

Closure of LQG Hazardous Waste Accumulation Units and LQG Facilities

Guidance on Hazardous Waste Requirements



Introduction

When large quantity generators accumulate hazardous wastes in containers, tanks, drip pads or containment buildings, the waste accumulation units must ultimately be closed in a manner that is protective of human health and the environment and the generator must notify the DNR of the closure. [s. NR 662.017(1)(h), Wis. Adm. Code]

The purpose of this document is to outline requirements and best management practices for the closure of these indoor waste accumulation units and for the closure of LQG facilities. These requirements became effective in Wisconsin on Sept. 1, 2020.

The closure requirements outlined in this document do not apply to the following:

- Very small quantity generators (VSQGs). [s. NR 662.220, Wis. Adm. Code]
- Small quantity generators (SQGs), except for the following:
 - SQGs that accumulate hazardous waste in tanks are subject to the closure requirements in s. NR 662.016(2)(c)6., Wis. Adm. Code.
 - SQGs that accumulate hazardous waste on drip pads are subject to the closure requirements in s. NR 665.0445, Wis. Adm. Code via s. NR 662.016(2)(d), Wis. Adm. Code.
 - SQGs that accumulate hazardous waste in a containment building are subject to the closure requirements in s. NR 665.1102, Wis. Adm. Code via s. NR 662.016(2)(e), Wis. Adm. Code.
- Satellite accumulation areas for LQGs and SQGs. [ss. NR 662.034(3) or 662.192(4), Wis. Adm. Code]

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Hazardous waste regulations are found in chapters [NR 600-679](#) of the Wisconsin Administrative Code

This document does not address the closure of outdoor central accumulation areas for containers, outdoor tank systems, in-ground or below ground tank systems, containment buildings and drip pads. For assistance in determining how to close these waste accumulation units, please contact DNR hazardous waste program staff.

Notification

In addition to meeting closure requirements, LQG facilities must notify the department prior to closing a facility or a waste accumulation unit using the federal EPA 8700-12 form. The form and instructions are located by going to dnr.wi.gov and searching “notification of hazardous waste activities.”

This notification must be made prior to the closing of the waste accumulation units or closure of the facility. In cases where a generator does not comply with the conditions for an exemption, the generator may have to comply with the more rigorous closure requirements of a licensed hazardous waste facility. [s. NR 662.001(1), Wis. Adm. Code]

Definitions

Central Accumulation Area or CAA means any on-site hazardous waste accumulation area with hazardous waste accumulating in units subject to either s. NR 662.016, Wis. Adm. Code, for small quantity generators or s. NR 662.017, Wis. Adm. Code, for large quantity generators. A central accumulation area at an eligible academic entity is also subject to s. NR 662.211, Wis. Adm. Code, when accumulating unwanted material or hazardous waste. Generators may have more than one CAA on site. The word “central” is used because many generators use a CAA to consolidate or centralize their hazardous waste from multiple satellite accumulation areas prior to shipment off-site. [s. NR 660.10(9t), Wis. Adm. Code]

Waste Accumulation Unit includes, but is not limited to, all of the following:

- the area used to accumulate the hazardous waste,
- the secondary containment system,
- the containers of hazardous waste,
- the tank and its ancillary equipment,
- the drip pad,
- the containment building, and
- the materials and equipment stored within the secondary accumulation area.

An indoor waste accumulation unit is typically referred to as an IWAU

Fluctuating Generator Categories

Generators who have experienced fluctuating generator categories should contact the DNR in advance of closure to determine whether the closure requirements of s. NR 662.017(1)(h), Wis. Adm. Code, will apply.

Some of the criteria the DNR may use to make this determination include:

- The length of time the generator was an LQG.
- The number of occurrences, the quantity and nature of the wastes, and reasons for greater than 90-day accumulation, including the length of time waste was accumulated beyond the 90th day.
- Whether the accumulation area is located indoors or outdoors, and the presence and condition of secondary containment (e.g., concrete floor and berm, presence of cracks, gaps, staining).
- The presence of leaking containers and the facility’s overall compliance history.
- Whether the facility is in corrective action.
- Indications of soil or groundwater contamination.

For example, a facility that was an LQG for 20 years and then dropped down to an SQG for six months before closing would most likely be subject to the LQG closure requirements. Conversely, a facility that was an SQG for 20 years but was an LQG for the last six months before a closure activity may potentially not have to meet the LQG closure requirements.

