FORM EQP 5111 ATTACHMENT TEMPLATE C1
USE AND MANAGEMENT OF CONTAINERS

This document is an attachment to the Michigan Department of Environment, Great Lakes, and Energy's *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.

R 299.9614 of 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 29.4101 to R 29.4505 promulgated pursuant to the provisions of the Michigan Fire Protection Act, PA 207, as amended (Act 207); and Title 40 of the Code of Federal Regulations (CFR) §§270.14(d), 270.15, and Part 264, Subpart I, establish requirements for the use and management of containers. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application template addresses requirements for the use and management of containers at the *Wayne Disposal Inc.* facility in Belleville, Michigan. This template addresses the condition of containers, compatibility of waste with containers, management of containers, inspections, containment, special requirements for ignitable or reactive waste, special requirements for incompatible wastes, and closure.

(Check as appropriate)

Applicant for Operating License for Existing Facility:

☐ R 299.9614 use and management of containers

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

☒ R 299.9614 use and management of containers

☞ *More than one box may be checked, if the facility has an existing container storage area and will construct a new container storage area.*

This template is organized as follows:

INTRODUCTION
C1.A DESCRIPTION OF CONTAINERS
C1.B CONDITION OF CONTAINERS
C1.C COMPATIBILITY OF WASTE WITH CONTAINERS
C1.D MANAGEMENT OF CONTAINERS
C1.E INSPECTIONS
C1.F CONTAINMENT
- C1.F.1 Secondary Containment System Design and Operation for Containers with Free Liquids
  - C1.F.1(a) Requirement for Base or Liner
  - C1.F.1(b) Containment System Drainage
  - C1.F.1(c) Containment System Capacity
  - C1.F.1(d) Control of Run-on
  - C1.F.1(e) Removal of Liquids from Containment System

C1.F.2 Secondary Containment System Design and Operation for Containers with No Free Liquids
C1.F.2(a) Containment System Drainage
C1.F.2(b) Container Management
C1.G SPECIAL REQUIREMENTS OF IGNITABLE OR REACTIVE WASTE
C1.H SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES
C1.I CLOSURE

📖 "Guidance for Permit Writers: Facilities Storing Hazardous Waste in Containers." EPA Publication PB88-105689.

INTRODUCTION

The container standards are performance standards for containers and container storage areas. Completion of this template should result in a demonstration of how your facility will meet these standards.

Please note that Template C11, Subpart CC, Air Emissions from Tanks, Containers, and Surface Impoundments, addresses air emissions for containers. Also note that while specific closure requirements for container storage areas are addressed in this template, you may reference information in Template A11, Closure and Postclosure Care Plans.

The application for renewal of the Operating License and this EQP Form 5111 Attachment Template C1 were developed from the same state and federal rules. The Application therefore answers all the substantive requirements of this Template and differs only in organization and form. Wayne Disposal, Inc. has reviewed this Template against the Application. After each requirement in this Template below we have referenced the appropriate section of the Application that addresses that requirement

C1.A DESCRIPTION OF CONTAINERS

[R 299.9614 and 40 CFR §264.171]

Wayne Disposal Inc. (WDI) may accept waste in bulk or containerized forms. Container types include but are not limited to drums, carboys, totes, filter bags, roll-off boxes. WDI does not accept containers holding free liquids for storage or disposal. The total available storage capacity at WDI is 328,510 gallons or 1,627 cubic yards of waste.

Drawing 1 WDI Permitted Structures identifies the location of the container storage areas. Figure 1 Container Storage Volume Estimate shows the storage capacity of the container storage area.

C1.B CONDITION OF CONTAINERS

[R 299.9614 and 40 CFR §264.171]

Generators are responsible for packaging the waste into containers in accordance with federal and state requirements for packaging and transport, and ensuring containers are made of or lined with materials that will not react with and are otherwise compatible with the hazardous waste stored in them so that the ability of the container to contain the waste is not impaired. Containers are visually inspected to ensure that they are in good condition and not leaking and then are placed in rows within the storage area. If a container holding hazardous waste that is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the hazardous waste will be transferred from the damaged container to a container that is in good condition, if it must be placed into storage. Container to container transfer will be done in the container storage area using a backhoe, excavator, and other appropriate equipment.

C1.C COMPATIBILITY OF WASTE WITH CONTAINERS

[R 299.9614 and 40 CFR §264.172]

In accordance with 40 CFR 262.30 generators must package the waste in accordance with Department of Transportation regulations for packaging. As a result, it is anticipated that containers received will be properly packaged and therefore made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

C1.D MANAGEMENT OF CONTAINERS

[R 299.9614 and 40 CFR §264.173]

In accordance with 40 CFR 264.173 containers holding hazardous waste will be closed during storage, except when it is necessary to add or remove waste, and they will not be opened, handled, or stored in a manner which may rupture the container or cause a leak. Non-bulk containers are protected from the flow of traffic and can be stacked two containers high or three containers high for 5 gallon pails.

