



WAYNE DISPOSAL, INC.

November 26, 2001

Ms. Rebecca Rodeen
United States Environmental Protection Agency, Region 5
77 West Jackson Boulevard
DW-8J
Chicago, Illinois 60604

COPY

RE: **Wayne Disposal Inc. Site #2 RCRA Reapplication**
Belleville, Michigan
MID# 048 090 633

Dear Ms. Rodeen:

Enclosed please find Wayne Disposal Inc. (WDI) Site #2's RCRA permit reapplication, supporting documentation, and engineering plans for your review. WDI appreciates the extension granted to submit mail these documents after the holiday.

If you have any questions regarding this information please contact me at (734) 699-6297 or Scott Maris at 734-329-8020.

Sincerely,
Wayne Disposal, INC.


Jennifer Drenner
Regulatory Specialist

Enclosure

CC: File 1.2.2

CC letter and application only:

- Mike Busse, MDEQ, Livonia
- Pete Quanckenbush, MDEQ, Lansing
- Scott Maris, EQ
- Tim Tilloti, EQ
- Laurie Kendall, EQ



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

APR 14 1997

REPLY TO THE ATTENTION OF:

DRP-8J

CERTIFIED MAIL: P 851 379 152
RETURN RECEIPT REQUESTED

Mr. Jerry A. Fore
Vice President
Wayne Disposal, Inc.
1349 South Huron Street
Ypsilanti, Michigan 48197

Ms. Helen Petraukas
Vice President
Environmental Safety Engineering
Ford Motor Company
12th Floor, The American Road
Dearborn, Michigan 48121

RE: Final Federal RCRA Permit
Wayne Disposal Site #2 Landfill
MID 048 090 633

Dear Mr. Fore:

Enclosed is a copy of the Federal portion of the Resource Conservation and Recovery Act (RCRA) permit for the Wayne Disposal Site #2 Landfill, in Belleville, Michigan. In addition, the Response to Comments generated as a result of the public notice for the draft permit is enclosed. The RCRA permit contains both Federal permit conditions (contained herein) and State permit conditions for which the Michigan Department of Environmental Quality has been authorized under Title 40 Code of Federal Regulations (40 CFR) Part 271. Unless review is requested under 40 CFR 124.19, the Federal portion shall become effective on the date indicated on the signature page of the permit. When both this portion of the permit and the State of Michigan's portion of the permit are effective, Wayne Disposal, Inc. will have a RCRA permit authorizing those hazardous waste management activities specified in the RCRA permit.

The duration of the permit is five (5) years. However, the United States Environmental Protection Agency (U.S. EPA) may modify, revoke, reissue, or terminate this permit based on causes specified in 40 CFR 270.41, 270.42, and 270.43.

This permit is effective on the date indicated on the signature

page of the permit. Eligibility to appeal this permit is discussed further in 40 CFR 124.19. The original and one copy of the petition must be received by the U.S. EPA in Washington, D.C., at the address indicated below within 30 days after service of notice:

U.S. Environmental Protection Agency
 Environmental Appeals Board (MC-1103B)
 401 M Street, SW
 Washington, D.C. 20460

Submissions made by hand-delivery (including overnight delivery) should be made at the following address:

U.S. Environmental Protection Agency
 Environmental Appeals Board (MC-1103B)
 Westory Building
 607 14th Street, NW
 Suite 500
 Washington, D.C. 20005

A copy of the petition should also be sent to:

Waste Management Branch (DRP-8J)
 Waste, Pesticides, and Toxics Division
 U.S. Environmental Protection Agency, Region 5
 77 West Jackson Boulevard
 Chicago, Illinois 60604-3590

The procedures for filing an appeal are found in 40 CFR 124.19 (enclosed). The administrative appeal procedures must be completed prior to any action seeking judicial review.

If you have any questions concerning this matter, please contact Shari Kolak of my staff, at (312) 886-6151.

