed, constructed and operated to detect and collect releases and accumulated liquid until the material is removed. NR 664.0193(2)(b)	Vol. II, Sect. 4.3			
H.4. Constructed of or lined with materials that are compatible with the wastes to be placed in the tank system. NR 664.0193(3)(a)	Vol. II, Sect. 4.3			
H.5. Has sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions and stress of daily operation. NR 664.0193(3)(a)	Vol. II, Sect. 4.3			

H.6. Placed on a foundation or base capable of providing support and resistance to pressure gradients above and below the system, and preventing failure due to settlement, compression or uplift. NR 664.0193(3)(b)	Vol. II, Sect. 4.3			
H.7. Provided with a leak detection system designed and operated to detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours or at the earliest practicable time unless demonstrated that existing detection technologies or site conditions will not allow detection of a release within 24 hours. NR 664.0193(3)(c)	Vol. II, Sect. 4.3			
H.8. Sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation. NR 664.0193(3)(d)	Vol. II, Sect. 4.3			
H.9. Spilled or leaked waste and accumulated precipitation will be removed from the secondary containment system within 24 hours or in a timely manner that prevents harm to human health and the environment if demonstrated that the material cannot be removed in 24 hours. NR 664.0193(3)(d)	Vol. II, Sect. 4.3			
H.10. Detailed plans and description of how an external liner system for each tank system meets the requirements stated in H.11. to H.14. NR 670.016(7)	Vol. II, Sect. 4.3			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
H.11. Designed or operated to contain 100% of the capacity of the largest tank within its boundary. NR 664.0193(5)(a)1.	Vol. II, Sect. 4.3			
H.12. Designed or operated to prevent run-on or infiltration of precipitation into the external liner system unless the collection system has sufficient excess capacity to contain run-on or infiltration from a 25 year, 24 hour rainfall event. NR 664.0193(5)(a)2.	Vol. II, Sect. 4.3			
H.13. Free of cracks and gaps. NR 664.0193(5)(a)3.	Vol. II, Sect. 4.3			
H.14. Designed and installed to surround the tank completely and cover all surrounding earth likely to come into contact with the waste if a release from the tank (capable of preventing lateral and vertical migration of waste). NR 664.0193(5)(a)4.	Vol. II, Sect. 4.3			

H.15. Detailed plans and description of how a vault system for each tank system meets the requirements stated in H.16. to H.21. NR 670.016(7)	N/A			The facility does not have a vault system as secondary containment.
H.16. Designed or operated to contain 100% of the capacity of the largest tank within its boundary. NR 664.0193(5)(b)1.	N/A			The facility does not have a vault system as secondary containment.
H.17. Designed or operated to prevent run-on or infiltration of precipitation into the vault system unless the collection system has sufficient excess capacity to contain run-on or infiltration from a 25 year, 24 hour rainfall event. NR 664.0193(5)(b)2.	N/A			The facility does not have a vault system as secondary containment.
H.18. Constructed with chemical-resistant water stops in place at all joints. NR 664.0193(5)(b)3.	N/A			The facility does not have a vault system as secondary containment.
H.19. Provided with an impermeable interior coating or lining compatible with the stored waste to prevent migration of waste into the concrete. NR 664.0193(5)(b)4.	N/A			The facility does not have a vault system as secondary containment.
H.20. Provided with a means to protect against the formation and ignition of vapors within the vault, if the waste stored or treated is ignitable waste or reactive waste capable of forming ignitable or explosive vapor. NR 664.0193(5)(b)5.	N/A			The facility does not have a vault system as secondary containment.
H.21. Provided with an exterior moisture barrier or otherwise designed or operated to prevent migration of moisture into the vault if it is subject to hydraulic pressure. NR 664.0193(5)(b)6.	N/A			The facility does not have a vault system as secondary containment.
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
H.22. Detailed plans and description of how a double-walled tank system for each tank system meets the requirements stated in H.23. to H.25. NR 670.016(7)	N/A			The facility does not have a double-walled tank system as secondary containment.
H.23. Designed as an integral structure so that the outer shell contains any release from the inner tank. NR 664.0193(5)(c)1.	N/A			The facility does not have a double-walled tank system as secondary containment.
H.24. Protected, if constructed of metal, from both corrosion of the primary tank interior and of the external surface of the outer shell. NR 664.0193(5)(c)2.	N/A			The facility does not have a double-walled tank system as secondary containment.
H.25. Provided with a built-in continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time if demonstrated that existing detection technology or site conditions would not allow detection of a release within 24 hours. NR 664.0193(5)(c)3.	N/A			The facility does not have a double-walled tank system as secondary containment.

H.26. Detailed plans and description of how ancillary equipment for each tank system will be provided with secondary containment except for aboveground piping; welded flanges, joints and connections; sealless or magnetic coupling pumps and sealless valves; and, pressurized aboveground piping systems with automatic shut-off devices that are visually inspected for leaks on a daily basis. NR 664.0193(6)	Vol. II, Sect. 4.3			
H.27. If seeking an alternative to the requirements of this section, detailed plans and engineering and hydrogeologic reports describing alternate design and operating practices; and, an evaluation of location characteristics which demonstrate the migration of hazardous waste or constituents into groundwater or surface water during the life of the facility is prevented. NR 670.016(8)(a)	N/A			The facility does not seek department approval for an alternative method.
H.28. If seeking an alternative to the requirements of this section, a detailed assessment of the substantial present or potential hazards posed to human health or the environment should a release enter the environment. NR 670.016(8)(b)	N/A			The facility does not seek department approval for an alternative method.
Section I: Tank Standards – Ignitable, Reactive and Incompatible Wastes NR 670.016(10)				
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
I.1. If ignitable or reactive waste is treated, rendered or mixed before or immediately after placement in the tank system, a description of how operating procedures and tank system and facility design will ensure the resulting waste, mixture or dissolved material no longer meets the definition of ignitable or reactive waste. NR 664.0198(1)(a)1.	N/A			The facility does not store ignitable waste in tanks.
I.2. If ignitable or reactive waste is treated, rendered or mixed before or immediately after placement in the tank system, a description of how operating procedures and tank system and facility design will ensure I.3. to I.7. will be met. NR 664.0198(1)(a)2.	N/A			The facility does not store ignitable waste in tanks.
I.3. Precautions taken to prevent reactions generating extreme heat or pressure, fire or explosions or violent reactions. NR 664.0017(2)(a)	N/A			The facility does not store ignitable waste in tanks.

I.4. Precautions taken to prevent reactions producing uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment. NR 664.0017(2)(b)	N/A			The facility does not store ignitable waste in tanks.
I.5. Precautions taken to prevent reactions producing uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion. NR 664.0017(2)(c)	N/A			The facility does not store ignitable waste in tanks.
I.6. Precautions taken to prevent reactions damaging the structural integrity of the device or facility. NR 664.0017(2)(d)	N/A			The facility does not store ignitable waste in tanks.
I.7. Precautions taken to prevent reactions which, through other means, threaten human health or the environment. NR 664.0017(2)(e)	N/A			The facility does not store ignitable waste in tanks.
I.8. Documentation demonstrating compliance with I.2.. to I.7., including references to published scientific or engineering literature, data from trial tests, waste analysis or the results of treatment of similar waste by similar treatment under similar operating conditions. NR 664.0017(3)	N/A			The facility does not store ignitable waste in tanks.
I.9. If ignitable or reactive waste is placed in the tank system, an alternative to I.2. to I.8. is to provide a description of how operating procedures and tank system and facility design will ensure the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react. NR 664.0198(1)(b)	N/A			The facility does not store ignitable waste in tanks.
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
I.10. If ignitable or reactive waste is placed in the tank system, an alternative to I.2 to I.8 or I.9. is to provide a description of how operating procedures, the tank system and facility design will ensure the tank system is used solely for emergencies. NR 664.0198(1)(c)	N/A			The facility does not store ignitable waste in tanks.
I.11. If the facility stores or treats ignitable or reactive waste in a tank, demonstrate compliance with the requirements to maintain protective distances between the waste management area and any public ways, streets, alleys or an adjoining property line that can be built upon, as required by Tables 2-1 to 2-6 of NFPA's "Flammable and Combustible Liquids Code. NR 664.0198(2)	N/A			The facility does not store ignitable waste in tanks.
I.12. Incompatible wastes are not placed in the same tank system unless the requirements in I.3. to I.8. are met. NR 664.0199(1)	N/A			The facility does not store ignitable waste in tanks.

I.13. Hazardous waste is not placed in a tank system that previously held an incompatible waste and has not been decontaminated unless the requirements of I.3. to I.8. are met. NR 664.0199(2)	N/A			The facility does not store ignitable waste in tanks.
Section J: Standards for Miscellaneous Units – Storage and Treatment NR 670.023				
J.1. Detailed description of the unit being used or proposed for use. NR 670.023(1)	Vol. II, Sect. 4.0			
J.2. Detailed description of the physical characteristics, materials of construction and dimensions of the unit. NR 670.023(1)(a)	Vol. II, Sect. 4.0			
J.3. Detailed plans and engineering reports describing how the unit will be located, designed, constructed, operated, maintained, monitored, inspected and closed to comply with J.4. to J.34. NR 670.023(1)(b)	Vol. II, Sect. 4.0			
J.4. Prevention of releases that may have adverse effects on human health or the environment due to migration of waste constituents in the groundwater or subsurface environment, considering items J.5. to J.13. NR 664.0601(1)	Vol. II, Sect. 4.0			
J.5. The volume and physical and chemical characteristics of the waste in the unit, including potential for migration through soil, liners or other containing structures. NR 664.0601(1)(a)	Vol. II, Sect. 4.0			
J.6. The hydrologic and geologic characteristics of the unit and surrounding area. NR 664.0601(1)(b)	Vol. I, Sect. 2.0			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
J.7. The existing quality of groundwater, including other sources of contamination and their cumulative impact on groundwater. NR 664.0601(1)(c)	Vol. I, Sect. 2.0			
J.8. Quantity and direction of groundwater flow. NR 664.0601(1)(d)	Vol. I, Sect. 2.0			
J.9. Proximity to and withdrawal rates of current and potential groundwater users. NR 664.0601(1)(e)	Vol. I, Sect. 2.0			
J.10. Patterns of land use in the region. NR 664.0601(1)(f)	Vol. I, Sect. 2.0			
J.11. Potential of migration or deposition of waste constituents into subsurface physical structures and into the root zone of food-chain crops and other vegetation. NR 664.0601(1)(g)	Vol. I, Sect. 2.0			
J.12. Potential for health risks caused by human exposure to waste constituents. NR 664.0601(1)(h)	Vol. II, Sect. 4.0			

J.13. Potential for damage to domestic animals, wildlife, crops, vegetation and physical structures caused by exposure to waste constituents. NR 664.0601(1)(i)	Vol. II, Sect. 4.0			
J.14. Prevention of any releases that may have adverse effects on human health or the environment due to migration of waste constituents in surface water, wetlands, or on soil surface, considering J.15.- J.25. NR 664.0601(2)	Vol. II, Sect. 4.0			
J.15. Volume and physical and chemical characteristics of the waste in the unit. NR 664.0601(2)a.	Vol. II, Sect. 4.0			
J.16. Effectiveness and reliability of containing, confining and collecting systems and structures in preventing migration. NR 664.0601(2)b.	Vol. I, Sect. 2.0			
J.17. Hydrologic characteristics of the unit and the surrounding area, including the topography of the land around the unit. NR 664.0601(2)c.	Vol. I, Sect. 2.0			
J.18. Precipitation patterns in the region. NR 664.0601(2)d.	Vol. I, Sect. 2.0			
J.19. Quantity, quality and direction of groundwater flow. NR 664.0601(2)e.	Vol. I, Sect. 2.0			
J.20. Proximity of the unit to surface waters NR 664.0601(2)f.	Vol. I, Sect. 2.0			
J.21. Current and potential uses of nearby surface waters and any water quality standards established for those surface waters. NR 664.0601(2)g.	Vol. I, Sect. 2.0			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
J.22. Existing quality of surface waters and surface soils, including other sources of contamination and their cumulative impact on surface waters and surface soils. NR 664.0601(2)(h)	Vol. II, Sect. 4.0			
J.23. Land use patterns in the region. NR 664.0601(2)(i)	Vol. I, Sect. 2.0			
J.24. Potential for health risks caused by human exposure to waste constituents. NR 664.0601(2)(j)	Vol. II, Sect. 4.0			
J.25. Potential for damage to domestic animals, wildlife, crops, vegetation and physical structures caused by exposure to waste constituents. NR 664.0601(2)(k)	Vol. II, Sect. 4.0			
J.26. Prevention of releases that may have adverse effects on human health or the environment due to migration of waste constituents in the air, considering J.27. to J.33. NR 664.0601(3)	Vol. II, Sect. 4.0			

J.27. Volume, physical and chemical characteristics of the waste in the unit, including its potential for the emission and dispersal of gases, aerosols and particulates. NR 664.0601(3)a.	Vol. II, Sect. 4.0			
J.28. Effectiveness and reliability of systems and structures to reduce or prevent emissions of hazardous constituents to the air. NR 664.0601(3)b.	Vol. II, Sect. 4.0			
J.29. Operating characteristics of the unit. NR 664.0601(3)c.	Vol. II, Sect. 4.0			
J.30. Atmospheric, meterologic and topographic characteristics of the unit and the surrounding area. NR 664.0601(3)d.	Vol. I, Sect. 2.0			
J.31. Existing quality of the air, including other sources of contamination and their cumulative impact on the air. NR 664.0601(3)e.	Vol. I, Sect. 4.0			
J.32. Potential for health risks caused by human exposure to waste constituents. NR 664.0601(3)f.	Vol. II, Sect. 4.0			
J.33. Potential for damage to domestic animals, wildlife, crops, vegetation and physical structures caused by exposure to waste constituents. NR 664.0601(3)g.	Vol. II, Sect. 4.0			
J.34. Inspection procedures and frequencies minimize or prevent releases that may have adverse effects on human health or the environment. NR 664.0602	Vol. III, App. A			
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
J.35. Detailed hydrologic, geologic and meteorologic assessments and land-use maps for the region surrounding the site that address and ensure compliance of the unit with each factor in J.4. to J.33. NR 670.023(2)	Vol. I, Sect. 2.0, fig. 2-3, 2-4, 2-5, 2-6, 2-7, 2-8			
J.36. Only preliminary hydrologic, geologic and meteorologic assessments are submitted if the applicant demonstrates they do not violate the environmental performance standards in J.4. to J.33. NR 670.023(2)	Vol. I, Sect. 2.0,			
J.37. Information on the potential pathways of exposure of humans or environmental receptors to hazardous waste constituents and the potential magnitude and nature of exposures. NR 670.023(3)	Vol. II, Sect. 4.0, 2.0			
J.38. For treatment units, a report on a demonstration of the effectiveness of the treatment based on laboratory or field data. NR 670.023(4)	Vol. I, Sect. 3.0			

J.39. Additional information necessary to evaluate if the unit complies with the environmental performance standards in J.4 to J.33., as determined by the department. NR 670.023(5)	N/A			The department has not requested additional information at this time.
J.40. If an existing miscellaneous unit located in a 100-year floodplain is not designed, constructed, operated and maintained to prevent washout, a demonstration that no adverse effects on human health or the environment will result if washout occurs, considering the volume and physical and chemical characteristics of the waste, and the concentrations and potential impacts of hazardous constituents on surface waters, sediments or soils. NR 664.0018(2)(a)2.	N/A			The facility is not located within a 100-year floodplain.
J.41. If an existing miscellaneous unit is not in compliance with J.40. and there are no procedures to move the waste to a location that is not vulnerable to flood waters, a plan and schedule to bring the facility into compliance. NR 670.014(2)(k)5.	N/A			The facility is not located within a 100-year floodplain.
Section K: Subch. AA – Air Emission Control Standards for Process Vents NR 670.024				
K.1. Documentation of compliance with the process vent standards in NR 664.1032, including K.2. to K.6. NR 670.024(2)	N/A			The facility has no process vents subject to subch. AA standards.
K.2. A facility plot plan and information identifying the hazardous waste management units in the facility, the approximate location of each affected hazardous waste management unit in the facility and all affected process vents. NR 670.024(2)(a)	N/A			The facility has no process vents subject to subch. AA standards..
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
K.3. Information on annual throughput and operating hours of each affected unit, estimated emission rates for each affected vent and the overall facility. NR 670.024(2)(a)	N/A			The facility has no process vents subject to subch. AA standards.
K.4. Information and data supporting estimates of vent emissions and emission reduction achieved by add-on control devices based on engineering calculations or source tests. NR 670.024(2)(b)	N/A			The facility has no process vents subject to subch. AA standards.
K.5. Estimates of vent emissions and emission reductions are made using operating parameter values that represent the conditions that exist when the waste management unit is operating at the highest load or capacity level reasonably expected to occur. NR 670.024(2)(b)	N/A			The facility has no process vents subject to subch. AA standards.
K.6. Information and data used to determine whether or not a process vent is subject to NR 664.1032. NR 670.024(2)(c)	N/A			The facility has no process vents subject to subch. AA standards.

K.7. Documentation of compliance with NR 664.1033, including information in K.8 to K.13. NR 670.024(4)	N/A			The facility has no process vents subject to subch. AA standards.
K.8. List of all information references and sources used in preparing the documentation. NR 670.024(4)(a)	N/A			The facility has no process vents subject to subch. AA standards.
K.9. Records, including the dates of each compliance test required by NR 664.1033(11). NR 670.024(4)(b)	N/A			The facility has no process vents subject to subch. AA standards.
K.10. Design analysis, specifications, drawings, schematics, and piping and instrumentation diagrams based on APTI Course 41.5 or other acceptable references. NR 670.024(4)(c)	N/A			The facility has no process vents subject to subch. AA standards.
K.11. Design analysis addresses the vent stream characteristic and control device operation parameters specified in NR 664.1035(2)(d). NR 670.024(4)(c)	N/A			The facility has no process vents subject to subch. AA standards.
K.12. Statement signed and dated by the owner/operator certifying the operating parameters used in the design analysis reasonably represent conditions that exist when the unit operates at the highest capacity reasonably expected to occur. NR 670.024(4)(d)	N/A			The facility has no process vents subject to subch. AA standards.
K.13. Statement signed and dated by the owner/operator certifying the control device for the affected process vents is designed to operate at the required efficiency levels. NR 670.024(4)(e)	N/A			The facility has no process vents subject to subch. AA standards.
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
K.14. If applying to use an alternate control device, a performance test plan if using test data. NR 670.024(3)	N/A			The facility has no process vents subject to subch. AA standards.
Section L: Subch. BB – Air Emission Control Standards for Equipment NR 670.025				
L.1. For each piece of equipment subject to subch. BB, the information in L.2. to L.7. NR 670.025(1)	N/A			The facility has no equipment subject to subch. BB standards.
L.2. Equipment identification number and hazardous waste management unit identification. NR 670.025(1)(a)	N/A			The facility has no equipment subject to subch. BB standards.
L.3. Approximate location within the facility, as identified on a facility plot plan. NR 670.025(1)(b)	N/A			The facility has no equipment subject to subch. BB standards.
L.4. Type of equipment. NR 670.025(1)(c)	N/A			The facility has no equipment subject to subch. BB standards.
L.5. Percent by weight total organics in the hazardous waste stream at each piece of equipment. NR 670.025(1)(d)	N/A			The facility has no equipment subject to subch. BB standards.
L.6. Hazardous waste state (gas, vapor, etc.) at each piece of equipment. NR 670.025(1)(e)	N/A			The facility has no equipment subject to subch. BB standards.

