FORM EQP 5111 ATTACHMENT TEMPLATE B2
CORRECTIVE ACTION INFORMATION

This document is an attachment to the Michigan Department of Environmental Quality's (DEQ) *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities.* See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) R 299.9504(1)(c), R 299.9508(1)(b), R 299.9525, R 299.9629, R 299.9635, and R 299.9636; §§324.11115a and 324.11115b of Act 451; and Title 40 of the Code of Federal Regulations (CFR) §270.14(d) and Part 264, Subpart F, establish requirements for submitting corrective action information and implementing a corrective action program for hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application template addresses requirements for corrective action information for the waste management units (WMU) at the *Wayne Disposal Inc.(WDI)* facility in *Belleville*, Michigan. This template includes facility background information, current conditions, and release assessment requirements for operating license applications. This template supplies information to support the corrective action program specified in R 299.9629. In this template, applicants must include appropriate justification for the proposed elimination of any WMU from the corrective action program under Part 111 of Act 451.

Ensure that all samples collected for waste characterization and environmental monitoring during corrective action are collected, transported, analyzed, stored, and disposed by trained and qualified individuals in accordance with a QA/QC Plan. The QA/QC Plan should at a minimum include the written procedures outlined in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846, Third Edition, Chapter 1 (November 1986), and its Updates.

Applicant for Operating License for Existing Facility:

☒ R 299.9629 Corrective Action

☐ Elimination from corrective action requirements proposed for one or more units

☞ *More than one box may be checked, if one or more WMUs are proposed for elimination from corrective action requirements*

Applicant for Operating License for New, Altered, Enlarged, or Expanded Operating License:

☐ R 299.9629 Corrective Action

☐ Elimination from corrective action requirements proposed for one or more units

Information in this attachment has been provided and approved with other license applications, and attachments of this license application. No new waste management units or areas of concern have been added to the facility.

Table of Contents

B2.A FACILITY BACKGROUND

B2.A.1 HISTORY AND DESCRIPTION OF OWNERSHIP AND OPERATION

In accordance with the previous RCRA permit for the facility, a Phase I RCRA Facility Investigation (RFI) for Wayne Disposal Site #2 Landfill was completed and submitted to USEPA. A copy of this report, "RCRA Corrective Action Plan RFI Phase I-Environmental Monitoring Report (Volumes I and II)", dated July 17, 1990, was submitted separately. This report includes a description of the location, design, and history of the operation of all Solid Waste Management Units at the facility. In addition, environmental monitoring data collected throughout the period of interim status was summarized and evaluated for evidence of the presence or absence of a release. The report concluded that data generated over this time period did not yield evidence for the presence of a release. In addition, a work plan for a Phase II investigation Wayne Disposal Site #1 Landfill, titled "RFI Phase II Release Assessment-Task A: RFI Phase II Workplan", dated September 21, 1989 was submitted to the USEPA. USEPA responded to the submission of the Phase I Report and the Phase II Workplan in a letter dated January 3, 1991, a copy of which is included in this section. In this letter, USEPA concluded that there had been no releases of waste or waste constituents to the environment from Wayne Disposal Site #2 Landfill. In addition, the letter approved the Phase II workplan for Wayne Disposal Site #1 Landfill.

The Phase II release assessment investigation of Wayne Disposal Site #1 Landfill was conducted in accordance with the approved workplan. A report, titled "Draft Report-RCRA Facility Investigation Phase II Release Assessment for Wayne Disposal Site #1 Landfill (Volumes I, II, and III)" dated October 7, 1992, was submitted to USEPA. The investigation found no clear evidence of a release to the environment but recommended limited additional work to be conducted to resolve the origin of some anomalous groundwater monitoring results at one monitoring well. There has been no response from USEPA regarding this draft report, however, EGLE assumed oversight of the RCRA CAP program and on September 24, 2014, requested that WDI conduct supplemental investigation of Site 1. A draft of the "Supplemental RCRA Interim Measures Report" was submitted to EGLE on September 28, 2021. Between the original and supplemental report, the items listed in the template have been addressed as warranted based on site conditions. EGLE has not yet provided comments on the supplemental report.

B2.A.2 ENVIRONMENTAL SETTING

See Attachment B4 Environment Assessment of WDI's Part 111 permit application.

B2.A.2(a) Climate

See Attachment B4 Environment Assessment of WDI's Part 111 permit application.

B2.A.2(b) Topography

See Appendix B2.A.2 Solid Waste Management Unit Topographic Map and Ground Floor Drawing of this attachment, as well as Attachment B4 Environment Assessment of WDI's Part 111 permit application.

B2.A.2(c) Hydrogeology

See Attachment B3 Hydrogeological Report of WDI's Part 111 permit application.

B2.A.2(d) Soil

See Attachment B3 Environmental Monitoring of WDI's Part 111 permit application.

B2.A.2(e) Surface Water

See Attachment B3 Environmental Monitoring of WDI's Part 111 permit application.

B2.A.2(f) Surrounding Land Uses

See Attachment B4 Environment Assessment of WDI's Part 111 permit application**.**

B2.A.2(g) Critical Habitats and Endangered Species

See Attachment B4 *Environment Assessment of WDI's Part 111 permit application***.**

B2.A.3 CHARACTERIZATION OF POTENTIAL OR ACTUAL SOURCES OF CONTAMINATION
[R 299.9504(c) and 40 CFR §270.14(d)]

B2.A.3(A) TANKS /CONTAINER STORAGE AREAS/LOADING AND UNLOADING AREAS

B2.A.3(a)(1) Unit Characteristics

Attachments C1 Containers WDI's Part 111 permit application, provide description of the solid waste management units.

B2.A.3(a)(2) Waste Characteristics and Management

Current WDI operations include receiving, and disposal of hazardous permitted by the MDEQ under the facility operating license (MID 048 090 633). Additionally, WDI is permitted to manage TSCA regulated PCB waste. Section XIII Description of. Hazardous Waste provides a list of hazardous waste codes that may have been received for storage or treatment at the facility. Non-hazardous liquid and solid wastes are managed in accordance with the Solid Waste Processing and Transfer Facility Operating License issued under Part 115 of Act 451 of 1994, the Natural Resources and Environmental Protection Act (NREPA). See Attachment A2A3 Chemical and Physical Waste Analysis Plan.

B2.A.3(a)(3) History of Releases or Potential to Release

On 4/17/17 partially treated leachate flowed into a blind, clay-lined collection ditch outside of the wastewater treatment plant following a failure in the primary and secondary process pumps and the high-level alarm system. WDI remediated the ditch. There was no off-site discharge and no harm to human health or the environment.