Sincerely yours,



Norman R. Niedergang, Director
 Waste, Pesticides and Toxics Division

Enclosure

cc: Jim Sygo, MDEQ
 Peter Quackenbush, MDEQ

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
HAZARDOUS WASTE MANAGEMENT PERMIT

Name of Permittee: Wayne Disposal, Incorporated
Name of Facility: Wayne Disposal Site #2 Landfill
Facility Location: Street Address: 49350 North I-94 Service Drive
City, State: Belleville, Michigan
EPA Identification Number: MID 048 090 633
Effective Date: May 19, 1997
Expiration Date: May 19, 2002

Authorized Activities:

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, (42 U.S.C. §6901, et seq.) (collectively referred to as "RCRA"), and regulations promulgated thereunder by the United States Environmental Protection Agency (U.S. EPA) (codified in Title 40 of the Code of Federal Regulations (40 CFR)), Federal permit conditions (hereinafter called the "permit") are issued to Wayne Disposal, Inc. (WDI) (hereinafter called the "Permittee"), for the facility Wayne Disposal Site #2 Landfill located in Belleville, Michigan.

The RCRA permit contains both the effective Federal permit conditions (contained herein) and the effective State permit conditions issued by the State of Michigan's RCRA program authorized under 40 CFR Part 271 (hereinafter called the "State license"). The RCRA permit authorizes the Permittee to conduct hazardous waste management activities as specified in the RCRA permit.

PERMIT CONDITIONS

(Note: The regulatory citations in parentheses are incorporated by reference.)

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT (40 CFR 270.4 and 270.30(g))

The Permittees are allowed to manage hazardous waste in accordance with the conditions of the RCRA permit. Any management of hazardous waste not authorized in the RCRA permit is prohibited.

Compliance with the RCRA permit during its term constitutes compliance, for the purposes of enforcement, with Subtitle C of RCRA, except for those requirements not included in the permit which become effective by statute, or which are promulgated under 40 CFR Part 268, restricting the placement of hazardous waste in or on the land, or which are promulgated under 40 CFR Part 264 regarding leak detection systems. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (42 U.S.C. §9601 et seq., commonly known as "CERCLA"); or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS (40 CFR 270.30(f))

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. This permit may also be reviewed and modified by the U.S. EPA, consistent with 40 CFR 270.41, to include any terms and conditions determined necessary to protect human health and the environment pursuant to Section 3005(c)(3) of RCRA. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes, or anticipated noncompliance on the part of the Permittees does not stay the applicability or enforceability of any permit condition. The Permittees shall

not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective.

C. SEVERABILITY (40 CFR 124.16)

The provisions of this permit are severable, and if any provision of this permit, or if the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. (40 CFR 270.30(a))

The Permittees shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit (See 40 CFR 270.61). Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of RCRA and HSWA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, denial of a permit renewal application, or other appropriate action.

2. Duty to Reapply. (40 CFR 270.10(h))

The Permittees must submit an application for permit reissuance at least 180 days before the expiration date of this permit pursuant to 40 CFR 270.10(h) unless permission for a later date has been granted by the Regional Administrator. The Regional Administrator shall not grant permission for applications to be submitted later than the expiration date of the existing permit.

3. Permit Expiration. (40 CFR 270.13, 270.14, 270.50, and 270.51)

This permit and all conditions herein shall be effective for a fixed term not to exceed 5 years, and will remain in effect beyond the permit's expiration date only if the Permittees have submitted a timely, complete application (per 40 CFR 270.10 and applicable sections of 270.14 through 270.29): a) to both the U.S. EPA and the State; and b) through no fault of the Permittees, the Regional Administrator and the State have not issued a new permit.

4. Need to Halt or Reduce Activity Not a Defense. (40 CFR 270.30(c))

It shall not be a defense for the Permittees in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. (40 CFR 270.30(d))

In the event of noncompliance with the permit, the Permittees shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health and the environment.

6. Proper Operation and Maintenance. (40 CFR 270.30(e))

The Permittees shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittees to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality control/quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information. (40 CFR 270.30(h) and 264.74)

The Permittees shall furnish to the Regional Administrator, within the time designated by the Regional Administrator, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittees shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit. The information required to be maintained or submitted pursuant to this

permit is not subject to the Paperwork Reduction Act of 1980, 44 U.S.C. §§3501 et seq.

