DLD
Drug & Laboratory Disposal, Inc.

March 01, 2019

Lisa Graczyk
RCRA/TSCA Programs Section
U.S. EPA Region 5
77 Jackson Blvd. (LR-17J)
Chicago, IL 60604

Dear Ms. Graczyk:

RE: PCB Waste Storage Application:

Please find attached DLD's Application to commercially store PCB waste. The application is in nine sections, each one addressing the requirements of the *Application Completeness Check List* you made available to us.

If you have any questions or find something we forgot to include, please feel free to contact myself (269-685-9824 ext.213) or Pete VanBruggen (269-685-9824 ext. 245). My apologies for submitting this document so close to the deadline.

Sincerely,

Sharon I. Joles, MS
Environmental Director

Enclosures

Section 1: Background

Section 2: Corporate Officers

Section 3: Employee Qualifications

Section 4: State and Federal Inspections

Section 5: PCB Storage (3 Attachments)

Section 6: Certification Statements

Section 7: SPCC

Section 8: Cost Closure Plan and Estimate

Section 9: Demonstration of Financial Assurance (Trust Fund)

Region V

APPROVAL OF COMMERCIAL STORERS OF PCB WASTE

APPLICATION COMPLETENESS CHECKLIST

Background:

Facility: Mailing Address	Facility: Location, EPA ID#
Drug & Laboratory Disposal, Inc.	MID092947928
331 Broad Street	Latitude: 42 26' 41"N
Plainwell, MI 49080	Longitude: 085 38' 05"
(269) 685-9824	Allegan County, Michigan

Contact: Pete VanBruggen Title: Vice-President Phone: 269-685-9824 ext. 245

Date Application Received: _____ Renewal? Y N

Current Permit Issue Date: _____ Current Permit Expiration Date: _____

Permit Renewal Extension Letter Sent by U.S. EPA? **Y** N Date: _____

Status:

X Operating _____ New X RCRA Permitted X TSCA Permitted

Application: (Number indicated identifies Section of Application containing info)

i. 2 Identification of owner(s) and/or operator(s) (owning >5%)
- _____ partner(s) of partnership
- 2 stockholder(s) of corporation
- _____ participant(s) in organization or entity

3 Identification of officials with direct management responsibility

ii. na Identification of official responsible for overall operations

3 Identification of supervisory employees

iii. 3 Qualifications of persons responsible for overall operations

3 Qualifications of employees responsible for handling waste

iv. 4 Information on state or federal environmental violations (past 5 years)
- 4 Involving same business
- na Involving business principals or supervisory employees involved with

v. 2 Companies currently owned or operated in the past (5 years) by principals and key employees

vi. 5 Estimate of maximum PCB waste handled

vii. 6 Written certification of compliance with 761.65(b) or (c)

viii. 6 Certification of 761.3

ix. 8 Closure Plan which accounts for PCB waste and includes:

x. 8 Closure cost estimate

xi. 9 Demonstration of financial assurance (if new, must be submitted and in effect 60 days before accept waste)

Closure trust fund

Trust fund (264.151(a)(1))

Certification of acknowledgement (264.151.(a)(2))

Surety bond guaranteeing payment into closure trust fund

Surety bond (264.151(b))

Stand-by trust fund (originally signed duplicate, 264.151(a)(1))

Certification of acknowledgement

Section 2. Corporate Officers of Drug & Laboratory Disposal, Inc.

Majority Equity Holder

Brent Winfield Walter, Esq, President

Lesser Equity Holders

Bradley Neil Walter
Bonnie Wallace

Officers

Brent Winfield Walter, President
Length of Employment at DLD: 23 Years

Peter Joel VanBruggen, Vice-President
Length of Employment at DLD: 14 Years

Companies Currently Owned/Operated by DLD Officials

Companies Owned by Brent Walter:

-Folley, Inc.
-Zuriel Holdings
-Bayit Rentals
-Living Waters Landscape Services

Section 3. Employee Qualifications

Officials responsible for Overall Operations

Brent W. Walter, President
Peter VanBruggen, Vice-President

Officials with Direct Management Responsibility

Robert Rittersdorf, Waste Processing Director
BS: Chemical Engineering
Length of Employment at DLD: 29 Years

Sharon I. Joles, Environmental Director
BS: Environmental Chemistry
MS: Physical Chemistry
Length of Employment at DLD: 23 Years

Lisa Colgren, Finance Director
BS: Accounting
Length of Employment at DLD: 8 years

Andrew Dinsmore, Director of Business Development and Laboratory Director
BS: Biochemistry
Length of Employment at DLD: 19 years

Marilee Dietsch, Sales and Marketing Director
BS: Marketing
Length of Employment at DLD: 14 years

Steven Barker, Customer Service Director
BS: Science and Biomedical Science
Master of Business Administration
Length of Employment at DLD: 31 years

Waste Handling Supervisors

Steve Noteboom, Dock Manager
Length of Employment at DLD: 29 years

Charles Walker, Warehouse Coordinator
BS: Electrical Engineering
Length of Employment at DLD: 19 years

Elba Fernandez, Team Leader
BS: Chemistry
Length of Employment at DLD: 6 years

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

OCT 17 2014

REPLY TO THE ATTENTION OF:

COPY

Ms. Sharon I. Joles
Environmental Director
Drug and Laboratory Disposal, Inc.
331 Broad Street
Plainwell, Michigan 49080

Re: Drug and Laboratory Disposal, Plainwell, Michigan
MID 092 947 928

Dear Ms. Joles:

On August 25, 2014 the U.S. Environmental Protection Agency issued Drug and Laboratory Disposal, Inc., a Notice of Violation (NOV) which identified a violation of the Michigan Administrative Code at the 331 Broad Street, Plainwell, Michigan facility. Subsequent to our NOV, you submitted information regarding the identified violations in a letter dated September 25, 2014.

This letter is to inform you that EPA has reviewed your response and determined that additional enforcement action need not be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the Resource Conservation and Recovery Act, as amended. Your hazardous waste management operations will continue to be evaluated by EPA and the Michigan Department of Environmental Quality (MDEQ) in the future.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,

For Gary J. Victorine, Chief
RCRA Branch

cc: Nadine Deak, MDEQ – Kalamazoo District Office (deakn@michigan.gov)
John Craig, MDEQ (craigj@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)

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

AUG 25 2016

REPLY TO THE ATTENTION OF

CERTIFIED MAIL 7009 1680 0000 7677 8329
RETURN RECEIPT REQUESTED

COPY

Mr. Brent W. Walter
President
Drug and Laboratory Disposal, Inc.
331 Broad Street
Plainwell, Michigan 49080

Re: Notice of Violation
Drug and Laboratory Disposal, Inc. Plainwell, Michigan
MID 092 947 928

Dear Mr. Walter:

On April 16, 2014 representatives of the United States Environmental Protection Agency and Michigan Department of Environmental Quality (MDEQ) inspected the Drug and Laboratory Disposal, Inc. (Drug and Laboratory Disposal) facility located at 331 Broad Street in Plainwell, Michigan. The purpose of the inspection was to evaluate Drug and Laboratory Disposal's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA). The inspection focused upon those regulations related to the generation, accumulation and storage of hazardous waste. We have enclosed a copy of the inspection report including photographs taken during the inspection for your reference.

Based on information provided by Drug and Laboratory Disposal personnel, review of records, and physical observations by the inspectors, EPA has determined that the Drug and Laboratory Disposal facility violated certain requirements of the Michigan Administrative Code (MAC) and the United States Code of Federal Regulations (CFR). We find that Drug and Laboratory Disposal did not comply with the following requirement:

- Used oil generators are subject to all applicable Spill Prevention Control and Countermeasures requirements (40 CFR Part 112) in addition to the requirements of MAC R 299.9810(3) and 40 CFR Section 279.22. Containers and aboveground storage tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See, MAC Rule 299.9810(3) [40 CFR § 279.22(c)(1)].

  During the inspection of the Maintenance Garage, the inspectors observed an oil collection device. The oil collection device was not labeled "Used Oil", see photograph number 2. At the time of the inspection, therefore, Drug and Laboratory Disposal failed

to label or mark the container in the Maintenance Garage with the words "Used Oil" as required by MAC Rule 299.9810(3) [40 CFR § 279.22(c)(1)].