L.7. Method of compliance with the applicable subch. BB standard. NR 670.025(1)(f)	N/A			The facility has no equipment subject to subch. BB standards.
L.8. Documentation demonstrating compliance with the equipment standards in NR 664.1052 to 664.1059, including records required by NR 664.1064. NR 670.025(4)	N/A			The facility has no equipment subject to subch. BB standards.
L.9. Additional documentation necessary to determine compliance with the subch. BB standards. NR 670.025(4)	N/A			The facility has no equipment subject to subch. BB standards.
L.10. Documentation demonstrating compliance with NR 664.1060 includes the information in L.11 to L.17. NR 670.025(5)	N/A			The facility has no equipment subject to subch. BB standards.
L.11. List of all information references and sources used to prepare the documentation. NR 670.025(5)(a)	N/A			The facility has no equipment subject to subch. BB standards.
L.12. Records, including the dates, of each compliance test required by NR 664.1033(10). NR 670.025(5)(b)	N/A			The facility has no equipment subject to subch. BB standards.
L.13. Design analysis, specifications, drawings, schematics and piping and instrumentation diagrams based on the appropriate sections of ATPI Course 415 or other engineering text that present basic control device design information. NR 670.025(5)(c)	N/A			The facility has no equipment subject to subch. BB standards.
L.14. Design analysis addresses the vent stream characteristics and control device operation parameters in NR 664.1035(2)(d)3. NR 670.025(5)(c)	N/A			The facility has no equipment subject to subch. BB standards.
Licensing Standard and Code Citation	**Location In Report (Page, Section or N/A)**	**Complete ? (Y/N/N/A)**	**Technically Adequate? (Y/N/N/A)**	**Comments**
L.15. Statement signed and dated by the owner/operator certifying the operating parameters used in the design analysis reasonably represent the conditions when the unit is operating at the highest capacity level reasonably expected to occur. NR 670.025(5)(d)	N/A			The facility has no equipment subject to subch. BB standards.
L.16. Statement signed and dated by the owner/operator certifying the control device is designed to operate at an efficiency of ≥95 weight %. NR 670.025(5)(e)	N/A			The facility has no equipment subject to subch. BB standards.
L.17. If applying to use an alternate control device, a performance test plan if using test data. NR 670.025(3)	N/A			The facility has no equipment subject to subch. BB standards.
Section M: Subch. CC – Air Emission Control Standards for Containers and Tanks NR 670.027				
M.1. Documentation for each floating roof cover installed on a tank subject to NR 664.1084(4)(a) or (b). NR 670.027(1)(a)	N/A			The facility does not have a tank with a floating roof.
M.2. Identification of each container area subject to subch. CC. NR 670.027(1)(b)	Vol. II, Sect. 4.0			

M.3. Owner/operator certification that the requirements of subch. CC are met for container storage areas. NR 670.027(1)(b)	Vol. II, Sect. 4.0			
M.4. Documentation for each enclosure used to control air emissions from containers per NR 664.1086(5)(a)2 and tanks per NR 664.1084(4)(e). NR 670.027(1)(c)	Vol. II, Sect. 4.0			
M.5. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria of a permanent total enclosure as specified by Procedure T in 40 CFR 52.741, appendix B. NR 670.027(1)(c)	N/A			No containers are managed using Level 3 controls at the facility.
M.6. Documentation for each closed-vent system and control device installed according to NR 664.1087, including design and performance information. NR 670.027(1)(e)	N/A			The facility has no closed-vent system in use at the facility.
M.7. An emission monitoring plan for Method 21 in 40 CFR part 60 Appendix A and control device monitoring methods. NR 670.027(1)(f)	Vol. II, Sect. 4.0			

EPA ID Number | W | I | D | 0 | 0 | 3 | 9 | 6 | 7 | 1 | 4 | 8 |

OMB#: 2050-0024; Expires 12/31/2014

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact	**First Name:** Tom	**MI:** S	**Last Name:** Daly	
	Contact Title: Branch EHS Manager			
	Phone: 262-255-6655	**Ext.:** 72609	**Email:** tom.daly@veoliaes.com	
2. Facility Permit Contact Mailing Address	**Street or P.O. Box:** W124 N9451 Boundary Road			
	City, Town, or Village: Menomonee Falls			
	State: WI			
	Country: USA	**Zip Code:** 53051		
3. Operator Mailing Address and Telephone Number	**Street or P.O. Box:** W124 N9451 Boundary Road			
	City, Town, or Village: Menomonee Falls			
	State: WI	**Phone:** 262-255-6655		
	Country: USA	**Zip Code:** 53051		
4. Facility Existence Date	**Facility Existence Date (mm/dd/yyyy):** 06/01/1988			

5. Other Environmental Permits

A. Facility Type *(Enter code)*	B. Permit Number	C. Description
T	W I D 0 0 3 9 6 7 1 4 8	Hazardous Waste
E	3 0 0 2	Solid Waste Processing License issued by WDNR
R	3 1 3 5	Hazardous Waste Storage License issued by WDNR
R	6 0 1 2	Hazardous Waste Storage(Tank) License issued by WDN
R	6 0 1 3	Hazardous Waste Treatment License issued by WDNR
E	2 6 8 2 0 1 1 2 0	Laboratory Certification issued by WDNR
E	2 6 8 4 3 0 4 7 0	Registration Operation Air Permit issued by WDNR

6. Nature of Business: Veolia ES Technical Solutions, L.L.C. is a provider of waste management services including the transport, treament and recycling of hazardous and universal wastes.

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

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.

B. PROCESS DESIGN CAPACITY – For each code entered in Item 7.A; enter the capacity of the process.

1. **AMOUNT – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.**
2. **UNIT OF MEASURE – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.**

C. PROCESS TOTAL NUMBER OF UNITS – Enter the total number of units for each corresponding process code.

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

Unit of Measure	Unit of Measure Code
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V
Short Tons Per Hour	D
Short Tons Per Day	N
Metric Tons Per Hour	W
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	X
Million BTU Per Hour	X
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
BTU Per Hour	I

7. Process Codes and Design Capacities (Continued)

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

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. PROCESS DESIGN CAPACITY (2) Unit of Measure	C. Process Total Number of Units	For Official Use Only
X	1	S	0	2	533.788	G	001	
	1	S	0	1	66,000	G	001	
	2	S	0	1	1,100	G	001	
	3	S	0	1	193,872	G	001	
	4	S	0	1	16,156	G	001	
	5	S	0	1	18,000	G	001	
	6	S	0	2	40	Y	001	
	7	S	0	2	54.5	Y	001	
	8	T	0	4	109,500	TONS/YEAR	001	
	9	T	0	4	16,000	U	001	
1	0							
1	1							
1	2							
1	3							

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

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

Line Number (Enter #s in sequence with Item 7)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. PROCESS DESIGN CAPACITY (2) Unit of Measure	C. Process Total Number of Units	For Official Use Only
X	2	T	0	4	100.00	U	001	

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

A. EPA HAZARDOUS WASTE NUMBER – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

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

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

D. PROCESSES

1. PROCESS CODES:

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

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

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

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

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

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

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

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

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

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

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
	1	D	0	0	1	200,000	T	S	0	1	S	0	2	T	0	4	
	2	D	0	0	2	200,000	T	S	0	1	S	0	2	T	0	4	
	3	D	0	0	3	200,000	T	S	0	1	S	0	2	T	0	4	
	4	D	0	0	4	200,000	T	S	0	1	S	0	2	T	0	4	
	5	D	0	0	5	200,000	T	S	0	1	S	0	2	T	0	4	
	6	D	0	0	6	200,000	T	S	0	1	S	0	2	T	0	4	
	7	D	0	0	7	200,000	T	S	0	1	S	0	2	T	0	4	
	8	D	0	0	8	200,000	T	S	0	1	S	0	2	T	0	4	
	9	D	0	0	9	200,000	T	S	0	1	S	0	2	T	0	4	
1	0	D	0	1	0	200,000	T	S	0	1	S	0	2	T	0	4	
1	1	D	0	1	1	200,000	T	S	0	1	S	0	2	T	0	4	
1	2	D	0	1	2	200,000	T	S	0	1	S	0	2	T	0	4	
1	3	D	0	1	3	200,000	T	S	0	1	S	0	2	T	0	4	
1	4	D	0	1	4	200,000	T	S	0	1	S	0	2	T	0	4	
1	5	D	0	1	5	200,000	T	S	0	1	S	0	2	T	0	4	
1	6	D	0	1	6	200,000	T	S	0	1	S	0	2	T	0	4	
1	7	D	0	1	7	200,000	T	S	0	1	S	0	2	T	0	4	
1	8	D	0	1	8	200,000	T	S	0	1	S	0	2	T	0	4	
1	9	D	0	1	9	200,000	T	S	0	1	S	0	2	T	0	4	
2	0	D	0	2	0	200,000	T	S	0	1	S	0	2	T	0	4	
2	1	D	0	2	1	200,000	T	S	0	1	S	0	2	T	0	4	
2	2	D	0	2	2	200,000	T	S	0	1	S	0	2	T	0	4	
2	3	D	0	2	3	200,000	T	S	0	1	S	0	2	T	0	4	
2	4	D	0	2	4	200,000	T	S	0	1	S	0	2	T	0	4	
2	5	D	0	2	5	200,000	T	S	0	1	S	0	2	T	0	4	
2	6	D	0	2	6	200,000	T	S	0	1	S	0	2	T	0	4	
2	7	D	0	2	7	200,000	T	S	0	1	S	0	2	T	0	4	
2	8	D	0	2	8	200,000	T	S	0	1	S	0	2	T	0	4	
2	9	D	0	2	9	200,000	T	S	0	1	S	0	2	T	0	4	
3	0	D	0	3	0	200,000	T	S	0	1	S	0	2	T	0	4	
3	1	D	0	3	1	200,000	T	S	0	1	S	0	2	T	0	4	
3	2	D	0	3	2	200,000	T	S	0	1	S	0	2	T	0	4	
3	3	D	0	3	3	200,000	T	S	0	1	S	0	2	T	0	4	
3	4	D	0	3	4	200,000	T	S	0	1	S	0	2	T	0	4	
3	5	D	0	3	5	200,000	T	S	0	1	S	0	2	T	0	4	
3	6	D	0	3	6	200,000	T	S	0	1	S	0	2	T	0	4	