8. Inspection and Entry. (40 CFR 270.30(i))

The Permittees shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

- a. Enter at reasonable times upon the Permittees' premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance, or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Recordkeeping. (40 CFR 270.30(j), 270.31, 264.73, and 264.74)

The Permittees shall retain all reports, records, or other documents, required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the reports, records or other documents. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

10. Reporting Planned Changes. (40 CFR 270.30(1)(1))

The Permittees shall give notice to the Regional Administrator of any planned physical alterations or additions to the permitted facility as soon as possible.

11. Anticipated Noncompliance. (40 CFR 270.30(1)(2))

The Permittees shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Such notice does not constitute a waiver of the Permittees' duty to comply with permit requirements.

12. Transfer of Permits. (40 CFR 270.30(1)(3), 270.40(a), and 264.12(c))

This permit may be transferred by the Permittees to a new owner or operator only after providing notice to the Regional Administrator and only if the permit is modified, or revoked and reissued, pursuant to 40 CFR 270.40(b), 270.41(b)(2), or 270.42(a). Before transferring ownership or operation of the facility during its operating life, the Permittees shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264, 268, and 270 (including all applicable corrective action requirements), and shall provide a copy of the RCRA permit to the new owner or operator.

13. Compliance Schedules. (40 CFR 270.30(1)(5) and 270.33)

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted to the Regional Administrator no later than 14 days following each scheduled date.

14. Twenty-four Hour Reporting. (40 CFR 270.30(1)(6) and 270.33)

The Permittees shall report to the Regional Administrator any noncompliance with this permit which may endanger human health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittees become aware of the circumstances. This report shall include the following:

- a. Information concerning the release of any hazardous waste which may endanger public drinking water supplies; and
- b. Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (1) Name, address, and telephone number of the owner or operator;
 - (2) Name, address, and telephone number of the facility;
 - (3) Date, time, and type of incident;
 - (4) Name and quantity of material(s) involved;
 - (5) The extent of injuries, if any;
 - (6) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
 - (7) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittees become aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); steps taken to minimize impact on the environment; whether the noncompliance has been corrected, and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate and prevent recurrence of the noncompliance. The Permittees need not comply with the 5-day written notice requirement if the Regional Administrator waives the requirement. Upon waiver of the 5-day requirement, the Permittees shall submit a written report within 15 days of the time the Permittees become aware of the circumstances.

15. Other Noncompliance. (40 CFR 270.30(1)(10))

The Permittees shall report to U.S. EPA all other instances of noncompliance not otherwise required to be reported above at the time monitoring reports are submitted to the State. The reports shall contain the information listed in Condition I.D.14.

16. Other Information. (40 CFR 270.30(1)(11))

Whenever the Permittees become aware that they failed to submit any relevant facts, or submitted incorrect information to the Regional Administrator in the permit application or in any reports, records, or other documentation provided to the Regional Administrator, the Permittees shall promptly submit such facts or information.

17. Submittal of Reports or Other Information. (40 CFR 270.30(1)(7), (8), and (9), and 270.31)

All reports or other information required to be submitted pursuant to this permit shall be sent to:

Waste Management Branch, DRP-8J
Waste, Pesticides and Toxics Division
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Attention: IL/IN/MI Permitting Section

18. All other requirements contained in 40 CFR 270.30 not set forth herein are hereby fully incorporated into this permit.

E. SIGNATORY REQUIREMENT (40 CFR 270.30(k))

All reports or other information submitted to or requested by the Regional Administrator, his designee, or authorized representative, shall be signed and certified as required by 40 CFR 270.11.

F. CONFIDENTIAL INFORMATION

In accordance with 40 CFR 270.12 and 40 CFR Part 2, Subpart B, any information submitted to the U.S. EPA pursuant to this

permit may be claimed as confidential by the submitter. Any such claim must be asserted at the time of submission in the manner prescribed on the application form or instructions, or, in the case of other submissions, by marking the words "Confidential Business Information" on each page containing such information.

If no claim is made at time of submission, the U.S. EPA may make the information available to the public without further notice. If a claim is asserted, the information will be treated in accordance with the procedures in 40 CFR Part 2.

G. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittees shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, all items required by 40 CFR 264.73, including the following documents and all amendments, revisions, and modifications to these documents:

1. Waste Analysis Plan, as required by 40 CFR 264.13 and this permit;
2. Operating Record, as required by 40 CFR 264.73 and this permit;
3. Notifications from generators accompanying each incoming shipment of wastes subject to 40 CFR Part 268, Subtitle C, that specify treatment standards, as required by 40 CFR 264.73, 268.7, and this permit.

II. LAND DISPOSAL REQUIREMENTS

A. GENERAL CONDITIONS

1. The Permittees shall comply with all the applicable self-implementing requirements of 40 CFR Part 268 and all applicable land disposal requirements which become effective by statute (42 U.S.C. §6924).
2. A mixture of any restricted waste with nonrestricted waste(s) is a restricted waste under 40 CFR Part 268.
3. The Permittees shall not in any way dilute a restricted waste or the residual from treatment of a restricted waste as a substitute for adequate treatment to achieve compliance with 40 CFR Part 268, Subpart D, to circumvent

the effective date of a prohibition in 40 CFR Part 268, Subpart C, to otherwise avoid a prohibition in 40 CFR Part 268, Subpart C, or to circumvent a land disposal prohibition imposed by Section 3004 of RCRA.

4. The Permittees shall prepare and maintain a current list of the hazardous waste codes handled by the facility that are identified in 40 CFR 268, Subparts B and C. The list shall include all waste codes handled by the facility, and any associated treatment standards, and shall be updated through the inclusion of new treatment standards, as promulgated or amended. This list shall be provided to the U.S. EPA representatives, or their designees, upon request.

B. TESTING AND RELATED REQUIREMENTS

1. The Permittees must test, in accordance with 40 CFR 268.7(a), any waste generated at the facility, or use knowledge of the waste, to determine if the waste is restricted from land disposal.
2. The Permittees shall comply with all applicable treatment standards provided in 40 CFR 268, Subpart D.
3. The Permittees shall comply with all the applicable notification, certification, and recordkeeping requirements described in 40 CFR 268.7(a) and (b).

III. HAZARDOUS DEBRIS AND OTHER WASTES

A. HAZARDOUS DEBRIS

The Permittees may dispose macroencapsulated wastes at the facility in accordance with this permit and the State license conditions pertaining to the landfill (including specified disposal capacities).

B. CARBAMATE WASTES

The Permittees may dispose treated carbamate wastes identified in Attachment I to this permit at the facility in accordance with this permit and the State license conditions pertaining to the landfill (including specified disposal capacities).

C. PCB WASTES

The Permittees may dispose PCB wastes at the facility provided the Permittees obtain approval from the U.S. EPA Toxic Substances and Control Act (TSCA) program and the Permittees comply with the provisions of Section III of the State license (including specified disposal capacities).

IV. AIR EMISSION STANDARDS

A. NOTIFICATION OF REGULATED ACTIVITY

The Permittees shall notify the Regional Administrator of any waste management units which become subject to the requirements of 40 CFR Part 264, Subparts AA or BB, within 30 days of startup of the regulated activity.

B. DUTY TO COMPLY WITH FUTURE REQUIREMENTS

The Permittees shall comply with all self-implementing provisions of any future air regulations promulgated under the provisions of Section 3004(n) of RCRA, as amended by HSWA.

V. SCHEDULE OF COMPLIANCE

The Permittees shall submit the required documents in accordance with the schedule shown below.

AIR EMISSION STANDARDS DOCUMENT	SUBMITTAL DEADLINE
Notification of waste management units subject to 40 CFR Part 264 Subparts AA or BB	Within 30 days of startup of activity

