



WASTE MANAGEMENT PLAN REMEDIATION TEAM ACTIVITIES

**FORMER WILLOW RUN ASSEMBLY PLANT
COMPANY VEHICLE OPERATIONS SITES**

YPSILANTI, MICHIGAN

PREPARED FOR RACER

CVO - MIK468293311

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LIST OF ACRONYMS

CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
COC	Chain of Custody
CRA	Conestoga-Rovers & Associates
CVO	Company Vehicle Operations
GM	General Motors Corporation
GM LLC	General Motors LLC
HASP	Health and Safety Plan
ID	Identification
LQG	Large Quantity Generator
MDEQ	Michigan Department of Environmental Quality
MLC	Motors Liquidation Company
NAPL	Non-Aqueous Phase Liquid
PAOC	Potential Area of Concern
PCB	Polychlorinated Biphenyls
POTW	Publicly Owned Treatment Works
PPE	Personal Protective Equipment
ppm	Parts Per Million
RACER	Revitalizing Auto Communities Environmental Response Trust
RFI	Resource Conservation and Recovery Act Facility Investigation
RCRA	Resource Conservation and Recovery Act
RWSA	Remediation Waste Storage Area
SAA	Satellite Accumulation Area
SQG	Small Quantity Generator
TCLP	Toxicity Characteristic Leaching Procedure
TSCA	Toxic Substances Control Act
U.S. DOT	U.S. Department of Transportation
U.S. EPA	U.S. Environmental Protection Agency
WRBC	Willow Run Business Center
WMP	Waste Management Plan

WWTP

Wastewater Treatment Plant

WSG

Waste Services Group

WASTE MANAGEMENT PLAN ACKNOWLEDGMENT SHEET

This is to certify that I have reviewed this Waste Management Plan (*Willow Run Company Vehicle Operations Site*) and I understand its contents. My failure to follow and comply with the requirements contained in this plan may result in disciplinary action and/or termination.

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WASTE MANAGEMENT PLAN ACKNOWLEDGMENT SHEET
(Continued)

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Print Name	Position	Signature	Date

1.0 INTRODUCTION

Conestoga-Rovers & Associates, Inc. (CRA) has prepared this Waste Management Plan (WMP) for the Willow Run Company Vehicle Operations (CVO) property (Site) at the former Willow Run Assembly Plant located in Ypsilanti, Michigan. The Site is bordered on the north and east by Tyler Pond, by Willow Run Business Center (WRBC) to the west, and Tyler Road and the Fons Landfill abuts the southern Site boundary.

The former Willow Run Assembly Plant property currently encompasses the WRBC and the Site. The WRBC was sold by General Motors Corporation (GM) to In Site Real Estate in 1997, while GM retained ownership of CVO (Site). GM operated the Site until the end of 2010. As a result of GM's bankruptcy, certain operating assets of GM were sold on July 10, 2009 to a newly formed company which is now known as General Motors LLC (GM LLC). Existing, non-conforming assets remained the property of GM, which was renamed Motors Liquidation Company (MLC). On October 20, 2010, MLC entered into a settlement agreement with federal and state governmental authorities regarding MLC's environmental obligations at its owned real property, including this Site (Settlement Agreement). On March 3, 2011, this Settlement Agreement was approved by the United States Bankruptcy Court for the Southern District of New York as part of MLC's Chapter 11 Plan of Liquidation. According to the terms of the Settlement Agreement, MLC transferred its interests in this Site to the Revitalizing Auto Communities Environmental Response Trust (RACER) on March 31, 2011, the Effective Date of MLC's Chapter 11 Plan of Liquidation. As such, the Site is now operated by RACER and this WMP has been prepared on RACER's behalf.

The WMP presented herein, describes policies, procedures, and protocols for the handling of waste materials generated during the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) activities at the Site. Types of wastes that may be generated include, but are not limited to the following:

- Toxic Substances Control Act (TSCA) polychlorinated biphenyls (PCB) remediation waste (includes solids and liquids from drilling and excavating activities), as defined by 40 Code of Federal Regulations (CFR) Part 761
- RCRA hazardous waste (includes solids and liquids from drilling, excavation, and other remedial activities), as defined by 40 CFR Part 261
- Non-hazardous waste (includes solids and liquids from excavating activities, personal protective equipment (PPE), debris, and soil)

The procedures and protocols outlined in the following subsections of this WMP include proper management, characterization testing/sampling, storage, transportation and/or disposal of wastes generated during project activities. These procedures will be performed in conjunction with those presented in the project Health and Safety Plan (HASP). In addition, this WMP will be revised/expanded, as appropriate, while the RFI work progresses to include information, methodologies and procedures associated with any changes in work scope and/or site conditions.

2.0 ADMINISTRATIVE ROLES AND RESPONSIBILITIES

The administrative roles and responsibilities of the project personnel are presented below.

RACER Contacts

Grant Trigger – Michigan Clean-up Manager

David Favero – Deputy Michigan Clean-up Manager

Cliff Lewis – Site Manager

CRA Project Manager – Ms. Beth Landale

Ms. Beth Landale is the CRA Project Manager and is responsible for preparation of this WMP, implementation of this WMP in a timely and cost effective manner, ensuring that the proper resources are available to complete the waste disposal activity, and having quality checks performed to ensure this WMP is being followed.

CRA Waste Coordinator – Mr. James VanAssche

Mr. James VanAssche is the CRA Waste Coordinator and is responsible for various day-to-day waste management activities including ensuring that characterization and sampling activities are performed, tracking the duration of on-Site waste storage, and tracking waste disposal budgets. Mr. VanAssche will be informed on a regular basis of all waste generated at the Site by CRA project personnel to update the on-site waste inventory. In addition, periodic internal audits of the waste handling activities will be conducted to ensure this WMP is being followed.

Mr. VanAssche is responsible for overseeing waste management activities, including selecting and liaison with transportation and disposal facilities, completing the required waste documentation (e.g. waste profiles), scheduling off-site waste shipments in a timely manner, and performing project notifications to the CRA Project Manager.

Mr. VanAssche will review and sign remediation waste profiles and manifests on behalf of RACER. The authorization to sign this documentation is provided in Appendix A. Mr. VanAssche will be responsible for manifest tracking including mailing a completed copy to the Michigan Department of Environmental Quality (MDEQ) and following up with the return copy of the manifest from the disposal facility within the timelines prescribed in 40 CFR Part 262.42.

For TSCA shipments, Mr. VanAssche will contact the disposal company to verify receipt of the waste if a third party transporter is used as per 40CFR 761.208(a)(4). The WSG will continuously update the annual PCB log and associated communication log as required by 40 CFR 761.180 and 761.208. This log will be submitted to RACER by

June 1st of each year, summarizing the previous years PCB waste. A copy of the RACER PCB Annual Log is provided in Appendix B.

CRA Field Technicians & Investigation Coordinators – CRA Project Personnel

Investigation Coordinators are responsible for communicating with the Waste Coordinator prior to initiating work that will generate waste to determine the type of sample analysis and containment that may be required. Following completion of work the Investigation Coordinators are responsible for informing the Waste Coordinator of the generated wastes for tracking purposes and inclusion in the waste inventory.

Field Technicians, CRA project personnel who perform field activities at the Site, are responsible for providing the Investigation Coordinators with a summary of all wastes generated during the field activities in writing. The summary shall include:

- Type and amount of waste (soil, water, PPE, etc)
- Date(s) waste was generated
- Waste generation method and location
- Number and capacity of containers
- Marking/labeling on containers;
- Unique container number (17303-Year-###)
- Waste characterization sampling identification (ID) (if applicable)
- Storage location

If the field activities are short in duration (less than 1 week) a summary of waste generated during those activities will be submitted at the conclusion of the activities. If the work is ongoing (more than one week) the summary will be submitted once a week.

At the conclusion of the waste generation activities, the containerized waste will be sampled for waste characterization using the protocol presented in Section 7.0.

In addition, CRA project personnel will inspect the appropriate Remediation Waste Storage Areas (RWSA) either periodically or weekly based on the waste hazard class designation.

3.0 WASTE MATERIALS

Waste materials generated as part of the RFI activities, summarized in Section 1.0, may include:

- Drummed and/or containerized aqueous wastes consisting of decontamination water, purged groundwater and dewatering of excavations, and/or trenches
- Drummed and/or containerized non-aqueous phase liquid (NAPL) and used absorbents
- Drummed and/or containerized solid waste from drilling, trenching, and excavating (may include a mixture of soils, PPE, debris, and cleared vegetation)
- Stockpiled solid wastes from drilling, trenching, and excavation activities
- Drummed and/or containerized waste from the groundwater treatment system (may include spent carbon and used bag filters)

None of the above wastes are considered to be explosive or shock-sensitive, therefore, provisions for these types of waste are not presented, herein. A detailed inventory by waste types/categories of all wastes produced during performance of the RFI activities will be maintained by CRA's Waste Coordinator.

3.1 RFI GENERATED WASTES

Excavated bulk soil will be staged in accordance with the Site work plans. Other RFI generated wastes may include drummed or containerized waste which will be stored daily at the area being investigated or remediated, while the drums/containers are still being filled. Once full or upon completion of the activity, all drummed or containerized wastes will be transferred to the appropriate on-site RWSA pending off-site treatment/disposal.

Waste intended for off-site disposal will be sent to facilities which were selected based on previous experience once waste profiles have been approved. Bulk and/or containerized RCRA hazardous waste will be staged on-site for a maximum of 90 days due to large quantity generator (LQG) status. This time period may be extended to 180 days if the generator status is changed to a small quantity generator (SQG). The locations for waste storage are presented on Figure 3.1.