Notification and Closure Options

When closing a waste accumulation unit, the LQG must choose one of the following two options, and notify accordingly:

- 1. Delaying Closure:** The DNR expects that most LQGs will choose this option if they are closing waste units but not closing the facility.
 - Place a notice in the operating record within 30 days after closing the waste accumulation unit, that identifies the waste accumulation unit's location within the facility. [s. NR 662.017(1)(h)1.a., Wis. Adm. Code]
 - Applicable closure performance requirements can then be addressed later, but no later than when the entire facility closes. [s. NR 662.017(1)(h)2.b., Wis. Adm. Code]
 - If necessary, the notice can be removed from the operating record at any point before closing the entire facility if the waste accumulation unit is put back into service. [s. NR 662.017 (1)(h)1.b., Wis. Adm. Code]
- 2. Implementing Closure:** Meet the closure performance standards for containers, tanks, and containment buildings under s. NR 662.017(1)(h)3., Wis. Adm. Code, or for drip pads under s. NR 662.017(1)(h)4. The following closure performance requirements address closure of the waste accumulation unit and the facility: [s. NR 662.017(1)(h)1.b., Wis. Adm. Code]
 - Notify the DNR using EPA form 8700-12 within 30 days prior to closing the facility. [s. NR 662.017(1)(h)2.a., Wis. Adm. Code]
 - Notify the DNR using EPA form 8700-12 within 90 days after closing the waste accumulation unit. [s. NR 662.017(1)(h)2.b., Wis. Adm. Code]
 - The LQG should have met the closure performance requirements in s. NR 662.017(1)(h) 3 or 4, Wis. Adm. Code, on or before the date the LQG submitted their 90-day notification. However, if the facility cannot meet the applicable closure performance requirements, then the facility will need to notify the DNR using EPA form 8700-12 that the facility will be closing as a land disposal unit either under s. NR 665.0310, Wis. Adm. Code, for containers, tanks or containment buildings, or s. NR 665.0445(2), Wis. Adm. Code, for drip pads. [s. NR 662.017(1)(h)2.b., Wis. Adm. Code]
 - If an LQG needs longer than 90 days to comply with the closure performance requirements, the LQG must submit an extension request to the DNR no later than 75 days after closure using EPA form 8700-12. [s. NR 662.017(1)(h)2.c., Wis. Adm. Code]

Closure Performance Requirements

Containers, Tanks, or Containment Buildings

Closure of containers, tanks, or containment buildings used to accumulate hazardous waste must occur in a manner that meets all of the following requirements:

1. Minimizes the need for further maintenance by controlling, minimizing, or eliminating, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste

decomposition products to the ground or surface waters or to the atmosphere. [s. NR 662.017(1)(h)3.a., Wis. Adm. Code]

2. Removes or decontaminates all contaminated equipment, structures and soil and any remaining hazardous waste residues from waste accumulation units including containment system components (pads, liners, etc.), contaminated soils and subsoils, bases, and structures and equipment contaminated with waste, unless s. NR 661.0003(4), Wis. Adm. Code, applies. [s. NR 662.017(1)(h)3.b., Wis. Adm. Code]
3. Any hazardous waste generated in the process of closing either the generator's facility or unit(s) accumulating hazardous waste must be managed in accordance with all applicable requirements of chapters NR 662, 663, 665 and 668, Wis. Adm. Code, including removing any hazardous waste contained in these units within 90 days of generating it and managing these wastes in a RCRA Subtitle C hazardous waste permitted treatment, storage and disposal facility or interim status facility. [s. NR 662.017(1)(h)3.c., Wis. Adm. Code]
4. If the generator concludes that any contaminated soils and wastes cannot be practicably removed or decontaminated as required in s. NR 662.017(1)(h) 2.a., Wis. Adm. Code, then the waste accumulation unit is considered to be a land disposal unit and the generator must close the waste accumulation unit and perform long-term care in accordance with the closure and long-term care requirements in s. NR 665.0310, Wis. Adm. Code, that apply to landfills. In addition, for the purposes of closure, post-closure, and financial responsibility, because such a waste accumulation unit is considered to be a landfill, the generator must meet all of the requirements for landfills specified in subchapters G and H of ch. NR 665, Wis. Adm. Code. [NR 662.017(1)(h)3.d., Wis. Adm. Code]