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

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
3	7	D	0	3	7	200,000	T	S	0	1	S	0	2	T	0	4	
3	8	D	0	3	8	200,000	T	S	0	1	S	0	2	T	0	4	
3	9	D	0	3	9	200,000	T	S	0	1	S	0	2	T	0	4	
4	0	D	0	4	0	200,000	T	S	0	1	S	0	2	T	0	4	
4	1	D	0	4	1	200,000	T	S	0	1	S	0	2	T	0	4	
4	2	D	0	4	2	200,000	T	S	0	1	S	0	2	T	0	4	
4	3	D	0	4	3	200,000	T	S	0	1	S	0	2	T	0	4	
4	4	F	0	0	1	200,000	T	S	0	1	S	0	2	T	0	4	
4	5	F	0	0	2	200,000	T	S	0	1	S	0	2	T	0	4	
4	6	F	0	0	3	200,000	T	S	0	1	S	0	2	T	0	4	
4	7	F	0	0	4	200,000	T	S	0	1	S	0	2	T	0	4	
4	8	F	0	0	5	200,000	T	S	0	1	S	0	2	T	0	4	
4	9	F	0	0	6	200,000	T	S	0	1	S	0	2	T	0	4	
5	0	F	0	0	7	200,000	T	S	0	1	S	0	2	T	0	4	
5	1	F	0	0	8	200,000	T	S	0	1	S	0	2	T	0	4	
5	2	F	0	0	9	200,000	T	S	0	1	S	0	2	T	0	4	
5	3	F	0	1	0	200,000	T	S	0	1	S	0	2	T	0	4	
5	4	F	0	1	1	200,000	T	S	0	1	S	0	2	T	0	4	
5	5	F	0	1	2	200,000	T	S	0	1	S	0	2	T	0	4	
5	6	F	0	1	9	200,000	T	S	0	1	S	0	2	T	0	4	
5	7	F	0	2	0	200,000	T	S	0	1	S	0	2	T	0	4	
5	8	F	0	2	1	200,000	T	S	0	1	S	0	2	T	0	4	
5	9	F	0	2	2	200,000	T	S	0	1	S	0	2	T	0	4	
6	0	F	0	2	3	200,000	T	S	0	1	S	0	2	T	0	4	
6	1	F	0	2	4	200,000	T	S	0	1	S	0	2	T	0	4	
6	2	F	0	2	5	200,000	T	S	0	1	S	0	2	T	0	4	
6	3	F	0	2	6	200,000	T	S	0	1	S	0	2	T	0	4	
6	4	F	0	2	7	200,000	T	S	0	1	S	0	2	T	0	4	
6	5	F	0	2	8	200,000	T	S	0	1	S	0	2	T	0	4	
6	6	F	0	3	2	200,000	T	S	0	1	S	0	2	T	0	4	
6	7	F	0	3	4	200,000	T	S	0	1	S	0	2	T	0	4	
6	8	F	0	3	5	200,000	T	S	0	1	S	0	2	T	0	4	
6	9	F	0	3	7	200,000	T	S	0	1	S	0	2	T	0	4	
7	0	F	0	3	8	200,000	T	S	0	1	S	0	2	T	0	4	
7	1	F	0	3	9	200,000	T	S	0	1	S	0	2	T	0	4	
7	2	K	0	0	1	200,000	T	S	0	1	S	0	2	T	0	4	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
73	K002	200,000	T	S01	S02	T04	
74	K003	200,000	T	S01	S02	T04	
75	K004	200,000	T	S01	S02	T04	
76	K005	200,000	T	S01	S02	T04	
77	K006	200,000	T	S01	S02	T04	
78	K007	200,000	T	S01	S02	T04	
79	K008	200,000	T	S01	S02	T04	
80	K009	200,000	T	S01	S02	T04	
81	K010	200,000	T	S01	S02	T04	
82	K011	200,000	T	S01	S02	T04	
83	K013	200,000	T	S01	S02	T04	
84	K014	200,000	T	S01	S02	T04	
85	K015	200,000	T	S01	S02	T04	
86	K016	200,000	T	S01	S02	T04	
87	K017	200,000	T	S01	S02	T04	
88	K018	200,000	T	S01	S02	T04	
89	K019	200,000	T	S01	S02	T04	
90	K020	200,000	T	S01	S02	T04	
91	K021	200,000	T	S01	S02	T04	
92	K022	200,000	T	S01	S02	T04	
93	K023	200,000	T	S01	S02	T04	
94	K024	200,000	T	S01	S02	T04	
95	K025	200,000	T	S01	S02	T04	
96	K026	200,000	T	S01	S02	T04	
97	K027	200,000	T	S01	S02	T04	
98	K028	200,000	T	S01	S02	T04	
99	K029	200,000	T	S01	S02	T04	
100	K030	200,000	T	S01	S02	T04	
101	K031	200,000	T	S01	S02	T04	
102	K032	200,000	T	S01	S02	T04	
103	K033	200,000	T	S01	S02	T04	
104	K034	200,000	T	S01	S02	T04	
105	K035	200,000	T	S01	S02	T04	
106	K036	200,000	T	S01	S02	T04	
107	K037	200,000	T	S01	S02	T04	
108	K038	200,000	T	S01	S02	T04	
109	K039	200,000	T	S01	S02	T04	
110	K040	200,000	T	S01	S02	T04	
111	K041	200,000	T	S01	S02	T04	
112	K042	200,000	T	S01	S02	T04	
113	K043	200,000	T	S01	S02	T04	
114	K044	200,000	T	S01	S02	T04	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
115	K045	200,000	T	S01	S02	T04	
116	K046	200,000	T	S01	S02	T04	
117	K047	200,000	T	S01	S02	T04	
118	K048	200,000	T	S01	S02	T04	
119	K049	200,000	T	S01	S02	T04	
120	K050	200,000	T	S01	S02	T04	
121	K051	200,000	T	S01	S02	T04	
122	K052	200,000	T	S01	S02	T04	
123	K060	200,000	T	S01	S02	T04	
124	K061	200,000	T	S01	S02	T04	
125	K062	200,000	T	S01	S02	T04	
126	K069	200,000	T	S01	S02	T04	
127	K071	200,000	T	S01	S02	T04	
128	K073	200,000	T	S01	S02	T04	
129	K083	200,000	T	S01	S02	T04	
130	K084	200,000	T	S01	S02	T04	
131	K085	200,000	T	S01	S02	T04	
132	K086	200,000	T	S01	S02	T04	
133	K087	200,000	T	S01	S02	T04	
134	K088	200,000	T	S01	S02	T04	
135	K093	200,000	T	S01	S02	T04	
136	K094	200,000	T	S01	S02	T04	
137	K095	200,000	T	S01	S02	T04	
138	K096	200,000	T	S01	S02	T04	
139	K097	200,000	T	S01	S02	T04	
140	K098	200,000	T	S01	S02	T04	
141	K099	200,000	T	S01	S02	T04	
142	K100	200,000	T	S01	S02	T04	
143	K101	200,000	T	S01	S02	T04	
144	K102	200,000	T	S01	S02	T04	
145	K103	200,000	T	S01	S02	T04	
146	K104	200,000	T	S01	S02	T04	
147	K105	200,000	T	S01	S02	T04	
148	K106	200,000	T	S01	S02	T04	
149	K107	200,000	T	S01	S02	T04	
150	K108	200,000	T	S01	S02	T04	
151	K109	200,000	T	S01	S02	T04	
152	K110	200,000	T	S01	S02	T04	
153	K111	200,000	T	S01	S02	T04	
154	K112	200,000	T	S01	S02	T04	
155	K113	200,000	T	S01	S02	T04	
156	K114	200,000	T	S01	S02	T04	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
157	K115	200,000	T	S01	S02	T04	
158	K116	200,000	T	S01	S02	T04	
159	K117	200,000	T	S01	S02	T04	
160	K118	200,000	T	S01	S02	T04	
161	K123	200,000	T	S01	S02	T04	
162	K124	200,000	T	S01	S02	T04	
163	K125	200,000	T	S01	S02	T04	
164	K126	200,000	T	S01	S02	T04	
165	K131	200,000	T	S01	S02	T04	
166	K132	200,000	T	S01	S02	T04	
167	K136	200,000	T	S01	S02	T04	
168	K141	200,000	T	S01	S02	T04	
169	K142	200,000	T	S01	S02	T04	
170	K143	200,000	T	S01	S02	T04	
171	K144	200,000	T	S01	S02	T04	
172	K145	200,000	T	S01	S02	T04	
173	K147	200,000	T	S01	S02	T04	
174	K148	200,000	T	S01	S02	T04	
175	K149	200,000	T	S01	S02	T04	
176	K150	200,000	T	S01	S02	T04	
177	K151	200,000	T	S01	S02	T04	
178	K156	200,000	T	S01	S02	T04	
179	K157	200,000	T	S01	S02	T04	
180	K158	200,000	T	S01	S02	T04	
181	K159	200,000	T	S01	S02	T04	
182	K161	200,000	T	S01	S02	T04	
183	K169	200,000	T	S01	S02	T04	
184	K170	200,000	T	S01	S02	T04	
185	K171	200,000	T	S01	S02	T04	
186	K172	200,000	T	S01	S02	T04	
187	K174	200,000	T	S01	S02	T04	
188	K175	200,000	T	S01	S02	T04	
189	K176	200,000	T	S01	S02	T04	
190	K177	200,000	T	S01	S02	T04	
191	K178	200,000	T	S01	S02	T04	
192	K181	200,000	T	S01	S02	T04	
193	P001	200,000	T	S01	S02	T04	
194	P002	200,000	T	S01	S02	T04	
195	P003	200,000	T	S01	S02	T04	
196	P004	200,000	T	S01	S02	T04	
197	P005	200,000	T	S01	S02	T04	
198	P006	200,000	T	S01	S02	T04	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
199	P007	200,000	T	S01	S02	T04	
200	P008	200,000	T	S01	S02	T04	
201	P009	200,000	T	S01	S02	T04	
202	P010	200,000	T	S01	S02	T04	
203	P011	200,000	T	S01	S02	T04	
204	P012	200,000	T	S01	S02	T04	
205	P013	200,000	T	S01	S02	T04	
206	P014	200,000	T	S01	S02	T04	
207	P015	200,000	T	S01	S02	T04	
208	P016	200,000	T	S01	S02	T04	
209	P017	200,000	T	S01	S02	T04	
210	P018	200,000	T	S01	S02	T04	
211	P020	200,000	T	S01	S02	T04	
212	P021	200,000	T	S01	S02	T04	
213	P022	200,000	T	S01	S02	T04	
214	P023	200,000	T	S01	S02	T04	
215	P024	200,000	T	S01	S02	T04	
216	P026	200,000	T	S01	S02	T04	
217	P027	200,000	T	S01	S02	T04	
218	P028	200,000	T	S01	S02	T04	
219	P029	200,000	T	S01	S02	T04	
220	P030	200,000	T	S01	S02	T04	
221	P031	200,000	T	S01	S02	T04	
222	P033	200,000	T	S01	S02	T04	
223	P034	200,000	T	S01	S02	T04	
224	P036	200,000	T	S01	S02	T04	
225	P037	200,000	T	S01	S02	T04	
226	P038	200,000	T	S01	S02	T04	
227	P039	200,000	T	S01	S02	T04	
228	P040	200,000	T	S01	S02	T04	
229	P041	200,000	T	S01	S02	T04	
230	P042	200,000	T	S01	S02	T04	
231	P043	200,000	T	S01	S02	T04	
232	P044	200,000	T	S01	S02	T04	
233	P045	200,000	T	S01	S02	T04	
234	P046	200,000	T	S01	S02	T04	
235	P047	200,000	T	S01	S02	T04	
236	P048	200,000	T	S01	S02	T04	
237	P049	200,000	T	S01	S02	T04	
238	P050	200,000	T	S01	S02	T04	
239	P051	200,000	T	S01	S02	T04	
240	P054	200,000	T	S01	S02	T04	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
241	P056	200,000	T	S01	S02	T04	
242	P057	200,000	T	S01	S02	T04	
243	P058	200,000	T	S01	S02	T04	
244	P059	200,000	T	S01	S02	T04	
245	P060	200,000	T	S01	S02	T04	
246	P062	200,000	T	S01	S02	T04	
247	P063	200,000	T	S01	S02	T04	
248	P064	200,000	T	S01	S02	T04	
249	P065	200,000	T	S01	S02	T04	
250	P066	200,000	T	S01	S02	T04	
251	P067	200,000	T	S01	S02	T04	
252	P068	200,000	T	S01	S02	T04	
253	P069	200,000	T	S01	S02	T04	
254	P070	200,000	T	S01	S02	T04	
255	P071	200,000	T	S01	S02	T04	
256	P072	200,000	T	S01	S02	T04	
257	P073	200,000	T	S01	S02	T04	
258	P074	200,000	T	S01	S02	T04	
259	P075	200,000	T	S01	S02	T04	
260	P076	200,000	T	S01	S02	T04	
261	P077	200,000	T	S01	S02	T04	
262	P078	200,000	T	S01	S02	T04	
263	P081	200,000	T	S01	S02	T04	
264	P082	200,000	T	S01	S02	T04	
265	P084	200,000	T	S01	S02	T04	
266	P085	200,000	T	S01	S02	T04	
267	P087	200,000	T	S01	S02	T04	
268	P088	200,000	T	S01	S02	T04	
269	P089	200,000	T	S01	S02	T04	
270	P092	200,000	T	S01	S02	T04	
271	P093	200,000	T	S01	S02	T04	
272	P094	200,000	T	S01	S02	T04	
273	P095	200,000	T	S01	S02	T04	
274	P096	200,000	T	S01	S02	T04	
275	P097	200,000	T	S01	S02	T04	
276	P098	200,000	T	S01	S02	T04	
277	P099	200,000	T	S01	S02	T04	
278	P101	200,000	T	S01	S02	T04	
279	P102	200,000	T	S01	S02	T04	
280	P103	200,000	T	S01	S02	T04	
281	P104	200,000	T	S01	S02	T04	
282	P105	200,000	T	S01	S02	T04	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
283	P106	200,000	T	S01	S02	T04	
284	P108	200,000	T	S01	S02	T04	
285	P109	200,000	T	S01	S02	T04	
286	P110	200,000	T	S01	S02	T04	
287	P111	200,000	T	S01	S02	T04	
288	P112	200,000	T	S01	S02	T04	
289	P113	200,000	T	S01	S02	T04	
290	P114	200,000	T	S01	S02	T04	
291	P115	200,000	T	S01	S02	T04	
292	P116	200,000	T	S01	S02	T04	
293	P118	200,000	T	S01	S02	T04	
294	P119	200,000	T	S01	S02	T04	
295	P120	200,000	T	S01	S02	T04	
296	P121	200,000	T	S01	S02	T04	
297	P122	200,000	T	S01	S02	T04	
298	P123	200,000	T	S01	S02	T04	
299	P127	200,000	T	S01	S02	T04	
300	P128	200,000	T	S01	S02	T04	
301	P185	200,000	T	S01	S02	T04	
302	P188	200,000	T	S01	S02	T04	
303	P189	200,000	T	S01	S02	T04	
304	P190	200,000	T	S01	S02	T04	
305	P191	200,000	T	S01	S02	T04	
306	P192	200,000	T	S01	S02	T04	
307	P194	200,000	T	S01	S02	T04	
308	P196	200,000	T	S01	S02	T04	
309	P197	200,000	T	S01	S02	T04	
310	P198	200,000	T	S01	S02	T04	
311	P199	200,000	T	S01	S02	T04	
312	P201	200,000	T	S01	S02	T04	
313	P202	200,000	T	S01	S02	T04	
314	P203	200,000	T	S01	S02	T04	
315	P204	200,000	T	S01	S02	T04	
316	P205	200,000	T	S01	S02	T04	
317	U001	200,000	T	S01	S02	T04	
318	U002	200,000	T	S01	S02	T04	
319	U003	200,000	T	S01	S02	T04	
320	U004	200,000	T	S01	S02	T04	
321	U005	200,000	T	S01	S02	T04	
322	U006	200,000	T	S01	S02	T04	
323	U007	200,000	T	S01	S02	T04	
324	U008	200,000	T	S01	S02	T04	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
325	U009	200,000	T	S01	S02	T04	
326	U010	200,000	T	S01	S02	T04	
327	U011	200,000	T	S01	S02	T04	
328	U012	200,000	T	S01	S02	T04	
329	U014	200,000	T	S01	S02	T04	
330	U015	200,000	T	S01	S02	T04	
331	U016	200,000	T	S01	S02	T04	
332	U017	200,000	T	S01	S02	T04	
333	U018	200,000	T	S01	S02	T04	
334	U019	200,000	T	S01	S02	T04	
335	U020	200,000	T	S01	S02	T04	
336	U021	200,000	T	S01	S02	T04	
337	U022	200,000	T	S01	S02	T04	
338	U023	200,000	T	S01	S02	T04	
339	U024	200,000	T	S01	S02	T04	
340	U025	200,000	T	S01	S02	T04	
341	U026	200,000	T	S01	S02	T04	
342	U027	200,000	T	S01	S02	T04	
343	U028	200,000	T	S01	S02	T04	
344	U029	200,000	T	S01	S02	T04	
345	U030	200,000	T	S01	S02	T04	
346	U031	200,000	T	S01	S02	T04	
347	U032	200,000	T	S01	S02	T04	
348	U033	200,000	T	S01	S02	T04	
349	U034	200,000	T	S01	S02	T04	
350	U035	200,000	T	S01	S02	T04	
351	U036	200,000	T	S01	S02	T04	
352	U037	200,000	T	S01	S02	T04	
353	U038	200,000	T	S01	S02	T04	
354	U039	200,000	T	S01	S02	T04	
355	U041	200,000	T	S01	S02	T04	
356	U042	200,000	T	S01	S02	T04	
357	U043	200,000	T	S01	S02	T04	
358	U044	200,000	T	S01	S02	T04	
359	U045	200,000	T	S01	S02	T04	
360	U046	200,000	T	S01	S02	T04	
361	U047	200,000	T	S01	S02	T04	
362	U048	200,000	T	S01	S02	T04	
363	U049	200,000	T	S01	S02	T04	
364	U050	200,000	T	S01	S02	T04	
365	U051	200,000	T	S01	S02	T04	
366	U052	200,000	T	S01	S02	T04	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
367	U053	200,000	T	S01	S02	T04	
368	U055	200,000	T	S01	S02	T04	
369	U056	200,000	T	S01	S02	T04	
370	U057	200,000	T	S01	S02	T04	
371	U058	200,000	T	S01	S02	T04	
372	U059	200,000	T	S01	S02	T04	
373	U060	200,000	T	S01	S02	T04	
374	U061	200,000	T	S01	S02	T04	
375	U062	200,000	T	S01	S02	T04	
376	U063	200,000	T	S01	S02	T04	
377	U064	200,000	T	S01	S02	T04	
378	U066	200,000	T	S01	S02	T04	
379	U067	200,000	T	S01	S02	T04	
380	U068	200,000	T	S01	S02	T04	
381	U069	200,000	T	S01	S02	T04	
382	U070	200,000	T	S01	S02	T04	
383	U071	200,000	T	S01	S02	T04	
384	U072	200,000	T	S01	S02	T04	
385	U073	200,000	T	S01	S02	T04	
386	U074	200,000	T	S01	S02	T04	
387	U075	200,000	T	S01	S02	T04	
388	U076	200,000	T	S01	S02	T04	
389	U077	200,000	T	S01	S02	T04	
390	U078	200,000	T	S01	S02	T04	
391	U079	200,000	T	S01	S02	T04	
392	U080	200,000	T	S01	S02	T04	
393	U081	200,000	T	S01	S02	T04	
394	U082	200,000	T	S01	S02	T04	
395	U083	200,000	T	S01	S02	T04	
396	U084	200,000	T	S01	S02	T04	
397	U085	200,000	T	S01	S02	T04	
398	U086	200,000	T	S01	S02	T04	
399	U087	200,000	T	S01	S02	T04	
400	U088	200,000	T	S01	S02	T04	
401	U089	200,000	T	S01	S02	T04	
402	U090	200,000	T	S01	S02	T04	
403	U091	200,000	T	S01	S02	T04	
404	U092	200,000	T	S01	S02	T04	
405	U093	200,000	T	S01	S02	T04	
406	U094	200,000	T	S01	S02	T04	
407	U095	200,000	T	S01	S02	T04	
408	U096	200,000	T	S01	S02	T04	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
409	U097	200,000	T	S01	S02	T04	
410	U098	200,000	T	S01	S02	T04	
411	U099	200,000	T	S01	S02	T04	
412	U101	200,000	T	S01	S02	T04	
413	U102	200,000	T	S01	S02	T04	
414	U103	200,000	T	S01	S02	T04	
415	U105	200,000	T	S01	S02	T04	
416	U106	200,000	T	S01	S02	T04	
417	U107	200,000	T	S01	S02	T04	
418	U108	200,000	T	S01	S02	T04	
419	U109	200,000	T	S01	S02	T04	
420	U110	200,000	T	S01	S02	T04	
421	U111	200,000	T	S01	S02	T04	
422	U112	200,000	T	S01	S02	T04	
423	U113	200,000	T	S01	S02	T04	
424	U114	200,000	T	S01	S02	T04	
425	U115	200,000	T	S01	S02	T04	
426	U116	200,000	T	S01	S02	T04	
427	U117	200,000	T	S01	S02	T04	
428	U118	200,000	T	S01	S02	T04	
429	U119	200,000	T	S01	S02	T04	
430	U120	200,000	T	S01	S02	T04	
431	U121	200,000	T	S01	S02	T04	
432	U122	200,000	T	S01	S02	T04	
433	U123	200,000	T	S01	S02	T04	
434	U124	200,000	T	S01	S02	T04	
435	U125	200,000	T	S01	S02	T04	
436	U126	200,000	T	S01	S02	T04	
437	U127	200,000	T	S01	S02	T04	
438	U128	200,000	T	S01	S02	T04	
439	U129	200,000	T	S01	S02	T04	
440	U130	200,000	T	S01	S02	T04	
441	U131	200,000	T	S01	S02	T04	
442	U132	200,000	T	S01	S02	T04	
443	U133	200,000	T	S01	S02	T04	
444	U134	200,000	T	S01	S02	T04	
445	U135	200,000	T	S01	S02	T04	
446	U136	200,000	T	S01	S02	T04	
447	U137	200,000	T	S01	S02	T04	
448	U138	200,000	T	S01	S02	T04	
449	U140	200,000	T	S01	S02	T04	
450	U141	200,000	T	S01	S02	T04	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
451	U142	200,000	T	S01	S02	T04	
452	U143	200,000	T	S01	S02	T04	
453	U144	200,000	T	S01	S02	T04	
454	U145	200,000	T	S01	S02	T04	
455	U146	200,000	T	S01	S02	T04	
456	U147	200,000	T	S01	S02	T04	
457	U148	200,000	T	S01	S02	T04	
458	U149	200,000	T	S01	S02	T04	
459	U150	200,000	T	S01	S02	T04	
460	U151	200,000	T	S01	S02	T04	
461	U152	200,000	T	S01	S02	T04	
462	U153	200,000	T	S01	S02	T04	
463	U154	200,000	T	S01	S02	T04	
464	U155	200,000	T	S01	S02	T04	
465	U156	200,000	T	S01	S02	T04	
466	U157	200,000	T	S01	S02	T04	
467	U158	200,000	T	S01	S02	T04	
468	U159	200,000	T	S01	S02	T04	
469	U160	200,000	T	S01	S02	T04	
470	U161	200,000	T	S01	S02	T04	
471	U162	200,000	T	S01	S02	T04	
472	U163	200,000	T	S01	S02	T04	
473	U164	200,000	T	S01	S02	T04	
474	U165	200,000	T	S01	S02	T04	
475	U166	200,000	T	S01	S02	T04	
476	U167	200,000	T	S01	S02	T04	
477	U168	200,000	T	S01	S02	T04	
478	U169	200,000	T	S01	S02	T04	
479	U170	200,000	T	S01	S02	T04	
480	U171	200,000	T	S01	S02	T04	
481	U172	200,000	T	S01	S02	T04	
482	U173	200,000	T	S01	S02	T04	
483	U174	200,000	T	S01	S02	T04	
484	U176	200,000	T	S01	S02	T04	
485	U177	200,000	T	S01	S02	T04	
486	U178	200,000	T	S01	S02	T04	
487	U179	200,000	T	S01	S02	T04	
488	U180	200,000	T	S01	S02	T04	
489	U181	200,000	T	S01	S02	T04	
490	U182	200,000	T	S01	S02	T04	
491	U183	200,000	T	S01	S02	T04	
492	U184	200,000	T	S01	S02	T04	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
493	U185	200,000	T	S01	S02	T04	
494	U186	200,000	T	S01	S02	T04	
495	U187	200,000	T	S01	S02	T04	
496	U188	200,000	T	S01	S02	T04	
497	U189	200,000	T	S01	S02	T04	
498	U190	200,000	T	S01	S02	T04	
499	U191	200,000	T	S01	S02	T04	
500	U192	200,000	T	S01	S02	T04	
501	U193	200,000	T	S01	S02	T04	
502	U194	200,000	T	S01	S02	T04	
503	U196	200,000	T	S01	S02	T04	
504	U197	200,000	T	S01	S02	T04	
505	U200	200,000	T	S01	S02	T04	
506	U201	200,000	T	S01	S02	T04	
507	U202	200,000	T	S01	S02	T04	
508	U203	200,000	T	S01	S02	T04	
509	U204	200,000	T	S01	S02	T04	
510	U205	200,000	T	S01	S02	T04	
511	U206	200,000	T	S01	S02	T04	
512	U207	200,000	T	S01	S02	T04	
513	U208	200,000	T	S01	S02	T04	
514	U209	200,000	T	S01	S02	T04	
515	U210	200,000	T	S01	S02	T04	
516	U211	200,000	T	S01	S02	T04	
517	U213	200,000	T	S01	S02	T04	
518	U214	200,000	T	S01	S02	T04	
519	U215	200,000	T	S01	S02	T04	
520	U216	200,000	T	S01	S02	T04	
521	U217	200,000	T	S01	S02	T04	
522	U218	200,000	T	S01	S02	T04	
523	U219	200,000	T	S01	S02	T04	
524	U220	200,000	T	S01	S02	T04	
525	U221	200,000	T	S01	S02	T04	
526	U222	200,000	T	S01	S02	T04	
527	U223	200,000	T	S01	S02	T04	
528	U225	200,000	T	S01	S02	T04	
529	U226	200,000	T	S01	S02	T04	
530	U227	200,000	T	S01	S02	T04	
531	U228	200,000	T	S01	S02	T04	
532	U234	200,000	T	S01	S02	T04	
533	U235	200,000	T	S01	S02	T04	
534	U236	200,000	T	S01	S02	T04	

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*							
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)			2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
535	U237	200,000	T	S01	S02	T04	
536	U238	200,000	T	S01	S02	T04	
537	U239	200,000	T	S01	S02	T04	
538	U240	200,000	T	S01	S02	T04	
539	U243	200,000	T	S01	S02	T04	
540	U244	200,000	T	S01	S02	T04	
541	U246	200,000	T	S01	S02	T04	
542	U247	200,000	T	S01	S02	T04	
543	U248	200,000	T	S01	S02	T04	
544	U249	200,000	T	S01	S02	T04	
545	U271	200,000	T	S01	S02	T04	
546	U278	200,000	T	S01	S02	T04	
547	U279	200,000	T	S01	S02	T04	
548	U280	200,000	T	S01	S02	T04	
549	U328	200,000	T	S01	S02	T04	
550	U353	200,000	T	S01	S02	T04	
551	U359	200,000	T	S01	S02	T04	
552	U364	200,000	T	S01	S02	T04	
553	U367	200,000	T	S01	S02	T04	
554	U372	200,000	T	S01	S02	T04	
555	U373	200,000	T	S01	S02	T04	
556	U387	200,000	T	S01	S02	T04	
557	U389	200,000	T	S01	S02	T04	
558	U394	200,000	T	S01	S02	T04	
559	U395	200,000	T	S01	S02	T04	
560	U404	200,000	T	S01	S02	T04	
561	U409	200,000	T	S01	S02	T04	
562	U410	200,000	T	S01	S02	T04	
563	U411	200,000	T	S01	S02	T04	

10. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

11. Facility Drawing

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

12. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas (see instructions for more detail).

13. Comments

10. & 11.) Please see Figures 2-2 and 2-3 for site layout and topographical maps.

12.) Please see section 1.6 of the Part A Permit Application for photographs of the facility.

SECTION II

GENERAL FACILITY DESCRIPTION

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

MENOMONEE FALLS, WISCONSIN

2.0 GENERAL FACILITY DESCRIPTION

This section presents a general description of the facilities and operations at the Veolia-Menomonee Falls Facility.

2.1 General Description

The purpose of the facility is to collect, consolidate, temporarily store, treat, and transport hazardous wastes generated by industries to other treatment and/or final disposal facilities.

The Veolia-Menomonee Falls Facility is a regional center that primarily serves generators of hazardous waste located in the upper Midwestern U.S., such as the metal finishing industry, heavy industrial, light industrial, the Department of Transportation, computer, and high technology industries. The existing facility has historically had its largest group of industrial customers in the metal finishing and paint manufacturing industries. Recent changes in the RCRA hazardous waste law has increased both the types of waste and the number of waste generators included in the regulated community. Small manufacturers, schools, and service industries are now generators of hazardous waste requiring storage and treatment services such as those offered by the Menomonee Falls Facility. A copy of the facility's current Hazardous Waste Facility Operation License is located in Appendix B.

The facility, when operating as a 10-day waste transfer station, transports hazardous waste to appropriate permitted reclamation, treatment, storage, or disposal facilities. Wastes that are transferred within 10 days are not sampled, analyzed, or treated.

2.1.1 Facility History

The facility and adjacent landfills were once part of the Elmer Lauer Family property. In 1975, Waste Management Inc. (WMI) began repairing lugger boxes and roll-off boxes at the site in support of their adjacent landfill operations. No wastes were managed at the site while the boxes were being repaired. In 1978, WMI began using the facility to solidify

liquid non-hazardous wastes prior to disposal in the adjacent landfills. In 1983, the facility began operating as Chemical Waste Management (CWM), a subsidiary of WMI. In 1988, a part B permit was obtained to store up to 400 drums of hazardous waste. In 1991, the facility began stabilizing hazardous wastes onsite and increased the permitted storage capacity at the facility to 800 drums. The stabilization Unit was enclosed within a building and a 48-unit bulk storage area were completed in 1993.

In 1995, the facility was included in a merger with a portion of Chemical Waste Management and Advanced Environmental Technical Corporation (AETC). The merger formed a company doing business as Advanced Environmental Technical Services (AETS), which was 60 percent owned by CWM and 40 percent owned by AETC. The formal approval of the change of "Operator" of the facility to AETS was completed on June 28, 1995.

In March, 1996, the facility "Clean Closed" an eighteen(18) Contianer Roll-off/Lugger Box RCRA Storage Unit which was formally approved by WDNR in June, 1996. In August, 1996, the facility received approval from WDNR to begin operation of a Permanent Household Hazardous Waste and Very Small Quantity Generator of Hazardous Waste Collection Facility. In March, 1997, the facility completed construction and began operating a steel lined concrete pit for the solidification of non-hazardous wastes. This pit was constructed in the area that had been "Clean Closed" in 1996.

In August, 1997, the facility submitted a Facility Plan of Operation Report renewal application jointly to WDNR and USEPA. This was required due to the existing 10-year permit expiring in June, 1998. Also in the fall of 1997, Chemical Waste Management completed the purchase of the outstanding 40 percent of AETC.

In July, 1998, the facility received a permit modification approval for the acceptance and storage of dioxin and dioxin precursor wastes. The permit also allowed for the construction and operation of the Repack/Bulking/Decant Unit.

In June 1999, Vivendi SA, through its wholly owned subsidiary Onyx North America Corp. purchased 51% of the assets and liabilities of the WMI hazardous waste business (including Chemical Waste Management) with the exception of WMI Subtitle C hazardous waste landfills. This purchase included the Menomonee Falls facility. The sale of the business units was completed in August 2000. Onyx Environmental Services was formed to own and operate the businesses purchased from WMI. Vivendi SA sold most of its interest in Onyx North American Corp. in 2003, and a new French company, Veolia Environnement was formed. Onyx Environmental services became Veolia ES Technical Solutions, LLC in 2006 through a name change only.

In June 2003, the facility's part B permit was renewed by WDNR. In July 2003, a modification to renovate the conveyors in the Stabilization Unit was approved by WDNR which included the decommissioning of the previous reagent delivery system.

In October 2008, the facility received approval to fuel blend material in the Depack/Repack/Bulking Unit. In August, 2011 WDNR approved an expansion of the Depack/Repack/Bulking Unit with the construction being completed in April, 2012.

The layout of the facility is depicted in Figure 2-2.