The current generator status for the Site is:

- RACER (Willow Run CVO) (MIK468293311) - LQG (hazardous waste)

If waste volumes or types change the generator status will be revised as necessary.

4.0 DRUM AND CONTAINERIZED WASTE HANDLING PROTOCOLS

4.1 GENERAL

This section applies to all activities involved in the handling of the generated waste drums and containers. All drum and container handling activities will be conducted in accordance with the HASP.

4.2 SAFETY EQUIPMENT/HANDLING EQUIPMENT

During the handling of drums or containers, PPE as specified in the HASP will be worn at all times. All lifting and transporting of drums or containers will be performed with mechanical equipment whenever possible. Spill kits contained in eighty-five gallon overpack drums will be stored on-site and contain spill response equipment such as absorbent booms, towels, a non-sparking shovel, waste labels, quick dry, plastic bags and general PPE. Spill kits will be stored at the hazardous waste storage location located within the Haulaway Building and the satellite accumulation area located in potential area of concern (PAOC) 18.

Equipment and materials will be maintained on-site at all times for control/cleanup in response to any spill, release, or discharge. Immediately following the identification of a large release the CRA Project Manager and RACER Clean-up Manager will be notified and the internal emergency notification procedure described in the Contingency Plan will also be followed. A large release is defined as any release that cannot be cleaned with the equipment and materials that are maintained on-site.

4.3 DRUM HANDLING

4.3.1 DRUM STAGING AND HANDLING

Drummed or containerized waste generated during RFI activities will be stored daily at the area being investigated or remediated, while the drums/containers are still being filled. Once full or upon completion of the activity, all drummed or containerized wastes will be transferred to the appropriate RWSA (see Figure 3.1) pending off-site treatment/disposal.

All drums containing waste will be transferred to the appropriate RWSA using mechanical equipment whenever possible. Drums will be moved by grapppler, non-metallic slings, within a backhoe bucket or front-end loader or by other means that

will minimize damage to the drums and the potential release of contents. All drums that contain liquid or are suspected to be a RCRA hazardous waste or contain PCBs at concentrations over than 50 parts per million (ppm) will be placed in overpacks or some other form of secondary containment that meets the applicable regulations. The drums will be oriented to permit sampling and inspection of each individual drum, if necessary.

All drums containing waste will be marked to include waste generation method, date produced (first date waste placed in drum), and unique drum number. All drums will be recorded by entering the container information in the detailed inventory maintained by the CRA Waste Coordinator. The CRA Waste Coordinator will be informed of any waste generated on Site on a regular basis by the CRA project personnel as described in Section 2.0.

Subsequent to completing waste sampling and characterization, as discussed in Sections 6.0 and 7.0, all drums containing TSCA and or RCRA hazardous waste will be labeled appropriately and manifested, as discussed in Section 5.0. Each container of hazardous waste shall be clearly labeled with the words "Hazardous Waste" and the appropriate waste codes and accumulation start date (first date waste place in drum). Drums stored in Satellite Accumulation Areas (SAA) will be labeled with the words "Hazardous Waste" and the appropriate waste codes. The accumulation start date will be added once 55 gallons of waste has been accumulated.

Containers/drums with TSCA waste will be stored at the Remediation Waste Storage Area for a period of up to 30 days from the initial waste generation date prior to shipment. Drums which are more than 30 days old will be overpacked to provide secondary containment thereby allowing the storage time to be extended to ensure disposal in a period of less than 1 year. The TSCA containers more than 30 days old will be inspected for leaks pursuant to 40 CFR Part 761.

Containers and drums with RCRA hazardous waste not in satellite accumulation will be stored on-site for a maximum of 90 days (unless generator status is revised to SQG). RCRA hazardous wastes in satellite accumulation (less than 55 gallons of hazardous wastes or one quart of acutely hazardous wastes) maybe stored on-Site for greater than 90 days if stored at the point of generation and under the control of the operator (40 CFR 262.34(c)(1)). Additional requirements including labeling and relocating the 55-gallon drum when full can be found at 40 CFR 262.34(c)(1).

RCRA storage requirements generally require secondary containment and inspections to detect any leaks. The requirements vary depending on whether the material is stored in

containers or tanks. Title 40 CFR 265 Subpart I applies to containers only and Subpart J applies to tanks only. Subparts AA, BB, and CC apply to both containers and tanks. The CRA Waste Coordinator will coordinate with CRA project personnel to ensure any required inspections are being conducted for RACER waste that is stored at the RWSAs. The RWSAs will be inspected either periodically or weekly based on the waste hazard class designation by CRA project personnel.

4.3.2 SPILL PREVENTION AND RESPONSE

The handling and transport of drummed and/or containerized waste will be, at all times, conducted in a controlled and safe manner which will minimize damage to the containers and prevent release of the contents. The RWSAs will be inspected either periodically or weekly based on the waste hazard class designation by CRA project personnel to ensure drums are intact and are not leaking. If drummed and/or containerized waste is stored outside of the RWSAs (SAA or other, as needed) CRA project personnel will periodically inspect the conditions of the drums and/or containers.

Immediately following the identification of a large release the CRA Project Manager and RACER Michigan Clean-up Manager will be notified and the internal emergency notification procedure described in the Contingency Plan will also be followed. A large release is defined as any release that cannot be cleaned with the equipment and materials that are maintained on-site. The spilled liquids will be confined to the immediate area of the spill. The released liquids will be collected utilizing a vacuum truck if the release is greater than 55 gallons. If the release is less than 55 gallons, the released liquid will be collected utilizing a portable hand pump and/or absorbent and deposited, into a drum or container. Any leaking drums will be placed in an overpack.

The spilled liquids will be confined by diking around the spill with native material or with an inert absorbent or absorbent booms. Any residual liquids which cannot be pumped will be absorbed with a sufficient quantity of inert absorbent to ensure that no free liquids remain. If the spill occurs on soil, outside of a previously identified contaminated area, CRA's Site Representative will immediately consult with CRA's Project Manager and the RACER Clean-up Manager to determine the appropriate response. If the spilled liquid consisted of decontamination water, the decision to excavate the visibly affected soils will be based on whether the water was generated from a source known to exhibit contamination. However, if a decontamination water spill occurred on soil within a previously identified contaminated area, the affected soil may not be excavated since the soils in these identified areas are under investigation.

This decision will be made after consultation with the RACER and CRA Project Managers.

All spills presenting a current or potential threat will be reported to the United States Environmental Protection Agency (U.S. EPA) by the RACER Michigan Clean-up Manager and spills above reportable quantities will be reported to the MDEQ according to the Michigan regulations, after consultation with RACER personnel. In the absence of the RACER Michigan Clean-up Manager, Dave Favero (RACER Deputy Michigan Clean-up Manager) would be responsible for reporting the release.

5.0 WASTE TRANSPORTATION AND DISPOSAL

5.1 MANIFESTING AND LABELING

All wastes designated for off-Site disposal will be labeled and manifested prior to leaving the Site for off-Site treatment/disposal facilities. The manifest forms and records will be consistent with 40 CFR Part 262 "U.S. EPA Hazardous Waste Generator Standards", 40 CFR Part 263 "EPA Hazardous Waste Transporter Standards", 40 CFR Part 268, "Land Disposal Restriction Standards", 40 CFR Part 761, "EPA Polychlorinated Biphenyls Rules", Michigan Act 451, Part III Hazardous Waste Management, and Michigan Act 451, Part 212 Liquid Industrial Wastes. Appendix C presents example waste labels. Appendix D presents example manifests.

The waste identification number is RACER (Willow Run CVO) - MIK468293311. This will be used on all manifests for the Site.

5.2 PREPARATION OF OFF-SITE TRANSPORT VEHICLES

All off-site transport vehicles will be prepared as appropriate prior to receiving drummed or bulk waste. Drummed/containerized wastes will be loaded and secured in a manner that will prevent damage to and movement of the containerized materials. The transporter will be responsible for ensuring that the waste being transported is properly loaded and secured prior to transport.

Most of the generated waste will be transported off-site to a disposal facility via an enclosed transport unit. In some instances (i.e. shipment of roll-off boxes) waste may be transported to a disposal facility via an open transport unit equipped with a weatherproof tarp (used to secure shipment).

Transport drivers will remain in their vehicle cabs while they are in an Exclusion Zone, temporary Exclusion Zone, or Contaminant Reduction Zone if the material is being live loaded (i.e. soils loaded by excavator) into the truck, as defined in the task specific work plan. Following tarping, each transport vehicle will enter the decontamination facility if leaving an Exclusion Zone, temporary Exclusion Zone, or Contaminant Reduction Zone. Each vehicle will be decontaminated to ensure that no loose soil, sludge or other material is tracked off-site. Particular attention will be paid to removing materials from the tires, under carriage and portions of vehicles, which may have been in contact with waste material during loading operations. Decontamination activities will include sweeping, brushing and/or steam cleaning, as appropriate.

CRA project personnel will inspect and document that each vehicle leaving the decontamination area has been decontaminated properly, tarps are secured, proper placards are in place, manifest/documents are correct and there are no visible signs of leaks from the drums/containers that have been loaded onto the vehicles.

5.3 AUTHORIZED TRANSPORTERS

Only transporters with a U.S. EPA hazardous waste identification number will be used for the transport of hazardous waste. Transporters will be in compliance with applicable state and federal hazardous waste transportation requirements (i.e., 40 CFR Part 263). If shipments are scheduled for facilities outside of the State of Michigan, transporters will be required to be licensed in the appropriate State(s) as well as comply with other applicable Federal laws including United States Department of Transportation (U.S. DOT) requirements.