Under Section 3008(a) of RCRA, 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Walt Francis, U. S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Nadine Deak, MDEQ – Kalamazoo District Office (deakn@michigan.gov)
John Craig, MDEQ (craigj@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)

Drug & Laboratory Disposal, Inc.

Inspection History

Date	Nature of Inspection	Description of Violations
	MIDEQ site inspection	No violations
9/30/2010	MIDEQ site inspection	No violations
3/25/2011	MIDEQ site inspection	No violations
9/23/2011	MIDEQ site inspection	No violations
3/13/2012	MIDEQ AST inspection	No violations
3/27/2012	MIDEQ site inspection	No violations
4/5/2012	PHMSA Inspection	49 CFR 172.201 – Improper shipping description
9/20/2012	MIDEQ site inspection	No violations
1/31/2013	MIDEQ site inspection	No violations
6/24/2013	MIDEQ fire incident	40 CFR 267.17(a) – Precautions to prevent accidental ignition or reaction of ignitable or reactive waste.
		40 CFR 267.17(b) – If you treat or store ignitable or reactive waste or mix incompatible wastes you must take precautions to prevent reactions (such as fires).
4/16/2014	EPA Site Inspection	40 CFR 279.22(c)(1)No “used oil” label on oil collection device. Corrected upon receipt of notification.
10/17/2014	MIDEQ site inspection	No violations
10/17/2014	EPA TSCA Site Inspection	No violations
3/10/2015	Bureau of Fire Services Storage Tank Division	Piping and venting issues are addressed in the report, a variance is being written.
3/25/2015	Allegan County Health Dept. Medical Waste Producing Facility Inspection	No Violations - No Report Written
3/27/2015	MIDEQ site inspection	No violations
6/30/2015	MIDEQ site inspection	No violations
9/18/2015	MIDEQ site inspection	No violations
12/14/2015	MIDEQ site inspection	No violations
3/23/2016	MIDEQ site inspection	No violations
6/27/2016	MIDEQ site inspection	No violations
8/16/2016	MIDEQ site inspection	No violations
11/30/2016	MIDEQ site inspection	No violations
2/10/2017	MIDEQ site inspection	40 CFR 264.1084(g) tank stack flange not properly reconnected following repair of tank fill alarm float.
6/13/2017	MIDEQ site inspection	No violations
8/8/2017	MIDEQ site inspection	No violations
12/7/2017	MIDEQ site inspection	No violations
3/16/2017	MIDEQ site inspection	No violations

Section 5. PCB Storage

Tank Storage

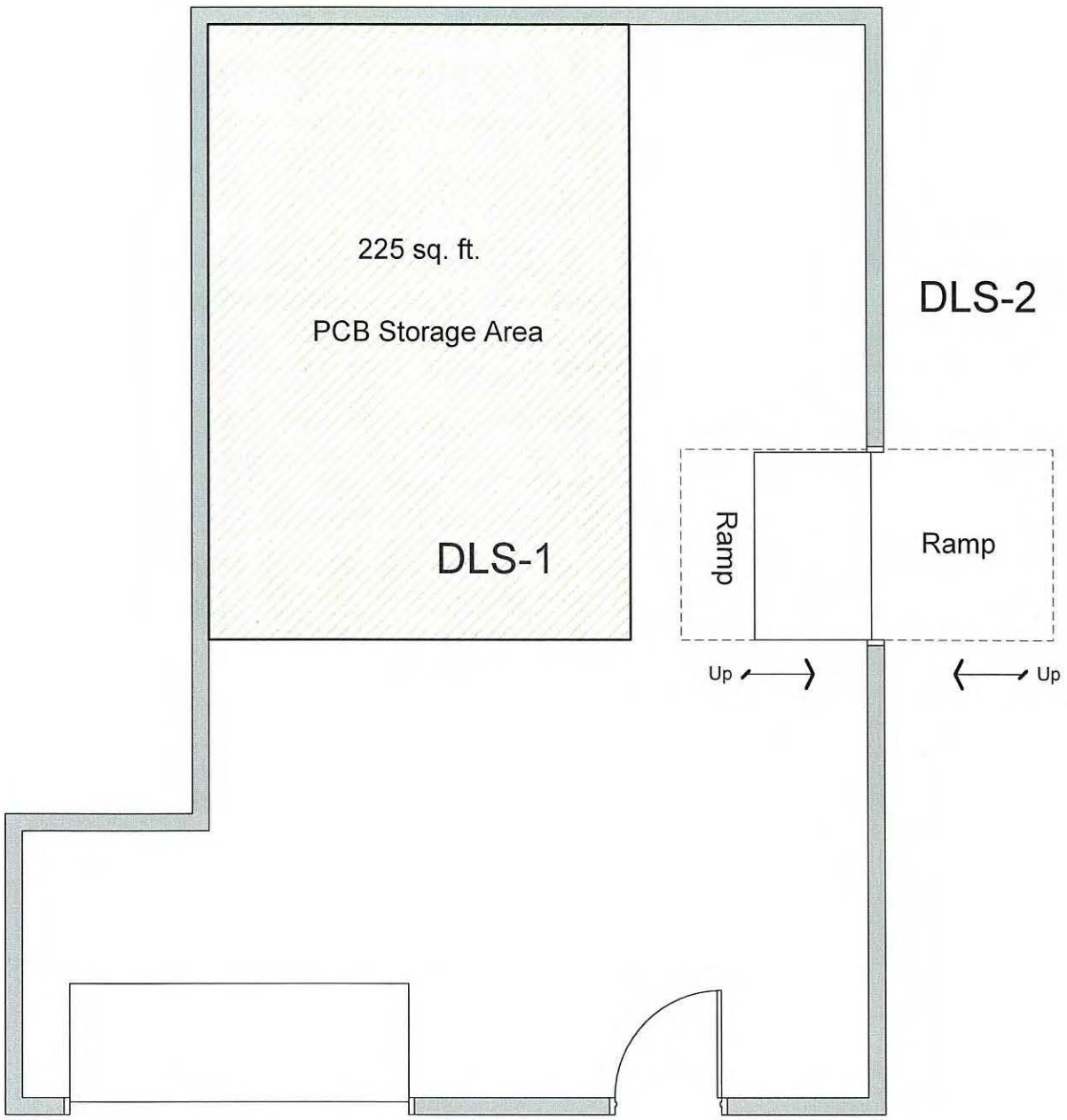
DLD has one 5000 gallon storage tank that will be used in if bulk storage exceeds the amount of container storage available. The tank is designated Tank #3 and is constructed of 304 stainles steel and is inspected once per year . Every five years more extensive testing is done. The secondary containment around the tank will hold 100 percent of its contents.

