

→ Day Rossberg L.M.D  
State of Wisconsin

**CORRESPONDENCE/MEMORANDUM**

DATE: April 26, 1989 FILE REF: 4440  
TO: Mark F. Giesfeldt - SW/3  
FROM: Robin Schmidt *RS* - SW/3  
SUBJECT: Drill Cuttings from Preremedial Superfund SIs

The Preremedial Superfund staff had a meeting on 4/25/89 in Stevens Point to discuss a variety of issues mostly relating to conducting Preremedial Superfund Site Inspections. One item that was discussed related to what to do with drill cuttings, well development water and purge water at these sites. Because there is no final policy on what to do with these materials nor are there standard operating procedures, we developed our own SOPs until more comprehensive guidelines are finalized. It was suggested that I submit our proposed policy to you for your information and action. This item may be brought up at the next Coordinators meeting. I think this interim policy makes sense and is logical in its approach. Perhaps we should discuss this in more detail at your convenience. We are concerned that the drilling season is fast approaching and we need a policy in place within the next few weeks in order to deal with the cuttings and water appropriately. Thanks for your expeditions review of this.

1. Drill Cuttings: Drill cuttings should be piled on a tarp and covered as the wells are installed. The drill contract will specify this and require the driller to sample and have analyzed the cuttings while the drill operation is ongoing. When the analyses are complete, the drill cuttings will be spread out at the site if they are non-hazardous. If they are hazardous, they will have to be containerized and dealt with as a hazardous waste. The driller would not be responsible for disposal, but would be responsible for containerizing the cuttings.

2. Development Water: The driller would be responsible for containerizing the development waters seperately and having them analyzed to determine if they are hazardous. If non-hazardous, the containers would be emptied on site. If hazardous, they would have to be dealt with as a hazardous waste. Please note that these analyses will help to determine whether the purge water will be hazardous prior to the sampling event.

3. Purge Waters: For sites that are recently drilled, the analyses of the development water will determine whether the purge water is hazardous or not. If not, the purge water will be emptied on site; if hazardous, the purge water will be collected for disposal as a hazardous waste. For sites without analyses of the water, we will screen the purge water with an HNu. If readings are greater than 10 units, we will containerize the water. If readings are less than 10 units, we will dispose of the water on site. We will also use the best professional judgement to determine whether we anticipate hazardous substances in the water and also use pH and conductivity

meters in the field to help determine whether there are problems with the quality of the purge water.

Please note that we anticipate using ERF monies to dispose of any wastes that are generated from the drilling and purging waters, since those costs are not covered in our Cooperative Agreement.

cc Barbara Zellmer - SW/3  
Lakshmi Sridharan - SW/3  
District Solid Waste Coordinators

**CORRESPONDENCE/MEMORANDUM**

State of Wisconsin

Date: April 24, 1989

Ref: 4440 &  
4430To: Mark Giesfeldt - SW/3  
Barb Zellmer - SW/3From: Gary Edelstein <sup>GE</sup> - SW/3  
Mark Tusler - SW/3 <sup>MT</sup>

Subject: RCRA Land Disposal Restrictions (LDR) Seminar, Milwaukee

We attended the above-referenced seminar on 3/23/89. This memo is intended to give a brief summary of the LDR's and discuss our impressions of the impacts the restrictions may have on the Environmental Response & Repair program. For further information on the applicability of these requirements, please consult with Ed Lynch of the Hazardous Waste Management Section. Attached is a copy of the table of contents for the program manual. We will keep a copy of the manual in our offices.

The land disposal restrictions are a complicated regulatory program now administered and enforced by EPA (with assistance from the Hazardous Waste Program). Our agency plans to apply for authorization for a portion of the LDR program within the next year. In summary:

1. The LDR's only apply to RCRA hazardous wastes. Specific groups of these wastes are banned or restricted from hazardous waste land disposal units according to a schedule. Some hazardous wastes are subject to the LDR's now; all are scheduled to be by May 1990. If a banned or restricted waste must go to a disposal unit, in most instances a "best available" treatment standard must be met first. Depending on the waste, such treatment methods can include incineration, solidification and treatment to achieve the standard or to eliminate a hazardous characteristic (if the waste is hazardous only by characteristic). Wastes that are hazardous only because they display a characteristic are not subject to the LDR's until May 1990.

2. Wastes, contaminated soil and debris (as well as investigative wastes) from ERF, spill and LUST sites, if a RCRA hazardous waste, must meet the LDR's prior to placement in a land disposal unit, including on-site units. If placement doesn't occur, the LDR's don't apply. The LDR guidance defines "placement" in a unit broadly, and includes redeposition on-site in the same unit after management in intervening treatment or storage units, as well as consolidation of wastes from other units into one unit. However, placement does not include movement or consolidation of waste within the same unit or area or covering or capping wastes in place. We've attached a graphic from a Superfund training manual which may help persons understand this definition. Such wastes at a federal Superfund or RCRA Corrective Action

sites are given a temporary exemption from the restrictions until 11/8/90; but clean-ups under state authorities are not covered by this exemption.

The greatest impact in Wisconsin appears to be on sites where investigation and clean-up of hazardous wastes will occur. This includes sites where it is known a listed RCRA hazardous waste was discharged or disposed of (even if that occurred before the effective date of the RCRA regulations--11/19/80) or a characteristic hazardous waste is found. The best way to illustrate the impact is to give examples:

1. Example 1--A solvent product is spilled over a period of years due to mishandling, tank and piping leaks (historical spill). Spillage occurred before 1980. The product is listed in Table V of s. NR 181.16 (a "U" waste). Any contaminated soil, groundwater and investigative wastes (including drill cuttings, development and decon water) must be managed as a hazardous waste. If such waste is land disposed of, the LDR requirements must be met, unless the site is addressed under Superfund (CERCLA) or RCRA corrective action authorities before 11/8/90. If the remedial action involves picking up and aerating the contaminated soil and placing back on-site, then the LDR requirements would apply to the treated soil, unless it could be shown that the soil was no longer a hazardous waste (i.e., show that all the solvent contamination was removed from the soil through aeration). It should also be noted that on-site disposal of treated soil, if it is still a hazardous waste, must be in a licenced unit that meets the minimum technology requirements (MTR's) of RCRA (including double liners, leachate collection, special cover design and groundwater monitoring). The MTR's fall under a RCRA provision that is separate from LDR. Finally, certain Ch. NR 181 requirements and the MTR's (but not the LDR's) may apply to the in-place closure or disposal of wastes that aren't picked up or treated in-situ. The application of these last requirements is dependent on a number of factors which are beyond the scope of this memo to describe.