Releases that could pose a threat to human health and the environment have been reported to MDEQ and incident reports have been filed as described in the Attachment A7 Contingency Plan.

B2.B FACILITY'S ASSESSMENT OF KNOWN NATURE AND EXTENT OF CONTAMINATION

The existing environmental monitoring programs required by the license monitor for contamination potential and the license conditions incorporate corrective action requirements. As described above, WDI submitted an RFA to USEPA in 1989. Any incidents that resulted or potentially resulted in a release of hazardous waste or waste constituents that required implementation of the contingency plan was summarized in this assessment. The summary included any assessments, clean-ups or corrective measures required to address the incidents. Since 1989, incidents have been reported to the DEQ according to license requirements and corrective measures have been finalized.

B2.B.1 GROUNDWATER

WDI submitted a Supplemental RCRA Interim Measures Report on October 4, 2021. To date, no comments from EGLE have been received regarding this report.

B2.B.1(A) RECOMMENDATIONS OR ESTABLISHED REQUIREMENTS FOR ADDITIONAL INVESTIGATIONS

The Supplemental RCRA Interim Measures Report dated October 4, 2021, listed additional recommendations for continuing the RCRA Corrective process for Site 1, including a recommendation for implementation of a groundwater monitoring program. EGLE has not responded to these recommendations. As outlined in the 2021 Report, further corrective action may or may not be necessary, which is why a monitoring program was proposed. If additional data are warranted, WDI will propose additional corrective measures through a corrective measures study that will be submitted to EGLE for review and approval.

B2.B.2 SOIL

The soil investigation performed at Site 1 is provided in Section 3.5 of the 2021 Supplemental RFI.

B2.B.3 SURFACE WATER AND SEDIMENT

The surface water investigation performed at Site 1 is provided in Section 6.3 of the 2021 Supplemental RFI.

B2.B.4 AIR

Ambient air monitoring has not been conducted at Site 1.

B2.B.4(A) RECOMMENDATIONS OR ESTABLISHED REQUIREMENTS FOR ADDITIONAL INVESTIGATIONS

.

B2.C FACILITY'S EXPOSURE ASSESSMENT

There are no environmental impacts on the facility pursuant to Part 201. Therefore no information is available and this section is not applicable.

B2.D INTERIM MEASURES

No information is available.

B2.E ENVIRONMENTAL INDICATORS

See Environmental Indicator forms.

B2.F FACILITY'S ASSESSMENT OF KNOWN OR PROPOSED CONSTITUENTS OF CONCERN

[R 299.9629(3)(a)(i) and (3)(b)(i)]

The constituents of concern are described in Sections 6.2.1 (Surficial Granular Unit), Section 6.2.2 (Intermediate Granular Unit), and Section 6.2.3 (Deep Granular Unit) of the 2021 Supplmental RFI. These results are summarized on Tables 4, 6, and 7.

B2.G ESTABLISHED OR PROPOSED CLEANUP CRITERIA

[R 299.9629(3)(a)(ii) and (iii) and R 299.9629(3)(b)(ii) and (iii)]

Section 1.2 of the 2021 Supplemental RFI references the clean-up standards applicable to Site 1.

B2.H ESTABLISHED OR PROPOSED COMPLIANCE POINTS AND PERIODS

[R 299.9629(3)(a)(iv) and (v) and R 299.9629(3)(b)(iv) and (v)]

The 2021 Supplemental RFI discusses which wells are downgradient of WMUs and the clean-up standards that apply to each water bearing unit. The application has been updated to reflect that the RFI for Site 1 is ongoing.

B2.I OFF-SITE ACCESS

WDI submitted a Supplemental RCRA Interim Measures Report on October 4, 2021. To date, no comments from EGLE have been received regarding this report. The report did not identify the need to investigate off-site migration of contamination due to the nature of the impact to groundwater and the hydrogeology of the site.

B2.J PUBLIC INVOLVEMENT PLAN

WDI submitted a Supplemental RCRA Interim Measures Report on October 4, 2021. To date, no comments from EGLE have been received regarding this report. The public involvement plan is contingent on EGLE's review of the Supplemental RFI and the subsequent Corrective Measures Study.
dy.

B2.K HEALTH AND SAFETY PLAN

Not applicable, since no on site contamination currently exists at the facility. WDI submitted a Supplemental RCRA Interim Measures Report on October 4, 2021. To date, no comments from EGLE have been received regarding this report. There was a Health and Safety Plan associated with the field work performed for the Supplemental RFI, and, if further investigation or corrective measures are implemented, a Health and Safety Plan will be prepared for this work.

B2.L NOTICE REQUIREMENTS
[R 299.9525]

Notice would have been filed to the office of register of deeds in Wayne County during the construction of the facility or within 60 days of the rule implementation.

B2.M JUSTIFICATION FOR PROPOSED ELIMINATION OF ANY WASTE MANAGEMENT UNIT FROM THE CORRECTIVE ACTION PROGRAM OR INTENT TO PROCEED WITH CORRECTIVE ACTIONS

No waste management units ate being eliminated from the corrective action program.