40 CFR 264.314 prohibits the disposal of free liquids. In the course of executing the waste pre-acceptance process non-bulk containers are temporarily staged in the proposed storage area while they remain in possession of the transporter and WDI makes a waste acceptance determination. Non-conforming that are identified as containing free liquids will be placed back onto conveyance, while discrepancy procedures identified in the Attachment A2.A3 Chemical and Physical Waste Analysis Plan (WAP) are completed.

F020, F021, F022, F023, F026, and F027 waste streams require secondary containment regardless of the presence of free liquids. WDI will only temporarily stage these waste streams in order to execute pre-acceptance procedures identified in the WAP. An acceptance determination must be made the same operating day and either placed in the landfill or rejected back to the generator or an alternate facility.

Aisle space will be maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the operation in an emergency. This spacing has been considered in the capacity determinations. The aisle space designated in Figure 1 depicts the typical configuration of the containers when the container storage area is full providing enough spacing for operating equipment to access containers in the event of an emergency. During normal operations the configuration of the containers in the storage area will be placed in a manner that maintains WDI's ability to access the containers in the event of an emergency. A minimum of two feet of aisle space is required within the storage area. Waste containers are segregated in accordance with Table C.1 as indicated in the WAP.

The designated container storage areas are adjacent to the landfill unloading process, but separated with sufficient space between the vehicle turn path where containers will be placed. Because non-bulk containers have reduced visibility from the cab of a delivery vehicle, WDI further protects the containers with concrete barriers.

C1.E INSPECTIONS

[R 299.9614 and 40 CFR §264.174]

Inspection procedures are outlined in Attachment A5 Inspection Schedules and comply with the requirements set forth by 40 CFR 264.174.

C1.F CONTAINMENT

[R 299.9614 and 40 CFR §§264.175 and 270.15]

As specified by 40 CFR 264.175(c) containers holding only wastes that do not contain free liquids need not have a containment system. WDI does not accept containers with free liquids for storage. Upon inspection containers that contain liquids will not be accepted.

C1.F.2 Secondary Containment System Design and Operation for Containers with No Free Liquids

[R 299.9614 and 40 CFR §§264.175 and 270.15(b)(1)]

C1.F.2(a) Containment System Drainage

[R 299.9614 and 40 CFR §§264.175 and 270.15(b)(2)]

The container storage area is paved with asphalt and sloped to allow precipitation to drain away from the containers. Precipitation from the paved area is managed through WDI's Lined Pond Water Shed.

C1.F.2(b) Container Management

[R 299.9614 and 40 CFR §§264.175 and 270.15(b)(2)]

See C1.D.

C1.G SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE

[R 299.9614 and 40 CFR §§264.176 and 270.15(b)(2)]

WDI does not accept ignitable or reactive waste

C1.H SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

[R 299.9614 and 40 CFR §§264.177(c) and 270.15(b)(2)]

Waste containers are segregated in accordance with Table C.1 as indicated in Attachment A2.A3 Chemical and Physical Waste Analysis Plan. WDI does not store incompatibles in the same container.

C1.I CLOSURE

[R 299.9614 and 40 CFR §264.178]

Closure information is provided in A11 Closure Care Plan. Upon closure, all hazardous waste and hazardous waste residues will be removed from the container storage area and containment systems. Remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed.

Drawing 1
WDI Permitted Structures

N 9000
N 8000
N 7000
N 6000
E 4000
E 5000
E 6000
E 7000
E 8000
E 9000

MC VI-F2
MC 4
MC VI-F3
MC VI-F4
MC VI-F1
MC VI-G2
MC VI-G3
MC VI-G1
MC VI-G1-EP2
MC VI-G1-EP1
MC VI-G4
MC VI-G6
MC VI-G7
MC VI-G5
MC 1
CONTAINER STORAGE AND VERIFICATION AREA
MC6EP2-NE
MC 5
MC6EP2-W
MC6EP2-SE
MC6EP1-SW
MC6 B
MC6 A-N
MC6 D
MC6 C
MC6 A-S
MICHIGAN DISPOSAL INC.
MC 7
MC 9
MC 11
MC 10
WASTEWATER TREATMENT PLANT

N

LEGEND:

- NEW CELL BOUNDARY LOCATION
- OLD CELL BOUNDARY LOCATION
- PROPERTY LINE LOCATION
- EXISTING CONTOUR (2 FT INTERVAL)
- EXISTING STRUCTURE / BUILDING
- PAVED / GRAVEL — EXISTING ROAD
- GRID COORDINATES

NOTES:

1. THE BASE MAP WAS CREATED USING AN AERIAL SURVEY TAKEN IN DECEMBER 10, 2020. UPDATED WITH FLYOVER FROM DRONEVIEW IN SEPTEMBER 2, 2021

SCALE 0' 100' 200' 400'