2. Example 2--A gasoline tank leak is to be remediated. Contaminated soil, debris, tank residues or other wastes which meet the RCRA characteristic of ignitability (it's possible most wastes from this type of case won't display a characteristic) must be managed as a RCRA hazardous waste, and if land disposed of after May 1990, meet LDR requirements. Other requirements under example 1 would apply in this situation, with the exception that the waste could be shown to be no longer hazardous once it is shown it no longer met the characteristic of ignitability. It should be noted that once EPA promulgates the proposed TCLP test, there may be more wastes from petroleum spills subject to RCRA, and possibly the LDR's.

3. Example 3--A large co-disposal municipal landfill is to be investigated and remediated. It is known the landfill accepted spent solvent wastes now listed in table II of s. NR 181.16 (an "F" waste) before November 1980. The proposed remedy includes consolidation of a drum disposal area, leachate control utilizing leachate withdrawal wells drilled through the waste, gas extraction wells also drilled through waste and a new cover system. In this case, contaminated investigative wastes, the drum area wastes and any wastes and drill cuttings generated by the installation of the gas and leachate control wells are RCRA hazardous wastes. However, these wastes, if managed on-site, may or may not be subject to the LDR's, depending on how they are managed. The key is if the management method meets the definition of "placement". For the investigative and gas and leachate extraction wastes, if the wastes aren't managed in an intervening treatment or storage unit, it may

be possible to re-dispose of them on-site in the large co-disposal area and call that "movement within the same unit or area", therefore, placement hasn't occurred and the LDR's don't apply. For the drum wastes, the key is if the drum area is close or "contiguous" enough to be considered the same unit as the large co-disposal area. If it is, and the wastes aren't managed in an intervening treatment or storage unit, that may be called "consolidation within the same area or unit", and the LDR's wouldn't apply since placement hasn't occurred. Unfortunately, EPA's guidance on the definition of "placement" is not entirely clear for this situation, which results in the use of the underlined "mays", above. Of course, if any of the wastes are managed at an off-site RCRA disposal facility, the LDR's would apply. It should be noted that even if the LDR's apply, there may be a temporary exemption available, such as the federal Superfund or RCRA corrective action exemption. Unfortunately, these exemptions don't apply to remedial actions under only a state authority. Finally, regardless of the applicability of the LDR's, it may be necessary to obtain a disposal license and/or meet the minimum technology requirements for any on-site re-disposal of such wastes. The application of these last requirements is dependent on a number of factors, which are beyond the scope of this memo to describe.

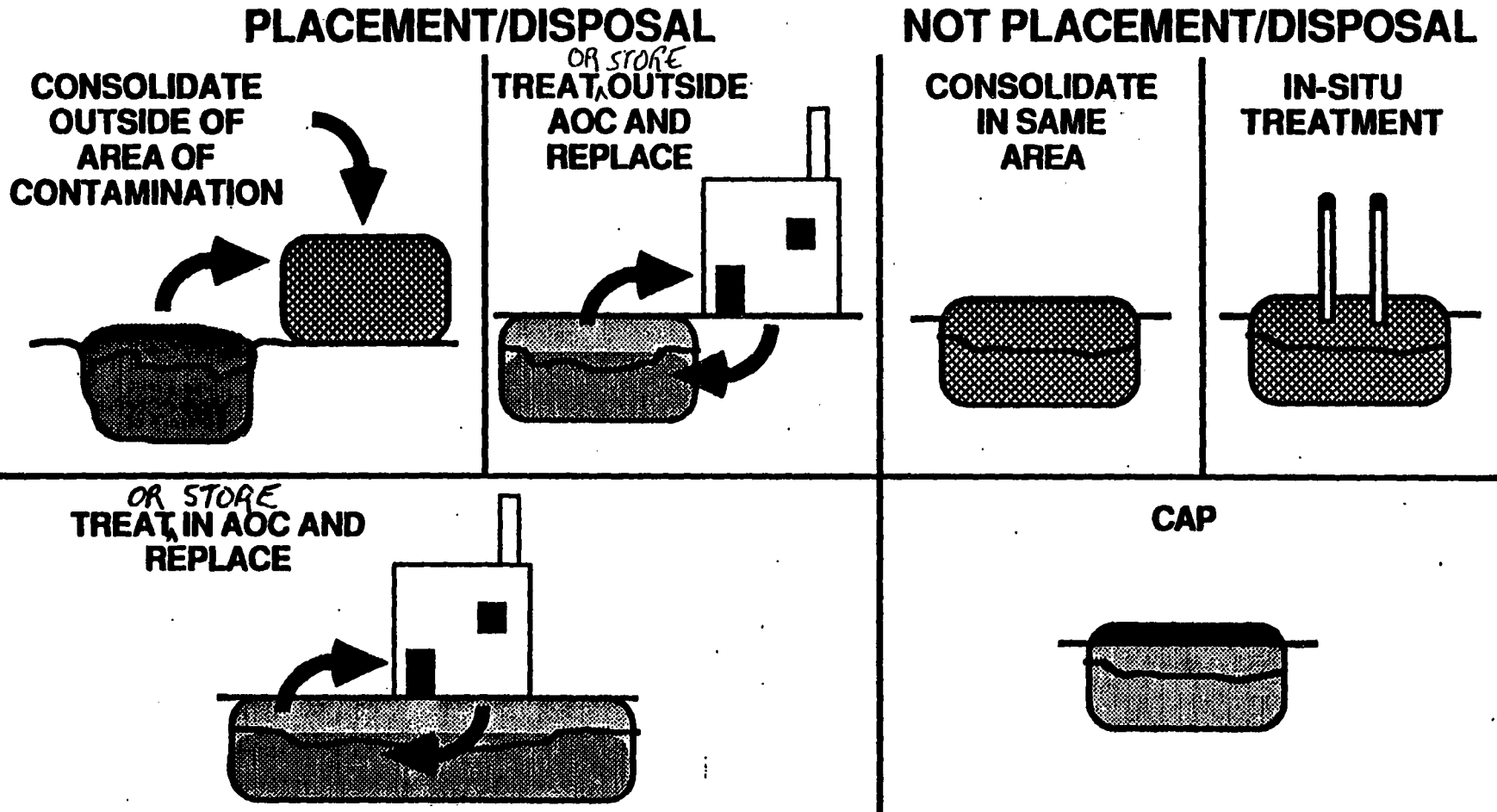
We note that regardless of the applicability of the LDR's, the Wisconsin Hazardous Waste Program can still consider contaminated soil, investigative wastes and other contaminated solid wastes from response activities to be a hazardous waste, if such wastes meet the definition of hazardous waste, and require them to be managed in accordance with Ch. NR 181, Wi. Adm. Code.