If wastes are deemed to be non-hazardous and non-TSCA, then transporters will be licensed for general transportation of Subtitle D waste or as required by the State of Michigan for the transport of Special Waste. These wastes may be disposed of in an appropriate Subtitle D landfill or a permitted wastewater treatment facility (WWTP), as appropriate.

5.4 TRANSPORTATION ROUTES

Transportation routes to off-site treatment and/or disposal facilities will be pre-determined by the authorized transporter prior to commencing off-site transport of waste materials. The transporter is responsible for consulting the appropriate State and interstate officials will be consulted as to whether any proposed routes are scheduled for construction or seasonal closures, which will occur during implementation of this project. Transportation route maps shall be provided to CRA prior to initiating material transport.

5.5 OFF-SITE TREATMENT/DISPOSAL

Off-site treatment and/or disposal facilities will be selected only if they comply with applicable state and federal regulations.

5.5.1 APPROVED TREATMENT/DISPOSAL FACILITIES

Off-site treatment and/or disposal facilities will be selected based on previous experience. All facilities identified for hazardous waste treatment/disposal will be Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) approved, RCRA compliant and/or TSCA compliant, as applicable.

Any wastes deemed to be non-hazardous and non-TSCA regulated may be transported to a Subtitle D landfill and/or Publicly Owned Treatment Works (POTW) system, as applicable, for disposal.

6.0 WASTE SAMPLING

6.1 GENERAL

Waste characterization and testing will be conducted as required on containerized liquid and solid wastes designated for off-site disposal at permitted facilities, to determine the appropriate disposal mode and ensure compliance with 40 CFR Part 261, 40 CFR Part 268, 40 CFR Part 761, and/or the Michigan Regulations. Soil/sediments may also be characterized and delineated in-situ then removed and transported in bulk based on the in-situ characterization.

The following subsections describe the procedures that will be implemented for sampling containerized liquids and/or solids for disposal characterization purposes.

6.2 SAMPLE COLLECTION PROTOCOLS

6.2.1 DRUMMED/CONTAINERIZED MATERIAL SAMPLING

This section describes the general procedures that will be followed when sampling drummed or bulk waste containers.

6.2.1.1 SAFETY EQUIPMENT

During the sampling of containerized materials, PPE as specified within the HASP will be worn at all times.

6.2.1.2 SAMPLING EQUIPMENT

Materials and equipment that may be required for sampling are as follows:

1. Chain of Custody (COC) data sheets
2. Glass sampling thief or bailer for collection of liquid samples
3. Stainless steel trowel, spoon, hand auger or trier for collection of solid or sludge samples, if applicable
4. Bung wrench

All drums will be sampled at the appropriate RWSA or at the location where the drums were initially filled (prior to transport to the appropriate RWSA).

6.2.1.3 SAMPLING PROCEDURES

The following procedures will be adhered, in general, during sampling of containerized liquid waste.

1. Remove cover from sample container and remove lid/bung from the drum.
2. Insert sampling thief (or other appropriate sampling equipment, as specified in Section 6.2.1.2) almost to the bottom of the drum or until a solid layer is encountered. If the liquid in the drum is a single phase, a representative sample of the liquid in the entire drum will be collected for compatibility testing, if necessary, and waste characterization. If more than a single phase of liquid is determined to be present in the drum, each phase of liquid will be sampled separately.
3. Allow the liquid waste in the drum to reach its natural level in the tube.
4. Carefully remove sampling device from drum and deposit sample into sample container. Repeat the above steps until sufficient volume has been collected for analysis. Sampler will be cautious not to spill any sample on the outside of the sample container.
5. Cap the sample container tightly and place pre-labeled sample container in a carrier.
6. Transport the sample to the laboratory for analysis.

Sampling of drummed and/or containerized solids or sludges will, in general, conform to the preceding procedures with the following exceptions:

1. Sample collection will be accomplished using a stainless steel trowel, spoon, hand auger or trier. All sampling equipment will be cleaned prior to use. Reusable sampling equipment will be cleaned between subsequent drums using the protocol presented in Section 8.0.
2. A representative sample of drummed and/or containerized solids or sludges, will be collected, if practical. If stratification is evident, a sample trier/hand auger or device capable of collecting from the entire vertical profile will be utilized. Samples from each unique layer will be collected.

3. The sample collected will be a composite of a minimum of four 25-gram samples collected from representative locations throughout the containerized material unless it is known that the containerized material is homogeneous in nature (e.g. soil cuttings, spent carbon). In this case, only one sample will be collected from the drum or container.

Samples collected from containerized waste containing the same material may be composited during sample collection into one sample for disposal characterization purposes.

6.2.2 SAMPLE SHIPMENT/CHAIN-OF-CUSTODY

All sample shipments will follow appropriate COC procedures.

7.0 WASTE CHARACTERIZATION

The physical and chemical testing protocols which may be required to meet the general testing requirements of various treatment/disposal facilities vary. The waste characterization requirements will be confirmed following selection and identification of the treatment and/or disposal facility(ies).

In general, a representative sample will be analyzed for Toxicity Characteristic Leaching Procedure (TCLP) constituents and PCBs. If applicable, investigative soil samples will also be utilized for waste characterization purposes. Analytical laboratory results for total constituent concentrations (not leachable concentrations) will be compared to 20 times the RCRA TCLP limits and the TSCA PCB regulatory limits. Should a total result for a RCRA parameter exceed 20 times the RCRA TCLP limit, a waste characterization sample will be collected from the container in question and the sample will be analyzed for TCLP for the parameter(s) in question. This approach is subject to change based on generator knowledge of the waste (Title 40 CFR 262.11) and project timing (time constraints may require total constituent analysis and TCLP analysis simultaneously).

Appendix E presents copies of waste profiles forms for waste disposal facilities used at the time this WMP was prepared.

8.0 EQUIPMENT CLEANING

Since samples are being collected for waste characterization for disposal purposes, all sampling equipment and tools (other than pre-cleaned disposable tools) will be decontaminated prior to the collection of samples using the following rinse sequence:

- i) Knocking soil/mud from the sampling equipment
- ii) Water rinsing using solution of water and Alconox
- iii) Scraping and brushing with long-handled brushes to remove remaining soils
- iv) A final water rinse
- v) Air dry

The following cleaning procedures are required for decontaminating the equipment being used for environmental investigation activities areas impacted with PCBs:

- i) Wash equipment with potable water and laboratory detergent (Alconox or Liquinox or similar solution)
- ii) Rinse thoroughly with potable water
- iii) Rinse thoroughly with de-ionized water
- iv) Rinse equipment with 1/10 dilution of hexane. Use a laboratory style bottle for hexane to avoid splashing in eyes. Do not use a spray bottle
- v) Rinse equipment with 1/10 dilution of acetone. Use a laboratory style bottle for acetone to avoid splashing in eyes. Do not use a spray bottle
- vi) Rinse thoroughly with de-ionized water and allow to air dry

Fluids used for cleaning will not be recycled. All wash water and rinse water will be transferred to drums on Site pending final disposal.

Following final rinse, sampling equipment will be visually inspected to verify that they are free of soil particulates and other solid material which may contribute to possible sample cross-contamination. Dedicated equipment which is used only once (e.g. glass thieves) will not be subject to the above decontamination procedures.