The present site owner of the facility is:

Veolia ES Technical Solutions, L.L.C.
700 East Butterfield Road Suite 201
Lombard, IL 60148
(630) 218-1500

The present site operator of the facility is:

Veolia ES Technical Solutions, L.L.C.
700 East Butterfield Road Suite 201
Lombard, IL 60148
(630) 218-1500

The present landowner is:

Waste Management of Wisconsin, Inc.
(a wholly owned subsidiary of Waste Management Inc.)
W124 N8925 Boundary Road
Menomonee Falls, WI 53051
(262) 251-9560

The Veolia ES Technical Solutions, L.L.C. has no one person that owns greater than or equal to ten percent legal or equitable interest in their assets. Veolia ES Technical Solutions, L.L.C. also owns one other solid or hazardous waste facility that is located in Wisconsin. This facility is the Veolia ES Technical Solutions, L.L.C. facility located at 1275 Mineral Springs Drive in Port Washington, WI. All plan approvals and orders relating to these facilities are being complied with. Additionally, Veolia has multiple facilities located throughout the United States which are identified in Appendix E.

2.2 Topographic Map

The topography of the existing facility is shown in Figure 2-1 and 2-3.

2.2.1 **Flood Plain and Flood Control**

The nearest surface water to the facility is the Menomonee River, which is about 1-1/2 miles southwest of the facility. This river is too far down gradient to show on the topographic maps, but is shown on the General Facility Location Map (Figure 2-4). The facility is not within the 100-year flood plain of this river or any other water course.

2.2.2 **Run-Off and Run-On Control**

The topographic maps show that the site is relatively flat with drainage generally to the south. The site is bounded on the north and west sides by drainage channels that drain the higher elevations of the property to the north and west. These channels prevent

stormwater runoff from these areas from draining onto the site. A drainage channel on the south side of the site accepts stormwater drainage from the site and conveys it to the southwest corner. From there the water discharges into a channel that conveys such runoff southward to a small man-made pond about 1/2 mile south of the facility. In addition, drainage from the employee parking area discharges to a drainage channel that runs along the east side of the facility parallel to Boundary Road.

There are no barriers to surface water drainage on the site. The drainage channels surrounding the site efficiently convey runoff from the site and surrounding areas to the pond mentioned above.

2.2.3 **Land Use**

The facility is bounded on the north by Parkview Landfill and the west by Orchard Ridge Landfill, which is on contiguous property owned by Waste Management of Wisconsin, Inc. Both Parkview (closed) and Orchard Ridge are municipal landfills which service(d) Waukesha, Washington, and Milwaukee counties. Further north is Omega Hills Landfill which in the past has been used for the disposal of solid wastes. South of the Facility is a fenced yard occupied by an office building for Field Services and Transportation personnel and parking for their vehicles. The fenced yard is also used for a 10 day transfer facility. On the east, the facility is bounded by Boundary Road and further east by undeveloped land and a scrap metal processing facility. There are six residential houses and commercial establishments within 1/2 mile of the facility. There are several dozen residences about 3/4 of a mile west, southwest and south of the facility. The more heavily populated subdivisions of Menomonee Falls begin about 1-1/2 miles west and southwest of the facility. These features are shown on the USGS Quadrangle Map provided in Figure 2-3.

The facility site is zoned for industrial use, which is consistent with the present and proposed facilities. Portions of four communities (listed below) lie within 0.5 mile of the

site. Zoning for the respective portions is shown in four segments of zoning maps (Figures 2-5, 2-6, 2-7, and 2-8):

Village of Menomonee Falls,	Waukesha County
City of Milwaukee,	Milwaukee County
City of Mequon,	Ozaukee County
Village of Germantown	Washington County

All areas within the 0.5 mile radius are zoned for industrial use (except for some that are adjacent to streams and designated as wetlands or floodplains).

2.2.4 **Legal Boundaries**

The facility is located in a lightly populated, industrial and semi-agricultural area within the city limits of Menomonee Falls, Wisconsin, at a location southwest of the intersection of Boundary Road and County Line Road, as shown in Figure 2-4. The geographic coordinates of this location are north latitude 43°11'17" and longitude 88°3'53". A map depicting the legal boundaries of the property on which the facility is located is included as Figure 2-1.

The legal description for the site is:

That part of the N.E. 1/2 of Section 1, T.8 N., R. 20 E. in the Village of Menomonee Falls, Waukesha County, Wisconsin, bounded and described as follows. Commencing at the N.E. corner of said Section 1, thence S. 00° 37' 14" E. along the East line of N.E. 1/2 of Section 1 a distance of 1374.60' to the place of beginning; thence S. 89° 49' 10" W. 640.86"; thence S. 82° 45,' 42" W. 177.46; thence S. 00° 37' 14" E. 180.00'; thence S. 57° 14' 09" E. 190.84; thence South 100.00'; thence S. 82° 24' 19" E. 302.65"; thence S. 88° 24' 17" E. 359.57' to the East line of the N.E. 1/2 of Section 1; thence N. 00° 37' 14" W. along the East line

of the N.E. 1/2 of Section 1, a distance of 457.69' to the place of beginning.

Reserving the easterly 33' for road purposes. Above description contains a total of 7.53 A.c.'s, more or less.

The property on which the facility is located covers approximately nine (9) acres.

2.2.5 **Access Control**

2.2.5.1 **Control of Unauthorized Entry**

The facility is entirely fenced with a 6-foot high chain-link fence. The east fence line has two vehicle gates. The gates are monitored by closed-circuit video surveillance system and are opened and closed to permit entry (and egress) of waste delivery trucks and other authorized entry. Additionally the south fence line has two gates and the west and north fence lines each have a gate. All of the gates will be kept closed and locked during non-operating hours.

During operating hours, all persons entering the facility are required to either (1) enter the office building, state their business to the receptionist, and sign a visitor's log or (2) in the case of waste or materials delivery trucks, stop at the receiving station in the office building and have the delivery accepted (or tentatively accepted in the case of waste deliveries). All non-complying entrants are treated as unauthorized entrants and are asked to leave the facility. Unauthorized entrants are detected by facility personnel who maintain visual surveillance of the facility.

During non-operating hours, the fence and locked gates control unauthorized entry in the facility.

2.2.5.2 **Control of Authorized Entry**

Drivers of trucks delivering wastes to the facility are given specific instructions at the receiving station about where to proceed within the facility to be sampled and off-loaded. All waste off-loading is conducted under the supervision of the Operation's Manager or other designated personnel.

Contractors, consultants, visitors, and other non-employee personnel authorized to enter the facility normally are accompanied by facility personnel while on the premises. Possible exceptions may occur where an individual has a prolonged and very specific job to perform in a specific area of the facility (e.g., building construction). In these cases, facility personnel familiarize the person with the facility and safety/emergency procedures to be followed while on site.

2.2.5.3 **Warning Signs**

Signs are posted at all points of entry to the facility and at 50-foot intervals on the perimeter fencing. The signs can be seen when approaching the facility at a distance of 25 feet, and are written in English, and contain the words "Danger - Unauthorized Personnel Keep Out".

2.2.6 **Location of Buildings**

Figure 2-9 is a detailed topographic survey map covering the existing facility site and surrounding area. It has a scale of 1 inch = 100 ft., a 2-foot contour interval, and elevations based on the USGS datum. This plan sheet includes the property and site boundaries; a survey grid and north arrow; homes, buildings, man-made features and utility lines; fences and gates; and site grading; as well as other pertinent features such as watercourses and railroad lines. For the sake of clarity, water supply and observations wells, as well as soil boring locations, are also shown separately in Figure 2-9. The monitoring wells and soil borings indicated on Figure 2-9 are located on adjacent property, and are neither owned nor operated by Veolia-Menomonee Falls.

The layout of operating units, other buildings and structures, fences, and other features of the facility are illustrated in greater detail on Figure 2-2.

The physical layout of the facility is shown in Figure 2-2. As shown, the facility consists of (1) a Container Storage Unit, (2) a Non-Hazardous Waste Processing Building, (3) Southeast Container Storage Unit, (4) Waste Stabilization Unit, (5) Drum Repack/Bulking/Decant Process Unit, (6) an administration building (including the laboratory), and (7) a maintenance building, which is primarily used for the repair and maintenance of equipment.

These units are described further in Section 4.0.

Non-regulated units include the administration and maintenance building. The maintenance building is used for repairing equipment and storage of parts and other supplies. A truck scale is installed at the facility. The facility has a perimeter fence with seven gates.

2.2.7 **Climatology**

The facility is located in the southeast section of the state of Wisconsin which usually has warm summers and mild winters due to the area's proximity to Lake Michigan. An average temperature for January is 22°F and for July, 82°F, as reported by the National Weather Service. Average precipitation which includes rain, melted snow and other moisture is 34 inches. Figure 2-10 provides a wind rose for the area. The prevailing winds are westerly in the winter and southerly in the summer.

2.3 **Location Standards**

Veolia-Menomonee Falls was previously developed and has been in continuous use for the same purpose as current operations. Because of the character of the operation, the facility does not affect the groundwater or surface water and has negligible potential to do so. The suitability of the site for its operations have been reviewed and approved by all affected municipalities.

2.3.1 **Flood Plain Standards**

The facility appears on the Federal Insurance Administration Map Number 550483 0005 covering Menomonee Falls, Wisconsin (Figure 2-11). The map shows that the facility is not located in a 100-year floodplain; therefore, the facility meets the locational requirements of s. NR 664.0018(2) and no floodplain related limitations on site development are invoked. Furthermore, as required by s. NR 664.0018(4) and (5), respectively, the facility is not located in a wetland and the facility is not located in or near a habitat critical to the continued existence of any endangered species listed in ch. NR 27.

2.3.2 **Wetland Standards**

No wetlands as defined by NR 103 are located within the facility area. In addition, no wetland areas are impacted by the facility in accordance with NR 103. Documentation showing that the requirements of ch. NR 103, Wis. Adm. Code, Water Quality Standards for Wetlands has been satisfied is supplied in Appendix E to this volume.

2.3.3 **Endangered Species Habitat Standards**

A letter along with the topographic map and legal description was sent to the Bureau of Endangered Resources on April, 9, 1992 requesting a report documenting the absence of concern species critical habitat. A copy of the letter as well as the response is included in Appendix G.

2.3.4 **Seismic Standards**

The Waukesha geological fault is greater than 1/2 mile from the Controlled Waste Division facility. There is no evidence of activity within Holocene time. Veolia-Menomonee Falls is located in Waukesha County, Wisconsin. This political jurisdiction is not listed in Appendix VI of 40 CFR Part 264. No further information is therefore required to demonstrate compliance with the seismic considerations.

2.4 **Traffic Information**

The facility is located on Boundary Road between County Line Road and State Trunk Highway (STH) 100. The majority of the truck traffic to the facility enters northbound Boundary Road from STH 100, but there is also significant truck traffic southbound on Boundary Road due to the presence of the adjacent Waste Management Landfill. Boundary Road is a two-lane asphalt road. Wisconsin Department of Transportation (WisDOT) conducted traffic counts on the surrounding area roads in 2010. The Average Annual Daily Traffic (AADT) on Boundary Road north of County Line Road was 5,100 vehicles, while the count was 5,500 AADT on Boundary Road north of STH 100. On STH 100, west of Boundary Road, the count was 13,300 AADT, and on County Line Road west of Boundary Road, the count was 3,700 AADT. The average daily traffic inbound and outbound from the facility is 30 vehicles inbound and 21 vehicles outbound. The facility traffic totals do not include local residents dropping off household hazardous wastes.

The facility as described in this Feasibility Report and Plan of Operation is expected to average approximately 10 waste delivery trucks received each day. These include van, trailer, trucks carrying wastes in drums, bulk bags or other smaller containers; and bulk solid wastes in Roll-Off Boxes and Lugger-Boxes or dump trucks. Transport will be via vehicles having a gross (loaded) weight of less than 80,000 pounds. There also will be truck traffic from the facility to other facilities to transfer (1) waste receipts that will not be managed at the facility and (2) wastes generated by the facility. It is expected that this truck traffic will average up to an additional ten trucks per day. These trucks will include (but are not limited to) van, trailer, flatbed, tank, roll-off and lugger-box trucks, and dump trucks having a gross (loaded) weight of approximately 80,000 pounds.

Trucks usually reach the facility by traveling U.S. Highway 45 (either southbound or northbound), exiting onto State Route 74, traveling east on this highway for about 3 miles to Boundary Road (124th Street) and traveling north on Boundary Road for about 1/2 mile to the entrance to the facility. Trucks leaving the facility will follow this same route in reverse. U.S. Highway 45 and State Route 74 are both four-lane highways which

typically carry heavy truck traffic and which will easily accommodate the facility traffic described above. Boundary Road is a straight, two-lane road that traverses a semi-rural area and is capable of carrying the traffic described above.

The travel routes to and from the facility are the same as described above. All of the roadways on the facility are asphalt paved and are designed and constructed to accommodate vehicles typically received at Veolia-Menomonee Falls.

Figure 2-13 shows the principle on-site traffic patterns for the facility. All personnel and visitor vehicle(s) enter/exit from the North-East gate. Waste delivery trucks enter from the South-East gate and exit from the North-East gate. Waste delivery trucks enter the facility from the South-East gate and stop at the office for weighing (if required), and confirming of manifest and shipping papers. Trucks are directed to proceed to one of the Container Storage Units, the Southeast Container Storage Unit staging area, the Waste Stabilization Process, or the Repack/Bulking/Decant Unit for sampling and analysis of the waste. Certain waste shipments are sampled at the weigh station. Once the incoming waste analysis is completed, trucks will unload the waste in the designated unit. For the Waste Stabilization Facility, delivery trucks enter the Waste Stabilization Unit from the north; they can be from the staging area, bulking unit, or storage units. In addition, non-bulk containerized waste from the Container Storage Building may be moved via forklift and truck through the north receiving docks. Regarding delivery of waste or reagent into the two silos, trucks go through the same procedure as listed above, but may deliver from the South-West gate to the unloading area. For the product loading, trucks enter through the north end of the unit using the South-East gate. Once off-loading is completed, trucks leave the facility using the route to the North-East or South-East gate.

2.5 Geologic, Hydrogeological, and Groundwater Considerations

Because of the engineered secondary containment around the storage and treatment areas in

the facility, the chance of an accidental leak or spill that could escape from the site and enter surface or groundwater is reduced. Only three such incidents have occurred during the history of the facility.

One of the incidents was a fire, which occurred in a roll-off box being stored in the Southeast Container Storage Building. It was determined, after interviewing the generator, that this was a recurring problem with the waste. The roll-off box was removed from the storage unit and placed in the yard where the fire was extinguished. The water used by the fire department to extinguish the fire drained off-site and into a retention pond on Waste Management's property. The waste was a characteristically hazardous waste for metals and no significant harm to the surface or ground water was caused by the release. Two significant lessons were learned from this incident. First, if the waste in question was going to self-ignite, it would occur within 30 days of being generated. Veolia ES Technical Solutions placed a condition on the acceptance of the waste that the generator must store the waste for greater than 30 days prior to shipping the waste. Second, if the contents of a roll-off box ignite in the future the roll-off box would either not be moved, or moved onto the floor of the stabilization building, so that the run-off from extinguishing the fire could be captured.

The second incident was the release of 1,500 gallons of a waste corrosive liquid from a semi-tanker at the Veolia-Menomonee Falls facility. The waste was parked at the facility in 10-Day transfer prior to shipment to Waste Management of Ohio, Inc. in Vickery, Ohio. The waste had a high nitric acid concentration which caused the stainless steel valves on the tanker to fail, releasing the entire contents of the tanker. The tanker was parked in the secondary containment area for the "post-stabilization" roll-off boxes. During the entire time the release was occurring it was raining. A portion of the waste was captured in the secondary containment, but additional waste was sprayed outside of the secondary containment and because of the rain, some of the waste overflowed the secondary containment.

A berm was created to stop the waste and rainwater from flowing into a drainage ditch and

subsequently into a retention pond. The waste/rainwater that was collected in the secondary containment, waste/rainwater collected because the berm was created, and pockets found prior to the drainage ditch were pumped into twenty-four (24) 55-gallon - poly containers (1,320 gallons collected).

The drainage ditch has an area of pooling before it flows off-site. A pH of the water in the pooled area indicated a pH of between five and six. A pH of the water in the

retention pond, which the water flows into, had the same pH. As a precaution approximately 1,000 gallons of water was pumped from the pooled area into a tank truck.

Approximately six inches of soil were removed from the drainage ditch and the area immediately south of the secondary containment where the waste sprayed outside of the secondary containment. Two soil samples were collected after the excavation. The analytical results for both samples indicated that the clean-up was successful and the metals levels were well below RCRA hazardous waste levels. The release caused minimal impact to the surface and ground water.

Two lessons were learned from this incident. First, Veolia ES Technical Solutions transportation division does not transport wastes with high nitric acid concentrations. Second, when tankers are parked in 10-Day transfer at the facility they are parked in secondary containment used for bulking from the Repack/Bulking/Decant Unit.

The third incident was a spill that occurred when a 330 gallon tote was tipped when it was being moved from the depack dock area to the east side of the Depack unit. The forklift hit a bump that jostled the tote and when the operator stopped, the tote slid off of the forks spilling approximately 175 gallons. Our response recovered all of the material and it was sent for proper disposal. The release had no impact to the surface and ground water.

Our lessons learned were that the operators of forklifts need to move with extra caution

when handling totes. As a result we re-trained the operators of forklifts using this incident as an example of uneven ground and the necessity to move slowly and safely. Our containment systems and procedures are operational and well equipped to handle spills.

With these "lessons learned" and subsequent modifications to facility procedures, Veolia ES Technical Solutions maintains that the facility continues to have a negligible potential to affect any of the surrounding area, and extensive geotechnical data is not relevant to this facility. Furthermore, there are no significant geological or topographic features on the site.

Section 2.3 describes the site topography, run-off and run-on control, land utilization within 1/2 miles of the proposed site, and identification of groundwater wells within the area.

2.6 Treatment and Disposal Facilities

Hazardous wastes from the facility will be transferred off-site for reclamation and/or treatment and disposal at various facilities owned by Veolia ES Technical Solutions (Figure 2-12) or by others. These off-site facilities could include the following:

Veolia ES -	Sauget, IL	Incinerator
Veolia ES -	West Carrollton, OH	Solvent Resource Recovery
Veolia ES -	Henderson, CO	Solvent Resource Recovery
Veolia ES -	Flanders, NJ	Storage and Transfer Facility
Veolia ES -	Port Arthur, TX	Incinerator
Veolia ES -	Creedmoor, NC	Storage and Transfer Facility
Veolia ES -	Phoenix, AZ	Storage and Transfer Facility
Veolia ES -	Azusa, CA	Solvent Resource Recovery

Veolia ES - Richmond, CA Storage and Transfer Facility

Other approved facilities will also be utilized.

2.7 Operating Schedule

Veolia-Menomonee Falls currently operates 18 hours per day, 6:00 AM to 12:00 AM (midnight) Monday through Friday and 7:00 AM to 3:00 PM on Saturday. However, the facility does operate longer hours and additional days (Sunday) as required to meet business needs. The facility maintains the ability to operate 24 hours per day seven days per week if necessary to meet business needs.

2.8 Environmental Impact Discussion

Veolia's Menomonee Falls facility is located in the Village of Menomonee Falls at W124 N9451 Boundary Road in the SE ¼ of the NE ¼ of Section 1, Township 8 North, Range 20 East in Waukesha County, Wisconsin. The facility is bounded on the north by the closed Parkview Recycling and Disposal Facility, on the south by the closed Boundary Road Landfill, on the west by the active Orchard Ridge Recycling and Disposal Facility, which is operated by Waste Management, and on the east by several light industrial facilities across Boundary Road. Figure 2-4 presents the facility location.

The purpose of the facility is to collect, consolidate, temporarily store, treat, and ship hazardous wastes generated by industries in the geographical region centered on southeastern Wisconsin. The waste is then transported to other treatment and disposal facilities in various parts of the United States. The presence of Veolia ES Technical Solutions is of great benefit to industries and commercial establishments in the State of Wisconsin in that it provides an acceptable and efficient means of managing the hazardous wastes that are an unavoidable byproduct of many industrial and commercial operations.

The extension of the RCRA hazardous waste regulations now include "small generators", in addition to the heavy industries that were primarily regulated, magnifies the need for the subject facility. Veolia ES Technical Solutions also enhances the welfare of the people and environment of the State of Wisconsin as a whole by providing a proper means of managing such hazardous wastes and thereby lessening the likelihood of random, improper, or illicit disposal of such wastes within the state.

2.8.1 **Physical Impacts**

The facility has minimal physical impact on the population and environment of the surrounding area.

During normal operations of the facility the potential exists for minimal amounts of volatile organic compounds (VOCs) to be released from drums when they are opened -briefly for sampling. When drums are processed in the Repack/Bulking/Decant Unit, the process does not release any emissions above regulatory levels. VOM calculations were conducted for and it was determined that the emission levels will be well below the one ton per year allowable emission levels. The emission calculations and the assumptions used in the calculations are included below.

VOM emissions may occur during the waste transfer process while waste is temporarily exposed to the atmosphere. VOM emissions were estimated by treating this transfer process as "pool evaporation" and applying an adaptation of the following equation from Section 7.7 of USEPA's TSDF Document:

Ea. vom = Fs x la x Wi x Vi

Where:

Ea, vom = annual waste transfer VOM emissions (pounds/year)

Fs = emission fraction = 0.0001

Ia = annual throughput (pounds/year)

Wi = volatile organic weight fraction

= total weight fraction of high Btu liquid

= 0.67

Vi = fraction for volatilization

= 0.2 was assumed to be a conservative evaporation rate based on the short duration of exposure

For the purpose of this estimate the volatile organic weight fraction was obtained from the high Btu composite profile Veolia ES Technical Solutions' hazardous waste incinerator located in Sauget, Illinois.