APPENDIX B2.A.1

Hazardous Waste Codes Processed in Solid Waste Management Units

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
1	D001[R]	200000	Y	D80			
2	D002	200000	Y	D80			
3	D003[R]	200000	Y	D80			
4	D004	200000	Y	D80			
5	D005	200000	Y	D80			
6	D006	200000	Y	D80			
7	D007	200000	Y	D80			
8	D008	200000	Y	D80			
9	D009	200000	Y	D80			
10	D010	200000	Y	D80			
11	D011	200000	Y	D80			
12	D012	200000	Y	D80			
13	D013	200000	Y	D80			
14	D014	200000	Y	D80			
15	D015	200000	Y	D80			
16	D016	200000	Y	D80			
17	D017	200000	Y	D80			
18	D018	200000	Y	D80			
19	D019	200000	Y	D80			
20	D020	200000	Y	D80			
21	D021	200000	Y	D80			
22	D022	200000	Y	D80			
23	D023	200000	Y	D80			
24	D024	200000	Y	D80			
25	D025	200000	Y	D80			
26	D026	200000	Y	D80			
27	D027	200000	Y	D80			
28	D028	200000	Y	D80			
29	D029	200000	Y	D80			
30	D030	200000	Y	D80			
31	D031	200000	Y	D80			
32	D032	200000	Y	D80			
33	D033	200000	Y	D80			
34	D034	200000	Y	D80			
35	D035	200000	Y	D80			
36	D036	200000	Y	D80			
37	D037	200000	Y	D80			
38	D038	200000	Y	D80			
39	D039	200000	Y	D80			
40	D040	200000	Y	D80			
41	D041	200000	Y	D80			
42	D042	200000	Y	D80			
43	D043	200000	Y	D80			
44	F001	200000	Y	D80			
45	F002	200000	Y	D80			
46	F003	200000	Y	D80			
47	F004	200000	Y	D80			
48	F005	200000	Y	D80			
49	F006	200000	Y	D80			
50	F007	200000	Y	D80			
51	F008	200000	Y	D80			
52	F009	200000	Y	D80			
53	F010	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
54	F011	200000	Y	D80			
55	F012	200000	Y	D80			
56	F019	200000	Y	D80			
57	F020	200000	Y	D80			
58	F021	200000	Y	D80			
59	F022	200000	Y	D80			
60	F023	200000	Y	D80			
61	F024	200000	Y	D80			
62	F025	200000	Y	D80			
63	F026	200000	Y	D80			
64	F027	200000	Y	D80			
65	F028	200000	Y	D80			
66	F032	200000	Y	D80			
67	F034	200000	Y	D80			
68	F035	200000	Y	D80			
69	F037	200000	Y	D80			
70	F038	200000	Y	D80			
71	F039	200000	Y	D80			
72	K001	200000	Y	D80			
73	K002	200000	Y	D80			
74	K003	200000	Y	D80			
75	K004	200000	Y	D80			
76	K005	200000	Y	D80			
77	K006	200000	Y	D80			
78	K007	200000	Y	D80			
79	K008	200000	Y	D80			
80	K009	200000	Y	D80			
81	K010	200000	Y	D80			
82	K011	200000	Y	D80			
83	K013	200000	Y	D80			
84	K014	200000	Y	D80			
85	K015	200000	Y	D80			
86	K016	200000	Y	D80			
87	K017	200000	Y	D80			
88	K018	200000	Y	D80			
89	K019	200000	Y	D80			
90	K020	200000	Y	D80			
91	K021	200000	Y	D80			
92	K022	200000	Y	D80			
93	K023	200000	Y	D80			
94	K024	200000	Y	D80			
95	K025	200000	Y	D80			
96	K026	200000	Y	D80			
97	K027[R]	200000	Y	D80			
98	K028	200000	Y	D80			
99	K029	200000	Y	D80			
100	K030	200000	Y	D80			
101	K031	200000	Y	D80			
102	K032	200000	Y	D80			
103	K033	200000	Y	D80			
104	K034	200000	Y	D80			
105	K035	200000	Y	D80			
106	K036	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
107	K037	200000	Y	D80			
108	K038	200000	Y	D80			
109	K039	200000	Y	D80			
110	K040	200000	Y	D80			
111	K041	200000	Y	D80			
112	K042	200000	Y	D80			
113	K043	200000	Y	D80			
114	K044[R]	200000	Y	D80			
115	K045[R]	200000	Y	D80			
116	K046	200000	Y	D80			
117	K047[R]	200000	Y	D80			
118	K048	200000	Y	D80			
119	K049	200000	Y	D80			
120	K050	200000	Y	D80			
121	K051	200000	Y	D80			
122	K052	200000	Y	D80			
123	K060	200000	Y	D80			
124	K061	200000	Y	D80			
125	K062	200000	Y	D80			
126	K069	200000	Y	D80			
127	K071	200000	Y	D80			
128	K073	200000	Y	D80			
129	K083	200000	Y	D80			
130	K084	200000	Y	D80			
131	K085	200000	Y	D80			
132	K086	200000	Y	D80			
133	K087	200000	Y	D80			
134	K088	200000	Y	D80			
135	K090	200000	Y	D80			
136	K091	200000	Y	D80			
137	K093	200000	Y	D80			
138	K094	200000	Y	D80			
139	K095	200000	Y	D80			
140	K096	200000	Y	D80			
141	K097	200000	Y	D80			
142	K098	200000	Y	D80			
143	K099	200000	Y	D80			
144	K100	200000	Y	D80			
145	K101	200000	Y	D80			
146	K102	200000	Y	D80			
147	K103	200000	Y	D80			
148	K104	200000	Y	D80			
149	K105	200000	Y	D80			
150	K106	200000	Y	D80			
151	K107	200000	Y	D80			
152	K108	200000	Y	D80			
153	K109	200000	Y	D80			
154	K110	200000	Y	D80			
155	K111	200000	Y	D80			
156	K112	200000	Y	D80			
157	K113	200000	Y	D80			
158	K114	200000	Y	D80			
159	K115	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
160	K116	200000	Y	D80			
161	K117	200000	Y	D80			
162	K118	200000	Y	D80			
163	K123	200000	Y	D80			
164	K124	200000	Y	D80			
165	K125	200000	Y	D80			
166	K126	200000	Y	D80			
167	K131	200000	Y	D80			
168	K132	200000	Y	D80			
169	K136	200000	Y	D80			
170	K141	200000	Y	D80			
171	K142	200000	Y	D80			
172	K143	200000	Y	D80			
173	K144	200000	Y	D80			
174	K145	200000	Y	D80			
175	K147	200000	Y	D80			
176	K148	200000	Y	D80			
177	K149	200000	Y	D80			
178	K150	200000	Y	D80			
179	K151	200000	Y	D80			
180	K156	200000	Y	D80			
181	K157	200000	Y	D80			
182	K158	200000	Y	D80			
183	K159	200000	Y	D80			
184	K161	200000	Y	D80			
185	K169	200000	Y	D80			
186	K170	200000	Y	D80			
187	K171	200000	Y	D80			
188	K172	200000	Y	D80			
189	K174	200000	Y	D80			
190	K175	200000	Y	D80			
191	K176	200000	Y	D80			
192	K177	200000	Y	D80			
193	K178	200000	Y	D80			
194	K181	200000	Y	D80			
195	P001	200000	Y	D80			
196	P002	200000	Y	D80			
197	P003	200000	Y	D80			
198	P004	200000	Y	D80			
199	P005	200000	Y	D80			
200	P006	200000	Y	D80			
201	P007	200000	Y	D80			
202	P008	200000	Y	D80			
203	P009	200000	Y	D80			
204	P010	200000	Y	D80			
205	P011	200000	Y	D80			
206	P012	200000	Y	D80			
207	P013	200000	Y	D80			
208	P014	200000	Y	D80			
209	P015	200000	Y	D80			
210	P016	200000	Y	D80			
211	P017	200000	Y	D80			
212	P018	200000	Y	D80			
213	P020	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
214	P021	200000	Y	D80			
215	P022	200000	Y	D80			
216	P023	200000	Y	D80			
217	P024	200000	Y	D80			
218	P026	200000	Y	D80			
219	P027	200000	Y	D80			
220	P028	200000	Y	D80			
221	P029	200000	Y	D80			
222	P030	200000	Y	D80			
223	P031	200000	Y	D80			
224	P033	200000	Y	D80			
225	P034	200000	Y	D80			
226	P036	200000	Y	D80			
227	P037	200000	Y	D80			
228	P038	200000	Y	D80			
229	P039	200000	Y	D80			
230	P040	200000	Y	D80			
231	P041	200000	Y	D80			
232	P042	200000	Y	D80			
233	P043	200000	Y	D80			
234	P044	200000	Y	D80			
235	P045	200000	Y	D80			
236	P046	200000	Y	D80			
237	P047	200000	Y	D80			
238	P048	200000	Y	D80			
239	P049	200000	Y	D80			
240	P050	200000	Y	D80			
241	P051	200000	Y	D80			
242	P054	200000	Y	D80			
243	P056	200000	Y	D80			
244	P057	200000	Y	D80			
245	P058	200000	Y	D80			
246	P059	200000	Y	D80			
247	P060	200000	Y	D80			
248	P062	200000	Y	D80			
249	P063	200000	Y	D80			
250	P064	200000	Y	D80			
251	P065	200000	Y	D80			
252	P066	200000	Y	D80			
253	P067	200000	Y	D80			
254	P068	200000	Y	D80			
255	P069	200000	Y	D80			
256	P070	200000	Y	D80			
257	P071	200000	Y	D80			
258	P072	200000	Y	D80			
259	P073	200000	Y	D80			
260	P074	200000	Y	D80			
261	P075	200000	Y	D80			
262	P076	200000	Y	D80			
263	P077	200000	Y	D80			
264	P078	200000	Y	D80			
265	P081	200000	Y	D80			
266	P082	200000	Y	D80			
267	P084	200000	Y	D80			