Container Storage

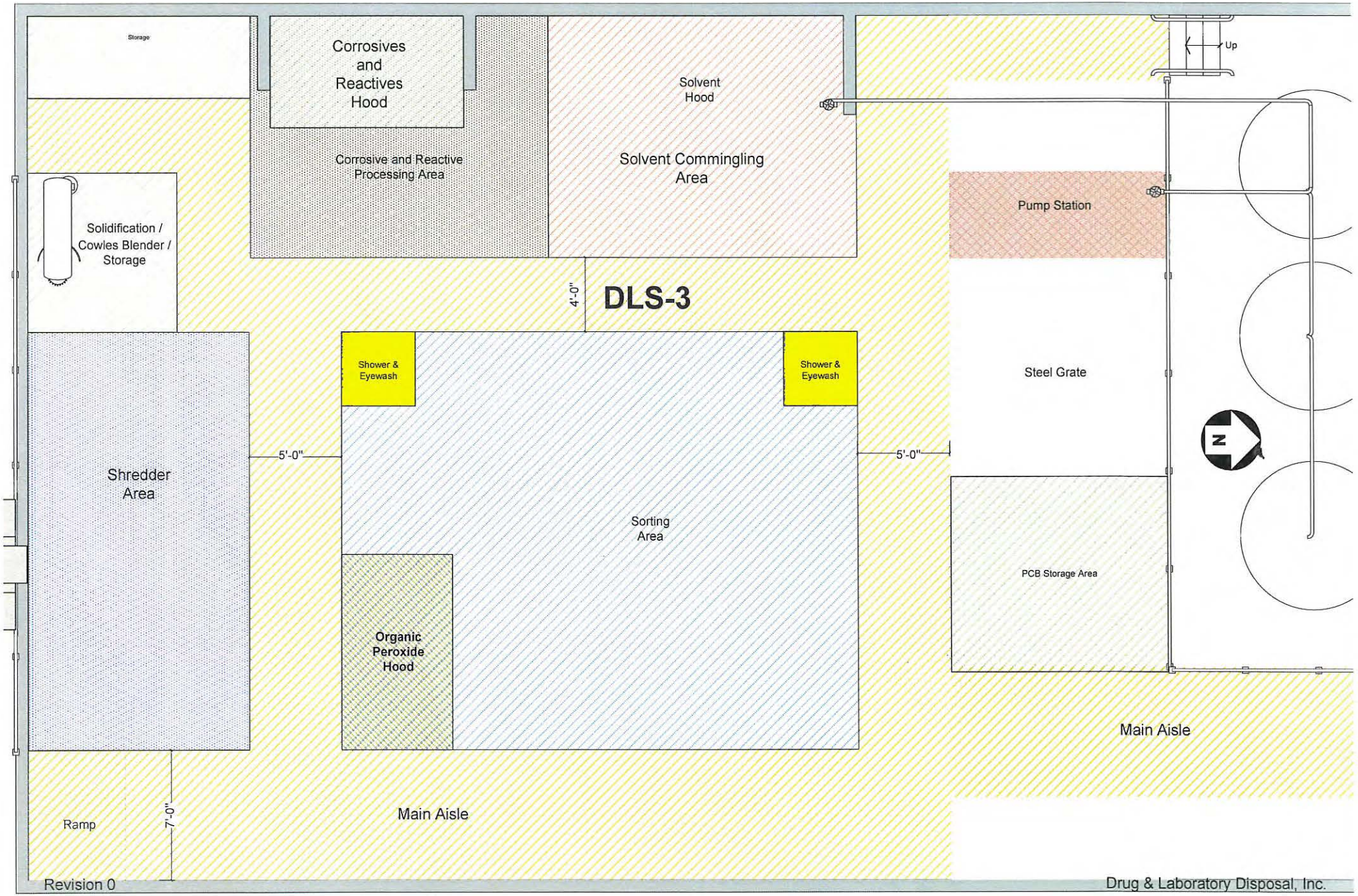
DLD proposes to continue storage of PCB wastes in the waste storage units DLS-1 (Attachment 5.1) and DLS-3 (Attachment 5.2). DLD also proposes storage in the waste storage area DLS-5 (Attachment 5.3). The proposed area is in DLS-5 and is in a L-shape racked area. The racks are nine feet long and hold at maximum 24 55 gallon drums. DLD consolidates PCB waste for shipment to licensed PCB incinerators. Consolidation will take place chiefly within the storage areas.

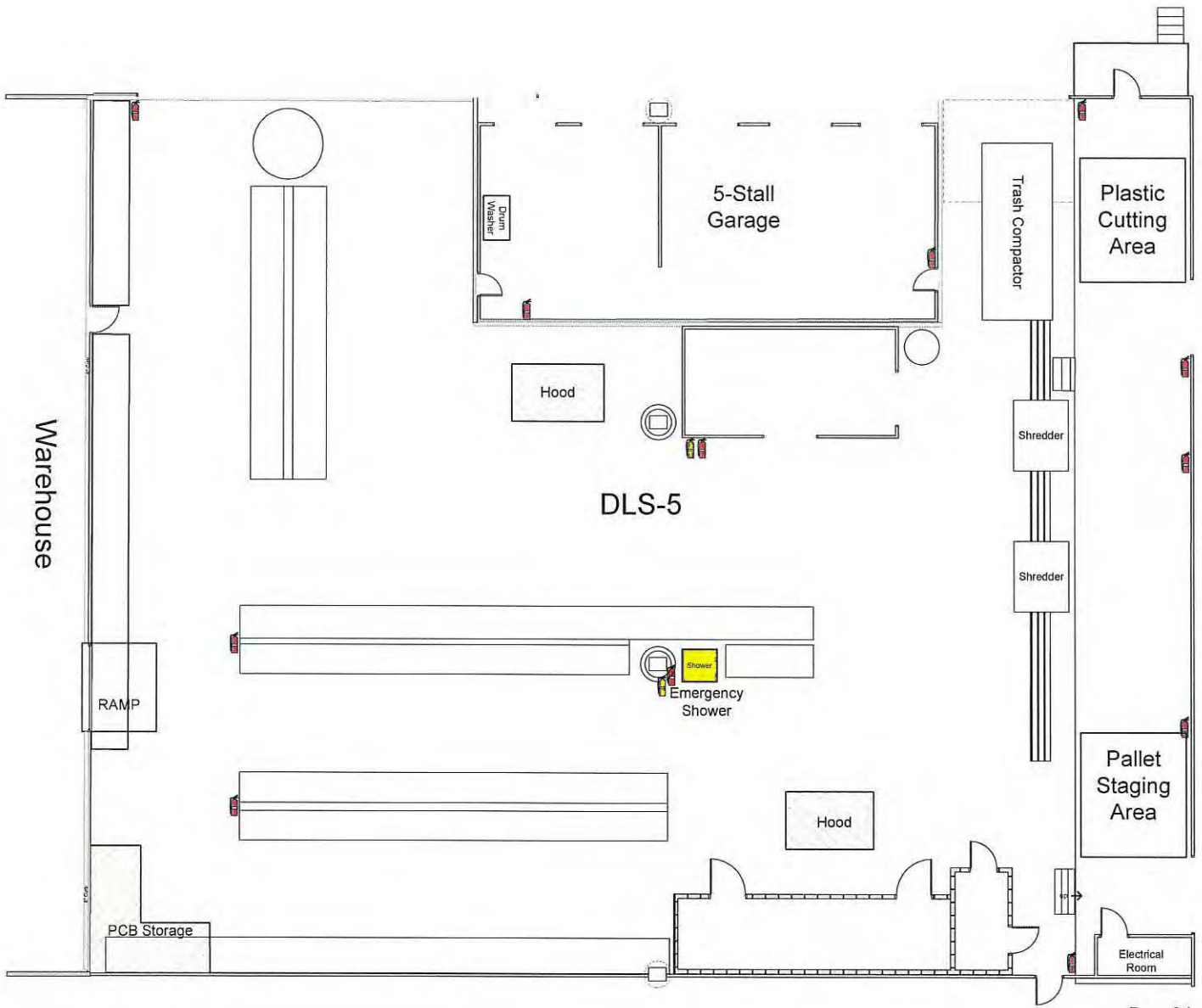
Estimated Maximum Inventory

Description	**Quantity in KG**
Small Capacitors (from households and industrial sources)	800
Large High Voltage Capacitors	250
PCB Article Containers PCB samples PCB debris/sawdust PCB contaminated clothing	150
PCB Liquid Drums	1500
PCB Liquid Totes	1100
PCB Transformer (over 500 ppm)	1000
PCB Paint (From household hazardous waste collections)	3000
PCB Liquids, Bulk Storage	15,000
Total	**21,800**



DLS-1 PCB Storage


Storage
Corrosives and Reactives Hood
Corrosive and Reactive Processing Area
Solvent Hood
Solvent Commingling Area
Up
Pump Station
Solidification / Cowles Blender / Storage
4'-0"
DLS-3
Shower & Eyewash
Shower & Eyewash
Steel Grate
N
Shredder Area
5'-0"
5'-0"
Sorting Area
PCB Storage Area
Organic Peroxide Hood
Main Aisle
Ramp
7'-0"
Main Aisle


N
Warehouse
Drum Washer
5-Stall Garage
Trash Compactor
Plastic Cutting Area
Hood
Shredder
DLS-5
Shredder
Shower
Emergency Shower
RAMP
Pallet Staging Area
Hood
PCB Storage
Electrical Room

DLD
Drug & Laboratory Disposal, Inc.

Certification Statement

Certification of Compliance with Facility Design and Construction Standards in 761.65(b)

Under the civil and criminal penalties of law for the making or submission of false or fraudulent statements of representation (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified sections of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Brent W. Walter — March 1, 2019

Brent W. Walter, President — Date

DLD
Drug & Laboratory Disposal, Inc.