It appears to us EPA hasn't completely resolved the problems associated with implementing the land disposal restrictions at clean-up sites where large volumes of leachate, contaminated soil and other wastes may need to be managed. The treatment technologies now named as required for wastes appear to only be feasible for the original industrial wastes when they are first generated. In fact, EPA is now being sued by Waste Management, Inc., for the interpretation that leachate derived from disposed of waste must be treated to meet the land ban standards, if the leachate is to be disposed of back on the land. Waste Management is also suing over retroactive application of a RCRA waste listing to wastes managed or disposed of before 11/19/80. However, on 3/14/89, the Appeals Court in Washington D. C. upheld EPA's position on these issues. It remains to be seen if EPA will change the treatment technology required for derived wastes like leachate and contaminated soil.

We suggest you distribute this memo to Bureau and District staff as appropriate. Let us know if you have any questions regarding this issue; Ed Lynch is also available to address issues on the applicability of the LDR's in Wisconsin.

cc: Sue Bangert - SW/3  
Ed Lynch - SW/3  
*Guidance Document SW 890011.*

# WHAT CONSTITUTES PLACEMENT/DISPOSAL?



AOC = Area of Contamination

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<b>SECTION 4</b>	<b>PREAMBLES</b>  51 FR 40572, November 7, 1986 52 FR 21010, June 4, 1987 52 FR 25760, July 8, 1987 52 FR 41287, October 27, 1987 53 FR 27147, July 19, 1988 53 FR 31138, August 17, 1988
<b>SECTION 5</b>	<b>SUMMARY: LAND DISPOSAL RESTRICTIONS PROGRAM</b>

**HAZARDOUS WASTE COMPLIANCE AND ENFORCEMENT SUMMARY**  
Form 430-5

**MONITORING**  
Rev. 1-86

Department of Natural Resources

0955

*Already On Extract 3/10/23/87*

**A. GENERAL INFORMATION**  Change in Name, Address, General Information

Date Sent to Bureau <b>2-6-87</b>	Date Received by Bureau	HW Sections Data Entry Date	Initials	Entrack Data Entry Date	Initials
Name of Facility <b>The Zinc Shop INC.</b>		EPA ID Number <b>WI0 006132088</b>		FID Number	
Street or Route (Facility Location) <b>315 S. SIXTH ST.</b>		Date of Contact <b>1-28-87</b>		Time of Contact <input checked="" type="checkbox"/> a.m. <input type="checkbox"/> p.m.	
City, State, Zip Code <b>De Pere WI 54115</b>		Telephone Number <b>( )</b>		District/County <b>LMD - Brown</b>	
Type of Contact <input checked="" type="checkbox"/> Field Inspection <input type="checkbox"/> Other <input type="checkbox"/> Conference			Name of Contacts and Title or Position (Enter none if no contact) <b>JOHN ZEMER</b>		

**B. FACILITY STATUS (Check all that apply)**

<input type="checkbox"/> Treatment	<input type="checkbox"/> Generator—Acute Toxics > 1 kg	<input type="checkbox"/> Under Review for Activity (Specify Recommended Status)
<input type="checkbox"/> Storage	<input type="checkbox"/> Generator—Sm. Quant. > 100 kg	<input type="checkbox"/> 90 Day Offsite Accumulation
<input type="checkbox"/> Disposal	<input type="checkbox"/> Generator—Very Sm. Quant. < 100 kg	<input type="checkbox"/> 10 Day Transfer Facility
<input type="checkbox"/> Transporter (Lic # _____)	<input checked="" type="checkbox"/> Closed/Ceased Operations	<input type="checkbox"/> Treatment (Code) _____
<input checked="" type="checkbox"/> Generator—Large Quant. > 1000 kg	<input type="checkbox"/> Non-Hazardous Waste Entity	<input type="checkbox"/> Other

**C. REGULATORY STATUS AND REPORTING CHANGES**

<input type="checkbox"/> This is a Change in Status	<input type="checkbox"/> Delete from Reporting List	<input type="checkbox"/> Change Reporting Status to Annual
	<input type="checkbox"/> Change Reporting Status to Quarterly	

**D. EVALUATION TYPE (Check all that apply)**

<input checked="" type="checkbox"/> 1. Compliance Evaluation Insp.	<input type="checkbox"/> 5. Follow-up Insp. (Date _____)	<input type="checkbox"/> 9. Closure/Long Term Care
<input checked="" type="checkbox"/> 2. Sampling Insp.	<input type="checkbox"/> 6. Immediate Threat Response	<input type="checkbox"/> 10. Routine Surveillance
<input type="checkbox"/> 3. Record Review	<input type="checkbox"/> 7. Licensing Evaluation	<input type="checkbox"/> 11. Other _____
<input type="checkbox"/> 4. Groundwater Monitoring Evaluation	<input type="checkbox"/> 8. Activity Verification	

Comments:

**E. ENFORCEMENT ACTIONS (List violation and/or enf. type separately)**  Enf. Update  Date Sent

Viol. Type Code Class 1 2	Enf. Type Code	Viol. Date YY - MM - DD	Date Issued YY - MM - DD	Response Due YY - MM - DD	Actual Comp. YY - MM - DD	Enf. Stat. Code	NR 181 Code Citation	Additional Information
8*	NON	1-28-87	2-2-87	3-28-87	-		181.21(1)	WASTE MARGIN
18	NON	1-28-87	2-2-87	3-28-87	-		181.21(5)	Label 90 day.
19A	NON	1-28-87	2-2-87	3-28-87	-		181.42(4)	CONT
1 X	NON	1-28-87	2-2-87	3-28-87	-		181.42(5)	TRAIN
24	NON	1-28-87	2-2-87	3-28-87	-			