By transposing the equation above we calculated the maximum allowable waste that can be bulked in a year. For this purpose the equation is transposed to:

$$Ia = \frac{Ea,vom}{Fs \times Wi \times V}$$

Using this equation gives us the maximum allowable throughput:

Ia = 2000 pounds

(0 0001)x(0.67)x(0.2)

= 149,253,731 pounds/year

Converting this to gallons we can then calculate the throughput per 55-gallon container:

Ia = (149,253,731 lbs per year) x (1 gallon/9.5 lbs) x (1 container/55-gallons)
= 285,653 containers/year

As the estimates above indicate, this process will not create a major source of VOM emissions from the facility. Veolia-Menomonee Falls would need to bulk over 300,000 gallons of waste per week operating 52 weeks per year to become a major source.

These calculations were submitted to Mr. Eric Donaldson, Environmental Engineer, Air Management, Wisconsin Department of Natural Resources on July 23, 1996.

Major truck parking and maneuvering areas are paved, so dust generation on the site is minimal from vehicle movement.

The Waste Stabilization Unit is enclosed within a building equipped with an induced draft air pollution control system, with collection points strategically placed at points of potential emissions from the process, including the unloading area, to control dust. The Facility has been issued an air pollution control permit by the Southeast District Office of the WDNR. Appendix B contains a copy of the air pollution control permit.

It is possible for accidental leaks or spills to have an adverse impact upon facility operations, however, extensive physical barriers, such as engineered secondary containment structures, and operational barriers, such as the precautionary procedures described in the Training Plan, reduce the possibility of such adverse impacts. The effectiveness of these procedures has been demonstrated by the minimal adverse impacts to human health and/or the environment from the incidents that have occurred during the life of the facility. Following

any incident any necessary modification to physical barriers, secondary containment structures, operational barrier, training plans, etc. to minimize or eliminate an incident recurring.

2.8.2 Resource Commitments

No irreversible or irretrievable commitment of resources has been made for this facility in association with the modifications discussed in Section 4. The modifications to the facility have not yet been undertaken. If the facility permit is not renewed, the facility could be removed, including buildings and foundations, and the area could be returned to a natural state, but at a significant cost to Veolia.

2.8.3 Alternatives to the Project

There are two primary alternatives to renewing this permit. The permit could be denied, which would result in the closing of this facility. Closing this facility would leave the current users of the facility to travel a much greater distance to dispose of their waste material at a much higher cost to them. It would also result in the local residences that rely on the facility to dispose of household waste that is hazardous somewhere else, which may lead them to illegally dispose of it with ordinary household trash.

A second alternative is to move the facility to a different location in the area. While this would result in the existing users of the facility having a place to dispose of their hazardous waste a reasonable distance from their operations, it would be at an unreasonable high cost to Veolia to develop a new site, since the existing facility is still in good condition and able to accept hazardous waste.

2.8.4 Effects of the Project

Because no modifications to the facility will require any expansion of the footprint, no primary or indirect adverse environmental, biological, water resources, socioeconomic

impacts or impacts to land use or special resources are anticipated due to the reissuance of the facility permit.

Renewing the permit for the facility is anticipated to have continuing beneficial economic impacts, including a cost effective way for Veolia's existing clients to dispose of their hazardous wastes and a facility for the residents of Menomonee Falls and the surrounding communities to dispose of their household hazardous materials in a safe and responsible manner.

Veolia ES Technical Solutions does not believe that the facility affects any known recreational, historic or archeological areas. Ms. Kelly Cams of the DNR Bureau of Endangered Resources communicated that no officially designated stretches of wild or scenic rivers or officially designated critical habitats are close to the site. A letter was sent to Ms. Cams at the DNR Bureau of Endangered Resources on April 14, 1992 requesting written verification of these findings. This confirmed earlier comments by Ms. Bernie Collins of the U.S. Department of the Interior, National Park Service, Recreational Resources Branch, regarding the applicability of the Wild and Scenic Rivers Act, and Mr. Jeff Smoller of the DNR State Fish and Game Department, regarding the applicability of the Endangered Species Act.

According to the telephone conversation with Ms. Charmaine Harbort of the Wisconsin Historic Preservation Agency, there are only two registered historical sites in Menomonee Falls: The Mace Kiln and the Miller-Davidson Train Station/Museum Property. These are 5 miles and 1 mile, respectively, from the Veolia ES Technical Solutions site, and will not be affected in any way by the facility. A letter was sent to Ms. Harbort at the Wisconsin Historic Preservation Agency on April 14, 1992 requesting written documentation of these findings.

Copies of the letters sent to Ms. Cams and Ms. Harbort, and the responses are included in Volume III, Appendix F.

2.8.5 Environmental Assessment

Because no physical modifications to the facility are planned, additional affects to the existing environment are not anticipated to occur by reissuing the permit for the facility as proposed. However, there is a potential for a spill or release of material to the environment, which could impact the detention basin that surface flow of the facility drains to and the connecting waterways downstream of the detention basin. Since the detention basin drains to the Menomonee River and Lake Michigan, a spill that reaches the detention basin could result in contamination of those water bodies and wetlands associated with them. This in turn may impact the biological resources associated with the surface waters in the nearby area and eventually downstream of the facility. Veolia has taken precautions to minimize this from occurring by developing and instituting spill plans and emergency procedures for the facility.

Affects to land use, zoning, and social and economic conditions, including ethnic and cultural groups are not anticipated to occur because the land use in the area surrounding the facility is anticipated to remain the same. Special resources such as archaeological, historical, state natural areas and prime agricultural land are not known to exist on or in areas adjacent to the facility.

An environmental assessment which addresses the requirements found in s. NR 670.014 Wis. Adm. Code is included as Appendix F to Volume III. It has been written so as to stand alone in its description of the facility, the physical characteristics of its location and the effects the construction and the operation may have on the environment around it.

The Veolia – Menomonee Falls facility is located adjacent to two subtitle D landfills owned by Waste Management of Wisconsin. In 2007, during a permit expansion study for the adjacent landfill, low levels of chlorinated volatile organic compounds (CVOC) were discovered in the groundwater along the boundary between the Parkview landfill and the Veolia - Menomonee Falls site, which sits to the south of the Parkview landfill. In

November 2007, two wells were installed on the Veolia - Menomonee Falls property, and sampling was conducted in these wells and one existing well onsite on several occasions in 2008. CVOC exceedences detected primarily in the western most well included 1,1-dichloroethan; cis-1,2-dichloroethylene; trans-1,2-dichloroethylene; 1,2-dichloropropane; 1,1,1-trichloroethane; and trichloroethylene (TCE). Additionally several soil samples were obtained on the property through Geoprobe borings. Several of the aforementioned CVOC's were also found in these soil samples. Based upon these investigations, additional groundwater monitoring investigation was recommended in an April 2009 work plan.

After further investigation, in October 2010, Waste Management developed a Site Investigation/Remedial Options Report, which recommended five remedial options to the WDNR to address the contamination associated with the property that Veolia-Menomonee Falls currently leases. In January 2012, Waste Management installed a groundwater extraction well immediately downgradient of the highest chlorinated volatile organic compound concentrations detected in groundwater. A copy of the Construction Documentation and Operation, Maintenance, and Monitoring plan that was submitted to the WDNR on October 3, 2012 is included in Appendix H.

The investigation revealed a very localized impact area with no evidence of CVOC impacts to the lower, intermediate sand seam. There is no obvious, current source of CVOC impacts at the Veolia – Menomonee Falls facility. The facility does not now nor has it ever operated a land disposal unit. In addition there have been no documented spills or releases of chlorinated volatile organic compounds at the facility. The source of the CVOC impacts are most likely from historical industrial uses of the property and not the current facility operations.

2.8.6 Topography and Geology

The topography of the facility is relatively level due to grading and filling of the area in order to lay pavement. The elevation of the facility has a high point at approximately 764 feet above mean sea level, with the elevation dropping slightly in all directions to aid

stormwater runoff of the facility. A topographic map of the facility is shown in Figure 2-1. The regional topography can be characterized as gently rolling with the land surface elevation sloping east toward an unnamed tributary of the Menomonee River, which is located approximately 1,000 feet southeast of the facility. The USGS topographic quadrangle map is shown in Figure 2-3.

The geology of the area consists of Niagara dolomites overlying Maquoketa shale, which overlies sandstone. In the lowest topographical areas dolomite bedrock layers have been removed by glaciation and the surface bedrock is Maquoketa shale. Soils in the area are comprised of glacial till, with localized areas of clay, silt, sand, and gravel.

2.8.7 Biological Resources

There are no biological resources located on the facility, since the entire facility is paved. Biological resources in the surrounding area include wetlands interspersed throughout the landfills surrounding the facility. The wetlands likely provide habitat for various birds, amphibians, and reptiles. The grassy areas of the closed landfills to the north and south of the facility likely serve as a nesting area for various bird species, small mammals, and reptiles. There are also large tracts of property located approximately ¼ mile to the east of the facility that are currently undeveloped and consist of wooded and shrub dominated parcels. These parcels likely support various bird species, large and small mammals, reptiles and amphibians.

2.8.8 Water Resources

As previously noted, there are no wetlands or waterways located within the facility. There are several retention basins and drainage channels located throughout the landfill properties surrounding the facility that collect stormwater runoff from the area and channel it toward the Little Menomonee River. Stormwater on the facility flows to catch basins that direct flow to drainage ditches that lead to a detention basin located south of the facility on Waste Management's property. The flow continues through several additional detention basins

located on Waste Managements' property which are covered by their Plan of Operation. Outflow from the detention basins eventually flows to an unnamed tributary to the Menomonee River, which flows to Lake Michigan. The facility is not located within the Menomonee River floodplain, as shown on Figure 2-11. The closest area within the 100-year floodplain is located east of Boundary Road along an unnamed tributary to the Menomonee River.

2.8.9 Climatology and Air Emissions

Climatological data for Germantown and Milwaukee were obtained from the Midwestern Climate Center, Champaign, Illinois. The average annual maximum and minimum temperatures for Germantown during the period from 1971 to 2000 are 54.3 and 34.8 °F, respectively. The average annual precipitation for Germantown is 33.45 inches. The average annual snowfall is 44.0 inches. An annual wind rose for Milwaukee, Wisconsin from 1961 to 1990 is included in Figure 2-10.

The facility currently operates under an air permit received through the WDNR(Appendix B). Within a one-mile radius of the facility there are 11 additional facilities that are currently permitted for air discharges by the WDNR. Current air discharges at the facility are primarily related to volatile organics released from drums when they are sampled and processed, during the waste transfer process when waste is temporarily exposed to the atmosphere and from truck engines while they are operating at the facility.

2.8.10 Land Use

Existing land use in the area surrounding the facility is primarily industrial, with the existing Waste Management landfill dominating the area. The area is zoned as Heavy Industrial on the Menomonee Falls Zoning Map shown in Figure 2-5. Land to the east of the facility in the City of Milwaukee is zoned for Light Industrial use, as shown on Figure 2-6. Land to the northeast, which is located in the City of Mequon, is zoned for light and rural industrial land use, as shown in Figure 2-7. Land to the north in the Village of Germantown is zoned

for general industrial land use, as shown in Figure 2-8, and is the location of the closed Waste Management Omega Hills landfill.

2.8.11 Socioeconomics

The area surrounding the facility is used for industrial purposes, therefore no residences are located in the vicinity. Socioeconomics are not an issue in the surrounding area.

2.8.12 Special Resources

There are no known special resources, such as protected species, Areas of Special Natural Resources Interest (ASNRI), or archaeologic sites mapped on the facility or in the surrounding area.

2.9 Non-Hazardous Operations

The facility also houses a permanent Household Hazardous Waste (HHW) collection facility. Veolia along with municipalities or government agencies, collect hazardous chemicals from the residents of Waukesha and Milwaukee Counties. This acts as an outlet for these types of waste to ensure they are not being poured down the drain, applied to the land or thrown out with the regular trash. Residents of the two counties can drop off waste three days per week. Associated with the HHW collection is a Product Re-use area where unused or re-usable products are stored and available to the public free of charge.

The permanent HHW collection facility receives HHW material from other permanent and temporary collections that are held throughout the Midwest. Once received at the Veolia facility in Menomonee Falls, these materials may be further processed prior to shipment offsite to the end disposal facility. The processing may include the bulking of flammable liquids from their original container into 55-gallon containers, pumping of flammable liquids from 55-gallon drums into a semi tanker for transportation off site, and the bulking of closed paint cans and poison solids into roll-off boxes.

Wastes from Very Small Quantity Generators (VSQG) are also received at the permanent HHW facility. When accepting material from a VSQG, a receipt is issued to the VSQG to document the delivery of each shipment. The receipt will include the following information:

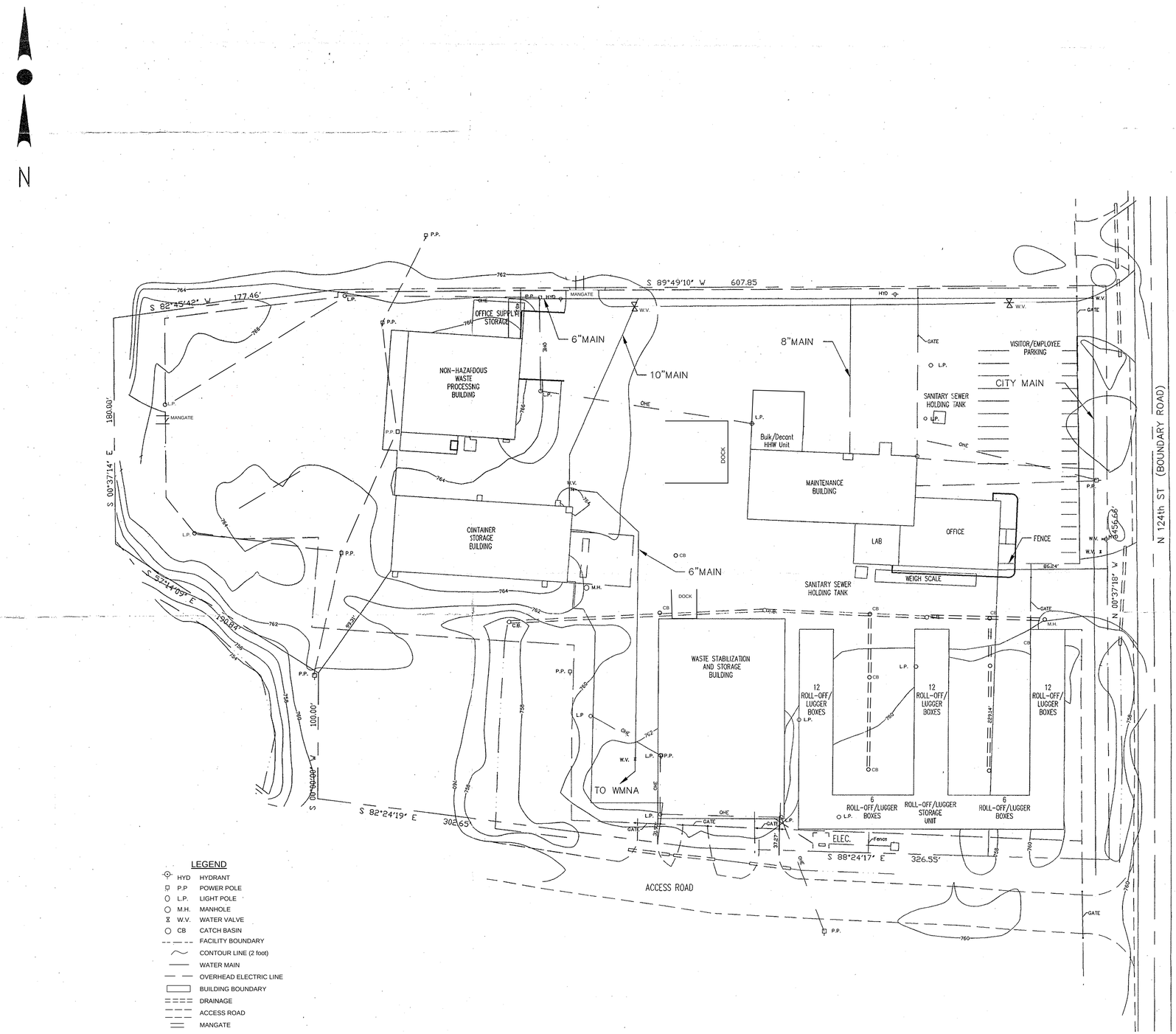
- The Very Small Quantity Generator's name and generation address, including county;
- Type of hazardous waste received, hazardous waste code, quantity and units of measure;
- Date of receipt;
- A signed and dated certification statement as follows:

> "I, (insert the very small quantity generator's name), certify that I am currently knowledgeable of the hazardous waste regulations as they pertain to my business and certify that the hazardous waste listed was generated by a very small quantity generator of hazardous waste. I further certify that a copy of this receipt shall be kept in the business files at the place of hazardous waste generation for regulatory review for a minimum of three years from this date."

The Veolia-Menomonee Falls facility also accepts non-hazardous solid, liquid and sludge wastes for solidification followed by landfill in appropriate drums, cubic yard boxes, pallets, tankers, roll-off boxes and lugger boxes. Upon arrival at the facility, all containers are inspected and sampled according to the WAP. Any container that is leaking or damaged is immediately re-containerized, over packed or processed.

After waste is sampled and received, drums and/or non-bulk containers are segregated by batch based on what landfill will be the ultimate disposal facility. Non-VES landfills will have passed the non-VES financial and environmental audits. The containers are then poured into a steel lined, cement encased processing pit and solidification reagent is added. An excavator then mixes the waste with the

solidification reagent until there are no free liquids. This solidified residual is then loaded into a transfer pit and then into dump trucks for transport to the landfill. Bulk tanker loads of liquids are loaded directly into the processing pit after the WAP analysis is complete and the waste is then solidified.



NOTES

REV. NO.	CODE CIRCLES	DATE	DESCRIPTION	SEC APPROVED
	REV. BY		NOTE: CIRCLE ALL REVISIONS, IDENTIFY WITH DIAMOND, NUMBER AND ARROW. REMOVE ONLY CIRCLE AND ARROW BEFORE NEXT REVISION.	

A	PRELIMINARY	C	MAT'L T.O.	F	CONST'N
B	DESIGN	D	MAT'L PURC.	G	
		E	BIDS	H	

SEAL

SIGNATURE

06/03/2013

DATE

DR.	DATE
DSGN.	SEC FILE NUMBER
CK.	
DPE	JOB NO.
CAD FILE NO.	

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road
Menomonee Falls, WI 53051

DRAWING TITLE

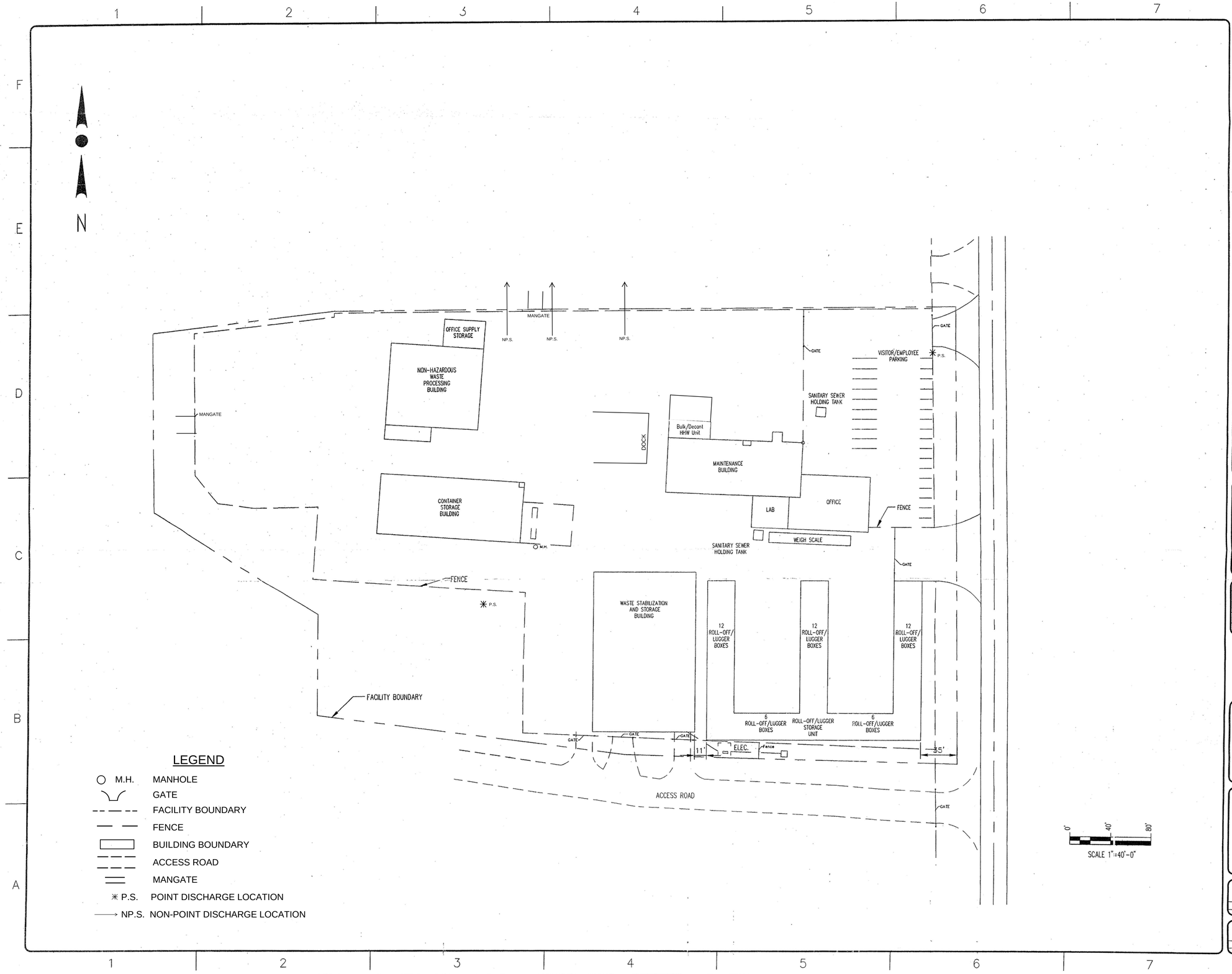
SITE LAYOUT

CLIENT DRAWING NUMBER

Figure 2-1

SEC DRAWING NUMBER

M1977-SL-02



NOTES

REV. NO.	CODE	CIRCLES	DATE	DESCRIPTION	SEC APPROVED
	REV. BY			NOTE: CIRCLE ALL REVISIONS, IDENTIFY WITH DIAMOND, NUMBER AND ARROW. REMOVE ONLY CIRCLE AND ARROW BEFORE NEXT REVISION.	