Certification Statement

Certification of Compliance with Definition in 49 CFR 761.3 of Commercial Storer of PCBs

Under the civil and criminal penalties of law for the making or submission of false or fraudulent statements of representation, I certify that Drug & Laboratory Disposal, Inc. (DLD) is subject to the PCB storage unit standards of 49 CFR 761.65(b). DLD engages in storage activities involving either PCB waste generated by others or that was removed while servicing the equipment owned by others and brokered for disposal.

Brent W. Walter — March 1, 2019

Brent W. Walter, President — Date

331 Broad Street Plainwell, MI 49080 | Phone: (269) 685-9824 • Fax: (269) 685-1130 | www.dld-inc.com

U.S. ENVIRONMENTAL PROTECTION AGENCY
TIER I QUALIFIED FACILITY SPCC PLAN

Instructions to Complete this Template

This template is intended to help the owner or operator of a Tier I qualified facility develop a self-certified Spill Prevention, Control, and Countermeasure (SPCC) Plan. To use this template, your facility must meet all of the applicability criteria of a Tier I qualified facility listed under §112.3(g)(1) of the SPCC rule. This template provides every SPCC rule requirement necessary for a Tier I qualified facility, which you must address and implement.

You may use this template to comply with the SPCC regulation or use it as a model and modify it as necessary to meet your facility-specific needs. If you modify the template, your Plan must include a section cross-referencing the location of each applicable requirement of the SPCC rule and you must ensure that your Plan is an equivalent Plan that meets all applicable rule requirements of 40 CFR 112.6(a)(3).

You may complete this template either electronically or by hand on a printed copy. This document is a reformatted version of the template found in Appendix G of 40 CFR part 112.[a] No substantive changes have been made. Please note that a "Not Applicable" ("N/A") column has been added to both Table G-10 (General Rule Requirements for Onshore Facilities) and Table G-11 (General Rule Requirements for Onshore Oil Production Facilities). The "N/A" column should help you complete your self-certification when a required rule element does not apply to your facility. Use of the "N/A" column is optional and is not required by rule.

All Tier I qualified facility self-certifiers must complete Sections I, II, and III. Additionally, the owner or operator of an:

- Onshore facility (excluding production) must complete Section A.
- Onshore oil production facility (excluding drilling and workover facilities) must complete Section B.
- Onshore oil drilling and workover facility must complete Section C.

Complete and include with your Plan the appropriate attachments. You should consider printing copies of the attachments for use in implementing the SPCC Plan (e.g. Attachment 3.1 - Inspection Log & Schedule; Attachment 4 - Discharge Notification Form).

To complete the template, check the box next to the requirement to indicate that it has been adequately addressed. Either write "N/A" in the column or check the box under the "N/A" column to indicate those requirements that are not applicable to the facility. Where a section requires a description or listing, write in the spaces provided (or attach additional descriptions if more space is needed).

Below is a key for the colors used in the section headers:

Sections I, II, and III: Required for all Tier I qualified facilities
Section A: Onshore facilities (excluding production)
Section B: Onshore oil production facilities (excluding drilling and workover facilities)
Section C: Onshore oil drilling and workover facilities
Attachments: 1 - Five Year Review and Technical Amendment Logs 2 - Oil Spill Contingency Plan and Checklist 3 - Inspections, Dike Drainage and Personnel Training Logs 4 - Discharge Notification Form

After you have completed all appropriate sections, certify and date your Plan, and then implement it by the compliance date. If your facility was in operation before August 16, 2002, and you do not already have a Plan, then implement this template immediately. Conduct inspections and tests in accordance with the written procedures that you have developed for your facility. You must keep with the SPCC Plan a record of these inspections and tests, signed by the appropriate supervisor or inspector, for a period of three years.

Do not forget to periodically review your Plan (at least once every five years) or to update it when you make changes to your facility. You must prepare amendments within six months of the facility change, and implement them as soon as possible, but not later than six months following preparation of any amendment.

In the event that your facility releases oil to navigable waters or adjoining shorelines, immediately call the National Response Center (NRC) at 1-800-424-8802. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

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[a] Please note that the use of this template is not mandatory for a Tier I qualified facility. You may also meet the SPCC Plan requirement by preparing a satisfactory Tier II qualified facility Plan, preparing a satisfactory Plan that is certified by a Professional Engineer, or by developing an equivalent Plan for a Tier I qualified facility. Further information on the requirements of these methods can be found in 40 CFR part 112.6(a)(1). If you use any of these alternative methods you must include a cross reference in your Plan that shows how the equivalent Plan meets all applicable 40 CFR part 112 requirements.

Tier I Qualified Facility SPCC Plan

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in §112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name: Drug and Laboratory Disposal, Inc.

Facility Address: 331 Broad Street

City: Plainwell State: MI ZIP: 49080

County: Allegan Tel. Number: (269) 685 - 9824

Owner or Operator Name: Brent W. Walter

Owner or Operator Address: 10084 Red Fox Lane

City: Zeeland State: MI ZIP: 49464

County: Kent Tel. Number: (269) 720 - 0400

I. Self-Certification Statement (§112.6(a)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

I Brent W. Walter, President certify that the following is accurate:

1. I am familiar with the applicable requirements of 40 CFR part 112;
2. I have visited and examined the facility;
3. This Plan was prepared in accordance with accepted and sound industry practices and standards;
4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices;
5. I will fully implement the Plan;
6. This facility meets the following qualification criteria (under §112.3(g)(1)):
   a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
   b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
   c. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.
7. This Plan does not deviate from any requirement of 40 CFR part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include any measures pursuant to §112.9(c)(6) for produced water containers and any associated piping;
8. This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.

I also understand my other obligations relating to the storage of oil at this facility, including, among others:

1. To report any oil discharge to navigable waters or adjoining shorelines to the appropriate authorities. Notification information is included in this Plan.
2. To review and amend this Plan whenever there is a material change at the facility that affects the potential for an oil discharge, and at least once every five years. Reviews and amendments are recorded in an attached log [See Five Year Review Log and Technical Amendment Log in Attachments 1.1 and 1.2.]
3. Optional use of a contingency plan. A contingency plan:
   a. May be used in lieu of secondary containment for qualified oil-filled operational equipment, in accordance with the requirements under §112.7(k), and;
   b. Must be prepared for flowlines and/or intra-facility gathering lines which do not have secondary containment at an oil production facility, and;
   c. Must include an established and documented inspection or monitoring program; must follow the provisions of 40 CFR part 109; and must include a written commitment of manpower, equipment and materials to expeditiously remove any quantity of oil discharged that may be harmful. If applicable, a copy of the contingency plan and any additional documentation will be attached to this Plan as Attachment 2.

I certify that I have satisfied the requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a). I certify that the information contained in this Plan is true.

Signature Brent W Walter Title: President

Name Brent W. Walter Date: 2-28-19

II. Record of Plan Review and Amendments

Five Year Review (§112.5(b)):

Complete a review and evaluation of this SPCC Plan at least once every five years. As a result of the review, amend this Plan within six months to include more effective prevention and control measures for the facility, if applicable. Implement any SPCC Plan amendment as soon as possible, but no later than six months following Plan amendment. Document completion of the review and evaluation, and complete the Five Year Review Log in Attachment 1.1. If the facility no longer meets Tier I qualified facility eligibility, the owner or operator must revise the Plan to meet Tier II qualified facility requirements, or complete a full PE certified Plan.