Comments: *I spoke w/ secretary + Dan Gurne today 2-10-87 - John's piled up now today.*

**F. SIGNATURES AND ATTACHMENTS**

Signature(s) <i>Thomas K. [Signature]</i>	Date <b>2-4-87</b>
Attachments	Reviewed By District
	Date



LMD  
DNR District

WID 006132088  
EPA ID Number

STATE OF WISCONSIN  
Department of Natural Resources  
Hazardous Waste Generation Site Inspection Form  
(Subchapter III of NR 181)

Note: Complete this form only for: 1) facilities which generate quantities of hazardous waste greater than those small quantities subject to the special requirements of s. NR 181.13, Wis. Adm. Code; 2) facilities which do not treat or dispose of hazardous waste on-site; and 3) facilities which do not receive hazardous waste from off-site.

I. General Information

Corporate/Facility Name: The Zinc Shop, Inc.

Facility Location:

Street: 315 S. 6th St.

City & Zip: Delaware Town: WI County: Brown 5465

Contact Person: John Zerner Title: Pres.

Facility Mailing Address:

Street: 315 S. 6th St.

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: \_\_\_\_\_

Operator: John Zerner Title: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: \_\_\_\_\_

Legal Owner: John Zerner owns business  
Better Brick Planting Inc owns property.

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: \_\_\_\_\_

DNR District Inspector: James Reiser Date: 1-28-87

II. REQUIREMENTS

A. Notification: (NR 181.06)

- 1. Has the generator submitted a notification form to the Department and obtained an identification number?

[ ] \_\_\_\_\_  
 Yes No (Comments or Clarification)

- 2. If the generator has changed its corporate name or mailing address, has a subsequent notification form been completed?

[ ] \_\_\_\_\_  
 Yes No (Comments or Clarification)

- 3. If the generator has added new hazardous waste activities and/or waste codes, has a letter to DNR and EPA or subsequent notification form been completed?

[ ] [ ] \_\_\_\_\_  
 Yes No (Comments or Clarification)

For Department Use *HAVE NOTIFIED EPA AND RECEIVED SOME ID# AS BETTER BULK. NOTIFIED AS SMALL QUANTITY GEN WITH NAME CHANGE AND RESPONSIBLE PARTY. EXPECT TO BE A SEC. WASTE CURRENTLY ON SITE WAS NOT GENERATED BY THE ZINC SHOP.*

B. Waste Determination: (NR 181.22)

- 1. Has an adequate determination been made to identify, and if necessary, test a representative sample of each waste in order to obtain enough information to treat, store or dispose of the waste properly off-site?

[ ]  \_\_\_\_\_ *HAVER NOT DONE ANALYSIS ON TREAT. STATION. AWAITING DETERMINATION IF EPA WASTE ANALYSIS IS SUFFICIENT.*  
 Yes No *USED ANALYSIS OF COOKER SMOKE.*

Note: Records of any test results, waste analysis or other determinations must be retained for at least 3 years from the date that the waste was last sent to an off-site treatment, storage or disposal facility.

For Department Use *WORKING WITH GROWING FEEDBACK AND FOR DISPOSAL OF TREATMENT SLUDGE PROBLEM IS BEING FIGURED AT WINTHROP HARBOR III. SITE.*

*New copies of pretreatment septum sent to Mr. Border in Madison last Friday.*

C. Waste Stream Information:

Waste Type	Potential Hazardous Constituent/Characteristics	Generator Rate	EPA Waste Code
1. Treatment Sludge	Zinc Hydroxide Iron Oxide complex		F006
2. Cooker sludge	- Detergent based oil + metal		
3. Waste water currently	in storage in 1500 gallon plastic + pretreat syte		
4. TREATMENT SLUDGE + WASTE WATER	are listed Haz waste		
5. (F006 + F007).			

Attach Waste Profile or Analysis for each Waste Stream or indicate how facility has complied with NR 181.22, Hazardous Waste Determination, for each Waste Stream.

For Department Use Please note they contain + filter plating soln never generate sludge in open tanks. The filtered sludge goes into pretreatment system.

D. 90-Day Accumulation: (NR 181.21(5)(a) and NR 181.26(2)(a))

1. Indicate how the hazardous waste is stored:

Containers  Above Ground Tanks  Underground Tanks

Note: Containers and above ground tanks are the only means allowable to store large quantities of hazardous waste and be eligible for the 90-day exemption. Any other means of storage, such as underground tanks and waste piles, require a storage interim or operating license/variance. (See the definitions of container and tank in NR 181.04.)

2. Are the above mentioned containers or tanks marked with the date on which hazardous waste was first placed in the container or tank for accumulation?

Yes  No \_\_\_\_\_ (Comments or Clarification)

3. Are containers marked with the words "Hazardous Waste" before placing them in an accumulation area or on-site storage facility?

Yes  No \_\_\_\_\_ (Comments or Clarification)

Not currently operating pretreatment system.  
Not currently generating any rinse water waste.  
Adding water to rinse tank as make up from evaporation.  
Eventually will have to agitate rinse tank + discharge to pretreatment.

4. Is the hazardous waste removed from the site before the end of the 90 day accumulation period or treated; stored or disposed of in an approved on-site hazardous waste facility or on-site recycling facility?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

Note: Attach to this form, as appropriate, completed container and/or storage tank inspection attachments. Complete the appropriate questions for generators as specified on those forms for generators.

For Department Use

E. Manifest System, Packaging, Labeling, Marking and Shipping:  
(NR 181.23 - .27)

1. Does the generator initiate a uniform manifest form with all off-site shipments of hazardous waste?

Yes  No have not made shipment to state. have the forms & will use.  
(Comments or Clarification)

Note: If the state to which the shipment is manifested (consignment state) supplies the uniform manifest form and requires its use, then the generator shall use that manifest form. If the consignment state does not supply the uniform manifest form, then the generator shall use the Wisconsin uniform manifest form.