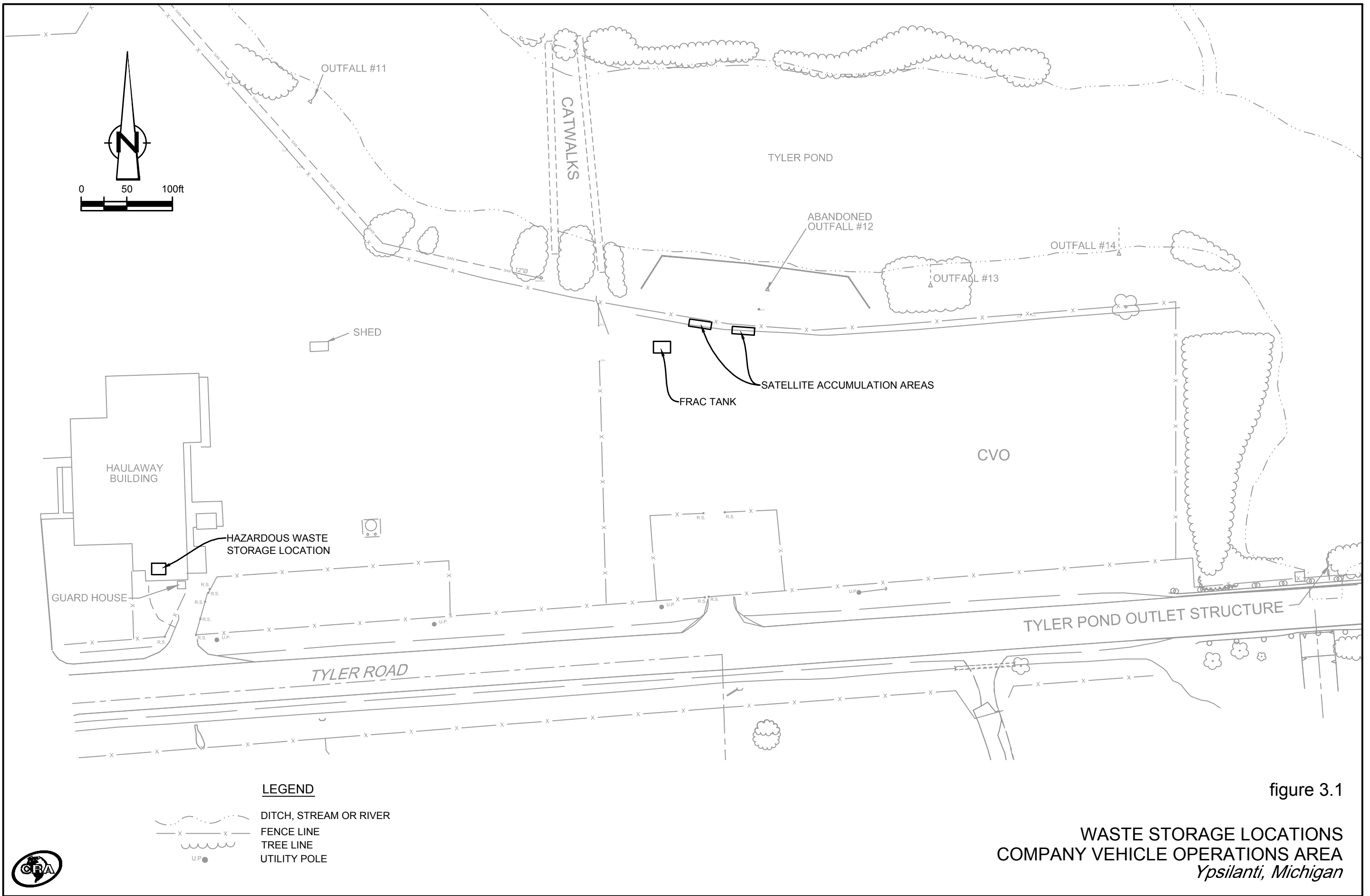


figure 3.1

APPENDIX A

AUTHORIZATION TO PREPARE HAZARDOUS WASTE MANIFEST

AGREEMENT REGARDING PREPARATION, EXECUTION AND DELIVERY OF ENVIRONMENTAL PERMIT AND WASTE DISPOSAL DOCUMENTS

In consideration of the various promises and undertakings set forth herein, effective as of March 31, 2011, REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE TRUST, a trust formed under the laws of the State of New York (the "RACER Trust"), for itself and its wholly-owned direct subsidiary, RACER PROPERTIES LLC, a Delaware limited liability company ("RACER Properties," and together with the RACER Trust, as their interests may appear, "RACER"), does hereby authorize, empower and direct CRA, Inc. ("CRA"), through one or more of the "Authorized Individuals" described below to take "Authorized Actions" on behalf of RACER with respect to those various "Properties" described in the "RACER Documents" identified below (the "Properties"), when and to the extent requested by RACER, EPLET, LLC (the "Trustee") and/or their respective officers. "Authorized Actions" for purposes of this Agreement are the preparation, execution and delivery, subject to and in accordance with the terms of this Agreement, of "Compliance Documents." "Compliance Documents," for purposes of this Agreement, include: (i) stormwater, wastewater and air discharge permit applications, monitoring reports, notification letters and modification, renewal and termination forms; and (ii) manifests and generator profiles relating the regulation of "Hazardous Materials" as defined below.

The following CRA employees are hereby authorized to sign the Permits and Reports, so long as they are active employees in good standing at CRA ("Authorized Individuals"):

Scott Adamowski	Brian LeRoy
Denise Anderson	Ken Malinowski
Fred Blickle	Chris Meincke
Corrie Bondy	Evan Varnas
Greg Carli	Randy Moore
Trace Chadwick	Mike Okamoto
Bruce Clegg	Gavin O'Neill
Lisa Clements	John Pentilchuk
Jeff Daniel	Walt Pochron
Martha Damton	Jennifer Quigley
Steven Davis	Ian Richardson
Sylvie Eastman	Shannon Richardson
Terry Gayman	Ryan Shepherd
Sean Grady	Mike Tomka
Phil Harvey	Glen Turchan
Brandon Hurl	Alan Van Norman
Beth Landale	Steve Wanner
Andrew Lavine	Jeroen Winterink
Katherine Galanti	Steve Bavetz
Amanda Gruesbeck	Derek Eisman
Bob Larsen	Kevin Gripper
James Van Asche	Martin Mylet
Chris Barton	Katie Kamm
David Rivers	John York
Steve Hoevemeyer	

CRA acknowledges and agrees that RACER is entering into this Agreement, and is authorizing the Authorized Individuals to undertake the Authorized Actions, in reliance on each such Authorized Individual being duly qualified to do so, and on their respective "first-hand knowledge" of the wastewater, storm water, and wastes generated at the specific Property for which such Authorized Individual executes any Compliance Document. When executing any such Compliance Documents, the Authorized Individual shall sign as "Agent for RACER Trust and RACER Properties."

In consideration of the authorization granted herein to CRA and its Authorized Individuals, CRA shall cause its Authorized Individuals to: (i) perform the Authorized Actions, and any and all actions necessary or reasonably required in connection therewith, in accordance with all applicable laws, statutes, regulations, orders, ordinances, decrees, permits, authorizations and other requirements (collectively, the "Laws") of any federal, state or local governmental and quasi-governmental agency or authority (collectively, "Governmental Agencies") governing stormwater and wastewater discharges, air emissions and the storage, transportation, treatment and/or disposal of any hazardous materials, product, substance or waste (collectively, the "Hazardous Materials"); and (ii) provide the RACER Trust Cleanup Manager with copies of all such executed Compliance Documents. RACER acknowledges and agrees that CRA, its parent and affiliated companies, and their officers, directors, employees, servants, and agents, including the Authorized Individuals (collectively, the "CRA Affiliates"), shall not incur any liability as a generator or a person arranging for the storage, transportation, treatment and/or disposal of any Hazardous Materials, the handling of which is regulated under any applicable Law.

Subject to the provisions of this Agreement, the limitations in the "RACER Documents" (as defined below) and any requirement to obtain court approval, RACER Trust agrees to indemnify, defend, and hold harmless the CRA Affiliates from and against any and all losses, liabilities, expenses, fines, penalties, and damages of every nature and description (including but not limited to reasonable attorneys' fees, but excluding special or consequential damages and payments for lost profits and business opportunities even if foreseeable) (collectively, "Liabilities"), to the extent such Liabilities are incurred by any CRA Affiliate in connection with the execution thereby of the Compliance Documents; provided, however, RACER shall not be obligated to indemnify, defend and hold harmless any such CRA Affiliate for any Liabilities resulting from or relating to: (i) failure by any CRA Affiliate to perform its responsibilities under this Agreement in accordance herewith; or (ii) gross negligence, willful misconduct or criminal acts by any CRA Affiliate.

The foregoing indemnity shall not apply to: (1) any Liability arising out of any contractual obligations to any third-party which any CRA Affiliate may assume; (2) any contamination caused, released or exacerbated by any CRA Affiliate or any third party for which CRA is legally liable; or (3) any claims or Liabilities for remediation costs, except to the extent of claims solely arising out of leaks, spills, or discharges which result in a level of contamination exceeding the current action levels established by the applicable Governmental Authorities, and in such case, will be limited to such compliance responses as required by said Governmental Authority.

CRA ACKNOWLEDGES AND AGREES THAT: (A) IT HAS RECEIVED AND REVIEWED A COPY OF THE RACER DOCUMENTS; (B) THE RESOURCES OF RACER AVAILABLE TO PERFORM THIS AGREEMENT, AND ALL LIABILITIES HEREUNDER AND RELATED

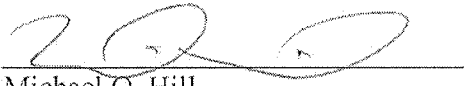
HERETO, ARE LIMITED ACCORDING TO THE TERMS OF THE RACER DOCUMENTS; AND (C) IT SHALL MAKE NO CLAIM OR LIABILITY TO THE CONTRARY UNDER THIS AGREEMENT, WHETHER AGAINST RACER AND/OR THE TRUST, THEIR RESPECTIVE DIRECT AND INDIRECT PARENTS, AFFILIATES, OWNERS, EQUITY HOLDERS, MEMBERS, MANAGERS, OFFICERS, DIRECTORS, EMPLOYEES, ATTORNEYS, SERVANTS AND AGENTS, INCLUDING WITHOUT LIMITATION, RACER'S CLEANUP MANAGERS, AND RACER'S REDEVELOPMENT MANAGER (COLLECTIVELY, THE "RACER AFFILIATES"). RACER TRUST AND THE RACER AFFILIATES SHALL BE ENTITLED TO ALL OF THE BENEFITS AND PROTECTIONS OF THE RACER DOCUMENTS IN CONNECTION WITH THE PERFORMANCE OF, AND OBLIGATIONS UNDER, THIS AGREEMENT, INCLUDING ANY DISPUTE RELATED THERETO. CRA FURTHER ACKNOWLEDGES AND AGREES THAT OTHER CLAIMANTS MAY BE ENTITLED TO PORTIONS OF THE RESOURCES OTHERWISE AVAILABLE TO SATISFY ANY CLAIM HEREUNDER OR AT LAW, BY CRA AND/OR THE CRA AFFILIATES.