Table G-1 Technical Amendments (§§112.5(a), (c) and 112.6(a)(2))	
This SPCC Plan will be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge to navigable waters or adjoining shorelines. Examples include adding or removing containers, reconstruction, replacement, or installation of piping systems, changes to secondary containment systems, changes in product stored at this facility, or revisions to standard operating procedures.	☒
Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template. *[§112.6(a)(2)]* **[See Technical Amendment Log in Attachment 1.2]**	☒

III. Plan Requirements

1. Oil Storage Containers (§112.7(a)(3)(i)):

Table G-2 Oil Storage Containers and Capacities		
This table includes a complete list of all oil storage containers (aboveground containers[a] and completely buried tanks[b]) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided.		☒
Oil Storage Container *(indicate whether aboveground (A) or completely buried (B))*	**Type of Oil**	**Shell Capacity (gallons)**
A, DLS-1,	oil containing PCB's	55 gallon drums x 20 drums
A, DLS-3, Tank 3	oil containing PCBs	5,000 gallons
A, DLS-5	used oil & oil containing PCBs	275 gallon totes x 14 totes

Total Aboveground Storage Capacity [c] 9,950 gallons
Total Completely Buried Storage Capacity 0 gallons
Facility Total Oil Storage Capacity 9,950 gallons

[a] Aboveground storage containers that must be included when calculating total facility oil storage capacity include: tanks and mobile or portable containers; oil-filled operational equipment (e.g. transformers); other oil-filled equipment, such as flow-through process equipment. Exempt containers that are not included in the capacity calculation include: any container with a storage capacity of less than 55 gallons of oil; containers used exclusively for wastewater treatment; permanently closed containers; motive power containers; hot-mix asphalt containers; heating oil containers used solely at a single-family residence; and pesticide application equipment or related mix containers.

[b] Although the criteria to determine eligibility for qualified facilities focuses on the aboveground oil storage containers at the facility, the completely buried tanks at a qualified facility are still subject to the rule requirements and must be addressed in the template; however, they are not counted toward the qualified facility applicability threshold.

[c] Counts toward qualified facility applicability threshold.

2. Secondary Containment and Oil Spill Control (§§112.6(a)(3)(i) and (ii), 112.7(c) and 112.9(c)(2)):

Table G-3 Secondary Containment and Oil Spill Control	
Appropriate secondary containment and/or diversionary structures or equipment[a] is provided for all oil handling containers, equipment, and transfer areas to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.	☒

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

Table G-4 Containers with Potential for an Oil Discharge

Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method[a]	Secondary containment capacity (gallons)
Bulk Storage Containers and Mobile/Portable Containers[b]					
DLS-1: Containerized Storage Area	Leak, spill, rupture, fire, explosion	1,100	N/A	DLS-1 is surrounded by a 6 inch high by 4 inch wide reinforced sealed concrete curb and 6 inch-high raised access ramp that slopes into DLS-2 (in case of overflow). Both areas are sealed and inspected regularly. Containment capacity of DLS-2 is 6,710 gallons.	2,955 gallons
DLS-3: Stainless-Steel Type 304 Tank #3	Leak, spill, rupture, fire, explosion	5,000	N/A	DLS-3 is surrounded by a 5.5 foot high by 8 inch thick reinforced concrete wall. The two sumps in the tank containment area of DLS-3 consist of six-foot tiles vertically concreted in place with the interior of each tile sealed with four feet of concrete and two inches of sealant. All joints, floors, walls, and curbs are sealed and inspected regularly to ensure that there is no breakdown in the structure or sealant.	46,750 gallons
DLS-5: Containerized Storage Area	Leak, spill, rupture, fire, explosion	550	N/A	DLS-5 is surrounded by a 6 inch high by 4 inch wide reinforced sealed concrete curb. The seals and curb are inspected regularly to ensure there is no breakdown.	51,068 gallons
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)[c]					

Piping, Valves, etc.					
DLS-3	Leak, spill, rupture, fire, explosion	5,000	N/A	DLS-3 is surrounded by a 5.5 foot high by 8 inch thick reinforced concrete wall. The two sumps in the tank containment area of DLS-3 consist of six-foot tiles vertically concreted in place with the interior of each tile sealed with four feet of concrete and two inches of sealant. All joints, floors, walls, and curbs are sealed and inspected regularly to ensure that there is no breakdown in the structure or sealant.	46,750 gallons
Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)					
DLD Loading/Unloading Area	Leak, spill, rupture, fire, explosion	5,000	N/A	Poured 5.5 foot by 8 inch thick concrete and block wall isolate the area. The wall and floor joints of the concrete wall are protected by a neoprene water stop. The perimeter of the floor and wall are sealed. A concrete ramp prevents storm water from flowing into this area.	5,000 gallons
Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through process vessels at an oil production facility)					

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

[b] For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.

[c] For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):

Table G-5 Inspections, Testing, Recordkeeping and Personnel Training	
An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. *[§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]*	☒
The following is a description of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility: Inspections of the oil storage areas are conducted on a daily basis. All oil articles and oil containers are inspected for leaks at least once each working day. The Inspection Check Sheet [Attachments 3.1 and 3.2] requires a review of existing conditions, notations of any necessary repairs, and any other pertinent information. The reports are signed and dated by the inspector(s). Copies of these inspection reports are made a part of this SPCC Plan by incorporation into DLD's Operating Log and are retained for a period of three years. The documented inspections are supplemented by routine visual inspections of the storage areas, diked areas, and piping systems by plant personnel during working hours. Tank 3 is cleaned and then inspected annually both internally and externally by the Non Destructive Testing Division of T.Ü.V. Rhineland of Caledonia, Michigan. Repairs to the tank are made as required. Accurate inventory records are maintained regarding materials received and stored. The levels of all bulk storage tanks are checked daily by the Hazardous Waste Chemists. Levels are measured with a tape from the tank's top hatch. Records of these readings are maintained by the Hazardous Waste Area Manager. Containerized oil waste is inventoried regularly. Employees are trained by DLD management to minimize the potential for spills of oils to groundwater and surface water. Formal classroom-style instruction is conducted at least once per year, in keeping with Michigan's Right-To-Know Law (OSHA Hazard Communication Standard, 29 CFR 1910.1200), to educate employees about the proper use of safety equipment and the safe handling of chemical materials. Topics covered include spill response (including the contents of the SPCC), fire-fighting procedures, and safety equipment use. Employees are trained in accordance with the facility's Contingency Plan to respond to emergency conditions within the building. Annual training regarding an employee's duties and responsibilities, as they relate to any spills or releases within the facility, will be in compliance with OSHA's Hazardous Waste Operations, HAZWOPER, Emergency Response Final Rule, 29 CFR 1910.120, and 40 CFR Part 761. DLD employees are also trained to properly inspect and maintain all tanks and storage areas for potential problems that could cause spills of chemical materials. A record of the content of these annual training sessions and of the persons in attendance is signed and kept on file at the facility for a period of three years.	
Inspections, tests, and records are conducted in accordance with written procedures included within the current Part B Operating License. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph. *[§112.7(e)]*	☒
A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years. *[§112.7(e)]* **[See Inspection Log and Schedule in Attachment 3.1]**	☒
Inspections and tests are signed by the appropriate supervisor or inspector. *[§112.7(e)]*	☒
Personnel, training, and discharge prevention procedures [§112.7(f)]	
Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan. *[§112.7(f)]*	☒
A person who reports to facility management is designated and accountable for discharge prevention. *[§112.7(f)]* Name/Title: Sharon Joles, Environmental Director	☒
Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and any recently developed precautionary measures. *[§112.7(f)]* **[See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]**	☒

4. Safety and Security (excluding oil production facilities) §112.7(g):

Table G-6 Implementation and Description of Security Measures	
Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.	☒

The following is a description of how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges:

Barbed wire-topped, six-foot high, chain-linked fence and secured gates enclose the active portion of the TSF/PCB storage facility and driveway. Access to the site is controlled at the secured entrance/exit gate. Automatic floodlights illuminate the total perimeter of the DLD buildings. Cameras throughout the facility provide twenty-four hour video surveillance. Strategically located telephones with intercom capabilities are located throughout the facility and office area. All visitors, vendors, and contractors to the facility sign in at the main office and are escorted while in the facility. Visitors without an escort will be questioned by company personnel. All entrances have warning signs legible from a distance of twenty-five feet with the legend "Danger – Unauthorized Personnel Keep Out". On evenings, weekends, and holidays, all gates and other entrances to the facility are locked and security is provided by heat/motion detectors. In addition, all doors are protected by a badge and key pad system. Unauthorized entry will activate an alarm system. Plainwell City Police patrol the area around DLD and maintain surveillance logs.

The oil storage areas are located within the DLS-1, DLS-3, and DLS-5 waste management areas. All PCB oil storage areas are posted with yellow and black "PCB Caution" signage. Accesses to the DLS-1 and DLS-3 areas are posted with "Authorized Personnel Only" signs. All visitors and/or inspectors are provided with disposable boots, eye protection, and a hard hat when touring the storage facility. The foot protection is removed in the decontamination room to prevent the movement of potential chemical contaminants into the outer clean environment. These tours are provided during worker break periods to avoid chemical exposure.