Drip Pads

Closure of drip pads used to accumulate hazardous waste must occur in a manner that meets all of the following requirements:

1. Items 1 and 3 from the above section on containers, tanks or containment buildings. [s. NR 662.017(1)(h) 4., Wis. Adm. Code]
2. Remove or decontaminate all waste residues, contaminated containment system components (such as pads and liners), contaminated subsoils, and structures and equipment contaminated with waste and leakage, and manage them as hazardous waste. [s. NR 665.0445(1) via s. NR 662.017(1)(h)4., Wis. Adm. Code]
3. If, after removing or decontaminating all residues and making all reasonable efforts to effect removal or decontamination of contaminated components, subsoils, structures and equipment as required in item two above, the owner or operator finds that not all contaminated subsoils can be practicably removed or decontaminated, the owner or operator must close the facility and perform long-term care in accordance with closure and long-term care requirements in s. NR 665.0310, Wis. Adm. Code, that apply to landfills. For licensed units, the requirement to have a license continues throughout the long-term care period. [s. NR 665.0445 (2) via s. NR 662.017 (1)(h) 4., Wis. Adm. Code]

Best Management Practices

Regulations do not require that a closure plan be submitted to the DNR for review and approval. Additionally, the regulations do not specify the steps necessary for closure or the concentration levels for the hazardous constituents that may be left after decontamination of the waste accumulation unit. To address these issues, the remainder of this document, unless a citation indicates otherwise, provides best management practices for IWAU design and maintenance to improve the closure process.

Impervious base or coatings: If the accumulation area or its secondary containment system has had an impervious base during its entire lifetime, clean closure may be easier to demonstrate. If an impervious coating or liner (e.g., epoxy coating, steel or plastic shell) is added after hazardous waste accumulation began, sampling of the underlying surface (e.g., concrete pad or floor) may be needed.

Maintenance: The accumulation area or secondary containment system should be maintained to ensure there are no cracks and/or deterioration.

Recordkeeping: The facility operating records should demonstrate proper maintenance of the floor of the accumulation area and that no major spills occurred in the IWAU's accumulation area or secondary containment system. A major spill is an event that cannot be handled safely without the assistance of the emergency response personnel, as opposed to a spill resulting from routine management of waste in containers (slight overfills, drips, splashes, etc.) that is promptly cleaned up.

- The facility operating records (e.g., inspection logs) should be available for the life of each IWAU.
- The facility operating records should identify all the types of hazardous waste managed in each the IWAU.
- The facility should maintain documentation of all inspections and repairs of the IWAUs.

This document does not address closure of outdoor CAAs for containers, outdoor tank systems, inground or below ground tank systems, containment buildings, and drip pads. For assistance in determining how to close these waste accumulation units please contact the DNR hazardous waste staff.

Identifying the Hazardous Constituents

Over time it is likely that the IWAU will become contaminated with hazardous constituents from the hazardous waste being managed in the IWAU. These hazardous constituents are a concern as they could affect human health and the environment long after the hazardous waste has been removed from the IWAU. Therefore, these constituents of concern (COCs) need to be identified in order to determine if decontamination of the IWAU was successful. To develop the COC list, the generator should list all the hazardous constituents that were ever managed in the IWAU. Hazardous constituents are those listed in ch. NR 661 Appendix VIII, Wis. Adm. Code.

Suggested sources the generator could use to develop their COC list include the following:

- Safety Data Sheets (SDS)
- Hazardous waste inspection reports
- Existing waste analysis records at the facility or the offsite licensed hazardous waste facility which received waste
- Manifests and Land Disposal Records
- Other environmental permits in place at the facility (e.g., wastewater or air permits)
- Groundwater monitoring data, if applicable
- Interviews of former and current employees
- Review of DNR record that are specific to the facility

Constituents of Concern (COCs)

A COC list should list all of the hazardous constituents that were ever managed in the waste accumulation units. Hazardous constituents are those listed in ch. NR 661 Appendix VIII, Wis. Adm. Code.

Closure Planning

In addition to meeting the closure requirements, generators closing an IWAU typically follow the general steps below:

Remove Waste: Upon ceasing operation of the IWAUs, remove all materials, equipment, and waste from the IWAUs and ensure that hazardous waste is shipped off-site to a permitted facility within 90 days from the point of generation (POG). [s. NR 662.017(1), Wisc. Adm. Code]

The removal of equipment does not necessarily extend to tank systems, especially if the tank system will remain in use for materials other than hazardous wastes after closure of the IWAU.