ISSUE CODE					
A	PRELIMINARY	C	MAT'L T.O.	F	CONST'N
B	DESIGN	D	MAT'L PURC.	G	
		E	BIDS	H	

SEAL

SIGNATURE

06/03/2013

DATE

DR.	DATE
DSGN.	SEC
CK.	FILE NUMBER
DPE	JOB NO.
CAD FILE NO.	

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road
Menomonee Falls, WI 53051

DRAWING TITLE

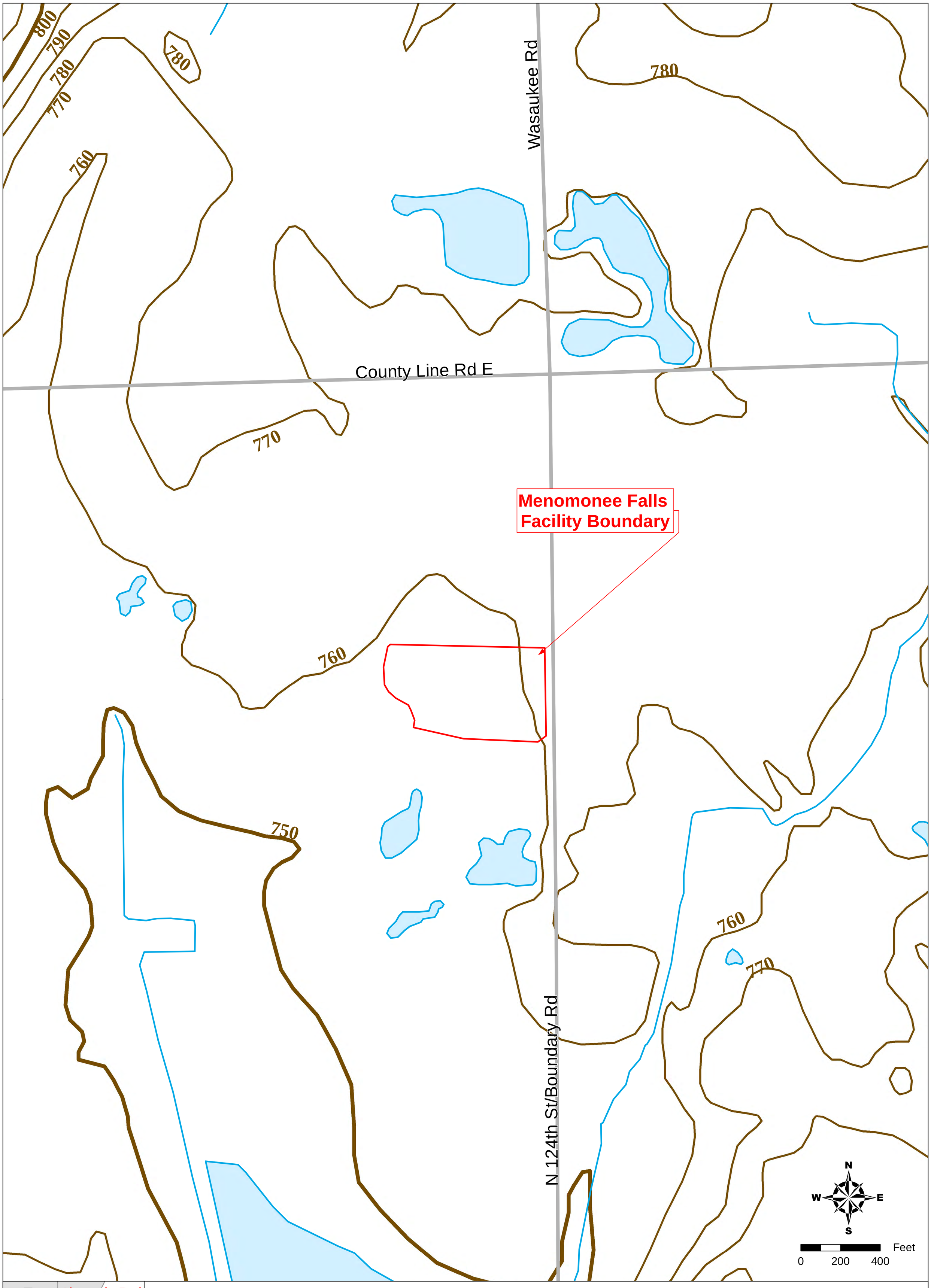
SITE LAYOUT

CLIENT DRAWING NUMBER

Figure 2-2

SEC DRAWING NUMBER

EM1977-SL-03



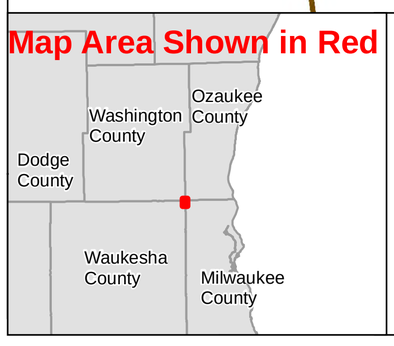


FIGURE 2-3
USGS TOPOGRAPHIC MAP
7.5 MINUTE SERIES
VEOLIA ES TECHNICAL SOLUTIONS LLC
WASHINGTON, WAUKESHA, OZAUKEE,
AND MILWAUKEE COUNTY, WI

Legend

Site Facility Boundary

Contour Line (feet above sea level)

06/25/2013

AECOM

ArcGIS Map Service World Topographic Map 2008, AECOM 2013

Figure 2-8

Figure 2-7

Figure 2-5

Figure 2-6

Menomonee Falls Facility Location

Map Area Shown in Red

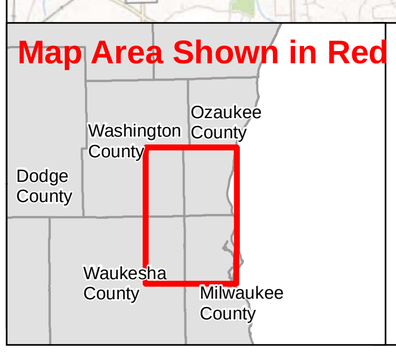


FIGURE 2-4
ZONING LOCATION MAP
VEOLIA ES TECHNICAL SOLUTIONS LLC
WASHINGTON, WAUKESHA, OZAUKEE, AND MILWAUKEE COUNTY, WI

Legend

- Site Facility Boundary
- Reference Boundaries for Figures 2-5, 2-6, 2-7, and 2-8

06/12/2013

AECOM

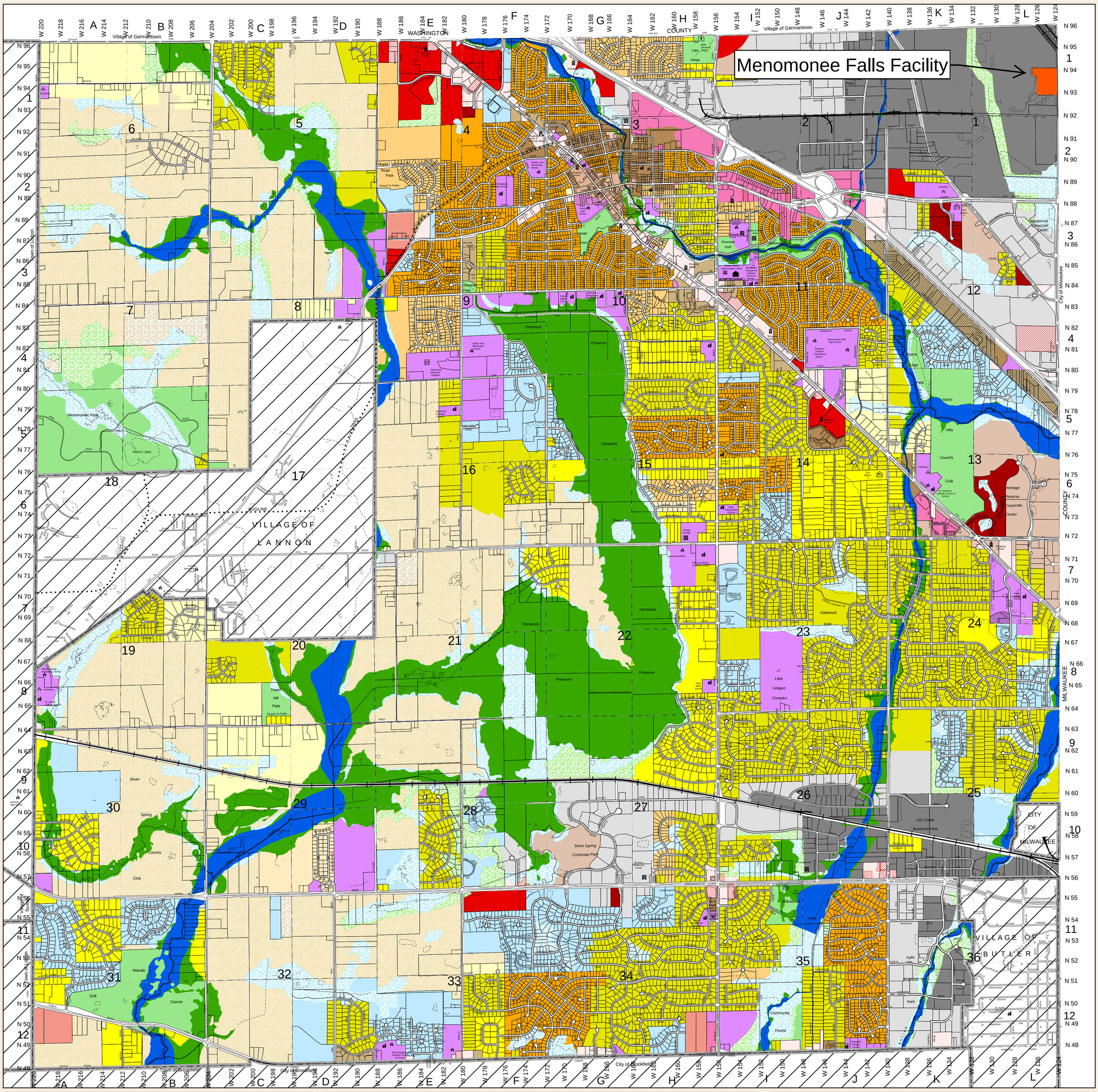
ZONING

Village of Menomonee Falls

---WAUKESHA COUNTY, WISCONSIN---

Figure 2-5

Zoning Map - Menomonee Falls



N
W E
S

0 0.25 0.5 1 1.5 Miles

Zoning Districts

- A-1 AGRICULTURE
- A-2 AGRICULTURE/URBAN FRINGE
- C-1 NEIGHBORHOOD BUSINESS
- C-2 COMMUNITY BUSINESS
- C-3 PLANNED DEVELOPMENT
- C-4 SUBURBAN RETAIL BUSINESS
- C-6 OFFICE
- CW-1 CONSERVANCY WETLANDS
- FLOOD FRINGE
- FLOODWAY
- I-1 LIGHT INDUSTRIAL
- I-2 HEAVY INDUSTRIAL
- I-3 OFFICE & LIGHT INDUSTRIAL
- P-1 PARK & OPEN SPACE
- P-2 INSTITUTIONAL
- PDD PLANNED DEVELOPMENT DISTRICT
- PRD PLANNED RESIDENTIAL DEVELOPMENT
- R-1 SINGLE FAMILY RESIDENTIAL
- R-2 SINGLE FAMILY RESIDENTIAL
- R-3 SINGLE FAMILY RESIDENTIAL
- R-3.5 SINGLE FAMILY RESIDENTIAL
- R-4 SINGLE FAMILY RESIDENTIAL
- R-5 SINGLE FAMILY RESIDENTIAL
- R-6 SINGLE FAMILY RESIDENTIAL
- RM-1 MULTI FAMILY RESIDENTIAL
- RM-2 MULTI FAMILY RESIDENTIAL
- SHORELAND WETLANDS

Menomonee Falls Facility

Zoning Overlays

- PID - Planned Infill Development
- OVC - Village Centre
- OC5 - Commercial Service

Map Accuracy: National Map Accuracy Standards
Coordinate System: State Plane Coordinate System
Datum: North American Datum, 1927

* Denotes Private Road

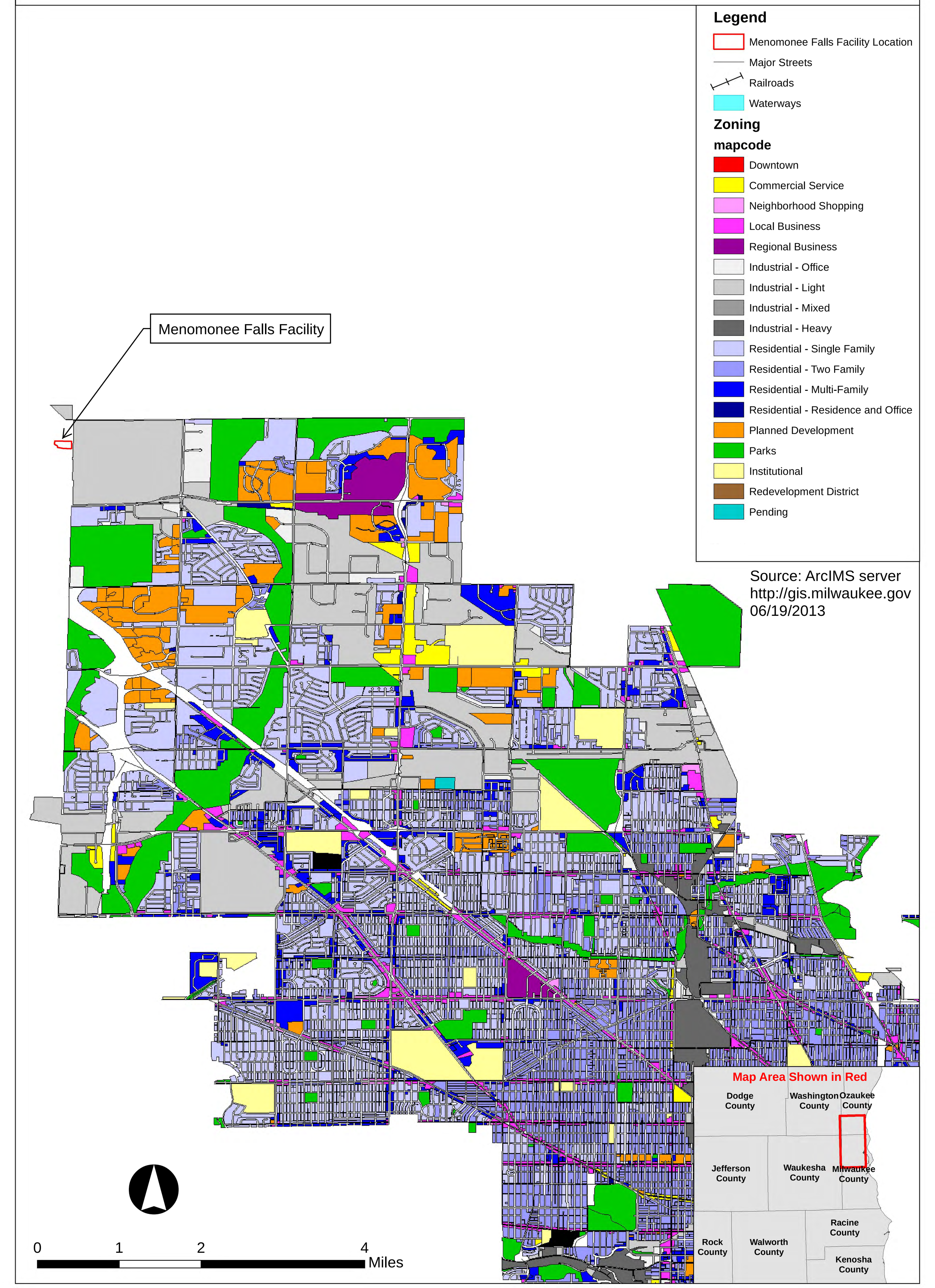
October, 2012

G:\projects\infoproj\common\CommunityDevelopment\Zoning\Zoning_ovrly&dist(11x17).mxd

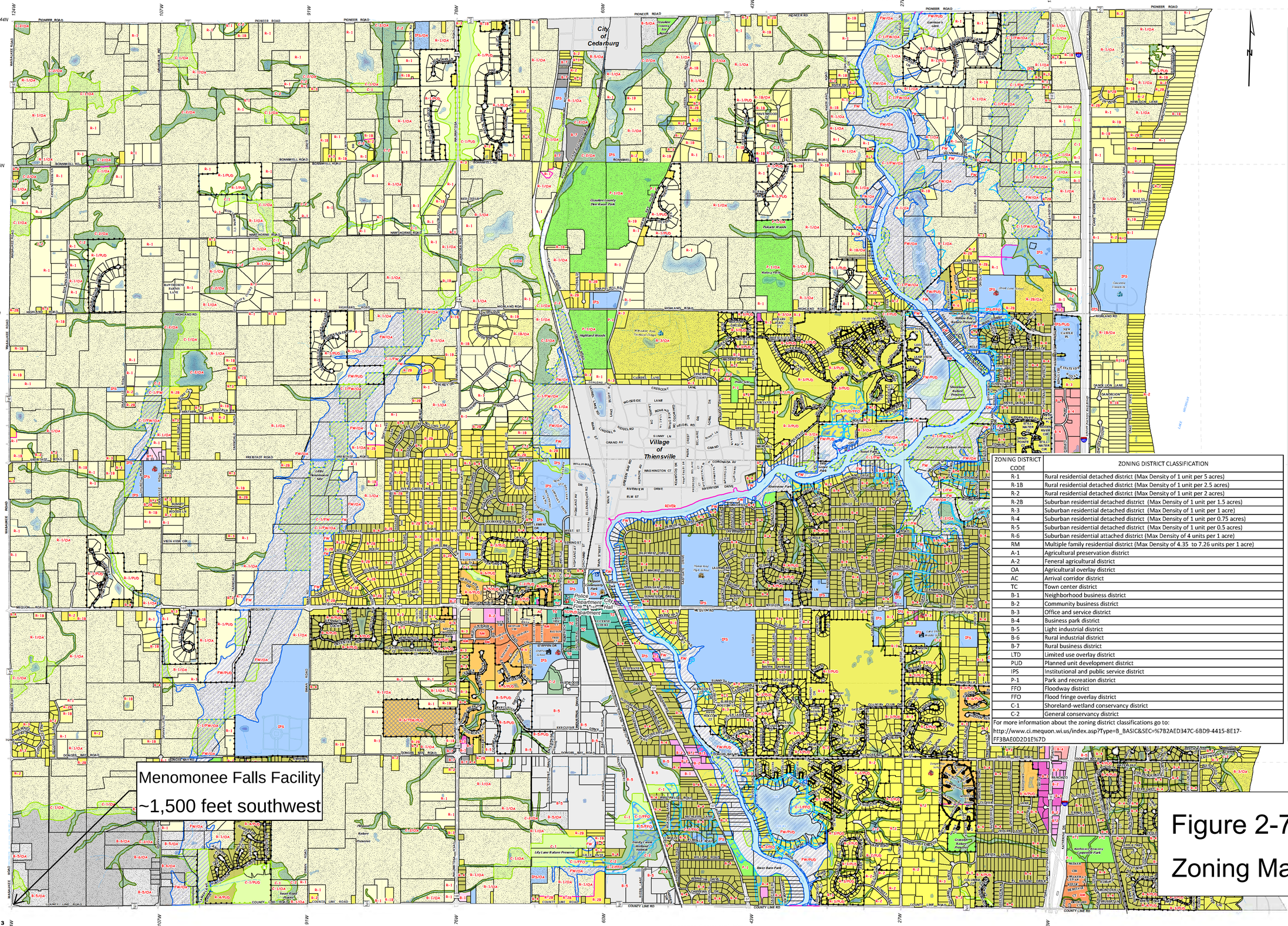
Source: http://www.menomonee-falls.org/DocumentCenter/Home/View/635