5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):

Table G-7 Description of Emergency Procedures and Notifications

The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines [§112.7(a)(3)(iv) and 112.7(a)(5)]:

DLD Spill (Emergency) response personnel are trained in accordance with OSHA's Hazardous Waste Operations and Emergency Response Final Rule, 29 CFR 1910.120 and with the applicable sections of the 29 CFR Subpart I, Personal Protective Equipment.

1. Notification [40 CFR 264.56(a) and (j)]

The list of emergency contacts contained in Section 6 of this part provides a ready reference for facility personnel and Spill (Emergency) Coordinators in the event of an imminent or actual emergency situation at the facility which will require immediate response. In the event of an emergency situation, the Spill (Emergency) Coordinator will be notified first. All other facility personnel, local emergency agencies, state and federal authorities will be promptly notified as directed by the Spill (Emergency) Coordinator.

2. Identification of Hazardous Materials [40 CFR 264.56(b)]

The Spill (Emergency) Coordinator will immediately identify the type, exact source, amount, and extent of any released materials. The Spill (Emergency) Coordinator is familiar with the facility and the types of wastes that are handled. The initial identification will be made by observation or knowledge of the material involved, the source, and the location of the release. The tanks, piping, and the containers are labeled to facilitate the identification of released material. If visual identification cannot be made, samples of the released materials will be identified by chemical analysis.

3. Assessment [40 CFR 264.56(c) and (d)]

The Spill (Emergency) Coordinator will assess possible hazards, both direct and indirect, to human health or the environment that may result from the release of the identified material or from a fire or explosion. The assessment will consider the effects of any gases that may be generated, the effects of oil or surface runoff from water or chemical agents used to control the fire, and the effects of any chemical or physical reactions on equipment or structures.

If the Spill (Emergency) Coordinator's assessment indicates that the evacuation of local areas may be advisable, the appropriate local authorities will be immediately notified. The Spill (Emergency) Coordinator will assist these authorities in deciding whether evacuation is indicated and what area may need to be evacuated. The National Response Center will also be immediately notified.

4. Control Procedures [40 CFR 264.52(a)]

Whenever there is an imminent or actual emergency situation where the potential or actual release of oil may threaten human health or the environment:

- The facility personnel who discover the situation will activate the emergency alarm system, thereby alerting the Spill (Emergency) Coordinator or designate who can then contact the Spill (Emergency) Coordinator by telephone.
- The Spill (Emergency) Coordinator or designate will contact the appropriate emergency responders and state or local agencies, if their assistance is needed.
- All emergency response personnel will utilize personal protective equipment, including gloves, boots, goggles or face shields, aprons, and other equipment appropriate to the emergency.
- All nonessential personnel will be evacuated from the immediate area of the emergency. If a total facility evacuation is indicated, the evacuation procedures will be followed.
- Any processes or operations that may interfere with emergency response will be stopped. Valves, pipes, and other equipment will be monitored for leaks, pressure buildup, gas generation, or ruptures.
- The character, source, and extent of the emergency will be evaluated. The actual or potential release of oil will be identified.
- Trained personnel will use fire extinguishers to contain the spread of fire, if appropriate. Upon the arrival of the fire department, the directions of the fire chief will be followed in handling the emergency.

Table G-7 Description of Emergency Procedures and Notifications cont.

- All measures will be undertaken to prevent the contact of any released materials with incompatible materials such as organic material with skin and eyes and flammable materials with any spark-emitting sources or open flames.
- Released materials are contained through the use of oil booms or dams and inert absorbent materials suitable to the released materials. Spark-proof equipment will be used to remove flammable materials.
- If necessary, the area will be roped off to limit access to the area until the emergency has been cleared and the area cleaned.

5. Prevention of Recurrence or Spread of Fires, Explosions or Releases [40 CFR 264.56(e)]

During an emergency, the Spill (Emergency) Coordinator must take all reasonable measures necessary to ensure that fires, explosions or releases do not recur or spread to other areas of the facility or off the facility site. Some actions which might be employed include:

- Shut off pump or valve lines, if required to stop the release.
- Start sump pumps to transfer accumulated contained released materials into available tanks.
- Set up portable pumps to transfer accumulated contaminant materials.
- Erect temporary dams in the path of the flow of released materials.

6. Storage and Treatment of Released Materials [40 CFR 264.56(g)]

Immediately after an emergency, the Spill (Emergency) Coordinator will make arrangements for the treatment, storage, or disposal of recovered wastes or any other contaminated materials. The treatment, storage, or disposal of recovered wastes and contaminated materials will be conducted in accordance with applicable regulations governing the management of these materials.

7. Container Spills and Leakage [40 CFR 264.171]

For emergency situations involving drums or other containers during storage, any materials released into the secondary containment system will be pumped out and disposed of according to applicable regulations. If a container holding oil is not in good condition or it begins to leak, the oil from this container will be transferred to a container in good condition. An entire leaking 55-gallon drum may also be placed within a larger recovery drum.

8. Tank Spills and Leakage [40 CFR 264.194(c)]

Any spill or leak from the storage tanks will be contained within the secondary containment structure that has been provided. Any materials released into the secondary containment system will be pumped out and disposed of according to applicable regulations. No materials will be placed into a defective tank or associated piping until repairs have been made to eliminate the potential for leakage or explosion.

9. Incompatible Wastes [40 CFR 264.56(h)(1)]

The Spill (Emergency) Coordinator will ensure that no wastes that may be incompatible with the released materials are received at the DLD facility until cleanup procedures are completed.

10. Post Equipment Maintenance [40 CFR 264.56(h)]

After an emergency event, all emergency equipment will be replaced or cleaned so that it is fit for use. Before operations are resumed, an inspection of all safety equipment will be conducted. The Spill (Emergency) Coordinator will notify the U.S. EPA Regional Administrator, the MDEQ, and local authorities that post equipment maintenance has been performed before operations at the facility will resume.

6. Contact List (§112.7(a)(3)(vi)):

Table G-8 Contact List	
Contact Organization / Person	**Telephone Number**
National Response Center (NRC):	1-800-424-8802
Cleanup Contractor(s): Valley City Environmental Services (or alternate as determined at the time of spill).	616-235-1500
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention:	Office: 269-685-9824 ext. 224
Kevin Jay Berghuis (Primary Emergency Coordinator)	Emergency: 269-685-9825
Robert Rittersdorf, Jr.	Office: 269-685-9824 ext. 222
	Emergency: 616-530-1739
State Oil Pollution Control Agencies: MDEQ's Pollution Emergency Alerting System (PEAS)	800-292-4706
Other State, Federal, and Local Agencies:	
Allegan County Sheriff Department	911
Plainwell Area Ambulance	269-685-6172
Consumers Electric	800-477-5050
Michigan Gas Utilities (gas)	800-401-6451
Local Fire Department: Plainwell Public Safety	911
Local Police Department: Plainwell Public Safety	911
Hospital(s):	
Borgess-Pipp Hospital	269-685-0737
Bronson Methodist Hospital Level I Trauma Unit	269-341-6386
Other Contact References (e.g., downstream water intakes or neighboring facilities)	

7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):

Table G-9 NRC Notification Procedure	
In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines **[See Discharge Notification Form in Attachment 4]**: *[§112.7(a)(4)]*	☒
• The exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimate of the total quantity discharged; • Estimate of the quantity discharged to navigable waters; • Source of the discharge; • Description of all affected media; • Cause of the discharge; • Any damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; and • Names of individuals and/or organizations who have also been contacted.	