Inspection: After the materials, equipment and waste have been removed from the IWAUs, remove any loose materials or debris from the accumulation area or secondary containment system prior to a visual inspection. The visual inspection of the accumulation area or secondary containment system inspection should identify and document whether:

- There is an impervious surface/base.
- There are cracks or deterioration. Soil sampling will be required if defects are discovered that could allow the waste to impact the underlying soils.
- There are significant surface stains other than light shadows, slight streaks, or minor discoloration that resulted from the routine management of waste.

If any deficiencies are found within the accumulation area or secondary containment system, or there are significant signs of spills, or stains, then these issues need to be investigated to determine if this self-implementing closure guidance is appropriate.

If the soils could be contaminated a consultant should be retained to investigate any potential release. If the investigation shows a release, then the generator will need to report the release as a spill. [s. 292.11, Wis. Stats.] To notify of the spill/release go to dnr.wi.gov and search, "spills."

Records Review: The generator should conduct a thorough records review to ensure that:

- No major spills occurred in the accumulation area or secondary containment system.
- The generator has conducted at least the required weekly inspections of the IWAUs (there should be no significant gaps in the required inspection records).

If the records review reveals that the conditions above have not been met, then then these issues need to be investigated further to determine if this self-implementing closure guidance is appropriate.

Decontamination

If the inspection and records review of the IWAUs are found to be acceptable, then the IWAUs are ready for the process of decontamination. Factors to consider in the method used for the decontamination of the IWAU include the following:

- The type of materials (e.g., concrete, steel, surface coating on the material) that have been decontaminated.
- COCs that may be present on those materials.
- Location of the IWAU and surrounding areas that may be affected (e.g., to ensure pressure washing does not occur near electrical equipment).

The decontamination method that is selected will need to remove any hazardous constituents that may be adhering to surfaces in the accumulation area or the secondary containment system, the tank and its ancillary equipment, and any other associated equipment used to manage the hazardous waste.

Decontamination Methods: Examples of physical and chemical decontamination methods are listed below. It is anticipated that most IWAU's can be decontaminated by implementing a chemical method such as detergent washing and water rinsing with a pressure washer rather than the more aggressive physical methods such as scarification and grinding.

Physical Methods:

- Abrasive Blasting: Involves using water and/or air pressure to propel a solid medium (e.g., aluminum oxide grit, plastic beads) such that contaminated surface layers are removed.
- Scarification and Grinding: Involves utilizing striking piston heads, saws or rotating grinding wheels such that contaminated surface layers are removed.
- Spalling: Involves drilling or chipping holes at appropriate locations and depth in the contaminated surface and applying a tool which exerts a force on the sides of those holes such that the surface layer is removed.
- Vibratory Finishing: Involves utilizing scrubbing media, flushing fluid and oscillating energy such that hazardous contaminants or contaminated surface layers are removed.

Chemical Methods:

- Water and/or Detergent Washing and Spraying: Application of water and/or detergent sprays of appropriate temperature, pressure, residence time, agitation, surfactant content and pH to remove hazardous contaminants from surface and surface pores or to remove contaminated surface layers.
- Chemical Oxidation: Uses oxidation reagents or a combination of reagents such as hypochlorite (i.e., bleach), chlorine, chlorine dioxide, ozone or UV (ultraviolet light) assisted ozone, peroxides, persulfates, perchlorates, permanganates, and/or other oxidizing reagents of equivalent destructive efficiency.
- Chemical Reduction: Utilizes reducing reagents or a combination of reagents such as sulfur dioxide, sodium, potassium or alkaline salts of sulfites, bisulfites and metabisulfites, and polyethylene glycols; sodium hydrosulfide; ferrous salts; and/or other reducing agents of equivalent efficiency.

Final Rinse/Wash: After a decontamination method has been implemented, a pressure wash of the IWAU (a minimum of three repetitions using cold water between 2,000 to 3,500 psi or hot water between 600 to 2,500 psi) should be conducted.

