

## Public Hearing

Wayne Disposal, Inc.  
Hazardous Waste Landfill Disposal Facility  
49350 North I-94 Service Drive  
Belleville, Michigan

Van Buren Township Hall

July 19, 2018

6:30 p.m.



## Agenda

- 6:30PM – 7:00PM: Informational Session
  - CTI Landfill Liner Design
  - EPA TSCA Reauthorization Review
  - MDEQ License Modification Review
- 7:00PM – 7:30PM: Informal Question & Answer
- 7:30PM – 8:30PM: Formal Comment Period



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# Proposed Renewal and Modification of TSCA PCB Chemical Waste Landfill Approval for Wayne Disposal, Inc.



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## Overview

- Introduction
  - Lisa Graczyk, U.S. Environmental Protection Agency (EPA), Permit Manager
- The EPA tentatively plans to renew and modify an existing Approval (permit) that is issued to Wayne Disposal, Inc. to allow them to continue to dispose of PCBs in their landfill
- Presentation
  - Why two permits?
  - What are PCBs?
  - Background
  - Description of Landfill Liner Modification
  - Basis of decision for proposed issuance of Approval



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## Overview (Contd.)



Willow Run Airport

Wayne Disposal, Inc.

I-94 Service Dr



## Why two permits?

- Michigan Department of Environmental Quality (MDEQ) proposes to issue a modification to an existing permit and the EPA is proposing to issue a permit to Wayne Disposal, Inc.
- Hazardous waste landfill permits are issued under the Resource Conservation and Recovery Act (RCRA) regulations. RCRA is delegated to the states and therefore, MDEQ is responsible for issuing a permit for a hazardous waste landfill.
- Polychlorinated biphenyls (PCBs) are regulated under the Toxic Substance Control Act (TSCA). TSCA is not delegated to the states and therefore, EPA is responsible for issuing PCB chemical waste landfill approvals (40 CFR 761.75).
- The term "Approval" is used in the TSCA regulations. "Approval" is synonymous with "permit."



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## What are PCBs?

- PCBs are an acronym for polychlorinated biphenyls. There are 209 PCB molecules, also known as congeners.
  - Common trade name is Aroclor
- PCBs are man-made (invented in 1929)
- The manufacture of PCBs was banned in the U.S. in 1977
- PCBs have been used as coolants and lubricants in transformers, capacitors, and other electrical equipment because they don't burn easily and are good insulators.
- Products made before 1977 that may contain PCBs include old fluorescent lighting fixtures and electrical devices containing PCB capacitors, caulking, paint, and old microscope and hydraulic oils.



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## What are PCBs? (contd.)

- Routes of exposure to PCBs include ingestion, inhalation, and dermal contact
- According to the Agency for Toxic Substances and Disease Registry (ATSDR), the health effects of PCBs include:
  - Acne-like skin conditions and rashes
  - Indications of possible liver damage
  - Probable human carcinogen (known animal carcinogen)
  - Nervous system and immune system effects in children
- For more information on health effects:
  - <https://www.epa.gov/pcbs>
  - <https://www.atsdr.cdc.gov/substances/toxsubstance.asp?toxid=26>



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## Background

- PCBs are regulated under TSCA; regulations governing PCB chemical waste landfills are in 40 Code of Federal Regulations (C.F.R.) 761.75.
- Wayne Disposal has had EPA approvals since 1997 to dispose of PCBs in their landfill.
- The most recent PCB approval was issued to Wayne Disposal on September 27, 2013, which included a modification to expand the landfill (addition of Subcells F and G). This approval expires on September 27, 2018.
- EPA received an application from Wayne Disposal to renew their PCB landfill approval and an approval modification request to modify the liner design for Master Cell VI Subcell G, Phase 2.
- **The renewal and modification requests do not include any expansions or requests to dispose additional waste volumes.**



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## Description of Landfill Liner Modification

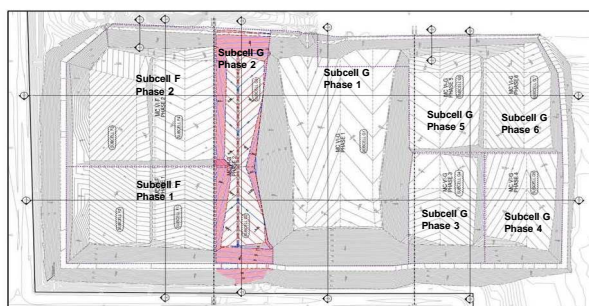


Figure 1. Master Cell VI-G and F Layout

Source: CTI, Proposed Permit Modification - Upgrades to MC VI-G Phase 2 Liner Design, Revision 1, Wayne Disposal, Inc., "2018.



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## Description of Landfill Liner Modification (contd.)