2. Are the manifests properly completed?

Yes  No NA  
(Comments or Clarification)

3. Are copies of all manifests for the past 3 years retained at the facility and available for review?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

Note: Records of past shipments (manifests) must be retained at the facility for at least 3 years after the date of shipment.

4. Does the manifest specify a designated facility which is approved (if in Wisconsin has an operating license, interim license, variance, waiver, or is exempt from licensing; or if outside of Wisconsin has an EPA permit, interim status, or is exempt from permitting under RCRA; or a permit or approval from an authorized state) to take the waste?

[ ] [ ] NA  
Yes No (Comments or Clarification)

5. Are procedures for exception reporting followed properly, if an exception has occurred?

[ ] [ ] NA  
Yes No (Comments or Clarification)

6. Is waste packaged in accordance with DOT requirements?

[ ] [ ] will be.  
Yes No (Comments or Clarification)

7. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials?

[ ] [ ] will be.  
Yes No (Comments or Clarification)

8. If required, are placards available to the transporter of the hazardous waste?

[ ] [ ] will be.  
Yes No (Comments or Clarification)

For Department Use

F. Reporting: (NR 181.24)

1. Have annual reports covering generator activities during the previous calendar years been submitted (they must be submitted by March 1 of the year following the reporting period) to the Department?

[ ] [ ] will be submitted for 1986  
Yes No (Comments or Clarification)

For Department Use

G. Contingency Plan and Emergency Procedures: (NR 181.42(4)(a) &(c))

1. Does the facility have a written contingency plan addressing potential discharge of hazardous waste or hazardous waste constituents to air, land, groundwater, or surface water?

[ ] [X]  
Yes No

*has old Petrol Bank - needs update*

\_\_\_\_\_  
(Comments or Clarification)

If the answer to #1, above, is yes, then answer questions #2 through #8 below. If the answer to #1, above, is no, then indicate below what measures are being taken to prepare the plan. The Contingency Plan and any revisions to the plan that become necessary are required to be submitted to the Department. The plan must comply with NR 181.42(4)(a) and (c), Wisconsin Administrative Code. An existing spill prevention control and countermeasure (SPCC) plan may be amended to comply with this requirement.

2. Is a copy of the contingency plan kept at the facility?

[ ] [X]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

3. Has a copy of the contingency plan or a letter stating that the contingency plan is kept at the facility and is available for review been sent to all local police and fire departments, hospitals and emergency response teams who may be called to provide emergency services?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

4. Does the plan identify an Emergency Coordinator who is always on-site when the facility is in operation, and if appropriate, alternates, with names, addresses, phone numbers (office and home) provided?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

5. Does the plan identify an Emergency Coordinator who will be present or on call when the facility is not in operation, and available to respond to an emergency by reaching the facility in a short period of time?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

6. Are the person or persons identified in #4 and #5, above, familiar with all aspects of site activities and contingency plan implementation?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

7. Do the person or persons identified in #4 and #5, above, have the authority to carry out all actions necessary to respond to fire, explosions or any unplanned discharge of hazardous waste to the air, soil or surface water?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

8. Does the plan contain the following:

- a. A description of the facility layout, types of waste handled and their associated hazards, places where facility personnel normally work, and entrances to and roads inside the facility?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

- b. An evacuation plan for facility personnel, including signal(s) to be used to begin evacuation, evacuation routes, and alternate routes?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

- c. Procedures for emergency shutdown of facility operations, and the actions facility personnel must take to comply with NR 181.42(4)(a)1., and NR 181.42(4)(c), in response to fires, explosions or any unplanned discharge of hazardous waste or hazardous waste constituents to the air, land or surface water at the facility, including procedures to:

- 1) Activate internal facility alarms or communication systems to notify all personnel of an imminent or actual emergency situation, where applicable?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

- 2) Telephone the division of emergency government and comply with the requirements of s. 144.76, Stats., and ch. NR 158, Wis. Adm. Code?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

- 3) Immediately identify the character, source, amount, and areal extent of any discharged materials?

Yes No \_\_\_\_\_ (Comments or Clarification)

- 4) Assess possible hazards to human health or the environment that may result from discharge, fire, or explosion?

Yes No \_\_\_\_\_ (Comments or Clarification)

- 5) Immediately notify appropriate local authorities, if an assessment indicates that a discharge, fire, or explosion could threaten human health or the environment outside the facility, and that evacuation of local areas may be advisable?

Yes No \_\_\_\_\_ (Comments or Clarification)

- 6) Take all reasonable measures necessary to ensure that fires, explosions, and discharges do not occur, reoccur, or spread to other hazardous waste at the facility?

Yes No \_\_\_\_\_ (Comments or Clarification)

- 7) Monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment, where appropriate, if the facility stops operation in response to a fire, explosion, or discharge?

Yes No \_\_\_\_\_ (Comments or Clarification)

- 8) Provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a discharge, fire, or explosion at the facility, immediately after an emergency?

Yes No \_\_\_\_\_ (Comments or Clarification)

- 9) Ensure that, in the affected areas of the facility, no waste that may be incompatible with the discharged material is treated, stored, or disposed of until cleanup procedures are completed; and all emergency equipment listed in the contingency plan is clean and fit for its intended use before operations are resumed?

Yes No \_\_\_\_\_ (Comments or Clarification)



10) Notify the Department before operations are resumed?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

d. Procedures to be used to notify local police and fire departments, hospitals and emergency response teams of a discharge of hazardous waste or a fire or explosion at the facility?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

e. An up-to-date list of all emergency equipment at the facility, including the location, physical description and a brief outline of its capabilities for each item?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

For Department Use

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H. Preparedness and Prevention: (NR 181.42(4)(b))

i. Does the facility have the following equipment, as applicable for the type of waste managed?

a. Internal communications and alarm systems:

Yes  No \_\_\_\_\_  
(Comments or Clarification)

b. A device to summon emergency assistance, such as a telephone or a 2-way radio?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

c. Portable fire extinguishers?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

d. Fire control equipment, including special extinguishing equipment and extinguishing agents? (Include type and volume of extinguishing agents in "comments" section.)