For purposes of this agreement, the "RACER Documents" means all of the following, as may be modified, amended, restated, supplemented and/or substituted: (i) that certain Findings of Fact, Conclusions of Law, and Order Pursuant to Sections 1129(a) and (b) of the Bankruptcy Code and Rule 3020 of the Federal Rules of Bankruptcy Procedure Confirming Debtors' Second Amended Joint Chapter 11 Plan, dated March 29, 2011 (the "Confirmation Order"), issued by the United States Bankruptcy Court, Southern District of New York (the "Bankruptcy Court") and filed as Docket No. 9941 in *In re Motors Liquidation Company, f/k/a General Motors Corporation, et al.*, Case No. 09-50026 (REG) (jointly administered) (the "Case, confirming Debtors' Second Amended Joint Chapter 11 Plan (the "Plan"); (ii) the Plan; (iii) that certain Environmental Response Trust Consent Decree and Settlement Agreement, the form of which was filed as Exhibit C to the Plan and approved by the confirmation Order; and (iv) that certain Environmental Response Trust Agreement entered into as of March 3, 2011, a copy of which was filed as Attachment C to the Settlement Agreement and approved by the confirmation Order.

This Agreement shall terminate on December 31, 2011, unless sooner terminated by RACER in accordance herewith. This Agreement may be terminated at any time, and for any reason or no reason, by RACER Trust, *provided prior notice of such termination shall be made in writing to CRA*, except that such prior notice is not required if and to the extent there is any breach by an CRA Affiliate. The indemnification obligations under this Agreement shall survive the termination hereof or completion of services to RACER Trust or RACER Properties, but no other obligations shall so survive. This Agreement supersedes any prior agreement of similar effect executed by RACER.

[Signatures on next page.]

REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
RESPONSE TRUST, for itself and on behalf of
RACER PROPERTIES LLC, its wholly-owned subsidiary

By: 
Michael O. Hill
Chief Operating Officer and General Counsel

Date: 10/7/11

CRA, INC.

By: 
Ian Richardson
Executive Vice President

Date: Oct 11/11

APPENDIX B

RACER ANNUAL PCB LOG

**RACER TRUST
US Facilities**

PCB Annual Document Log

Due: Each July 1 for the previous calendar year

Return To: Grant Trigger
2930 Ecorse Road
Ypsilanti, MI 48198
email: gtrigger@racertrust.org
p: 313-670-6226

Plant: Willow Run Company Vehicle Operations
2901 Tyler Road
EPA ID No: MIK 468 293 311

Name of
person
completing
form:
Phone:

RACER
Representative Grant Trigger
Phone: 313-670-6226
Date:

Section I: Summary

Calendar Year: 2012

EPA ID No:

MIK 468 293 311

Address

2901 Tyler Road

Ypsilanti, MI

	Remaining in service	Placed into storage for disposal or disposed
PCB Transformers: (Total Number)	None	None
Total Weight of PCB's (kg)	0	0
Large PCB Capacitors: (Total Number)	None	None
Total Weight of PCB's (kg)	0	0
PCB Articles (Specify Type, Total Number)	None	None
Total Weight of PCB's (kg)	0	0
PCB Article Containers: (Total Number)	None	None
Total Weight of PCB's (kg)	0	0
PCB Containers: (Total Number)	None	None
Total Weight of PCB's (kg)	0	0
Bulk PCB Waste: (Total Weight of PCB's, kg)	None	None

Section II: PCB Transformers
Calendar Year: 2012

EPA ID No: MIK 468 293 311

[illegible]

Section III: PCB Capacitors
Calendar Year: 2012

EPA ID No: MIK 468 293 311

[illegible]

EPA ID No: MIK 468 293 311

EPA ID No: MIK 468 293 311

[illegible]

Section IV: Bulk PCB Waste
Calendar Year: 2012

EPA ID No: MIK 468 293 311

[illegible]

APPENDIX C

EXAMPLE WASTE LABELS

NON- HAZARDOUS WASTE

GENERATOR INFORMATION: (optional)

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

CONTENTS: _____

NON-HAZARDOUS WASTE

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME _____

ADDRESS _____ PHONE _____

CITY _____ STATE _____ ZIP _____

EPA / MANIFEST
ID NO. / DOCUMENT NO. _____

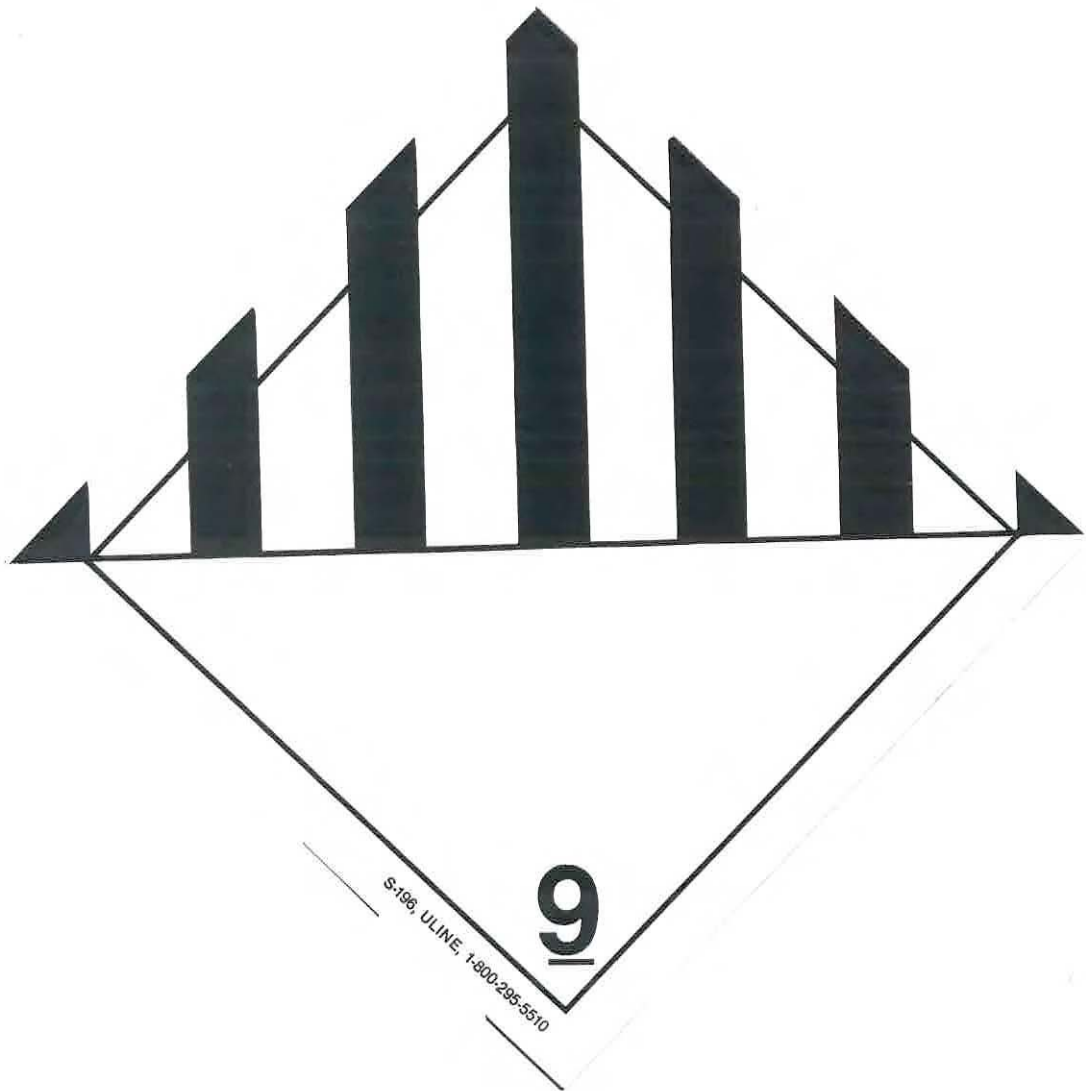
ACCUMULATION
START DATE _____ EPA
WASTE NO. _____

[_____

_____]

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!



CAUTION

CONTAINS

PCBs

(Polychlorinated Biphenyls)

A toxic environmental contaminant requiring special handling and disposal in accordance with U.S. Environmental Protection Agency Regulations 40 CFR 761 – For Disposal Information contact the nearest U.S. E.P.A. Office.

In case of accident or spill, call toll free the U.S. Coast Guard National Response Center:
800-424-8802

Also Contact: _____

Tel No.: _____

THIS CONTAINER ON **HOLD** **PENDING ANALYSIS**

CONTENTS _____

ORIGIN OF MATERIALS _____

ADDRESS _____

CONTACT _____

DO NOT TAMPER WITH CONTAINER
AUTHORIZED PERSONNEL ONLY

EMPTY

APPENDIX D

EXAMPLE MANIFESTS

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number		2. Page 1 of		3. Emergency Response Phone		4. Manifest Tracking Number 002217756 JJK	
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)							
Generator's Phone:									
6. Transporter 1 Company Name								U.S. EPA ID Number	
7. Transporter 2 Company Name								U.S. EPA ID Number	
8. Designated Facility Name and Site Address								U.S. EPA ID Number	
Facility's Phone:									
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
					No.	Type			
	1.								
	2.								
	3.								
	4.								
14. Special Handling Instructions and Additional Information									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Officer's Printed/Typed Name				Signature				Month	Day Year
TRANSPORTER	16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____								
	17. Transporter Acknowledgment of Receipt of Materials								
	Transporter 1 Printed/Typed Name				Signature				Month Day Year
	Transporter 2 Printed/Typed Name				Signature				Month Day Year
DESIGNATED FACILITY	18. Discrepancy								
	18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection								
	Manifest Reference Number: _____								
	18b. Alternate Facility (or Generator)								U.S. EPA ID Number
	Facility's Phone:								
	18c. Signature of Alternate Facility (or Generator)								Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1.		2.		3.		4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name				Signature				Month Day Year	