06/03/2013

Figure 2-6: City of Milwaukee Zoning Map



City of Mequon Zoning



ZONING DISTRICT CODE	ZONING DISTRICT CLASSIFICATION
R-1	Rural residential detached district (Max Density of 1 unit per 5 acres)
R-1B	Rural residential detached district (Max Density of 1 unit per 2.5 acres)
R-2	Rural residential detached district (Max Density of 1 unit per 2 acres)
R-2B	Suburban residential detached district (Max Density of 1 unit per 1.5 acres)
R-3	Suburban residential detached district (Max Density of 1 unit per 1 acre)
R-4	Suburban residential detached district (Max Density of 1 unit per 0.75 acres)
R-5	Suburban residential detached district (Max Density of 1 unit per 0.5 acres)
R-6	Suburban residential attached district (Max Density of 4 units per 1 acre)
RM	Multiple family residential district (Max Density of 4.35 to 7.26 units per 1 acre)
A-1	Agricultural preservation district
A-2	Feneral agricultural district
OA	Agricultural overlay district
AC	Arrival corridor district
TC	Town center district
B-1	Neighborhood business district
B-2	Community business district
B-3	Office and service district
B-4	Business park district
B-5	Light industrial district
B-6	Rural industrial district
B-7	Rural business district
LTD	Limited use overlay district
PUD	Planned unit development district
IPS	Institutional and public service district
P-1	Park and recreation district
FFO	Floodway district
FFO	Flood fringe overlay district
C-1	Shoreland-wetland conservancy district
C-2	General conservancy district

For more information about the zoning district classifications go to:
http://www.ci.mequon.wi.us/index.asp?Type=B_BASIC&SEC=%7B2AED347C-6BD9-4415-8E17-FF3BAE0D2D1E%7D

- AC
- AC/PUD
- B-1
- B-2
- B-2/FFO
- B-2/PUD
- B-3
- B-3/FFO
- B-3/LTD
- B-3/PUD/LTD
- B-4
- B-4/PUD
- B-5
- B-5/FFO
- B-5/OA
- B-5/PUD
- B-6/OA
- B-7
- C-1
- C-1/FFO
- C-1/FW
- C-1/FW/OA
- C-1/FW/PUD
- C-1/OA
- C-1/PUD
- C-1/PUD/FFO
- C-1/ROW
- C-1/ROW/FFO
- C-2
- C-2/FFO
- C-2/FW
- C-2/FW/OA
- C-2/FW/PUD
- C-2/OA
- C-2/PUD
- C-2/PUD/FFO
- C-2/PUD/ROW
- C-2/ROW
- C-2/ROW/FFO
- FW
- FW/OA
- FW/PUD
- GFP
- IPS
- IPS/FFO
- IPS/OA
- IPS/PUD
- P-1
- P-1/FFO
- P-1/FW/PUD
- P-1/OA
- P-1/PUD
- R-1
- R-1/FFO
- R-1/OA
- R-1/OA/FFO
- R-1/PUD
- R-1B
- R-1B/FFO
- R-1B/OA
- R-2
- R-2/FFO
- R-2/OA/FFO
- R-2/PUD
- R-2B
- R-2B/FFO
- R-2B/OA
- R-3
- R-3/FFO
- R-3/OA
- R-3/PUD
- R-3/PUD/FFO
- R-4
- R-4/FFO
- R-4/OA
- R-4/PUD
- R-4/PUD/FFO
- R-5/PUD
- R-6
- R-6/FFO
- R-6/PUD
- R-6/TDR/PUD
- RIVER
- RM
- RM/PUD
- TC
- TC/FFO
- TC/PUD

Date: 5/7/2013
Data Current: April, 2010
Path: \\GIS_SERVER\data-work\Projects\00004\Surrounding_Zoning_Arch_D_Website.mxd

Reference Scale: 1:18,000

0 1 2 3 4 Miles

Figure 2-7
Zoning Map - Mequon

06/19/2013

Source: http://www.ci.mequon.wi.us/vertical/Sites/%7BEC6048ED-C06B-457B-A49D-CC38EE9D051C%7D/uploads/Zoning_Arch_D_Website.pdf

Figure 2-8

Germantown Zoning Map

Monument

Hydrology

- **Water Body Major**
- **River / Creek**
- **River Body**

Zoning

- A-2
- B-1
- B-2
- B-3
- B-4
- B-5
- EH
- I
- MHP
- M-1
- M-2
- M-4
- Rd-2
- Rm-1
- Rm-2
- Rm-3
- Rs-1
- Rs-2
- Rs-3
- Rs-4
- Rs-5
- Rs-6
- Rs-7

ZONING KEY

A-1	Agricultural District
A-2	Agricultural District
Rs-1	Single-Family Residential District
Rs-2	Single-Family Residential District
Rs-3	Single-Family Residential District
Rs-4	Single-Family Residential District
Rs-5	Single-Family Residential District
Rs-6	Single-Family Residential District
Rs-7	Single-Family Residential District
Rd-2	One-Family and 2-family Residential District
Rm-1	Multiple-Family Residential District
Rm-2	Multiple-Family Residential District
Rm-3	Multiple-Family Residential District
EH	Elderly Housing District
MHP	Mobile Home Park Residential District
I	Institutional District
PD	Planned Development District
B-1	Neighborhood Business District
B-2	Community Business District
B-3	General Business District
B-4	Professional Office District
B-5	Highway Business District
M-1	Limited Industrial District
M-2	General Industrial District
M-3	Special Use Industrial District
M-4	Mineral Extraction District
HIA	Highway Interchange Area District (Overlay District)
FW	Floodway District
FF	Flood Fringe District

Village Land

Town Land

N W E S

SCALE 1 : 16,900

1,000 0 1,000 2,000 3,000

FEET

06/06/2013

Sources: Germantown GIS services at:
http://rmgis.ruekert-mielke.com/Germantown/

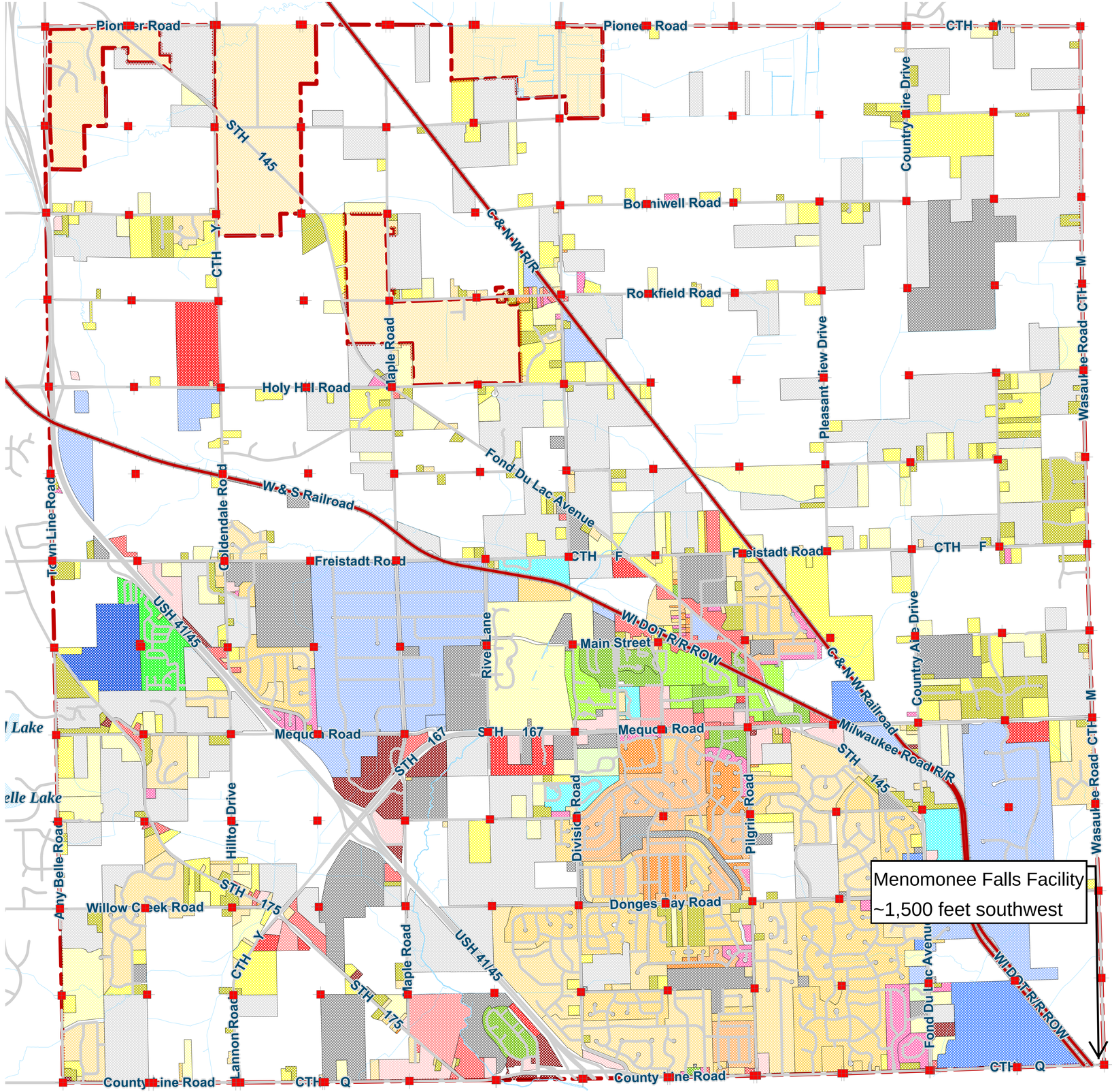
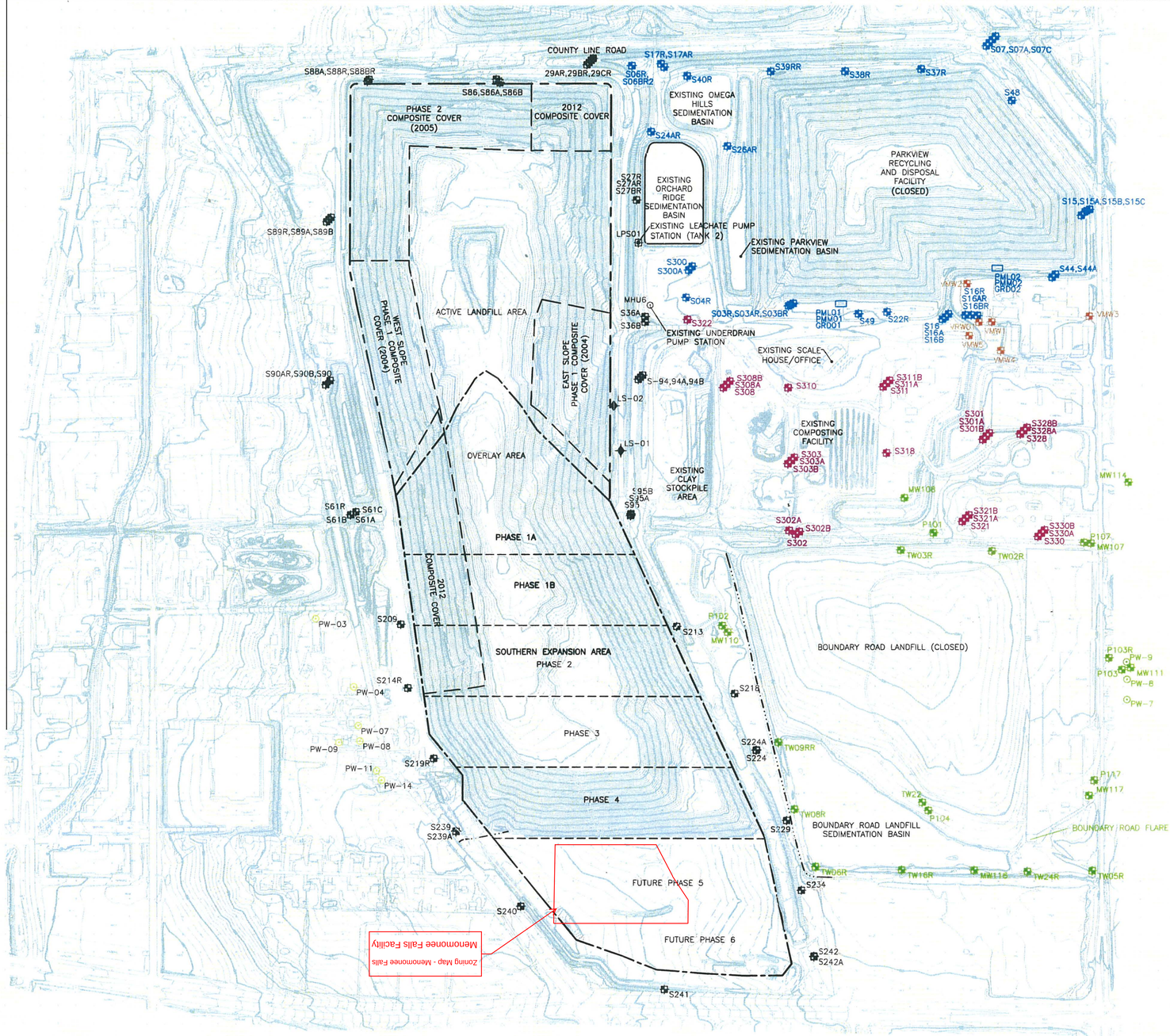


Figure 2-5



NOTES:

1. TOPOGRAPHIC SURFACE OUTSIDE OF WASTE LIMIT PROVIDED BY SURDEX DATED FEBRUARY, 6, 2006 AND INSIDE OF WASTE LIMIT THE SURVEY PERFORMED BY CQM, INC. ON SEPTEMBER 20, 2012.
2. TOPOGRAPHIC CONTOUR INTERVAL IS TWO FEET.
3. ELEVATIONS ARE BASED ON USGS MEAN SEA LEVEL DATUM.
4. GRID BASED ON WISCONSIN STATE PLANE COORDINATE SYSTEM, SOUTH ZONE (NAD27).
5. BOUNDARY ROAD LANDFILL MONITORING SYSTEM SHOWN IN GREEN.
6. PARKVIEW RDF MONITORING SYSTEM SHOWN IN BLUE.
7. PROPOSED EASTERN EXPANSION SYSTEM SHOWN IN RED. WELLS S308, S308A, S308B, S310, S311, S311A, S311B, S318, S303, S303A, S303B, S301, S301A, S301B, S321, S321A, S321B, S322 AND MW108 ARE NOT PART OF THE LONG TERM MONITORING PROJECT.
8. LOW LEVEL VOC IMPACT APEA REMEDIAL ACTION PROJECT, WDNR BRRTS #02-58-553602 WELLS SHOWN IN ORANGE.

RELEASE	DATE:	BY:
Project Review		
5		
4		
3		
2		
1		
NO.	DATE:	BY:
DESCRIPTION		
REVISIONS		

WASTE MANAGEMENT

Figure 2-9
Well Locations Within 1000 Feet

Orchard Ridge RDF
Menomonee Falls, Wisconsin

DRAWN BY: WBE

DATE: Nov. 2012

SCALE: 1"=300'

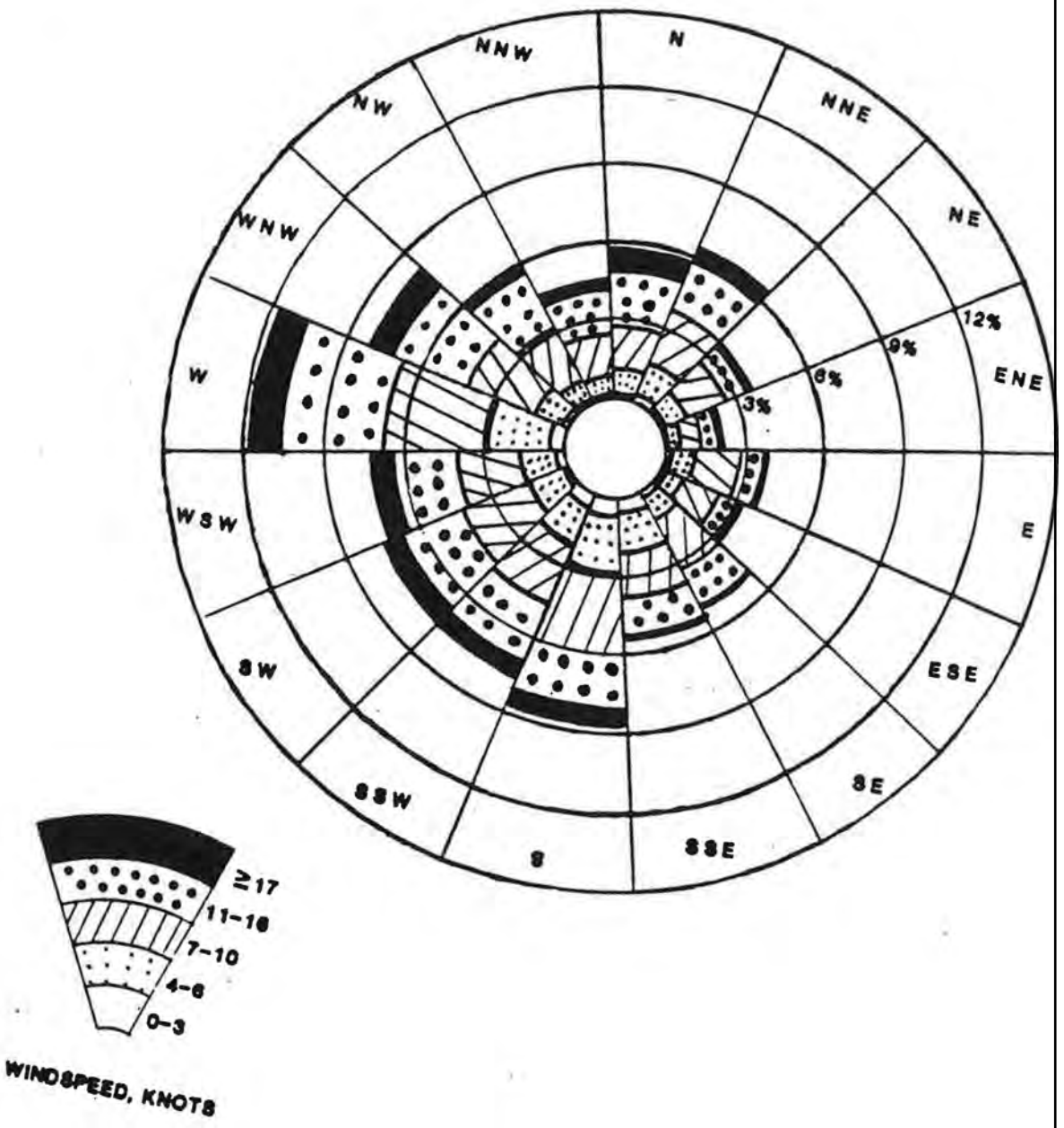
DRAWING NO.
1

MILWAUKEE, WISCONSIN
1965–1974

FIGURE 2-10

Figure 2-5

29,215 OBSERVATIONS
2.2% CALM



WIND ROSE

Figure 2-11

Legend

- Menomonee Falls Facility Location
- Municipal Boundaries
- 100 Year Floodplain
- 500 Year Floodplain
- Floodway