Equipment Decontamination: Equipment that is reusable (e.g., pressure washer, hoses, brooms, shovels) that is used to decontaminate the IWAU, or equipment or structures that had been located or used in the IWAU, should also be decontaminated. Equipment that will be disposed of (e.g., personal protective equipment (PPE) like gloves, Tyvek® suits, and respirator cartridges; mop heads) needs to be evaluated to determine if the disposal equipment is a hazardous waste. [s. NR 662.011, Wis. Adm. Code]

If the disposal equipment would need to be tested to determine if it is a hazardous waste, then it may be more economical to simply declare the disposal equipment a hazardous waste rather than test it.

Waste Determinations of Decontamination Waste

Section NR 662.011, Wis. Adm. Code, requires a person who generates a solid waste to determine if that solid waste is also a hazardous waste at its point of generation (POG).

The POG:

- occurs before any dilution, mixing, or other alteration of the waste.
- must be accurate to ensure the proper management of the hazardous waste.

The following information may assist the generator in making their hazardous waste determination of the wastes generated from decontamination activities and to avoid potential regulatory issues:

1. Do not combine decontamination residues (e.g., wastewaters, floor scrapings) with wastes from other IWAUs or other areas.
2. Do not combine decontamination residues generated from a tank and its ancillary equipment with the decontamination residues generated from the tank's secondary containment system.
3. The multiple wastewater streams generated from the decontamination of the accumulation area or secondary containment system can be combined into one waste stream for the purpose of making a waste determination under s. NR 662.011, Wis. Adm. Code. This is because the decontamination of the accumulation area or secondary containment system is viewed as one process. Do not combine wastewater streams from other IWAUs for the purpose of making a waste determination.
4. If the COCs for a hazardous waste that is listed for toxicity (e.g., F001, F005, K031, P012, or U019) are present in the decontamination residues then the decontamination residues are a listed hazardous waste.
5. If the COCs for a hazardous waste that is listed for ignitability, corrosivity, or reactivity (e.g., F003, U202, U031) are present in the decontamination residues and the decontamination residues do not exhibit a characteristic of a hazardous waste then the decontamination residues are not a listed hazardous waste. [s. NR 661.0003(7)(a), Wis. Adm. Code]
6. A representative sample is required when making a characteristic hazardous waste determination. [subchapter C of NR 661, Wis. Adm. Code]
7. Field sampling methods should follow the guidance in EPA's SW-846, "Volume II, Field Manual." Field sampling methods not covered by SW-846 should be discussed with DNR hazardous waste staff before they are used to close the IWAUs.
8. Sampling methods and equipment, as well as laboratory analytical methods, should follow the guidance in U.S. EPA's SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Third Edition." [40 CFR 260.11]
9. Samples submitted for testing should be analyzed by laboratories certified or registered under ch. NR 149, Wis. Adm. Code.

10. Use the lowest possible analytical Method Detection Limit (MDL) for the hazardous constituents associated with listed hazardous wastes.
11. Record all concentration data, even if it is estimated, for compounds or elements that have been positively identified in the sample. Some target analytes are present at concentrations which are above the level that can be reliably detected but below the level that they can be reliably quantified. These data are referred to as “qualified” and will be reported as a number which has been “flagged” by the laboratory. Although less reliable than data which are reported above the Estimated Quantitation Limit (EQL), these qualified data must nevertheless be evaluated carefully by the generator.

Hazard Minimization

When engaging in closure activities make sure to avoid creating other environmental and/or health problems like chemical exposures, fugitive dust emissions, contaminated run-off/discharges, and the spread of potential contaminants. All clean-up and sampling work should be performed by personnel using Occupational Safety and Health Administration’s (OSHA) recommended safe practices. Visit osha.gov and search “recommended practices for safety and health programs.”

Managing the Closure-Derived Waste: To avoid potential complications when closing a facility, any hazardous waste generated as a result of closing the IWAU should, if conditions permit, be managed under the satellite accumulation area (SAA) requirements instead of the CAA requirements.

Demonstrating the Effectiveness of the Decontamination: Once the IWAU has been decontaminated, confirm the effectiveness of the decontamination. Two ways to demonstrate the effectiveness of the decontamination are:

- Analyze the final rinse water sample collected for any COCs that may have been contained in the waste managed in the IWAU.
- Analyze wipe samples collected from the surfaces of the IWAU for COCs. The results of the wipe samples should show that all areas of a unit have been successfully decontaminated.