TIME PLOTTED: 3:36:17 PM
DATE PLOTTED: 10/7/2021

DRAWING SIZE: 24" X 36"

DATE:	9-30-21
DESIGNED BY:	XZ
DRAWN BY:	BDA
CHECKED BY:	HS
APPROVED BY:	XZ

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REVISIONS	REV	DATE	DRN	APP

WAYNE DISPOSAL FACILITY
WAYNE, MICHIGAN

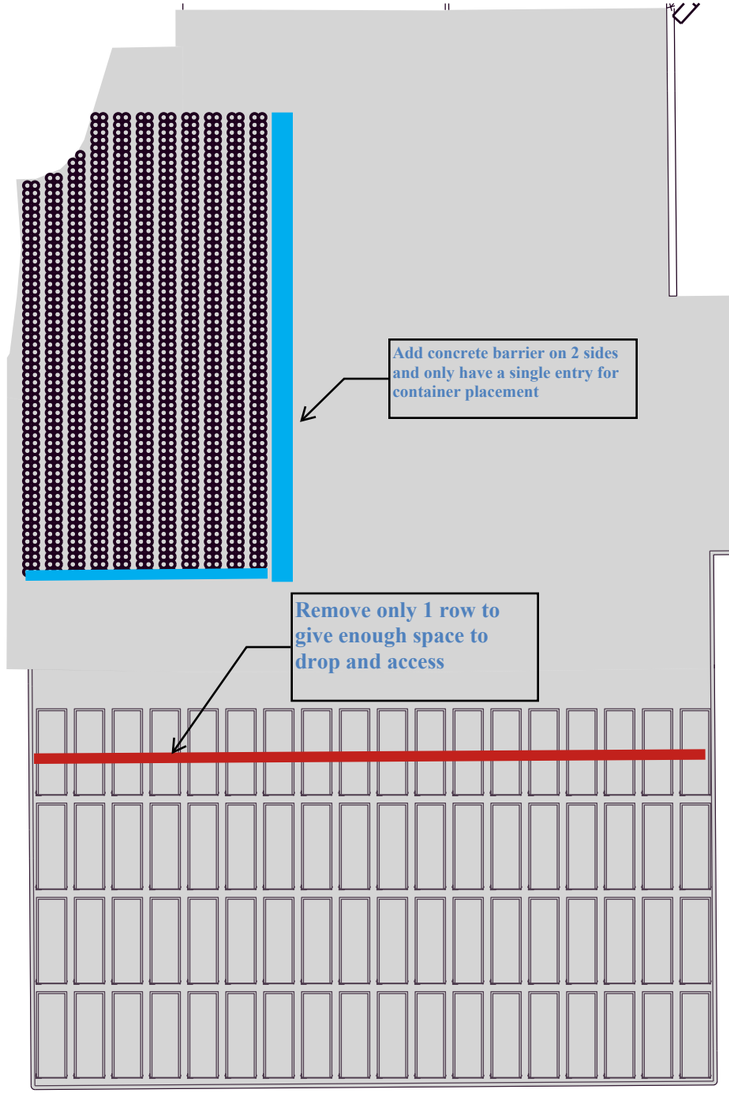
FACILITY DRAWING

PROJECT NUMBER
1218070066

SCALE
1" = 200'

DRAWING NO
1

Figure 1
Container Storage Volume Estimate



NON-BULK CONTAINER STORAGE AREA

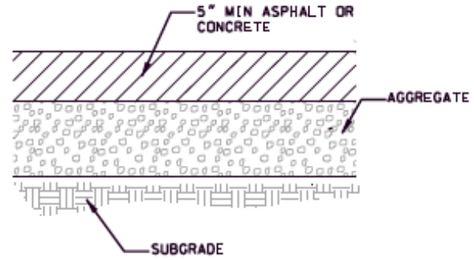
NUMBER OF CONTAINERS SHOWN ASSUMING ALL CONTAINERS ARE DOUBLE STACKED: 2594

VOLUME OF STORAGE AVAILABLE: 142,670 GALLONS

BULK CONTAINER STORAGE AREA

NUMBER OF CONTAINERS SHOWN: 72

VOLUME OF STORAGE AVAILABLE: 290,880 GALLONS



PAVEMENT
NOT TO SCALE

SCALE 0' 20' 40' 80'

LEGEND

ASPHALT OR CONCRETE PAVEMENT

20 CUBIC YARD ROLL-OFF BOX

55 GALLON DRUM

NOTE:

1. 2 FEET OF AISLE SPACE SHOWN.

PROJECT: WAYNE DISPOSAL, INC
BELLEVILLE, MICHIGAN

SHEET TITLE: **CONTAINER STORAGE VOLUME ESTIMATE**

cti

PROJECT NO: 1218070050
SCALE: 1"= 40'
DATE: 8-31-21

FIGURE NO. 1

TIME PLOTTED: 5:04:47 PM
DATE PLOTTED: 9/7/2021

DRAWING SIZE: 11"x17"