[ ] [ ] \_\_\_\_\_  
Yes No (Comments or Clarification)

e. Spill control equipment?

[ ] [ ] \_\_\_\_\_  
Yes No (Comments or Clarification) *over-flow equipment to 250 gal tank at which time alarm goes off.*

f. Decontamination equipment:

[ ] [ ] \_\_\_\_\_  
Yes No (Comments or Clarification) *eq. wash - shower*

2. Is all of the equipment mentioned in #1, above, operable?

[] [ ] \_\_\_\_\_  
Yes No (Comments or Clarification)

3. Is all of the equipment mentioned in #1 tested and maintained as required to assure its proper operation in an emergency?

[] [ ] \_\_\_\_\_  
Yes No (Comments or Clarification)

4. Specify how often the equipment mentioned in #1 is tested to assure proper operation:

\_\_\_\_\_ *once per month.* \_\_\_\_\_  
\_\_\_\_\_

5. Is immediate access provided to internal or external alarms, unless the Department has determined that such devices are not required, for personnel involved in the handling of hazardous waste?

[ ] [ ] \_\_\_\_\_  
Yes No (Comments or Clarification) *NA*

6. Have the following arrangements, as applicable, been made involving emergency organizations?

a. If more than one police and fire department may respond to an emergency, have agreements designating primary authority and support roles been made?

[ ] [ ] \_\_\_\_\_  
Yes No (Comments or Clarification) *NA*

- b. Have agreements with state emergency response teams, emergency response contractors and equipment suppliers been made to provide response?

[ ] [X]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

- c. Arrangements to familiarize local hospitals with the properties of the hazardous waste handled and the types of injuries or illnesses which could result from an incident?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

Note: An attempt must be made, as appropriate for the type of wastes and the potential need for services, to contact the emergency organization mentioned in #6(a-c), above, and make the arrangements outlined. If the organizations decline to participate the refusal must be documented in the facility's records.

7. Is adequate aisle space provided throughout the hazardous waste facility to allow unobstructed movement of personnel and all emergency equipment mentioned in #1, above?

[X] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

8. If the facility handles ignitable or reactive waste, are wastes separated from sources of ignition or reaction?

[ ] [X]  
Yes No

*NA*

\_\_\_\_\_  
(Comments or Clarification)

9. Are "No Smoking" signs posted in areas where there is a hazard from ignitable or reactive wastes?

[ ] [X]  
Yes No

*NA*

\_\_\_\_\_  
(Comments or Clarification)

\_\_\_\_\_  
For Department Use

I. Personnel Training/Records: (NR 181.42(5))

1. Does the facility have a program of classroom instruction or on-the-job training for personnel in hazardous waste management procedures?

Yes  No

THAT OSHA - RIGHT TO KNOW - ADDRESSES HAZ WASTE  
NEED TO ADD CONTINGENCY PLAN TO TRAINING  
(Comments or Clarification)

If the answer to #1, above, is no, then a training program must be developed.

If the answer to #1, above, is yes, then answer the following questions (#2-4) below:

2. Does this program including training of personnel in Contingency Plan implementation?

Yes  No

ADD THIS

(Comments or Clarification)

3. Are the following items included in the program if applicable?

- a. Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment?

Yes  No

NOT SPECIFIC FOR H.W.

(Comments or Clarification)

- b. Key parameters for automatic waste feed cut-off systems?

Yes  No

(Comments or Clarification)

- c. Communications and/or alarm systems?

Yes  No

(Comments or Clarification)

- d. Response to fires or explosions?

Yes  No

(Comments or Clarification)

- e. Response to groundwater contamination incidents?

Yes  No

NOT FORMAL

(Comments or Clarification)

f. Shutdown of operations?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

4. Do facility personnel take part in an annual review of the program mentioned in #1, above?

Yes  No *will be* \_\_\_\_\_  
(Comments or Clarification)

5. Are records of personnel training maintained at the facility?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

If the answer to #5, above, is no, then these records must be developed and maintained at the facility.

If the answer to #5, above, is yes, then answer the following question (#6).

6. Which of the following items are included in the personnel training records?

a. Job titles and the name of the employee filling each job?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

b. Job descriptions?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

c. Description of training required for each position?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

d. Written documentation that training or job experience has been given and completed?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

Note: Training records of current personnel must be kept until facility closure. Training records of former employees must be kept for at least 3 years from the date the employee last worked at the facility. Personnel training records must accompany personnel transferred within the same company.

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For Department Use

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J. Other Requirements:

1. Does the generator have underground storage tanks and/or underground spill containment tanks?

[ ]    
 Yes No \_\_\_\_\_ (Comments or Clarification)

If the answer to #1, above, is yes, complete Attachments 9 and/or 11.

2. Does the generator combine absorbent material with waste generated on site?

[ ]    
 Yes No \_\_\_\_\_ (Comments or Clarification)

If the answer to #2, above, is yes, complete Attachment 10.

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For Department Use

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III. Facility Status Evaluation

A. Facility Classification Based on District Verification: \_\_\_\_\_

Signature: \_\_\_\_\_ Date \_\_\_\_\_

This facility is also subject to regulation as a:

\_\_\_ treatment facility

\_\_\_ exempt treatment facility (specify) \_\_\_\_\_

\_\_\_ storage facility

-

- \_\_\_ disposal facility
- \_\_\_ transporter
- \_\_\_ small quantity off-site accumulation facility
- \_\_\_ large quantity off-site accumulation facility

---

For Department Use

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Mr. Zinner purchased business & family  
took over operation December 18, 1986

Send example of tracing plan & entering plan  
NOT using treatment system - acting  
as storage tank.

[ 41 Full and partial fuel 55 gal drums  
of treatment residue and cooker sludge  
9 drums were cooker - LABELED with orange paint

~ 3800 gal waste water in  
tanks & pretreat system. See ATTACHED

LMD

DNR District

WID 006132088

EPA ID Number

Attachment 2  
Hazardous Waste Facility Inspection  
Form Attachment on  
Use and Management of Above Ground Storage Tanks  
(NR 181.42(7) and NR 181.21(5)(a)3., Wis. Adm. Code)

A. General Information:

Corporate/Facility Name: The Zive Shop Inc.

Facility Location: 315 S. 6th St.