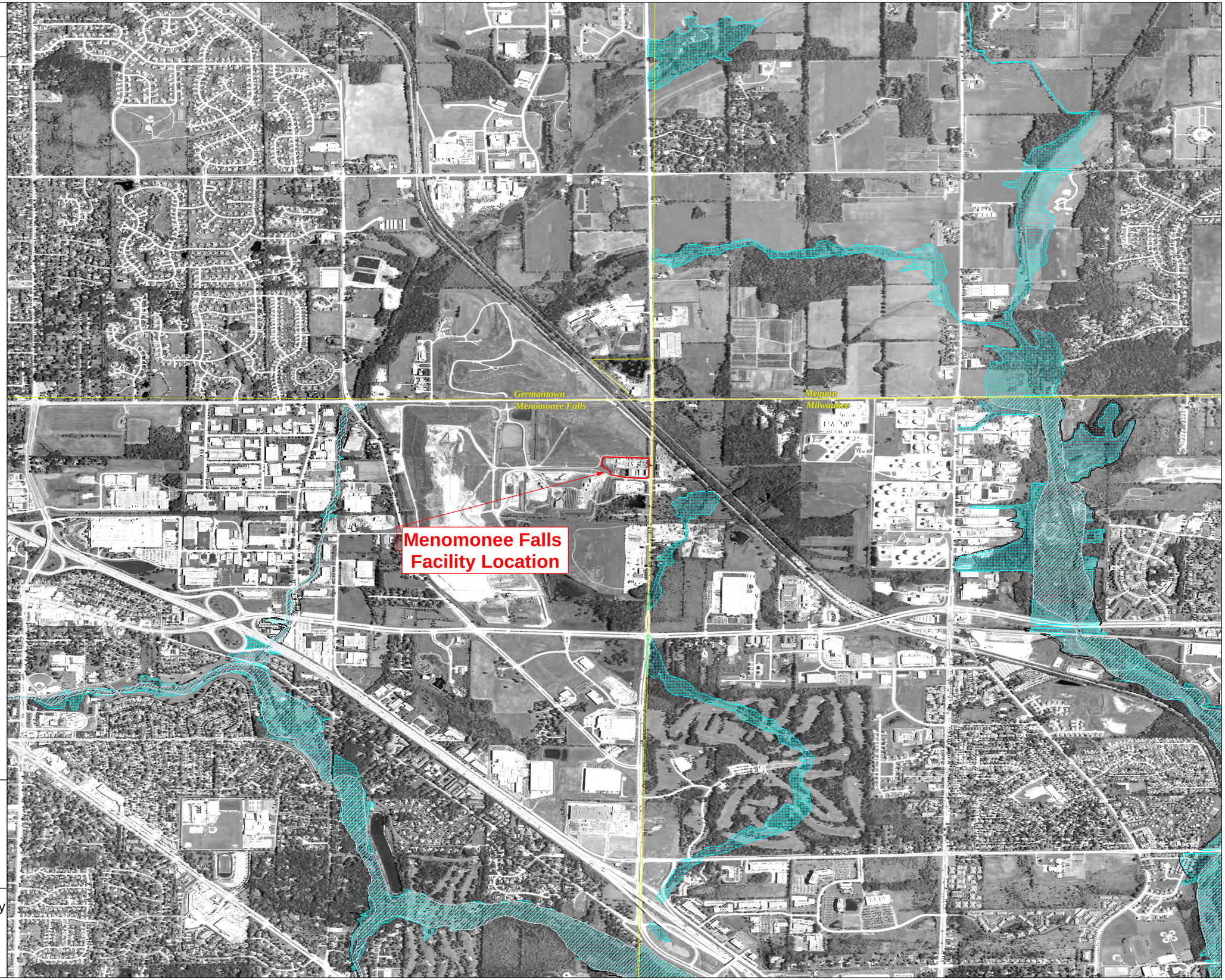
N
W E
S

0 1,000 2,000 4,000 Feet

AECOM

06/12/2013

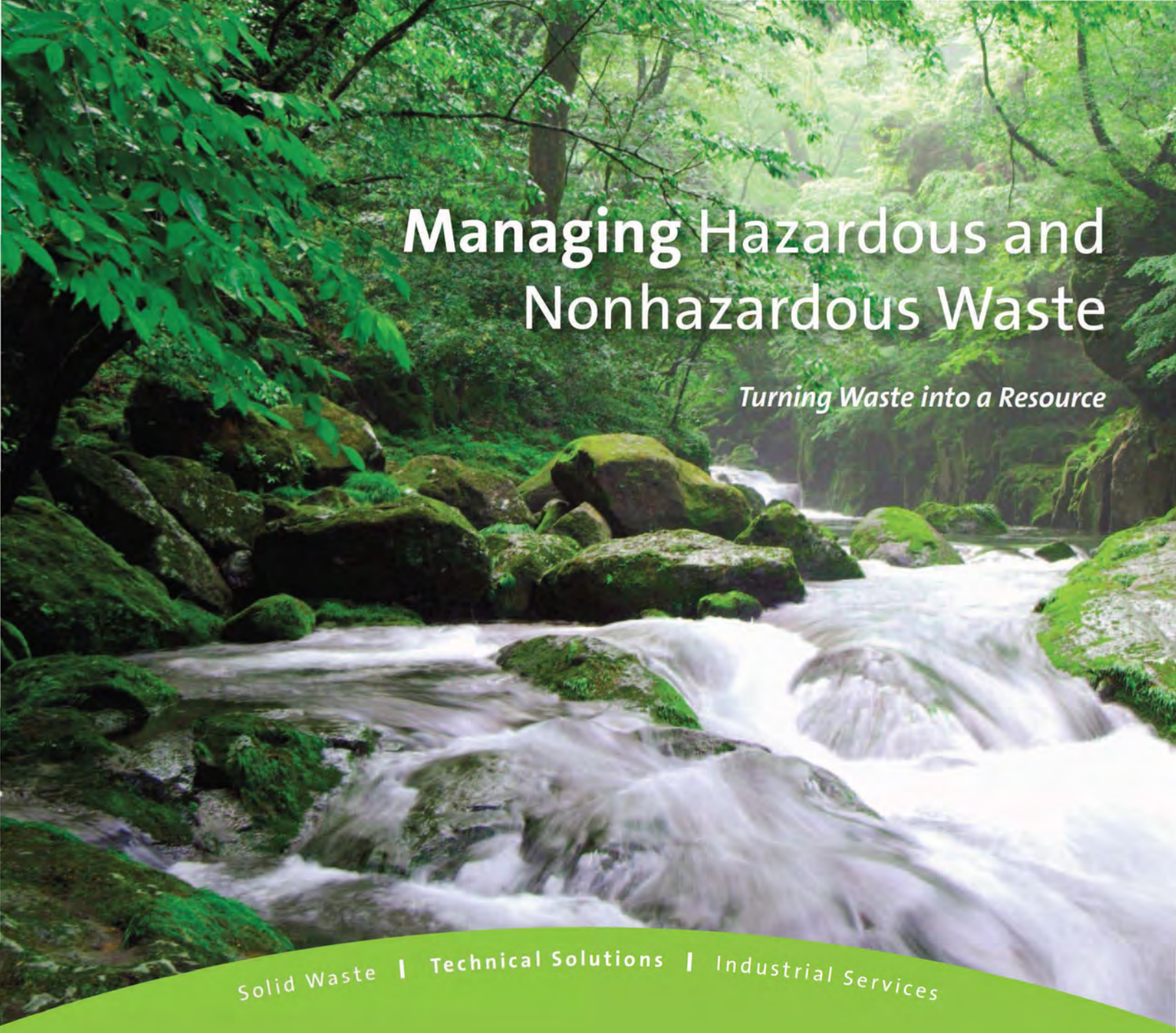
Sources: 100 Year Flood Layer provided by the Current FEMA Issued Flood Maps to the Wisconsin Department of Natural Resources and NAIP 2010 Images.



F I G U R E 2 - 1 2

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

OPERATED FACILITIES



Managing Hazardous and Nonhazardous Waste

Turning Waste into a Resource

Solid Waste | **Technical Solutions** | Industrial Services

VEOLIA
ENVIRONMENTAL
SERVICES

Veolia Environnement

- $49.7 billion in revenue
- Fortune global 150 company
- Operating in 74 countries with 1,340 companies
- 313,000 employees focused on delivering environmentally sustainable solutions
- Over 150 years of experience

Call today for your free on-site waste evaluation 888-262-4910

VEOLIA
ENVIRONMENTAL
SERVICES

Why Veolia ES Technical Solutions

Managing Hazardous and Nonhazardous Waste

When you manage multiple environmental responsibilities, including hazardous waste and its associated liability, you must rely on the capabilities and expertise of your service provider. Veolia ES Technical Solutions (Veolia) stands alone in meeting the criteria you use to determine the most viable environmental service partner.

From on-site services and transportation to final treatment or disposal, Veolia assures regulatory compliance by channeling hazardous and nonhazardous waste and related information through its network of nearly 400 company owned or certified service centers nationwide. These service centers include treatment, recovery and disposal facilities, sales offices and transportation locations.

Environmental Compliance

Veolia maintains an excellent record of compliance with environmental regulations. This record is ready for inspection at any time. A culture of compliance is a way of life at Veolia, where we manage hazardous and nonhazardous waste with the utmost care. We follow procedures meticulously with our on-site teams, and continue to focus on the details throughout transportation, treatment and disposal. Our waste processing, storage and disposal locations are routinely audited and certified, and all disposal documentation is verified to assure compliance.

Financial Strength

Our parent is Veolia Environnement, a publicly owned company with over 150 years of experience delivering environmental solutions. The Paris-based company is the international leader in providing environmental services for waste, water, energy and transportation. With over $49 billion in revenue, it is the largest environmental services company in the world.

Technical Expertise

Our account, project and technical representatives understand hazardous and nonhazardous waste and the related regulatory requirements. Over 1,600 Veolia employees are ready to assist you in any way—from providing information about government regulations and answering technical questions regarding treatment alternatives, to training your employees and setting up disposal programs that save you time and money.

Excellent Health and Safety Record

Safety is critical in our business, and Veolia's safety record is strong. Our OSHA log summary shows a recordable injury case rate that is less than half the average for the North American Industry Classification System, and a lost time injury case rate that is less than 10% of the NAICS average. Similarly, our Experience Modification Rate, which is used by the insurance industry to determine premiums for workers compensation insurance and is based on past safety performance, is lower than 96% of our competitors. The reason for our excellent record is, simply, training excellence. Our field employees alone receive nearly twice as much training than is required by government regulations.

Innovation through Research

Veolia Environnement has established the only research and development program in the world dedicated to environmental services, with laboratories in France, Australia, Germany, the United Kingdom, and the United States. This program develops technical innovations for nonhazardous and hazardous waste processes, recovery and disposal, supporting Veolia's commitment to environmental sustainability. Locally, we use these innovative processes to improve our efficiencies in recycling electronic waste, metal scrap and organic solvents.

Reuse, Recycle, Reduce Waste

To ensure the most cost effective waste processing, we evaluate your waste streams to reduce overall waste volume and expense, while minimizing environmental impact. We always look for ways to reuse, recycle and reduce waste, including using waste as a product. Annually, Veolia transforms over 400 million pounds of waste into a resource through energy recovery, recycling and product substitution. Over 60 million pounds of that waste was converted into usable products, rather than considered hazardous waste under RCRA. Throughout all of our operations, we are pursuing waste treatment options to assure sustainability.

Environmentally Compliant

Financially Sound

Reducing Waste, Reducing Costs

On Call 24/7

www.veoliaes.com

Industries Served

Utilities
Refining
Chemical
Aerospace
Automotive
Manufacturing
Metals
Pulp and paper
Government and municipalities
Universities and hospitals
Healthcare
High technology and electronics
Pharmaceutical and biotechnology
Service providers
Consumer products

Waste Managed

Nonhazardous
Agricultural waste
Medical waste
Laboratory chemicals
Controlled substances
Catalysts and reagents
Polychlorinated biphenyls
Low-level radioactive waste
Household hazardous waste
Process solids, liquids and sludges
Returned goods/off-spec/ out-of-date products
Cylinders, propellants, explosives and pyrotechnics
Reclaimable organic solvents

Capabilities for Each Location

Full Service

Not All Services Available

Sales/Processing/Other

Site Name	State	Phone	Customer Service Level	Sales Office	Incineration	Energy Recovery (Fuels Blending)	Recycling & Recovery	Stabilization/Landfill	Lighting & Electronic Recycling	Permitted TSDF	10 Day In Transit
Phoenix	AZ	602-233-2955	●	●					●	●	●
Azusa	CA	800-395-6726	●	●		●	●			●	●
Fremont	CA	800-325-2382	●	●							●
Huntington Beach	CA	800-303-6320	●	●							●
Richmond	CA	800-243-2382	●	●						●	
Sacramento	CA	916-379-0872	●	●							●
San Diego	CA	800-956-5782	◐	●							●
Henderson	CO	303-289-4827	●	●		●	●			●	●
Newington	CT	860-667-6003	●	●							
Tallahassee	FL	850-877-8299	◐	●					●	●	
Morrow	GA	800-443-5645	●	●						●	●
Lombard	IL	800-667-2387	◐	●							
Lombard	IL	630-364-1760	◐				●				
Sauget	IL	618-271-2804	●	●	●					●	●
East Chicago	IN	800-548-4458	●	●							●
Indianapolis	IN	317-917-3904	●	●							
Louisville	KY	502-375-2386	●	●							●
Baton Rouge	LA	225-293-4600	◐	●							
Marlborough	MA	800-354-2382	●	●							
Stoughton	MA	781-341-6080	◐	●					●		
Livonia	MI	734-632-8459	●	●							●
Blaine	MN	888-887-9457	●	●							●
Mooresville	NC	704-662-3044	●	●							●
Creedmoor	NC	919-528-3996	●	●						●	●
Flanders	NJ	800-426-2382	●	●						●	●
Middlesex	NJ	732-469-5100	●	●		●	●			●	●
Colonie	NY	518-382-0246	●	●							●
Tonawanda	NY	716-879-0600	●	●							●
Wantagh	NY	516-221-8300	●	●							●
North Jackson	OH	330-538-0600	●	●			●				●
West Carrollton	OH	937-859-6101	●	●		●	●			●	●
Philadelphia	PA	800-423-2382	●	●							●
Wampum	PA	724-535-5777	◐	●			●			●	●
York	PA	888-877-2387	●	●							●
Gurabo	PR	787-744-0070	●	●							●
Baytown	TX	800-624-9302	●	●							●
Port Arthur	TX	409-736-2821	●	●	●					●	●
North Salt Lake	UT	801-294-7111	●	●							●
Fredericksburg	VA	540-368-9780	●	●							●
Richmond	VA	804-233-6980	●	●							●
Kent	WA	425-272-0772	●	●							●
Vancouver	WA	360-260-0882	●	●							●
Greenville	WI	920-757-5265	◐	●							
Menomonee Falls	WI	800-255-5092	●	●		●		●		●	●
Port Washington	WI	262-243-8900	●	●					●	●	●
Poca	WV	304-759-1055	●	●							●

Services and Technologies

On Call 24/7

- Convert Waste to Product
- Electronics Recycling
  - Computers and Electronics
  - Mercury Compounds
  - Batteries
  - Power Distribution Equipment
  - Lamps and Ballasts
  - RECYCLEPAK®
- Emergency Response 24/7
- Energy Recovery (Fuels Blending)
- Household Hazardous Waste
- Incineration
  - RCRA, TSCA, CERCLA
  - Nonhazardous
- Laboratory Chemical Services
  - Lab Packing Using Computerized System
  - Chemical Inventory
  - Equipment Decontamination
- Low-Level Radioactive Waste
- Medical Waste Services
- Online Services
  - Web-Based Waste Profiling, Invoicing and Reporting
- On-Site Services
- Program Management
- Reactive Chemicals Management
  - Remote Opening
  - Specialized Packaging and Transport
  - High Hazard Chemicals
- Recycling and Recovery
  - Ethanol Recovery/Secure Brand Destruction
  - Solvents and Thinners
- Remediation
- Secure Beverage Destruction/Ethanol Production
- Specialty Services
  - Unknown Drum Identification
  - Cylinder Sampling, Identification and Disposal
  - Chemical Moving Services
  - Consumer Commodity Disposal
- Stabilization and Landfill
- Training and Awareness Programs
  - Customized Training Courses
- Transportation
- Veolia Audited Facilities

Turning Waste into a Resource

VEOLIA
ENVIRONMENTAL
SERVICES

Check out Veolia online at www.veoliaes.com

Click on "Technical Solutions".
Once you're registered you can:

- Complete Waste Profiles
- Review Invoices
- Print Certificates of Tracking
- Retrieve Generator Waste Shipment Data

04.10

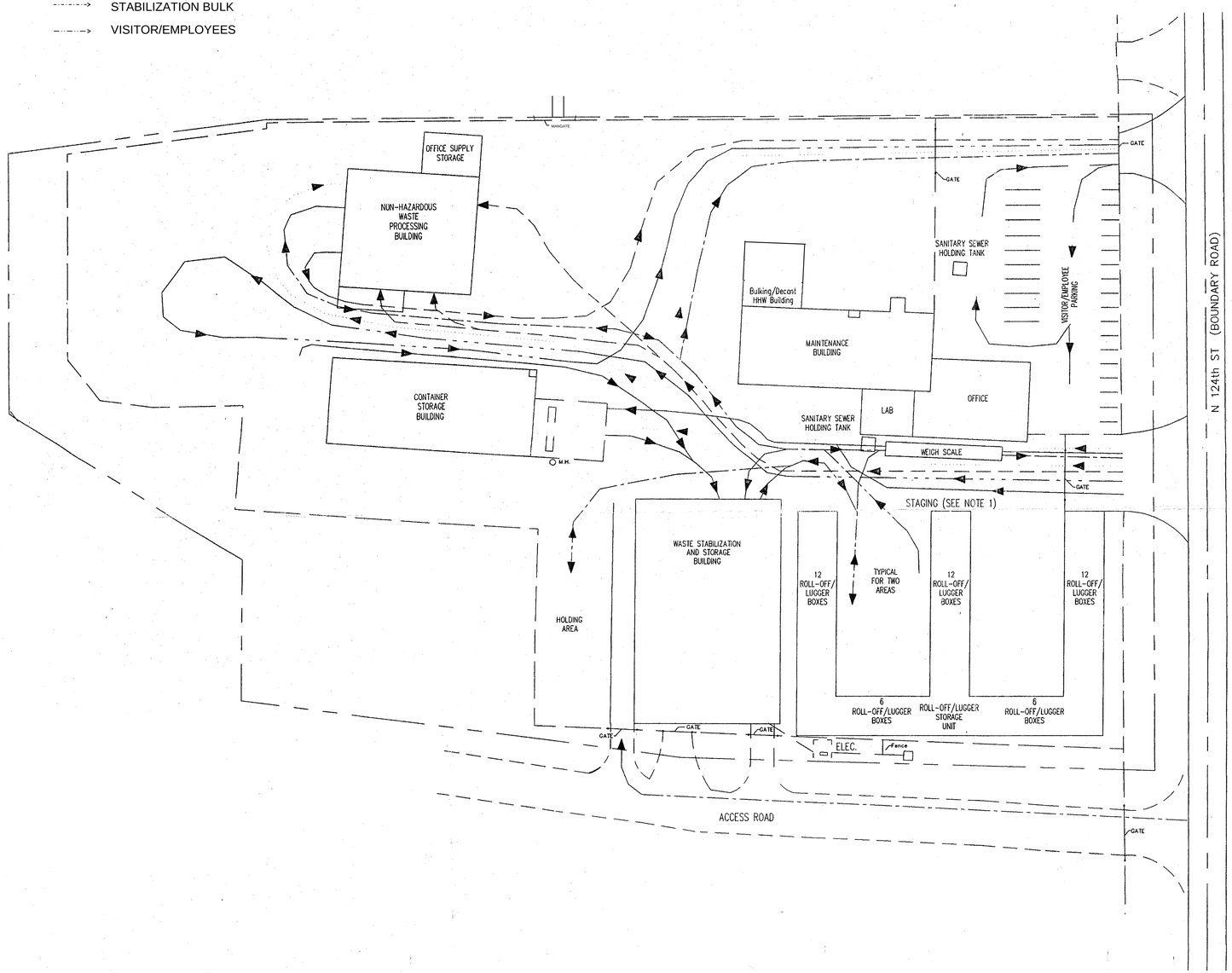
LEGEND

- M.H. MANHOLE
- FACILITY BOUNDARY
- BUILDING BOUNDARY
- ACCESS ROAD

TRAFFIC PATTERNS

- NON-HAZARDOUS PROCESS
- TANKER-REPACK/DECANT
- HAZARDOUS, RCRA STORAGE
- STABILIZATION DRUMS
- STABILIZATION BULK
- VISITOR/EMPLOYEES

N



NOTES

1. EXISTING STAGING AREA FOR WASTE STABILIZATION PROCESS WILL CONTINUE TO BE UTILIZED UNTIL THE 48 UNIT ROLL-OFF STORAGE UNIT IS CONSTRUCTED.

REV. NO.	CODE CIRCLES	DATE	DESCRIPTION	SEC APPROVED
	REV. BY		NOTE: CIRCLE ALL REVISIONS, IDENTIFY WITH DIAMOND, NUMBER AND ARROW. REMOVE ONLY CIRCLE AND ARROW BEFORE NEXT REVISION.	

ISSUE CODE		C	MAT'L T.O.	F	CONST'N
A	PRELIMINARY	D	MAT'L PURC.	G	
B	DESIGN	E	BIDS	H	

SEAL

SIGNATURE

06/19/2013

DATE

DR.	DATE
DSGN.	SEC FILE NUMBER
CK.	
DPE	JOB NO.
CAD FILE NO.	

Veolia ES Technical Solutions, L.L.C.
W124 N9451 Boundary Road
Menomonee Falls, WI 53051

DRAWING TITLE

TRAFFIC PATTERNS

CLIENT DRAWING NUMBER

Figure 2-5

SEC DRAWING NUMBER

M1977-SL-08