[R]Reacted

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
268	P085	200000	Y	D80			
269	P087	200000	Y	D80			
270	P088	200000	Y	D80			
271	P089	200000	Y	D80			
272	P092	200000	Y	D80			
273	P093	200000	Y	D80			
274	P094	200000	Y	D80			
275	P095	200000	Y	D80			
276	P096	200000	Y	D80			
277	P097	200000	Y	D80			
278	P098	200000	Y	D80			
279	P099	200000	Y	D80			
280	P101	200000	Y	D80			
281	P102	200000	Y	D80			
282	P103	200000	Y	D80			
283	P104	200000	Y	D80			
284	P105	200000	Y	D80			
285	P106	200000	Y	D80			
286	P108	200000	Y	D80			
287	P109	200000	Y	D80			
288	P110	200000	Y	D80			
289	P111	200000	Y	D80			
290	P112	200000	Y	D80			
291	P113	200000	Y	D80			
292	P114	200000	Y	D80			
293	P115	200000	Y	D80			
294	P116	200000	Y	D80			
295	P118	200000	Y	D80			
296	P119	200000	Y	D80			
297	P120	200000	Y	D80			
298	P121	200000	Y	D80			
299	P122	200000	Y	D80			
300	P123	200000	Y	D80			
301	P127	200000	Y	D80			
302	P128	200000	Y	D80			
303	P185	200000	Y	D80			
304	P188	200000	Y	D80			
305	P189	200000	Y	D80			
306	P190	200000	Y	D80			
307	P191	200000	Y	D80			
308	P192	200000	Y	D80			
309	P194	200000	Y	D80			
310	P196	200000	Y	D80			
311	P197	200000	Y	D80			
312	P198	200000	Y	D80			
313	P199	200000	Y	D80			
314	P201	200000	Y	D80			
315	P202	200000	Y	D80			
316	P203	200000	Y	D80			
317	P204	200000	Y	D80			
318	P205	200000	Y	D80			
319	U001	200000	Y	D80			
320	U002	200000	Y	D80			
321	U003	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
322	U004	200000	Y	D80			
323	U005	200000	Y	D80			
324	U006	200000	Y	D80			
325	U007	200000	Y	D80			
326	U008	200000	Y	D80			
327	U009	200000	Y	D80			
328	U010	200000	Y	D80			
329	U011	200000	Y	D80			
330	U012	200000	Y	D80			
331	U014	200000	Y	D80			
332	U015	200000	Y	D80			
333	U016	200000	Y	D80			
334	U017	200000	Y	D80			
335	U018	200000	Y	D80			
336	U019	200000	Y	D80			
337	U020	200000	Y	D80			
338	U021	200000	Y	D80			
339	U022	200000	Y	D80			
340	U023	200000	Y	D80			
341	U024	200000	Y	D80			
342	U025	200000	Y	D80			
343	U026	200000	Y	D80			
344	U027	200000	Y	D80			
345	U028	200000	Y	D80			
346	U029	200000	Y	D80			
347	U030	200000	Y	D80			
348	U031	200000	Y	D80			
349	U032	200000	Y	D80			
350	U033	200000	Y	D80			
351	U034	200000	Y	D80			
352	U035	200000	Y	D80			
353	U036	200000	Y	D80			
354	U037	200000	Y	D80			
355	U038	200000	Y	D80			
356	U039	200000	Y	D80			
357	U041	200000	Y	D80			
358	U042	200000	Y	D80			
359	U043	200000	Y	D80			
360	U044	200000	Y	D80			
361	U045	200000	Y	D80			
362	U046	200000	Y	D80			
363	U047	200000	Y	D80			
364	U048	200000	Y	D80			
365	U049	200000	Y	D80			
366	U050	200000	Y	D80			
367	U051	200000	Y	D80			
368	U052	200000	Y	D80			
369	U053	200000	Y	D80			
370	U055	200000	Y	D80			
371	U056	200000	Y	D80			
372	U057	200000	Y	D80			
373	U058	200000	Y	D80			
374	U059	200000	Y	D80			
375	U060	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
376	U061	200000	Y	D80			
377	U062	200000	Y	D80			
378	U063	200000	Y	D80			
379	U064	200000	Y	D80			
380	U066	200000	Y	D80			
381	U067	200000	Y	D80			
382	U068	200000	Y	D80			
383	U069	200000	Y	D80			
384	U070	200000	Y	D80			
385	U071	200000	Y	D80			
386	U072	200000	Y	D80			
387	U073	200000	Y	D80			
388	U074	200000	Y	D80			
389	U075	200000	Y	D80			
390	U076	200000	Y	D80			
391	U077	200000	Y	D80			
392	U078	200000	Y	D80			
393	U079	200000	Y	D80			
394	U080	200000	Y	D80			
395	U081	200000	Y	D80			
396	U082	200000	Y	D80			
397	U083	200000	Y	D80			
398	U084	200000	Y	D80			
399	U085	200000	Y	D80			
400	U086	200000	Y	D80			
401	U087	200000	Y	D80			
402	U088	200000	Y	D80			
403	U089	200000	Y	D80			
404	U090	200000	Y	D80			
405	U091	200000	Y	D80			
406	U092	200000	Y	D80			
407	U093	200000	Y	D80			
408	U094	200000	Y	D80			
409	U095	200000	Y	D80			
410	U096	200000	Y	D80			
411	U097	200000	Y	D80			
412	U098	200000	Y	D80			
413	U099	200000	Y	D80			
414	U101	200000	Y	D80			
415	U102	200000	Y	D80			
416	U103	200000	Y	D80			
417	U105	200000	Y	D80			
418	U106	200000	Y	D80			
419	U107	200000	Y	D80			
420	U108	200000	Y	D80			
421	U109	200000	Y	D80			
422	U110	200000	Y	D80			
423	U111	200000	Y	D80			
424	U112	200000	Y	D80			
425	U113	200000	Y	D80			
426	U114	200000	Y	D80			
427	U115	200000	Y	D80			
428	U116	200000	Y	D80			
429	U117	200000	Y	D80			