City/Town/County De Pere WI.

DNR District Inspector: Reynolds Inspection Date: 1-28-87

For Department Use

B. Facility Standards:

Note: Questions 1-12 must be answered for treatment and disposal facilities that are generators, but have not applied for a storage interim license/variance. These facilities will be eligible for the 90-day exemption per NR 181.43(2)(a). If the form is being used to inspect a generator only, who qualifies for the same exemption, then also complete questions 1-12 and complete the special generator inspection form. All questions must be completed for a storage facility that is not exempt. Storage of waste received from off-site is not eligible for the 90-day exemption.

1. Do uncovered tanks have at least 2 feet (60 cm) of freeboard or sufficient freeboard to prevent over topping by wave or wind action, or by precipitation, whichever is greater?

Yes  No and have overflow collection tank + return  
(Comments or Clarification)

2. Are tanks used to store only those wastes which will not cause corrosion, rupture, leakage or premature failure of the tank?

Yes  No All tanks of course are plastic  
(Comments or Clarification)



3. Are wastes and other materials such as treatment reagents, which are incompatible with the material of construction of the tank, placed in the tank?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

If the answer to #3, above, is yes, complete #4.

4. Is the tank protected from accelerated corrosion, erosion or abrasion through the use of:

a. An inner liner or coating which is compatible with the waste or material and which is free of leaks, cracks, holes or other deterioration?

Yes  No when necessary \_\_\_\_\_  
(Comments or Clarification)

b. Alternative means of protection, such as cathodic protection or corrosion inhibitors?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

5. Do continuous feed systems have a waste feed cutoff or bypass system to a standby tank?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

6. Are required weekly inspections made for:

a. Tank leaks and defects including corrosion or deterioration?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

b. Dike and discharge confinement structures for evidence of leakage?

Yes  No NA \_\_\_\_\_  
(Comments or Clarification)

7. Are required daily inspections made for:

a. Overflowing control equipment such as waste feed cut-off systems and bypass systems, to insure that it is in good working order?

Yes  No \_\_\_\_\_  
(Comments or Clarification)

b. Data gathered from monitoring equipment to ensure operation is according to tank design?

Yes  No NA (Comments or Clarification)

c. The level of waste in the tank to comply with #1., above?

Yes  No \_\_\_\_\_ (Comments or Clarification)

d. For interim licensed storage facilities, the area immediately surrounding the tank, to detect obvious signs of discharges or leakage, such as wet spots and dead vegetation?

Yes  No \_\_\_\_\_ (Comments or Clarification)

8. Are incompatible wastes stored in separate tanks?

Yes  No \_\_\_\_\_ (Comments or Clarification)

9. Are empty tanks washed prior to adding incompatible waste?

Yes  No NA (Comments or Clarification)

10. Are reactive or ignitable wastes in tanks protected from conditions which may cause reaction or ignition, or is the waste treated, rendered or mixed so that it is no longer reactive or ignitable?

Yes  No \_\_\_\_\_ (Comments or Clarification)

11. Do covered tanks which store ignitable or reactive waste comply with the buffer zone requirements for tanks set forth in ch. Ind. 8?

Yes  No no covered tanks. (Comments or Clarification)

12. Are the inspections mentioned in #6 and #7 above, recorded into:

a. For generation sites, an inspection log or summary, which includes the date and time of inspection, the name of the inspector, a notation of the observation made, and the date and nature of any repairs or other remedial actions?

Yes  No \_\_\_\_\_ (Comments or Clarification)

b. For storage facilities, a TSD facility inspection log, which includes the date and time of inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

13. Do tanks have sufficient shell strength, and for closed tanks, pressure controls, such as vents, to assure that they do not collapse or rupture?

[ ] [ ]  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

14. Are waste analyses performed or is documented information obtained before tanks are used to store wastes substantially different than waste previously stored?

[ ]  *would be*  
Yes No

\_\_\_\_\_  
(Comments or Clarification)

Note: Storage tanks which contain volatile waste must comply with Wisconsin Administrative Code, s. NR 154.13, regarding the control of organic compound emissions.

*two 1500 gal plastic tanks on floor - one is treated waste water and one is non-treated waste water.*

*~ 400 gal in acid rinse tank*

*~ 200 gal alkaline rinse tank.*

*600 gal in treat tank*

*500 gall settling tank*

*600 gallons in 2nd settling tanks - in back*

*30 gallons in filter bag*

*main plant pretreat system*

2nd  
DNR District

W10 006132088  
EPA ID Number

Attachment 1  
Hazardous Waste Facility Inspection  
Form Attachment on  
Use and Management of Containers  
(NR 181.43(8), Wis. Adm. Code)

A. General Information:

Facility Name: The Zinc Shop, Inc.

Facility Location: 315 S. 6th St.

City/Town/County De Pere Wz. 54115

DNR District Inspector: Reyburn Inspection Date: 1-28-87

B. Facility Standards:

Note: Attachment 1 must be completed by 90-day exempt generation sites (including treatment and disposal facilities that are generators but have not applied for a storage interim license/variance) and interim licensed storage facilities.

1. Are all the containers which are used to store hazardous waste in good condition?

[ ] [ ]  
Yes No \_\_\_\_\_  
(Comments or Clarification)

2. Are containers made or lined with materials which are compatible with the waste in them?

[ ] [ ]  
Yes No \_\_\_\_\_  
(Comments or Clarification)

3. Are containers stored closed, except when it is necessary to add or remove waste?

[ ]  [ ]  
Yes No unit open to capture water.  
\_\_\_\_\_  
(Comments or Clarification)

4. Are containers opened, handled and stored in such a way as to prevent leaks or ruptures?

[ ] [ ]  
Yes No on skids & banded to prevent tipping  
\_\_\_\_\_  
(Comments or Clarification)

5. Are containers inspected weekly for leaks and defects?

[ ] [ ]  
Yes No \_\_\_\_\_ (Comments or Clarification)

6. Are the inspections mentioned in #5 above recorded into:

a. For generation sites, an inspection log or summary, which includes the date and time of inspection, the name of the inspector, a notation of the observation made, and the date and nature of any repairs or other remedial actions?