APPENDIX E

WASTE PROFILES

**GENERATOR WASTE PROFILE SHEET**

Requested Disposal Facility: _____
an Allied Waste Company

Waste Profile #

I. Generator Information

Date:

Generator Name:			
Generator Site Address:			
City:	County:	State:	Zip:
Generator State ID Number:		SIC Code Number:	
Generator Mailing Address (if different):			
City:	County:	State:	Zip:
Generator Contact Name:			
Phone Number:		Fax Number:	

II. Transporter Information

Transporter Name:			
Transporter Address:			
City:	County:	State:	Zip:
Transporter Contact Name:			
Phone Number:		Fax Number:	
State Transportation Number:			

III. Waste Stream Information

Name of Waste:	
Process Generating Waste:	
Type of Waste: ☐ INDUSTRIAL PROCESS WASTE or ☐ POLLUTION CONTROL WASTE	
Physical State: ☐ SOLID ☐ SEMI-SOLID ☐ POWDER ☐ LIQUID ☐ OTHER: _____	
Method of Shipment: ☐ BULK ☐ DRUM ☐ BAGGED ☐ OTHER: _____	
Estimated Annual Volume: ☐ CUBIC YARDS: _____ ☐ TONS: _____ ☐ OTHER: _____	
Frequency: ☐ ONE TIME ☐ DAILY ☐ WEEKLY ☐ MONTHLY ☐ OTHER: _____	
Special Handling Instructions:	

IV. Representative Sample Certification

☐ NO SAMPLE TAKEN

Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA 40 CFR 261.20(c) guidelines or equivalent rules?		☐ YES or ☐ NO
Sample Date:	Type of Sample: ☐ COMPOSITE SAMPLE ☐ GRAB SAMPLE	
Sampler's Employer:		
Sampler's Name (printed):		Signature:

**GENERATOR WASTE PROFILE SHEET (continued)**

Waste Profile #

V. Physical Characteristics of Waste

Characteristic Components

% by Weight (range)

1.

2.

3.

Color:	Odor (describe):	Free Liquids: ☐ YES or ☐ NO Content _____%	% Solids:	pH:	Flash Point: _____ °F	Phenol _____ ppm
--------	------------------	--	-----------	-----	--------------------------	---------------------

**Attach Laboratory Analytical Report (and/or Material Safety Data Sheet)
Including Required Parameters Provided for this Profile**

Does this waste or generating process contain regulated concentrations of the following Pesticides and/or Herbicides: Chlordane, Endrin, Heptachlor (and it epoxides), Lindane, Methoxychlor, Toxaphene, 2,4-D, or 2,4,5-TP Silvex as defined in 40 CFR 261.33?	☐ YES or ☐ NO
Does this waste or generating process cause it to exceed OSHA exposure limits from high levels of Hydrogen Sulfide or Hydrogen Cyanide as defined in 40 CFR 261.23?	☐ YES or ☐ NO
Does this waste contain regulated concentrations of Polychlorinated Biphenyls (PCBs) as defined in 40 CFR Part 761?	☐ YES or ☐ NO
Does this waste contain regulated concentrations of listed hazardous wastes defined in 40 CFR 261.31, 261.32, 261.33, including RCRA F-Listed Solvents?	☐ YES or ☐ NO
Does this waste contain regulated concentrations of 2,3,7,8-Tetrachlorodibenzodioxin (2,3,7,8-TCDD), or any other dioxin as defined in 40 CFR 261.31?	☐ YES or ☐ NO
Is this a regulated Toxic Material as defined by Federal and/or State regulations?	☐ YES or ☐ NO
Is this a regulated Radioactive Waste as defined by Federal and/or State regulations?	☐ YES or ☐ NO
Is this a regulated Medical or Infectious Waste as defined by Federal and/or State regulations?	☐ YES or ☐ NO
Is this waste generated at a Federal Superfund Clean Up Site?	☐ YES or ☐ NO

VI. Generator Certification

I hereby certify that to the best of my knowledge and belief, the information contained herein is a true and accurate description of the waste material being offered for disposal. I further certify that by utilizing this profile, neither myself nor any other employee of the company will deliver for disposal or attempt to deliver for disposal any waste which is classified as toxic waste, hazardous waste or infectious waste, or any other waste material this facility is prohibited from accepting by law. Our company hereby agrees to fully indemnify this disposal facility against any damages resulting from this certification being inaccurate or untrue. I further certify that the company has not altered the form or content of this profile sheet as provided by Allied Waste Industries, Inc.

AUTHORIZED REPRESENTATIVE NAME AND TITLE (Printed)

COMPANY NAME

AUTHORIZED REPRESENTATIVE SIGNATURE

DATE

VII. Allied Waste Decision☐ Approved☐ Rejected

Expiration: _____

Conditions:

Name, Title

Signature

Date

To change data in this form, use the EQ WCR Application.
To download the EQ WCR Application please visit www.EQOnline.com/Services/Software.

Tracking # _____

EQ - The Environmental Quality Company

WASTE CHARACTERIZATION REPORT

☐ I authorize EQ - The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.

☐ Michigan Disposal Waste Treatment Plant (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ Wayne Disposal, Inc. Site #2 Landfill (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☐ EQ Detroit, Inc. (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211 Phone: 313 923-0080 Fax: 313-923-3375	EPA ID # MID 980 991 566
☐ EQ Resource Recovery, Inc. (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ EQ North Carolina (Stabilization, Treat., Labpack Decommissioning)	1004 Investment Blvd, Apex, NC 27502 Phone: 919-363-4700 Fax: 919-363-4714	EPA ID # NCD 982 170 292
☐ EQ Florida, Inc. (Drum Consolidation, Labpack Decommissioning)	7202 East 8 th Ave, Tampa, FL 33619 Phone: 813-623-5463 Fax: 813-628-0842	EPA ID # FLD 981 932 494
☐ EQ Transfer & Processing (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198 Phone: 734-547-1000 Fax: 734-480-9195	EPA ID # MI0 000 263 871
☐ EQ Indianapolis (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10 th Street, Indianapolis, IN 46222 Phone: 317-247-7160 Fax: 317-247-7170	EPA ID # MI0 000 263 871
☐ EQ Atlanta (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID # MI0 000 263 871
☐ EQ Augusta, Inc. (Wastewater Treatment)	3920 Goshen Industrial Blvd, Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124	EPA ID # GAR 000 011 817

Waste Common Name: _____

Section 1 - Generator & Customer Information

SIC/NAICS* _____

Generator EPA ID # _____

Generator _____

Facility Address _____

City _____

State _____ Zip _____

County _____

Mailing Address _____

City _____

State _____ Zip _____

Generator Contact _____

Title _____

Phone _____ Fax _____

Internal Use Only: EQ Division _____

EQ Customer No. _____

Invoicing Company _____

Address _____

City _____

State _____ Zip _____

Country _____

Invoicing Contact _____

Phone _____ Fax _____

Technical Contact _____

Phone _____ Fax _____

Mobile _____ Pager _____

Email _____

* For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 2 - Shipping & Packaging Information

2.1) Shipping Volume & Frequency _____ ☐ One Time Only ☐ Year ☐ Quarter ☐ Month

2.2) DOT Shipping Name _____

2.3) Is this waste surcharge exempt? ☐ Yes ☐ No (If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.)

2.4) Packaging (check all that apply)

- ☐ Bulk Solid (Yd³ < 2000 lbs/yd³) ☐ Bulk Solid (Ton > 2000 lbs/yd³) ☐ Bulk Liquids (Gallon)
☐ Totes, Size _____ ☐ Cubic Yard Boxes/Bags ☐ Drums
☐ Other (palletized, 5 gal. Pail, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

Section 3 - Physical Characteristics

- 3.1) Color _____ 3.2) Odor _____
- 3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☐ No
- 3.4) Physical State at 70°F: ☐ Solid ☐ Dust ☐ Liquid ☐ Sludge
- 3.5) What is the pH of this waste? ☐ <2 ☐ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ >12.5
- 3.6) What is the flash point of this waste? ☐ <90°F ☐ 90-139°F ☐ 140-199°F ☐ >=200°F
- 3.7) Does this waste contain? (check all that apply) ☐ None ☐ Free Liquids ☐ Oily Residue ☐ Metal Fines
☐ Biodegradable Sorbants ☐ Amines ☐ Ammonia ☐ Dioxins ☐ Furans ☐ Biohazard
☐ Shock Sensitive Waste ☐ Reactive Waste ☐ Radioactive Waste ☐ Explosives ☐ Pyrophoric Waste ☐ Isocyanates
☐ Asbestos - non-friable ☐ Asbestos - friable

Section 4 - Waste Composition and Generating Process

- 4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical compounds, etc.)
- | | | | |
|-------|----|-------|---|
| _____ | to | _____ | % |
| _____ | to | _____ | % |
| _____ | to | _____ | % |
| _____ | to | _____ | % |
- 4.2) Provide a detailed description of the process generating this waste (attach flow diagram if available).
- _____

Section 5 - Hazardous or Non-Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules:

- 5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)?

☐ Yes ☐ No

Comments:

- 5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)?

☐ Yes ☐ No

Comments:

- 5.3) Do any State Waste Codes apply?

☐ Yes ☐ No

Comments:

- 5.4) Is this waste intended for wastewater treatment?

☐ Yes* ☐ No

If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 6 - Hazardous Wastes

- 6.1) Does this waste exceed Land Disposal Restriction levels? ☐ Yes ☐ No
- 6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☐ No
- 6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☐ No
- 6.2) Is the waste an oxidizer (D001)? ☐ Yes ☐ No
- 6.3) Does this waste contain reactive cyanide > 250 ppm (D003)? ☐ Yes ☐ No
- 6.4) Does this waste contain reactive sulfide > 500 ppm (D003)? ☐ Yes ☐ No
- 6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either "Below" or "Above" MUST be checked for each constituent.