- The landfill liner modification is only proposed for Master Cell VI, Subcell G, Phase 2 at this time.
  - Similar liner modifications will likely be proposed by WDI in the future for other Subcells/Phases.
- The liner modification mainly consists of replacing some of the compacted clay liner components in the currently approved design with 4 geosynthetic clay liners (GCL).
- CTI presentation presented liner modification details.



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## Basis of decision for proposed issuance of Approval Modification and Renewal

- GCL is as protective as compacted clay liner
  - Equivalency determination performed by expert Geotechnical Engineers
- Wayne Disposal has monitoring controls in place which are required by the current Approval and will be required by the proposed Approval
  - Double liner and double leachate collection system
  - Storm water management system
  - Groundwater monitoring, quarterly
  - Perimeter air monitoring, twice monthly
  - Surface water monitoring, quarterly



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## Basis of decision (contd.)

- Leachate collection system monitoring (primary and secondary)
  - Weekly – leachate levels measured and sumps inspected
  - Monthly – leachate production volumes determined
  - Monthly/Quarterly/Annually – leachate in sumps samples and analyzed
- Other Factors
  - Quarterly and Annual Reports
  - Notification Requirements
  - Employee Training Program
  - Inspections of Facility
  - Facility Security/Controlled Access
  - Truck Wheel Wash Stations
  - Approval Renewal Process



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## Conclusion

- EPA public comment period open through July 31, 2018
- Submit comments to:
  - Form on draft approval website [www.epa.gov/pcbs/forms/public-notice-wayne-disposal-inc-us-ecology](http://www.epa.gov/pcbs/forms/public-notice-wayne-disposal-inc-us-ecology))
  - EPA TSCA Project Manager, Lisa Graczyk, [Graczyk.lisa@epa.gov](mailto:Graczyk.lisa@epa.gov)
  - EPA Public Affairs Specialist, Rafael P. Gonzalez, [Gonzalez.rafaelp@epa.gov](mailto:Gonzalez.rafaelp@epa.gov); 800-621-8431, Ext. 60269
  - By Mail to: Lisa Graczyk, Land and Chemicals Division, U.S. EPA Region 5, 77 W. Jackson Blvd., LR-17J, Chicago, IL 60604
- For more information on WDI draft approval see: [www.epa.gov/pcbs/forms/public-notice-wayne-disposal-inc-us-ecology](http://www.epa.gov/pcbs/forms/public-notice-wayne-disposal-inc-us-ecology)
- For more information on PCBs see: [www.epa.gov/pcbs](http://www.epa.gov/pcbs)



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## **Operating License Major Modification for Wayne Disposal, Inc.**



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### **MDEQ License Modification Overview**

- What is an Operating License & modification?
- What did the MDEQ review?
- Public Comment Period
- If approved, then what?
- If denied, then what?



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## What is an Operating License & modification?

- Operating License
  - Hazardous Waste Landfills
  - Wayne Disposal, Inc. – Issued May 4, 2012
- Changes to the existing operating license
  - Governed by federal and state law
  - Changes broken into categories that are determined to be minor or major modifications.
- Submit proposed modification
  - Major Modification
  - Landfill liner design



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## What did the MDEQ review?

- Dr. Qian, P.E., Ph.D. – Geotechnical Engineer
  - Over 30 years experience
- Equivalency Demonstration
  - Part 111 Rules - R 299.9620
  - Technical
    - Hydraulic Properties: Permeability, Steady state water flux, Chemical adsorptive capacity
    - Physical Properties: Erosion, Settlement, Stability on Slopes, Bearing Capacity
  - Operational
    - Construction: Puncture resistant, quality control
    - Everyday Use: Dynamic load, Environmental factors



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## What did the MDEQ review? (contd.)

- Compatibility with waste and leachate
  - GCL will not deteriorate over time due to contact with waste or leachate
- Review EPA comments & concerns
  - Concur with Wayne Disposal responses to comments and concerns



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## Public Comment Period

- 60 days Public Comment Period
  - June 14, 2018 – August 13, 2018
  - Public can make comments about the modification
- MDEQ will review all public comments
  - Response to Comments



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## If approved, then what?

- Response to Comments
  - Address comments
- Changes to Operating License
  - Attachment 7: Engineering Plans
- No changes to the license conditions
- Liner Construction
  - MDEQ certifies & approves construction and use of cell
- Waste placed within cell



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## If denied, then what?

- Part 111 Rules – R299.9520
- Response to Comments
  - Address comments
- Notify Wayne Disposal, Inc
  - Use currently approved design or reapply for modification.



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## Informal Questions & Answer



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## How Tonight's Hearing will Work:

- The names of the people wishing to provide a comment will be called in order of registration. When your name is called, please come up to the microphone.
- If you have written comments or items that you would like to present, please hand them to staff as you approach the microphone. Written copy of comments are appreciated.
- State your name and any group or association you may represent.
- Begin your comments. You will be given a specific amount of time for your comments.
- Once your comments are complete, take your seat so the next person may be called. When all names have been called, we will ask if anyone else would like to make a comment.



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