[ ]  [ ]  
Yes No \_\_\_\_\_ (Comments or Clarification)

b. For storage facilities, a facility inspection log, which includes the date and the time of inspection, the name of the inspector, a notation of the observation made, and the date and nature of any repairs or other remedial actions?

[ ] [ ]  
Yes No \_\_\_\_\_ (Comments or Clarification)

Note: These records shall be kept for at least 3 years from the date of inspection.

7. If the facility stores ignitable or reactive waste, are the containers at least 50 feet (15 meters) from the facility property line?

[ ] [ ] NA  
Yes No \_\_\_\_\_ (Comments or Clarification)

8. Are incompatible wastes stored in separate containers?

[ ] [ ] NA  
Yes No \_\_\_\_\_ (Comments or Clarification)

9. Are empty containers washed prior to adding incompatible waste?

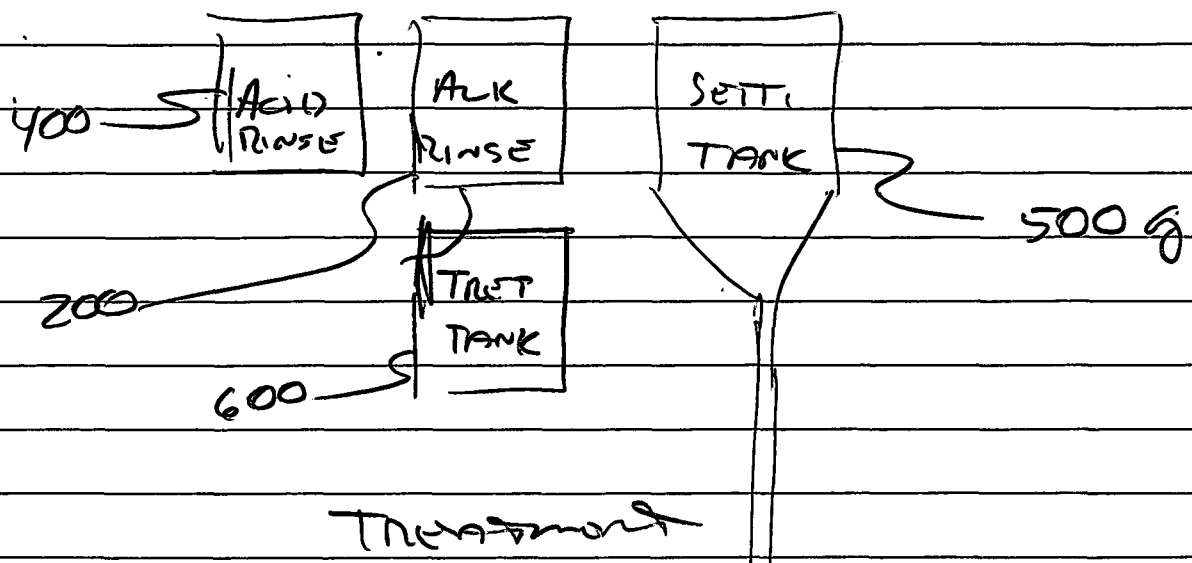
[ ] [ ] NA  
Yes No \_\_\_\_\_ (Comments or Clarification)

10. Are containers of incompatible waste separated or protected from each other and other incompatible wastes in tanks, piles or surface impoundments by physical barriers such as a berm, dike, wall or sufficient distance?

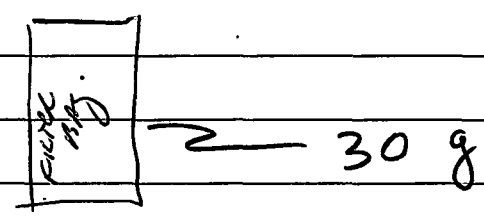
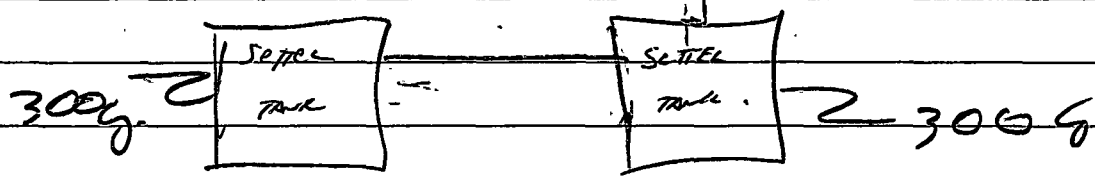
[ ] [ ] NA  
Yes No \_\_\_\_\_ (Comments or Clarification)

7785Y

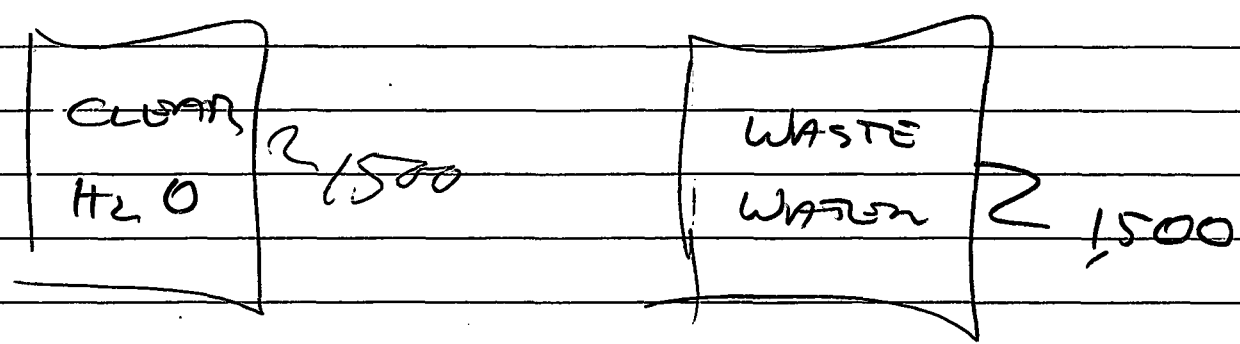
*All cyanide waste solution has decomposed as Ferric cyanide (iron cyanide complex) no free + available therefore not reactive.*



TREATMENT



FILTRATION



41 drums mostly full - 5-6 partially  
 of 41 all but 8-9 TREAT sludge. 8-9 codden  
 one unknown in Canal.