Based On: ☐ Generator Knowledge ☐ Analysis* ☐ MSDS* * Please attach a copy.

Code	Regulatory Level	Concentration	Code	Regulatory Level	Concentration
------	------------------	---------------	------	------------------	---------------

	TCLP (mg/l)		(if above)		TCLP (mg/l)		(if above)
D004	Arsenic	5	☐ Below ☐ Above		D024	m-Cresol	200 ☐ Below ☐ Above
D005	Barium	100	☐ Below ☐ Above		D025	p-Cresol	200 ☐ Below ☐ Above
D006	Cadmium	1	☐ Below ☐ Above		D026	Cresols	200 ☐ Below ☐ Above
D007	Chromium	5	☐ Below ☐ Above		D027	1,4-Dichlorobenzene	7.5 ☐ Below ☐ Above
D008	Lead	5	☐ Below ☐ Above		D028	1,2-Dichloroethane	0.5 ☐ Below ☐ Above
D009	Mercury	0.2	☐ Below ☐ Above		D029	1,1-Dichloroethylene	0.7 ☐ Below ☐ Above
D010	Selenium	1	☐ Below ☐ Above		D030	2,4-Dinitrotoluene	0.13 ☐ Below ☐ Above
D011	Silver	5	☐ Below ☐ Above		D031	Heptachlor	0.008 ☐ Below ☐ Above
D012	Endrin	0.02	☐ Below ☐ Above		D032	Hexachlorobenzene	0.13 ☐ Below ☐ Above
D013	Lindane	0.4	☐ Below ☐ Above		D033	Hexachlorobutadiene	0.5 ☐ Below ☐ Above
D014	Methoxychlor	10	☐ Below ☐ Above		D034	Hexachloroethane	3.0 ☐ Below ☐ Above
D015	Toxaphene	0.5	☐ Below ☐ Above		D035	Methyl Ethyl Ketone	200 ☐ Below ☐ Above
D016	2,4-D	10	☐ Below ☐ Above		D036	Nitrobenzene	2 ☐ Below ☐ Above
D017	2,4,5-TP (Silvex)	1	☐ Below ☐ Above		D037	Pentachlorophenol	100 ☐ Below ☐ Above
D018	Benzene	0.5	☐ Below ☐ Above		D038	Pyridine	5 ☐ Below ☐ Above
D019	Carbon Tetrachloride	0.5	☐ Below ☐ Above		D039	Tetrachloroethylene	0.7 ☐ Below ☐ Above
D020	Chlordane	0.03	☐ Below ☐ Above		D040	Trichloroethylene	0.5 ☐ Below ☐ Above
D021	Chlorobenzene	100	☐ Below ☐ Above		D041	2,4,5-Trichlorophenol	400 ☐ Below ☐ Above
D022	Chloroform	6.0	☐ Below ☐ Above		D042	2,4,6-Trichlorophenol	2 ☐ Below ☐ Above
D023	o-Cresol	200	☐ Below ☐ Above		D043	Vinyl Chloride	0.2 ☐ Below ☐ Above

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☐ No
If yes, please list the constituents in Section 11

Section 7 - Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

7.1) Is this a Michigan non-hazardous liquid industrial waste? ☐ Yes ☐ No
Comments:

7.2) Is this a Universal waste? ☐ Yes ☐ No

7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ☐ Yes ☐ No

7.4) Is this waste a recoverable petroleum product? ☐ Yes* ☐ No

7.5) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes* ☐ No

If you answered 'yes' to questions 7.4 or 7.5 please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 8 - TSCA Information

8.1) What is the concentration of PCBs in the waste? ☐ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm

8.2) Does the waste contain PCB contamination from a source with a concentration > 50 ppm? ☐ Yes ☐ No
If you answered "no" to 8.1 and 8.2, please skip to Section 9.

8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☐ No
If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm

8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No

8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No

8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 9 - Clean Air Act Information

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☐ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants - VOHAP's or Volatile Organic Compounds - VOC's?)
For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide

9.2) Does this waste stream contain Benzene? ☐ Yes ☐ No
If you answered "no" to 9.2, please skip to Section 10

9.3) Does the waste stream come from a facility with one of the SIC codes listed under the NESHAP?* ☐ Yes ☐ No

9.4) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) >10 Mg/year? ☐ Yes ☐ No
For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.
If you answered "no" to question 9.3 and 9.4, please skip to Section 10.

- 9.5) Does the waste contain >10% water? ☐ Yes ☐ No
- 9.6) What is the TAB quantity for your facility? _____ Mg/Year
- 9.7) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No
- 9.8) What is the total Benzene concentration in your waste? (concentration) _____ (unit) _____.

(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)

*NESHAP	2812 2813 2816 2819 2821 2822 2823 2824 2833 2834 2835 2836 2841 2842 2843 2844 2851 2861 2865 2869 2873 2874 2875 2879 2891 2892 2893 2895 2899 2911 3312 4953 9511
SIC:	*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 - Fuel Blending Information

- 10.1) Is this waste intended for fuel blending? ☐ Yes* ☐ No
- *If yes, Heat value _____ (BTU/lb.) Chlorine (%) _____ Water (%) _____ Solids (%) _____
- 10.2) Is this waste intended for reclamation? ☐ Yes* ☐ No (5-Gallon Sample required for all reclaim waste streams)

Section 11 - Constituent Information

Please identify your waste constituents from these four categories: **Underlying Hazardous Constituents (UHC's)**, **Volatile Organic Hazardous Air Pollutants (VOHAP's)**, **Volatile Organic Compounds (VOC's)** and **Toxic Release Inventory Constituents (TRI)**

Constituent	Concentration	UHC?	
_____	_____	☐ Yes	☐ No
_____	_____	☐ Yes	☐ No
_____	_____	☐ Yes	☐ No
_____	_____	☐ Yes	☐ No
_____	_____	☐ Yes	☐ No
_____	_____	☐ Yes	☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Comments:

Generator Signature _____ Printed Name _____

Company _____ Title _____ Date 11/20/2006

The generator's signature **MUST** appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ - The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Characterization Report, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste. The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

Definitions

The following definitions shall apply for purposes of this Agreement:

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii)) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Characterization Report and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Characterization Report (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Characterization Report containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Characterization Report, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Characterization Report.

Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Characterization Report. The information set forth in the Waste Characterization Report or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Characterization Report, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statutes, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

Force Majeure

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.



U.S. Industrial Technologies, Inc.

Phone: (734) 462-4100

Fax: (734) 462-4114

13075 Newburgh Rd

Livonia, MI 48150

www.usitcorp.com

NON-HAZARDOUS WASTE PROFILE FORM

PLEASE FILL OUT FORM AS COMPLETELY AS POSSIBLE.

Generator Name: _____ US EPA ID: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Technical Contact: _____ Email: _____

Phone: _____ Fax: _____

Remit to Address: _____
(if different) _____

Billing Name(if different): _____

Address: _____

City: _____ State: _____ Zip Code: _____

Contact: _____

Phone: _____ Fax: _____ Email: _____

Waste Material: _____

Process Generating: _____

Is a representative sample included(Y/N): _____

Is a MSDS/Analytical included(Y/N): _____

Is USIT Lab authorized to analyze sample(if required)(Y/N): _____

**U.S. Industrial Technologies, Inc.**

Phone: (734) 462-4100

Fax: (734) 462-4114

13075 Newburgh Rd

Livonia, MI 48150

www.usitcorp.com

Physical State: ☐ Solid ☐ Liquid ☐ Sludge ☐ OtherpH: ☐ < 2 ☐ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ > 12.5Flash Point: ☐ < 140 ☐ 141-200 ☐ > 200Odor: ☐ None ☐ Mild ☐ Strong Describe Composition:
Is this an EPA RCRA listed hazardous waste (F, K, P, or U)(Y/N): Does this waste have oxidizing potential(Y/N): Is this an EPA RCRA characteristic hazardous waste (D001-D043) (Y/N): Do any State Waste Codes apply(Y/N): Does the waste contain PCB's(Y/N): Based On: ☐ General Knowledge ☐ Analysis ☐ MSDSDo the following chemicals exceed the limits? (Y/N) Check here if no for all

D004 Arsenic (5.0 ppm)		D024 m-Cresol (200 ppm)	
D005 Barium (100 ppm)		D025 p-Cresol (200 ppm)	
D006 Cadmium (1.0 ppm)		D026 Cresols (200 ppm)	
D007 Chromium (5.0 ppm)		D027 1,4 Dichlorobenzene (7.5 ppm)	
D008 Lead (5.0 ppm)		D028 1,2 Dichloroethane (0.5 ppm)	
D009 Mercury (0.2 ppm)		D029 1,1 Dichloroethylene (0.7 ppm)	
D010 Selenium (1.0 ppm)		D030 2,2 Dinitrotoluene (0.13 ppm)	
D011 Silver (5.0 ppm)		D031 Heptachlor (0.008 ppm)	
D012 Endrin (0.02ppm)		D032 Hexachlorobenzene (0.13 ppm)	
D013 Lindane (0.4 ppm)		D033 Hexachlorobutadiene (0.5 ppm)	
D014 Methoxychlor (10 ppm)		D034 Hexachloroethane (3.0 ppm)	
D015 Toxaphene (0.5 ppm)		D035 Methyl Ethyl Ketone (200 ppm)	
D016 2,4 D (10 ppm)		D036 Nitrobenzene (2 ppm)	
D017 2,4,5 TP (1 ppm)		D037 Pentachlorophenol (100 ppm)	
D018 Benzene (0.5 ppm)		D038 Pyridine (5 ppm)	
D019 Car. Tetrachloride (.5 ppm)		D039 Tetrachloroethylene (0.7 ppm)	
D020 Chlordane (0.03 ppm)		D040 Trichloroethylene (0.5 ppm)	
D021 Chlorobenzene (100 ppm)		D041 2,4,5 Trichlorophenol (400 ppm)	
D022 Chloroform (6.0 ppm)		D042 2,4,6 Trichlorophenol (2 ppm)	
D023 o-Cresol (200 ppm)		D043 Vinyl Chloride (0.2 ppm)	