[R]Reacted

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
430	U118	200000	Y	D80			
431	U119	200000	Y	D80			
432	U120	200000	Y	D80			
433	U121	200000	Y	D80			
434	U122	200000	Y	D80			
435	U123	200000	Y	D80			
436	U124	200000	Y	D80			
437	U125	200000	Y	D80			
438	U126	200000	Y	D80			
439	U127	200000	Y	D80			
440	U128	200000	Y	D80			
441	U129	200000	Y	D80			
442	U130	200000	Y	D80			
443	U131	200000	Y	D80			
444	U132	200000	Y	D80			
445	U133	200000	Y	D80			
446	U134	200000	Y	D80			
447	U135	200000	Y	D80			
448	U136	200000	Y	D80			
449	U137	200000	Y	D80			
450	U138	200000	Y	D80			
451	U140	200000	Y	D80			
452	U141	200000	Y	D80			
453	U142	200000	Y	D80			
454	U143	200000	Y	D80			
455	U144	200000	Y	D80			
456	U145	200000	Y	D80			
457	U146	200000	Y	D80			
458	U147	200000	Y	D80			
459	U148	200000	Y	D80			
460	U149	200000	Y	D80			
461	U150	200000	Y	D80			
462	U151	200000	Y	D80			
463	U152	200000	Y	D80			
464	U153	200000	Y	D80			
465	U154	200000	Y	D80			
466	U155	200000	Y	D80			
467	U156	200000	Y	D80			
468	U157	200000	Y	D80			
469	U158	200000	Y	D80			
470	U159	200000	Y	D80			
471	U160	200000	Y	D80			
472	U161	200000	Y	D80			
473	U162	200000	Y	D80			
474	U163	200000	Y	D80			
475	U164	200000	Y	D80			
476	U165	200000	Y	D80			
477	U166	200000	Y	D80			
478	U167	200000	Y	D80			
479	U168	200000	Y	D80			
480	U169	200000	Y	D80			
481	U170	200000	Y	D80			
482	U171	200000	Y	D80			
483	U172	200000	Y	D80			

[R]Reacted

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
484	U173	200000	Y	D80			
485	U174	200000	Y	D80			
486	U176	200000	Y	D80			
487	U177	200000	Y	D80			
488	U178	200000	Y	D80			
489	U179	200000	Y	D80			
490	U180	200000	Y	D80			
491	U181	200000	Y	D80			
492	U182	200000	Y	D80			
493	U183	200000	Y	D80			
494	U184	200000	Y	D80			
495	U185	200000	Y	D80			
496	U186	200000	Y	D80			
497	U187	200000	Y	D80			
498	U188	200000	Y	D80			
499	U189	200000	Y	D80			
500	U190	200000	Y	D80			
501	U191	200000	Y	D80			
502	U192	200000	Y	D80			
503	U193	200000	Y	D80			
504	U194	200000	Y	D80			
505	U196	200000	Y	D80			
506	U197	200000	Y	D80			
507	U200	200000	Y	D80			
508	U201	200000	Y	D80			
509	U202	200000	Y	D80			
510	U203	200000	Y	D80			
511	U204	200000	Y	D80			
512	U205	200000	Y	D80			
513	U206	200000	Y	D80			
514	U207	200000	Y	D80			
515	U208	200000	Y	D80			
516	U209	200000	Y	D80			
517	U210	200000	Y	D80			
518	U211	200000	Y	D80			
519	U213	200000	Y	D80			
520	U214	200000	Y	D80			
521	U215	200000	Y	D80			
522	U216	200000	Y	D80			
523	U217	200000	Y	D80			
524	U218	200000	Y	D80			
525	U219	200000	Y	D80			
526	U220	200000	Y	D80			
527	U221	200000	Y	D80			
528	U222	200000	Y	D80			
529	U223	200000	Y	D80			
530	U225	200000	Y	D80			
531	U226	200000	Y	D80			
532	U227	200000	Y	D80			
533	U228	200000	Y	D80			
534	U234	200000	Y	D80			
535	U235	200000	Y	D80			
536	U236	200000	Y	D80			
537	U237	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
538	U238	200000	Y	D80			
539	U239	200000	Y	D80			
540	U240	200000	Y	D80			
541	U243	200000	Y	D80			
542	U244	200000	Y	D80			
543	U246	200000	Y	D80			
544	U247	200000	Y	D80			
545	U248	200000	Y	D80			
546	U249	200000	Y	D80			
547	U271	200000	Y	D80			
548	U278	200000	Y	D80			
549	U279	200000	Y	D80			
550	U280	200000	Y	D80			
551	U328	200000	Y	D80			
552	U353	200000	Y	D80			
553	U359	200000	Y	D80			
554	U364	200000	Y	D80			
555	U367	200000	Y	D80			
556	U372	200000	Y	D80			
557	U373	200000	Y	D80			
558	U387	200000	Y	D80			
559	U389	200000	Y	D80			
560	U394	200000	Y	D80			
561	U395	200000	Y	D80			
562	U404	200000	Y	D80			
563	U409	200000	Y	D80			
564	U410	200000	Y	D80			
565	U411	200000	Y	D80			
566	001S	200000	Y	D80			
567	002S	200000	Y	D81			
568	003S	200000	Y	D82			
569	004S	200000	Y	D83			
570	005S	200000	Y	D84			
571	006S	200000	Y	D85			
572	007S	200000	Y	D86			
573	001K	200000	Y	D80			
574	002K	200000	Y	D80			
575	001U	200000	Y	D80			
576	002U	200000	Y	D80			
577	003U	200000	Y	D80			
578	004U	200000	Y	D80			
579	005U	200000	Y	D80			
580	006U	200000	Y	D80			
581	007U	200000	Y	D80			
582	008U	200000	Y	D80			
583	009U	200000	Y	D80			
584	011U	200000	Y	D80			
585	012U	200000	Y	D80			
586	013U	200000	Y	D80			
587	014U	200000	Y	D80			
588	015U	200000	Y	D80			
589	016U	200000	Y	D80			
590	017U	200000	Y	D80			
591	020U	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
592	021U	200000	Y	D80			
593	022U	200000	Y	D80			
594	023U	200000	Y	D80			
595	024U	200000	Y	D80			
596	025U	200000	Y	D80			
597	027U	200000	Y	D80			
598	028U	200000	Y	D80			
599	029U	200000	Y	D80			
600	030U	200000	Y	D80			
601	031U	200000	Y	D80			
602	032U	200000	Y	D80			
603	033U	200000	Y	D80			
604	034U	200000	Y	D80			
605	036U	200000	Y	D80			
606	037U	200000	Y	D80			
607	038U	200000	Y	D80			
608	040U	200000	Y	D80			
609	041U	200000	Y	D80			
610	042U	200000	Y	D80			
611	043U	200000	Y	D80			
612	044U	200000	Y	D80			
613	046U	200000	Y	D80			
614	047U	200000	Y	D80			
615	048U	200000	Y	D80			
616	049U	200000	Y	D80			
617	050U	200000	Y	D80			
618	051U	200000	Y	D80			
619	052U	200000	Y	D80			
620	054U	200000	Y	D80			
621	055U	200000	Y	D80			
622	056U	200000	Y	D80			
623	057U	200000	Y	D80			
624	058U	200000	Y	D80			
625	059U	200000	Y	D80			
626	061U	200000	Y	D80			
627	063U	200000	Y	D80			
628	064U	200000	Y	D80			
629	065U	200000	Y	D80			
630	068U	200000	Y	D80			
631	070U	200000	Y	D80			
632	071U	200000	Y	D80			
633	072U	200000	Y	D80			
634	073U	200000	Y	D80			
635	074U	200000	Y	D80			
636	075U	200000	Y	D80			
637	076U	200000	Y	D80			
638	077U	200000	Y	D80			
639	078U	200000	Y	D80			
640	079U	200000	Y	D80			
641	080U	200000	Y	D80			
642	082U	200000	Y	D80			
643	083U	200000	Y	D80			
644	086U	200000	Y	D80			
645	088U	200000	Y	D80			