Ideally after decontamination of the IWAU there should be no detection of any of the COCs in the final rinse or the wipe samples. However, there may be occurrences where achieving no detection is not feasible – even after several decontamination attempts. If achieving no detection is not feasible, then meeting either the health-based standard or the LDR wastewater treatment standards identified in Table 1 of s. NR 668.40, Wis. Adm. Code (the lower of the two) for the COC could be accepted by the DNR for meeting the closure requirements of the IWAU.

Potential disposal issues when demolishing an IWAU

If an IWAU is to be demolished (e.g., concrete floor is cut out and disposed of) and if the IWAU was contaminated with hazardous waste that is listed for toxicity (e.g., F001, F005, F006) then the debris generated from the demolition of the IWAU is a listed hazardous waste and is subject to the Land Disposal Restriction (LDR) requirements of ch. NR 668, Wis. Adm. Code.

However, the LDR disposal restriction requirements for the demolished IWAU may be avoided if the appropriate treatment technology (e.g., extraction or destruction) is selected from Table 1 of s. NR 668.45, Wis. Adm. Code. The residues generated from the extraction or destruction process are a listed hazardous waste. Another way to possibly avoid the LDR disposal restriction requirements is to obtain a “no longer contains” determination from the DNR under s. NR 661.0003(6)(b), Wis. Adm. Code.

Documenting Closure

It is important to maintain thorough documentation of the closure process to demonstrate compliance with the closure performance requirements of s. NR 662.017(1)(h), Wis. Adm. Code. It is recommended that this documentation be placed into a closure report that includes the following:

1. Discussion/evaluation of the history of the IWAU. Include the types and quantities of waste managed in the IWAU and how long the IWAU has been used. If possible, include photos, drawings, and a physical description of the area (materials of construction, dimensions, etc.), as well as any associated structures and/or equipment. The drawing should show, at a minimum, the dimensions and other construction details, appurtenant structures and relationship to other significant points or structures on the facility property. All drawings should have a specified scale, legend, and north arrow.
2. Discussion/evaluation of the visual inspection of the accumulation area or secondary containment area. Include any observations of visible contamination (e.g., staining caused by waste consisting of shadows, streaks, or discolorations), cracks, crevices, and pits in the floor and any defects in the impervious coating used on the floor.
3. Discussion/evaluation of how the cleaning methods and the surfactants chosen are suitable for the COCs. If detergent washing and water rinsing are selected, the closure report should show that the detergent solution will remove the COCs. This may be demonstrated with solubility data from product specification sheets or standard chemical tables. The length of time the solution is in contact with the surface and whether or not scrubbing or other physical efforts are used will affect the accuracy of the decontamination demonstration. Other useful considerations might include the temperature of the wash water and the pressure/nozzle used to clean the surface. The effectiveness of chemical and physical decontamination will also depend on the IWAU's design, the cleaning solutions, and the COC to be removed.
4. Discussion/evaluation on the equipment used to clean the IWAUs, how this equipment was decontaminated and how the residues from the decontamination were handled.
5. Discussion/evaluation/rationale of how waste materials (i.e., rinsate, debris, disposable equipment, etc.) from decontamination were managed and the quantity of waste materials that were generated by the decontamination efforts.
6. Discussion/evaluation of the sampling strategy (i.e., sample collection, sample locations, number of samples collected, how samples were collected and analytical considerations) that was used to confirm that the unit was clean-closed.
7. A photo log documenting the decontamination activities of the waste accumulation unit and photos showing the decontaminated waste accumulation unit. Each photo should be numbered, dated, and include a description of what was photographed and the direction of the photo.
8. Waste disposal documentation (e.g., bills of lading, uniform hazardous waste manifests, waste profile information).
9. All waste determination information and supportive laboratory data. The laboratory data should include the concentration data, even if they are estimated, for compounds or elements that have been positively identified in the sample in levels below lab quantification limits.
10. Discussion/evaluation of the evidence that closure standards have been met, the date of the closure determination, and the name, title and signature of the person making the closure determination. This person should be qualified to make this determination.
11. The closure report should be retained for at least three years after closure of the IWAU. The DNR recommends that a copy of the closure report be provided to the DNR.

Resources and Contact information

For more information including [publications, inspection forms, and administrative codes and statutes](#), go to dnr.wi.gov and search “hazardous waste resources.” Use the *Additional Resources* menu to navigate to specific topics. For staff contact information, go to the [staff directory](#) and enter “hazardous waste requirements” in the subject field and choose the appropriate county contact.

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***Disclaimer:** This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.*

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