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Is this waste a Michigan non-hazardous liquid industrial waste(Y/N): _____ Code _____

Is this waste a used oil as defined by 40 CFR Part 279(Y/N): _____

Answer the following only if material is a used oil:

Is used oil mixed with a characteristic waste(Y/N): _____

Used oil is exempt from the rebuttable presumption because:

Generator is conditionally exempt(Y/N): _____

Testing shows used oil to contain < 1000 ppm Total Halogens(Y/N): _____

Rebutting the presumption:

Used oil is mixed with a halogenated listed waste(Y/N): _____

Used oil contains significant concentrations of halogenated
hazardous constituents listed in appendix VIII of 40 CFR 261(Y/N): _____

Waste Collection: _____ Drum _____ Cubic Yard Box _____ Tote - Gallon _____

Volume: _____ per _____

Additional Information: _____

On behalf of the generator I certify that all information contained in this non hazardous waste profile is complete and factual and is an accurate representation of the known and suspected hazards, and waste generator regulations, pertaining to the waste described herein; and I am an employee and duly authorized representative of the Generator.

Signature: _____ Print: _____ Date: _____

Internal Use Only: _____ Profile Number: _____

Reviewed By: _____ Approved: _____ Date: _____



WASTESTREAM INFORMATION PROFILE

☐ Recertification

Disposal Code _____

Veolia ES LOCATION

☐ Invoice Address

ADDRESS _____

CITY _____

ST _____

☐ Manifest from – blank if direct

Veolia ES TSDF requested _____ Technology requested _____ Generator No. _____ Generator EPA ID No. _____

1. Generator Name _____ Generator State No. _____
Address _____ State Wastestream No. _____
City _____ State _____ Country USA ZIP _____
NAICS (SIC) Code _____ Source _____ Origin _____ Form _____ System Type _____

2. Waste Name _____ Lab or Waste Area _____

3. Process Generating Waste _____

4. Shipping Name _____

Hazard Class _____ UN/NA No. _____ PG _____ RQ amt _____ lb

RQ Desc: 1. _____ 2. _____

DOT Desc: 1. _____ 2. _____

5. Waste Codes _____

Wastewater ☐

Non Wastewater ☐

Sub Category _____

6. Physical and chemical properties

(check all that apply)

pH	Specific Gravity	Flash Point (F)	Solids	
a ☐ < 2	a ☐ < .8	a ☐ < 80	_____ % suspended	_____ % ash
b ☐ 2 - 5	b ☐ .8 - 1.0	b ☐ 80 - 100	_____ % settleable	_____ water solubility
c ☐ 5 - 9	c ☐ 1.0	c ☐ 101 - 140	_____ % dissolved	_____ BTU/lb
d ☐ 9 - 12.5	d ☐ 1.0 - 1.2	d ☐ 141 - 200		
e ☐ > 12.5	e ☐ > 1.2	e ☐ > 200		
_____ exact	_____ exact	f ☐ no flash _____ exact	Free Liquid Range _____ to _____ %	

Physical State

s ☐ solid
m ☐ semi-solid
l ☐ liquid
p ☐ pumpable semi-solid
f ☐ flowable powder
g ☐ gas
a ☐ aerosol
r ☐ pressurized liquid
d ☐ debris per 40 CFR 268.45
h ☐ sharps

Hazardous Characteristics

a ☐ air reactive
w ☐ water reactive
c ☐ cyanide reactive
f ☐ sulfide reactive
e ☐ explosive
o ☐ oxidizing acid
p ☐ peroxide former
r ☐ radioactive or NRC regulated
s ☐ shock sensitive
t ☐ temp sensitive
m ☐ polymerization/monomer
n ☐ OSHA carcinogen
I ☐ infectious
h ☐ inhalation hazard Zone: _____

Odor

a none ☐
b mild ☐
c strong ☐
describe _____

Halogens

Br _____ % Bromine
Cl _____ % Chlorine
F _____ % Fluorine
I _____ % Iodine

Layers:	a ☐ multilayered:	b ☐ bi-layered:	c ☐ single phase:
	Top Layer	Second Layer	Bottom Layer
Viscosity by Layer:	☐ high (syrup)	☐ high (syrup)	☐ high (syrup)
	☐ medium (oil)	☐ medium (oil)	☐ medium (oil)
	☐ low (water)	☐ low (water)	☐ low (water)
	☐ solid	☐ solid	☐ solid

Color

Used oil y/n _____ HOC <1000 ppm ☐ or > 1000 ppm ☐

page 1 of 2

WIP No. _____

7. **Chemical Composition** [M = Marine Pollutant, S - Severe Marine Pollutant, O = Ozone Depleting Substance, U = Underlying Hazardous Constituent,
B = Benzene NESHP, T = TRI Chemical, C = OSHA Carcinogen]

Constituents			Range	Units	Constituents			Range	Units

Total Composition Must Equal or Exceed 100%

- Other:**
8. Is the wastestream being imported into the USA? Yes ☐ No ☐
9. Does the wastestream contain PCBs regulated by 40CFR? Yes ☐ No ☐
PCB concentration _____ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes ☐ No ☐
11. Is the wastestream subject to Benzene NESHP? Yes ☐ No ☐
If yes, is the wastestream subject to Notification and Control Requirements? Yes ☐ No ☐
Benzene concentration _____ ppm
12. Is the wastestream subject to RCRA subpart CC controls? Yes ☐ No ☐
Volatile organic concentration, if known _____ ppmw
CC approved analytical method ☐ Generator Knowledge ☐
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes ☐ No ☐

14. **Container Information** (Identify UN container marking if known)
Packaging: Bulk Solid ☐ Type/Size: _____ Bulk Liquid ☐ Type/Size: _____ Drum ☐Type/Size: _____
Other _____
Shipping Frequency: Units _____ Per Month ☐ Quarter ☐ Year ☐ One Time ☐ Other _____

15. **Additional Information:** _____

Is analytical or an MSDS available that describes the waste? Yes ☐ No ☐ If yes, please attach.

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

NAME (PRINT OR TYPE)	PHONE	DATE
SIGNATURE	TITLE	

FACILITY NOTIFICATION

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

TSDF PROCESSING USE ONLY: PPE REQUIRED No _____ Yes _____ Describe _____

VEOLIA ENVIRONMENTAL SERVICES

WIP INSTRUCTIONS

Veolia ES requires completion of all sections of the Wastestream Information Profile (WIP). Sections not applicable to the wastestream must have N/A written in the space provided.

Documented WIP information is used to comply with TSDF Waste Analysis Plans, RCRA and DOT regulations, Emergency Planning and Community Right-to-Know Act (EPCRA), Pollution Prevention Act, Toxic Release Inventory Report and other regulatory and generator requirements.

MARINE POLLUTANT

- The wastestream is subject to the Marine Pollutant Regulations if:
 1. it is a bulk (>119 gallons) packaging with Marine Pollutant concentration $\geq 10\%$ or Severe Marine Pollutant concentration $\geq 1\%$
or
 2. it is non-bulk Marine Pollutant shipped by vessel (boat) in packages larger than 5 liters (liquid) or 5 kg (solid)
or
 3. it is a non-bulk Severe Marine Pollutant, shipped by vessel (boat) in packages larger than 0.5 liters (liquid) or 0.5 kg (solid).
- Refer to the list of Marine Pollutants.

OZONE DEPLETING SUBSTANCE (ODS)

Refer to the list of Ozone Depleting Substances.

UNDERLYING HAZARDOUS CONSTITUENT (UHC)

Refer to the list of Underlying Hazardous Constituents (40 CFR 268.48)

BENZENE NESHAP

- The wastestream is subject to Benzene NESHAP notification and control requirements if it:
 1. contains > 10 ppm benzene, **and**
 2. is generated by a chemical manufacturing plant, petroleum refinery or coke by-product recovery plant, **and**
 3. the generator's Total Annual Benzene (TAB) is ≥ 10 Mg/yr

TRI CHEMICAL

- The wastestream is subject to Toxic Release Inventory Reporting if it contains a Section 313 Toxic Chemical and meets Qualifier requirements.

OSHA CARCINOGEN

- OSHA promulgated standards in 1974 to regulate the industrial use of 13 chemicals identified as occupational carcinogens. Exposures are to be controlled through the required use of engineering controls, work practices, and personal protective equipment, including respirators. See 29 CFR 1910.1003-1910.1016 for specific details.

RCRA SUB-PART CC CONTROLS

- Subpart CC Air Emission Control requirements apply to large quantity hazardous waste generators and to treatment, storage, and disposal facilities.
- Waste in containers greater than 0.1 cubic meters (i.e., 26.4 gallons) with greater than 500 ppm volatile organics are subject to this rule, unless otherwise exempted. Allowable controls include DOT approved containers, containers with an adequate cover and closure devices, and containers which operate with no detectable emissions (less than 500 ppm).