[R]Reacted

Description of Hazardous Wastes
Wayne Disposal, Inc., Site # 2
MID 048 090 633

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
646	089U	200000	Y	D80			
647	090U	200000	Y	D80			
648	092U	200000	Y	D80			
649	093U	200000	Y	D80			
650	094U	200000	Y	D80			
651	095U	200000	Y	D80			
652	096U	200000	Y	D80			
653	097U	200000	Y	D80			
654	098U	200000	Y	D80			
655	099U	200000	Y	D80			
656	100U	200000	Y	D80			
657	101U	200000	Y	D80			
658	102U	200000	Y	D80			
659	103U	200000	Y	D80			
660	104U	200000	Y	D80			
661	106U	200000	Y	D80			
662	108U	200000	Y	D80			
663	110U	200000	Y	D80			
664	111U	200000	Y	D80			
665	112U	200000	Y	D80			
666	113U	200000	Y	D80			
667	114U	200000	Y	D80			
668	115U	200000	Y	D80			
669	116U	200000	Y	D80			
670	117U	200000	Y	D80			
671	118U	200000	Y	D80			
672	119U	200000	Y	D80			
673	120U	200000	Y	D80			
674	121U	200000	Y	D80			
675	122U	200000	Y	D80			
676	124U	200000	Y	D80			
677	127U	200000	Y	D80			
678	128U	200000	Y	D80			
679	129U	200000	Y	D80			
680	131U	200000	Y	D80			
681	132U	200000	Y	D80			
682	134U	200000	Y	D80			
683	135U	200000	Y	D80			
684	136U	200000	Y	D80			
685	137U	200000	Y	D80			
686	138U	200000	Y	D80			
687	139U	200000	Y	D80			
688	140U	200000	Y	D80			
689	141U	200000	Y	D80			
690	142U	200000	Y	D80			
691	143U	200000	Y	D80			
692	144U	200000	Y	D80			
693	146U	200000	Y	D80			
694	147U	200000	Y	D80			
695	148U	200000	Y	D80			
696	150U	200000	Y	D80			
697	151U	200000	Y	D80			
698	152U	200000	Y	D80			
699	153U	200000	Y	D80			

[R]Reacted

LINE NO.	A. EPA Hazardous Waste Code	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C.UNIT OF MEASURE	D1 PROCESS CODES			D2. PROCESS DESCIRPTION
700	154U	200000	Y	D80			
701	155U	200000	Y	D80			
702	157U	200000	Y	D80			
703	158U	200000	Y	D80			
704	159U	200000	Y	D80			
705	160U	200000	Y	D80			
706	161U	200000	Y	D80			
707	162U	200000	Y	D80			
708	163U	200000	Y	D80			
709	164U	200000	Y	D80			
710	165U	200000	Y	D80			
711	166U	200000	Y	D80			
712	167U	200000	Y	D80			
713	168U	200000	Y	D80			
714	169U	200000	Y	D80			
715	170U	200000	Y	D80			
716	171U	200000	Y	D80			
717	172U	200000	Y	D80			
718	173U	200000	Y	D80			
719	174U	200000	Y	D80			
720	175U	200000	Y	D80			
721	PCBs	200000	Y	D80			
722	CAMU-eligible	200000	Y	D80			

[R]Reacted

APPENDIX B2.A.2

Solid Waste Management Unit
Topographic Map and Ground Floor Drawing

N 5000

REV-00

0 100' 200' 400'
SCALE

N

NOTE:

1. THE BASE MAP WAS CREATED USING AN AERIAL DRONE SURVEY PROVIDED BY FIRMATEK, DATED FEBRUARY 2, 2025.

LEGEND

PROPERTY BOUNDARY		EXISTING FENCE	
PHASE BOUNDARY		GRID COORDINATES	N 6500
OLD CELL BOUNDARIES		TREELINE	
EXISTING CONTOUR (2 FT INTERVAL)	710	BRUSHLINE	
EXISTING STRUCTURE/ BUILDING		SPOT ELEVATION	
EXISTING ROAD	PAVED / GRAVEL	DRAINAGE	