ATTACHMENT I
LIST OF ACCEPTABLE WASTE TYPES

EPA Hazardous Waste Number	Description of Hazardous Waste (Carbamates)
K156	Organic waste (including heavy ends, still bottoms, light ends, spent solvents, filtrates, and decantates) from the production of carbamates and carbamoyl oximes.
K157	Wastewaters (including scrubber waters, condenser waters, washwaters, and separation waters) from the production of carbamates and carbamoyl oximes.
K158	Bag house dust, and filter/separation solids from the production of carbamates and carbamoyl oximes.
K159	Organics from the treatment of thiocarbamate wastes.
K161	Purification solids (including filtration, evaporation, and centrifugation solids), bag house dust, and floor sweepings from the production of dithiocarbamate acids and their salts. (This listing does not include K125 or K126.)
P127	7-Benzofuranol, 2,3-dihydro-2,2-dimethyl-, methylcarbamate
P128	Phenol, 4-(dimethylamino)-3,5-dimethyl-, methylcarbamate
P185	1,3-Dithiolane-2-carboxaldehyde, 2,4-dimethyl-, O-[(methylamino)carbonyl]oxime
P188	Benzoic acid, 2-hydroxy, compound with (3aS-cis)-1,2,3,3a,8,8a-hexahydro-1,3a,8-trimethylpyrrolo [2,3-blindol-5-yl methylcarbamate ester (1:1)
P189	Carbamic acid, [(dibutylamino)thio]methyl-, 2,3-dihydro-2,2-dimethyl-7-benzofuranyl ester
P190	Carbamic acid, methyl-, 3-methylphenyl ester

- P191 Carbamic acid, dimethyl-, 1 -[(dimethylamino carbonyl)]-5-methyl-1H-pyrazol-3-yl ester
- P192 Carbamic acid, dimethyl-, 3-methyl-1-(1-methylethyl)-1H-pyrazol-5-yl ester
- P194 Ethanimidothioc acid, 2-(dimethylamino)- N-[[(methylamino) carbonyl]oxy]-2-oxo-, methyl ester
- P196 Manganese, bis(dimethylcarbomodithioato-S,S')-,
- P197 Methanimidamide, N,N-dimethyl-N'-[2-methyl-4-[[(methylamino) carbonyl]oxy]phenyl]-
- P198 Methanimidamide, N,N-dimethyl-N'-[3-[[(methylamino) carbonyl]oxylphenyl]-, monohydrochloride
- P199 Phenol, (3,5-dimethyl-4-(methylthio)-, methylcarbamate
- P201 Phenol, 3-methyl-5-(1-methylethyl)-, methyl carbamate
- P202 Phenol, 3-(1-methylethyl)-, methyl carbamate
3-isopropylphenyl N-methylcarbamate or m-Cumenyl methylcarbamate
- P203 Propanal, 2-methyl-2-(methysulfonyl)-, O-[(methylamino)carbonyl] oxime
- P204 Pyrrolo[2,3-b]indol-5-ol, 1,2,3,3a,8,8a-hexahydro-1, 3a,8-trimethyl-, methylcarbamate (ester), 3aS-cis)-
- P205 Zinc, bis(dimethylcarbomodithioato-S,S')-,
- U271 Carbamic acid, [1-[(butylamino)carbonyl]-1H-benzimidazol-2-yl]-, methyl ester
- U278 1,3-Benzodioxol-4-ol, 2,2-dimethyl-, methyl carbamate
- U279 1-Naphthalenol, methylcarbamate
- U280 Carbamic acid, (3-chlorophenyl)-, 4-chloro-2-butynyl ester

4-chloro-2-butynyl ester

- U364 1,3-Benzodioxol-4-ol, 2,2-dimethyl-,
- U367 7-Benzofuranol, 2,3-dihydro-2,2-dimethyl-
- U372 Carbamic acid, 1 H-benzimidazol-2-yl, methyl ester
- U373 Carbamic acid, phenyl-, 1 -methylethyl ester
- U387 Carbamothioic acid, dipropyl-,
S-(phenylmethyl) ester
- U389 Carbamothioic acid, bis(1-methylethyl)-
S-(2,3,3-trichloro-2-propenyl) ester
- U394 Ethanimidothioic acid,
2-(dimethylamino)-N-hydroxy-2-oxo-, methyl ester
- U395 Ethanol, 2,2'-oxybis-, discarbamate
- U404 Ethanamine, N,N-diethyl-
- U409 Carbamic acid, [1,2-
phenylenebis(iminocarbonothioyl)]bis, dimethyl
ester
- U410 Ethanimidothioc acid, N,N'-
[thiobis(methylimino)carbonyloxy]]bis-, dimethyl
ester
- U411 Phenol, 2-(1-methylethoxy)-, methylcarbamate