8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or
Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve month period

You must submit the following information to the RA:

(1) Name of the facility;
(2) Your name;
(3) Location of the facility;
(4) Maximum storage or handling capacity of the facility and normal daily throughput;
(5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
(6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
(7) The cause of the reportable discharge, including a failure analysis of the system or subsystem in which the failure occurred; and
(8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
(9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

* * * * *

A. Onshore Facilities (excluding production) (§§112.8(b) through (d), 112.12(b) through (d)):

The owner or operator must meet the general rule requirements as well as requirements under this section. Note that not all provisions may be applicable to all owners/operators. For example, a facility may not maintain completely buried metallic storage tanks installed after January 10, 1974, and thus would not have to abide by requirements in §§112.8(c)(4) and 112.12(c)(4), listed below. **In cases where a provision is not applicable, write "N/A".**

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Drainage from diked storage areas is restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. Diked areas may be emptied by pumps or ejectors that must be manually activated after inspecting the condition of the accumulation to ensure no oil will be discharged. *[§§112.8(b)(1) and 112.12(b)(1)]*	☐	☒
Valves of manual, open-and-closed design are used for the drainage of diked areas. *[§§112.8(b)(2) and 112.12(b)(2)]*	☐	☒
The containers at the facility are compatible with materials stored and conditions of storage such as pressure and temperature. *[§§112.8(c)(1) and 112.12(c)(1)]*	☒	☐
Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). *[§112.6(a)(3)(ii)]*	☒	☐
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: *[§§112.8(c)(3) and 112.12(c)(3)]*		
• Bypass valve is normally sealed closed	☐	☒
• Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters or adjoining shorelines	☐	☒
• Bypass valve is opened and resealed under responsible supervision	☐	☒
• Adequate records of drainage are kept **[See Dike Drainage Log in Attachment 3.3]**	☐	☒
For completely buried metallic tanks installed on or after January 10, 1974 at this facility *[§§112.8(c)(4) and 112.12(c)(4)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☒
• Regular leak testing is conducted.	☐	☒
For partially buried or bunkered metallic tanks *[§112.8(c)(5) and §112.12(c)(5)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☒
Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.8(c)(6) and §112.12(c)(6)(i)]*	☒	☐
Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(c)(6) and 112.12(c)(6)]*	☒	☐
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.12(c)(6)(ii)]*	☒	☐

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Each container is provided with a system or documented procedure to prevent overfills for the container. Describe: The PCB bulk storage tank in DLS-3 is protected by a high-level alarm system activated by a float switch inside the tank. If the high-level mark is reached an audible horn sounds for twenty seconds. At the same time the horn sounds a red light, associated with the tank, illuminates on the bulk tank monitoring panel and remains lit until the liquid level in the tank has been lowered. A full tank is indicated by a continuously lit red light on the storage-tank monitoring panel. DLD's storage tanks and containment areas are inspected daily and their conditions are noted on the Inspection Log and Schedule [Attachment 3.1]	☒	☐
Liquid level sensing devices are regularly tested to ensure proper operation **[See Inspection Log and Schedule in Attachment 3.1]**. *[§112.6(a)(3)(iii)]*	☒	☐
Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed. *[§§112.8(c)(10) and 112.12(c)(10)]*	☒	☐
Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☒	☐
Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☒

ATTACHMENT 1 – Five Year Review and Technical Amendment Logs

ATTACHMENT 1.1 – Five Year Review Log

I have completed a review and evaluation of the SPCC Plan for this facility, and will/will not amend this Plan as a result.

Table G-13 Review and Evaluation of SPCC Plan for Facility			
Review Date	Plan Amendment		Name and signature of person authorized to review this Plan
	Will Amend	Will Not Amend	
06/29/10	☒	☐	Brent W. Walter
08/07/13	☒	☐	Brent W. Walter
09/09/16	☒	☐	Brent W. Walter
02/01/19	☒	☐	Brent W. Walter
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	

ATTACHMENT 1.2 – Technical Amendment Log

Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template.

Table G-15 Description and Certification of Technical Amendments		
Review Date	Description of Technical Amendment	Name and signature of person certifying this technical amendment

ATTACHMENT 3.1 – Inspection Log and Schedule Sheets

DAILY INSPECTION CHECK SHEET

		M	T	W	TH	F	Sat	Comments
Date:								
Time:								
Inspector's Initials:								
DLS-1 - Operating & Structural Equipment								
Containment Area:	No Cracks							
	No Deterioration							
	No Liquid in Sump							
Containers:	No Leaks							
	Closed Properly							
	Labeled Properly							
PCB Storage:	PCB Articles Not Leaking							
	PCB Containers Not Leaking							
	PCB Marks Displayed							
Safety & Emergency Equipment:	Intercom Working							
DLS-2 - Operating & Structural Equipment								
Containment Area:	No Cracks							
	No Deterioration							
Containers:	No Leaks							
	Closed Properly							
	Labeled Properly							
Hammermill:	Flaps Intact							
	Integrity of Air Ducts							
	Fan Working Properly							
Shredder 3:	Working Properly							
	No Deterioration							
	Fan working properly							
Shredder 2:	Working Properly							
	No Deterioration							
	Fan Working Properly							
Blender:	Covers in Place							
Safety & Emergency Equipment:	Telephone/Intercom Working							
DLS-3 - Operating & Structural Equipment								
Containment Area:	No Cracks							
	No Deterioration							
	No Liquid in Sumps							
	Float Switch Operational							
Containers:	No Leaks							
	Closed Properly							
	Labeled Properly							
Tanks, Ancillary Equipment, & Piping:	No leaking or Corrosion of Valves/Fittings/Seams							
	High Level Alarms Working							
Fume Hoods:	Fume Hood #1 Fans Working							
	Fume Hood #2 Fans Working							
PCB Storage:	PCB Articles Not leaking							
	PCB Containers Not Leaking							
	PCB Marks Displayed							
Safety & Emergency Equipment:	Intercom Working							

	M	T	W	TH	F	Sat	Comments
Date:							Ver. 1-E-doc-3-18-10
Time:							
Inspector's Initials							
DLS-4 - Operating & Structural Equipment							
Containment Area: No Cracks							
No Deterioration							
No Free Liquid in Sumps							
Float Switch Operational							
Tanks, Ancillary Equipment, & Piping: No leaking or Corrosion of Valves/Fittings/Seams							
High Level Alarms Working							
DLS-5 - Operating & Structural Equipment							
Containment Area No Cracks							
No Deterioration							
No Liquid in Sump							
Containers: No Leaks							
Closed Properly							
Labeled Properly							
Shredder 4: Working Properly							
No Deterioration							
Fan Working Properly							
TeeMark: Working Properly							
No Deterioration							
Fan working properly							
Xtractor: Working Properly							
No Deterioration							
Fan working properly							
Tanks, Ancillary Equipment, & Piping:							
No leaking or Corrosion of Valves/Fittings/Seams							
Safety & Emergency Equipment:							
Intercom Working							
HWLD							
Containment Area No Cracks							
No Deterioration							
No Liquid in Sump							
Containers: No Leaks							
Closed Properly							
Labeled Properly							
Safety & Emergency Equipment:							
Intercom Working							

TANK LIQUID LEVELS		M	T	W	TH	F	Sat	Start Date	Finish Date
	# 1								
	#2								
	#3								
	#4								
	#5								
	#6								

Comments: _____

(OOS = Out of Service) (NIU = Not in Use)

DLD RCRA WEEKLY INSPECTION CHECK SHEET

SAFETY & EMERGENCY EQUIPMENT INSPECTIONS

	Date Confirmed	Comments
All Alarms & System Tested & Operable		
#1 Safety Shower and Eyewash Operable (DLS-3)		
#2 Safety Shower and Eyewash Operable (DLS-5)		
#3 Safety Shower and Eyewash Operable (HWLD)		
#1 Shower Heat Tape Okay (in winter)		
#2 Shower Heat Tape Okay (in winter)		
#1 Circulation Pump On (in winter) (Decon Room)		
#2 Circulation Pump On (in winter) (Electrical Room)		

EQUIPMENT INSPECTIONS

Shredders (Weekly Splintax Test)

Shredder 2: Airflow Unobstructed?	☐ Yes	☐ No
Shredder 3: Airflow Unobstructed?	☐ Yes	☐ No
Shredder 4: Airflow Unobstructed?	☐ Yes	☐ No
TeeMark: Airflow Unobstructed?	☐ Yes	☐ No
Xtractor: Airflow Unobstructed?	☐ Yes	☐ No

OPERATING & STRUCTURAL EQUIPMENT

Inspected Bimonthly		Date Last Inspected	Date Inspected	Comments
Tanks, Ancillary Equipment, & Piping				
Flange Connection Bolts Intact	DLS-3			
	DLS-4			
Flange Connection Bolts Tightened	DLS-3			
	DLS-4			