DATE:	2/7/25
DESIGNED BY:	TCR/DRB
DRAWN BY:	DRB
CHECKED BY:	
APPROVED BY:	

CTI and Associates, Inc.
34705 W. 12 Mile Road, Ste. 230
Farmington Hills, Michigan 48331
248.486.5100
www.cticompanies.com

REVISIONS

REV	DATE	REVISION DESCRIPTION	DRN	APP
00	12-8-23	ISSUED FOR REVIEW	PAA	XZ

WAYNE DISPOSAL, INC. SITE NO. 2
VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN

SITE PLAN - FEBRUARY 3, 2025

PROJECT NUMBER: 23L023
SCALE: 1" = 200'
DRAWING NO: **01**

APPENDIX B2.E.1

ENVIRONMENTAL INDICATOR FORMS

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

DEQ adapted to Word 8/07

RCRA Corrective Action Environmental Indicator (EI) RCRA Info Code (CA725)
Current Human Exposures Under Control

Facility Name: **Wayne Disposal Inc.**
Facility Address: **49350 North I-94 Service Dr., Belleville, MI 48111**
Facility EPA ID #: **MID 048 090 633**

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to Resource Conservation Recovery Act of 1976 (RCRA) Corrective Action (e.g., waste management unit [WMU], regulated unit [RU], and area of concern [AOC]), been **considered** in this EI determination?

   ☒ If yes – check here and continue with #2 below.

   ☐ If no – reevaluate existing data, or

   ☐ If data are not available, skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)
EIs are measures being used by the RCRA Corrective Action Program to go beyond programmatic activity measures (reports received and approved, etc.) to track changes in the quality of the environment. The two EIs developed to date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for nonhuman (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI
A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA Corrective Action at or from the identified facility [i.e., site-wide]).

Relationship of EI to Final Remedies
While final remedies remain the long-term objective of the RCRA Corrective Action Program the EIs are near-term objectives that are currently being used as program measures for the Government Performance and Results Act of 1993 (GPRA). The "Current Human Exposures Under Control" EIs are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action Program's overall mission to protect human health and the environment requires that final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration/Applicability of EI Determinations
EI determinations status codes should remain in the RCRAInfo national database ONLY as long as they remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"1** above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from WMUs, RUs or AOCs)?

	Yes	No	?	Rationale/Key Contaminants
Groundwater	☐	☒	☐	
Air (indoors)2	☐	☒	☐	
Surface Soil (e.g., <2ft)	☐	☒	☐	
Surface Water	☐	☒	☐	
Sediment	☐	☒	☐	
Subsurf. Soil (e.g., >2ft)	☐	☒	☐	
Air (outdoors)	☐	☒	☐	

☒ If no (for all media) – skip to #6, and enter "YE", status code after providing or citing appropriate "levels" and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

☐ If yes (for any media) – continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

☐ If unknown (for any media) – skip to #6 and enter "IN" status code.

Rationale and Reference(s):

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

1"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

2Recent evidence (from the Colorado Department of Public Health and Environment, and others) suggests that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above [and adjacent to] groundwater with volatile contaminants) does not present unacceptable risks.

Potential **Human Receptors** (Under Current Conditions)

Contaminated Media	**Residents**	**Workers**	**Day-Care**	**Construction**	**Trespassers**	**Recreation**	**Food3**
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

A. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.

B. Enter "yes" or "no" for potential "completeness" under each "Contaminated" Media – Human Receptor Combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media – Human Receptor combinations (Pathways) do not have check spaces ("__"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

☐ If no (Pathways are not complete for any contaminated media-receptor combination) – skip to #6, and enter "YE" status code, after explaining and/or referencing conditions(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

☐ If yes (Pathways are complete for any "Contaminated" Media – Human Receptor combination) – continue after providing supporting explanation.

☐ If unknown (for any "Contaminated" Media – Human Receptor combination) – skip to #6 and enter "IN" status code.

Rationale and Reference(s)

4. Can the **exposures** from any of the complete Pathways identified in #3 be reasonably expected to be

3Indirect Pathway/Receptor (vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.).

"significant"4 (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: (1) greater in magnitude [intensity, frequency and/or duration] than assumed in the derivation of the acceptable "levels" [used to identify the "contamination"]; or (2) the combination of exposure magnitude [perhaps even though low] and contaminant concentrations [that may be substantially above the acceptable "levels"] could result in greater than acceptable risks)?

☐ If no (exposures can not be reasonably expected to be significant [i.e., potentially "unacceptable"] for any complete exposure pathway) – skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant".

☐ If yes (exposures could be reasonably expected to be "significant" [i.e., potentially "unacceptable"] for any complete exposure pathway) – continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

☐ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

☐ If yes (all "significant" exposures have been shown to be within acceptable limits) – continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

☐ If no (there are current exposures that can be reasonably expected to be "unacceptable") – continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

☐ If unknown (for any potentially "unacceptable" exposure) – continue and enter "IN" status code.

Rationale and Reference(s):

6. Check the appropriate RCRAInfo status codes for the Current Human Exposures Under Control EI Code (CA725), obtain supervisory signature and date on the EI determination below, and attach appropriate supporting documentation as well as a map of the facility.

☒ YE – Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Michigan Disposal Waste Treatment Plant, EPA ID #MID 048 090 633, located at 49350 North I-94 Service Drive, Belleville MI 48111 under current and reasonably expected conditions. This determination will be reevaluated when the agency/state

4If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

becomes aware of significant changes at the facility.

☐ NO – "Current Human Exposures" are NOT "Under Control."

☐ IN – More information is needed to make a determination.

Completed by: _____ Date: (type date)

(type name)
(type title)
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
517- -

Supervisor: _____ Date: (type date)

(type name)
(type title)
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
517- -

Locations where references may be found:

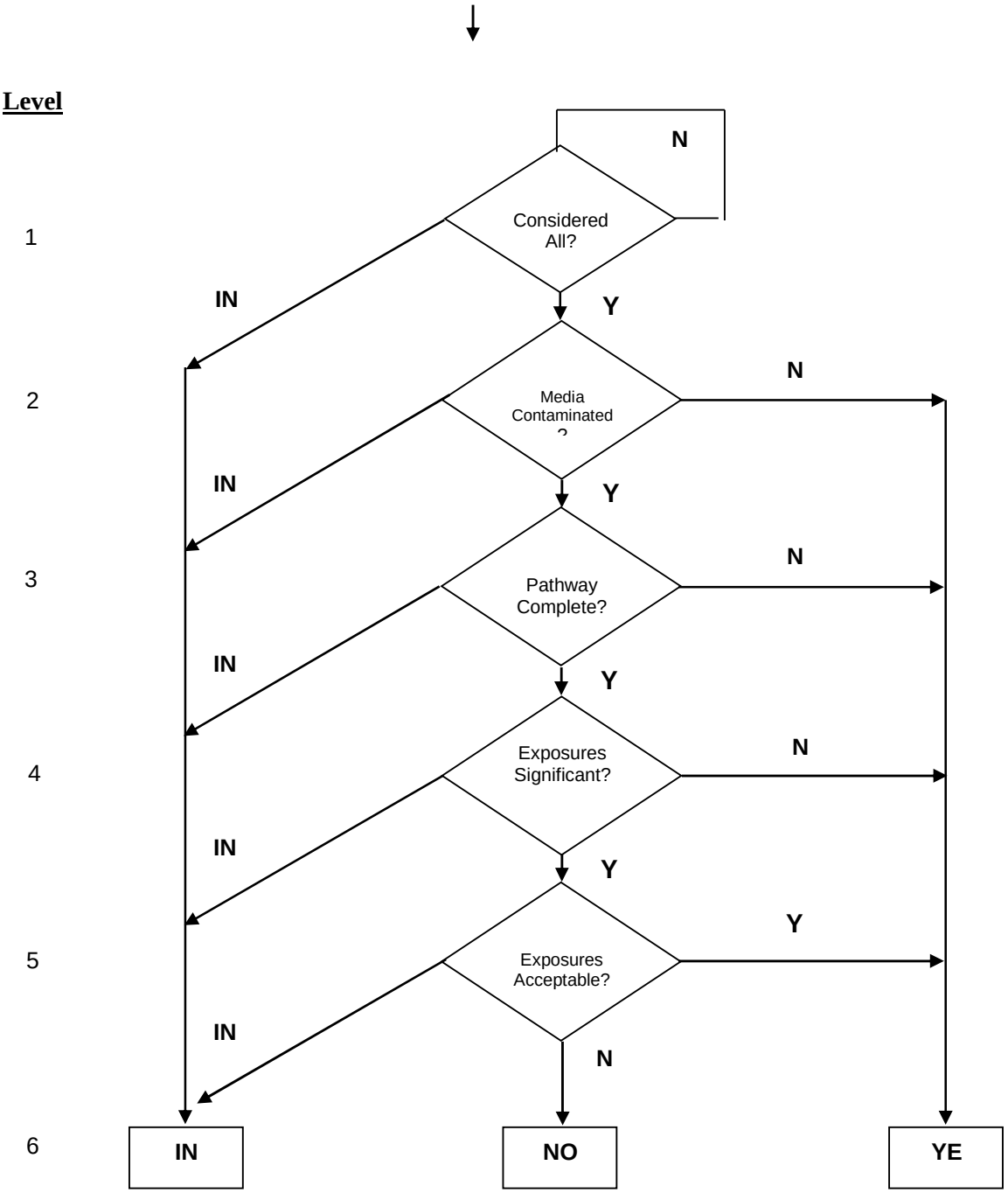
Hazardous Waste Section facility files at:
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
525 West Allegan Street
Lansing, Michigan 48933

Contact e-mail addresses:

(type name) - (type e-mail)
(type name) - (type e-mail)

Final Note: The human exposures EI is a qualitative screening of exposures and the determinations within this document should not be used as the sole basis for restricting the scope of more detailed (e.g., site-specific) assessments of risk.

Facility Name: Wayne Disposal Inc.(WDI)
EPA ID#: MID 048 090 633
City/State: Belleville, MI



DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

DEQ adapted to Word 8/07

RCRA Corrective Action Environmental Indicator (EI) RCRAInfo Code (CA750)
Migration of Contaminated Groundwater Under Control

Facility Name: **Wayne Disposal Inc.(WDI)**
Facility Address: **49350 North I-94 Service Drive., Belleville, MI 48111**
Facility EPA ID #: **MID 048 090 633**

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from waste management units (WMU), regulated units (RU), and areas of concern (AOC)), been **considered** in this EI determination?

   ☒ If yes - check here and continue with #2 below.

   ☐ If no - reevaluate existing data, or

   ☐ **I**f data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)
EIs are measures being used by the RCRA Corrective Action Program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EIs developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for nonhuman (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI
A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA Corrective Action at or from the identified facility [i.e., site-wide]).

Relationship of EI to Final Remedies
While final remedies remain the long-term objective of the RCRA Corrective Action Program the EIs are near-term objectives that are currently being used as program measures for the Government Performance and Results Act of 1993, (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated groundwater and contaminants within groundwater (e.g., nonaqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration/Applicability of EI Determinations
EI determinations status codes should remain in the RCRAInfo national database ONLY as long as they

remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

2. Is **groundwater** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

   ☐ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

   ☒ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

   ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"[2] as defined by the monitoring locations designated at the time of this determination)?

   ☐ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"[2].

   ☐ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"[2]) – skip to #8 and enter "NO" status code, after providing an explanation.

   ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

   ☐ If yes - continue after identifying potentially affected surface water bodies.

   ☐ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

   ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the

maximum concentration[3] of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions [e.g., the nature, and number, of discharging contaminants, or environmental setting], that significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

☐ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: (1) the maximum known or reasonably suspected concentration[3] of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and (2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

☐ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: (1) the maximum known or reasonably suspected concentration[3] of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and (2) for any contaminants discharging into surface water in concentrations[3] greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

☐ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented[4])?

☐ If yes - continue after either: (1) identifying the final remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR (2) providing or referencing an interim-assessment,[5] appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors that should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

☐ If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

☐ If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s):

7. Will groundwater **monitoring**/measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

   ☐ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

   ☐ If no - enter "NO" status code in #8.

   ☐ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

8. Check the appropriate RCRAInfo status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), obtain supervisor signature and date on the EI determination below, and (attach appropriate supporting documentation as well as a map of the facility.

   ☒ YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Michigan Disposal Waste Treatment Plant, EPA ID # MID 048 090 633, located at 49350 North I-94 Service Drive, Belleville, MI 48111. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater." This determination will be reevaluated when the agency/state becomes aware of significant changes at the facility.

   ☐ NO - Unacceptable migration of contaminated groundwater is observed or expected.

   ☐ IN - More information is needed to make a determination.

Completed by: _____ Date (type date)

(type name)
(type title)
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
517- -

Supervisor: _____ Date (type date)

(type name)
(type title)
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality

Locations where references may be found:

Hazardous Waste Section facility files at:
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
525 West Allegan Street
Lansing, Michigan 48933

Contact e-mail addresses:

(type name) - (type e-mail)
(type name) - (type e-mail)

Facility Name: Wayne Disposal Inc.(WDI)
EPA ID#: MID 048 090 633
City/State: Belleville, MI