MONTHLY INSPECTION SHEET

Inspection Date: _____
Time: _____
Inspector's Signature: _____

SAFETY & EMERGENCY EQUIPMENT INSPECTIONS

Inspected Monthly	Date Confirmed	Comments
Fire Protection		
Fire Extinguisher Dates Not Expired		
Fire Extinguishers Properly Charged		
Decontamination		
Decontamination Area Door Seals		
Spill Control Equipment		
Absorbent Material		
110 volt Suction Pumps (2)		
Hand Pumps (2)		
Air/Vacuum Pumps (3)		

EQUIPMENT INSPECTIONS

	Filter Press # 1	Filter Press #2 (NA)	Filter Press #3 (NA)
Has press been used this month?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
If so, has it been decontaminated?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

POLLUTION CONTROL DEVICES – CHARCOAL FILTERS

Tested Quarterly	Date Last Tested	Date of Last Replacement
Tank #1		
Tank #2		
Tank #3		
Tank #4		
Tank #5		
Tank #6		

Tested Monthly	Date Last Tested	Date of Last Replacement
Fume Hood #1		
Fume Hood #2		
Hammermill		
Shredder #2		
Shredder #3		
Shredder #4		
TeeMark		
Xtruder		

ATTACHMENT 3.2 – Bulk Storage Container Inspection Schedule – onshore facilities (excluding production):

To comply with integrity inspection requirement for bulk storage containers, inspect/test each shop-built aboveground bulk storage container on a regular schedule in accordance with a recognized container inspection standard based on the minimum requirements in the following table.

Table G-17 Bulk Storage Container Inspection Schedule

Container Size and Design Specification	Inspection requirement
Portable containers (including drums, totes, and intermodal bulk containers (IBC))	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas
55 to 1,100 gallons with sized secondary containment	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas plus any annual inspection elements per industry inspection standards
1,101 to 5,000 gallons with sized secondary containment and a means of leak detection[a]	
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection[a]	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas, plus any annual inspection elements and other specific integrity tests that may be required per industry inspection standards

[a] Examples of leak detection include, but are not limited to, double-walled tanks and elevated containers where a leak can be visually identified.

ATTACHMENT 3.4 – Oil-handling Personnel Training and Briefing Log

Date :	
Description / Scope :	
Attendees: (Please Sign In Below)	

ATTACHMENT 4 – Discharge Notification Form

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center **[also see the notification information provided in Section 7 of the Plan]**:

Table G-20 Information provided to the National Response Center in the Event of a Discharge			
Discharge/Discovery Date		Time	
Facility Name			
Facility Location (Address/Lat-Long/Section Township Range)			
Name of reporting individual		Telephone #	
Type of material discharged		Estimated total quantity discharged	Gallons/Barrels
Source of the discharge		Media affected	☐ Soil ☐ Water (specify) ☐ Other (specify)
Actions taken			
Damage or injuries	☐ No ☐ Yes (specify)	Evacuation needed?	☐ No ☐ Yes (specify)
Organizations and individuals contacted	☐ National Response Center 800-424-8802 Time ☐ Cleanup contractor (Specify) Time ☐ Facility personnel (Specify) Time ☐ State Agency (Specify) Time ☐ Other (Specify) Time		

ESTIMATED PCB COSTS FOR CLOSURE WITH JUSTIFICATION

Item 1. PCB Inventory

a. Small Capacitors (Ballasts)

800 Kg Or 1,760 Lbs (Approximately 2 55-Gal Drums)
Disposal Method (Incineration) $ 1390.00
Disposal Cost @ $.79/lb

b. Large Electrical Capacitors

250 Kg Or 550 Lbs (Approximately 2 55-Gal Drums)
Disposal Method (Incineration)
Disposal Cost @ $2.50/lb 1,375.00

c. PCB Article Containers (PCB Samples, PCB Debris/Sawdust, PCB Contaminated Clothing)

150 Kg Or 330 Lbs (Approximately 2 55-Gal Drums)
Disposal Method (Incineration)
Disposal Cost @ $6.85/lb 2260.00

d. PCB Liquid Drums

5 Drums
Disposal Method (Incineration)
Disposal @ $450/drum 2,250.00

e. PCB Liquid Totes 5,370.00
814 Kg or 1790 Lbs (approximately 2 totes)
Disposal @1.50/Lb

e. PCB Transformers > 500 ppm

1,000 Kg Each or 2,200 Lbs.
Disposal Method (Incineration)
Purge/Smelt Cost @ $0.75/lb 1,650.00

f. PCB Paint (from Household Hazardous Waste Collections)
(Approximately 12 55-gallon Drums @550 lbs/drum)
Disposal Method (Incineration)
Disposal Cost @ $1.50/lb 9900.00

g. 5,000-gallon Tank
Approximately 5,000 Gallons PCB Liquid>500 ppm
Disposal Method (Incineration)
Disposal Cost @ $2.64/gallon 13,200.00

h. Transportation Cost

i.	31 Drums @ $100/drum		3100.00
ii.	Transformers, 2200 pounds @ $0.25/pound	$	550.00

Item 2. Decontamination and Cleaning of Dedicated PCB Tank and 7,700 sq. foot Area
(Assumes that DLS-1, DLS-2, DLS-3 and loading/unloading area need decontamination)

a.	Decontamination 7,700 square-foot Area 2 days @ $3,500/day	7,000.00
b.	Labor Cleaning Tank - 1 Day @ $2,500/Day	2,500.00
c.	Decontamination of Floor Drain and Piping 2 Hours with a 2-man Crew @ $150/hr/man	600.00
d.	Cleanup Items and Contaminated Laboratory Equipment 2 Drums solids, 300 pounds each (600 pounds @ $6.85/lb)	4110.00

Item 3. Washwater Disposal

Disposal of Cleaning Wastes from Decontamination 2500 gallons of flushings from the 5,000-gallon tank (2500 gallons x 7.8 lbs/gal. x $0.30/lb)	5,850.00

Item 4. Sampling and Analysis

a. Floor Drains and Piping

i.	2-Man Crew for 2 hours @ $80/hr/man	320.00
ii.	3 Samples @ $55/analysis	165.00

b. Wipe/Soil Samples and Analysis

i.	2-Man Crew for 12 hours @ $80/hr/man	1920.00
ii.	120 Sample Bottles & Analysis @ $55/analysis	6,600.00

c. Post-Cleanup Verification Samples

i.	2-Man Crew for 8 hours @ $40/hr/man	640.00
ii.	65 Sample Bottles & Analysis @ $75 analysis	4875.00

Subtotal PCB Estimated Closure Costs	**$ 75,625.00**

ESTIMATED PCB COSTS FOR CLOSURE
WITH JUSTIFICATION

03-06

II. TOTAL COST CLOSURE ESTIMATE

Subtotal PCB Estimated Closure Costs	75,625.00
Subtotal of Contingency (10% of Subtotal)	7563.00
Documentation and Certification	2,000.00
TOTAL ESTIMATE FOR CLOSURE (12-97)	**$ 85,188.00**

CHEMICAL BANK®
WEALTH MANAGEMENT

720 Pleasant Street
St. Joseph, MI | 49085

Account Summary

Statement of Account

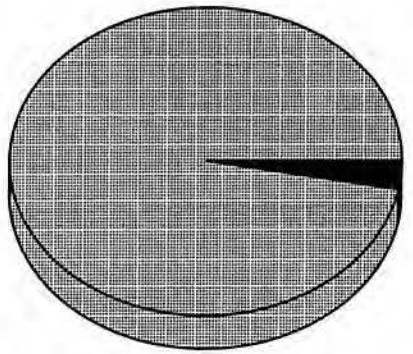
October 1, 2018 - December 31, 2018

Market Value Summary

	This Period	1/1/18 to 12/31/18
Beginning Market Value	**$91,311.79**	**$90,897.60**
Net Change in Market Value	-$523.39	-$109.20
Ending Market Value	**$90,788.40**	**$90,788.40**
Realized Gains/Losses (Included in Total Above)	$0.00	$222.00

Asset Allocation

	Asset Class	Balance
97%	Fixed Income	$88,024.69
3%	Cash & Equivalents	$2,763.71
100%	**Total Assets Value**	**$90,788.40**



Investment Objective: INCOME