

WAYNE DISPOSAL, INC.

POST OFFICE BOX 5187, DEARBORN, MICHIGAN 48128 (313) 326-0200

WASTE ACCEPTANCE POLICY AND PROCEDURES

- Wayne Disposal, Site #2, MID048090633 -

Due to the frequency of recent changes in hazardous waste regulations, we find it necessary to issue the following information for your use in getting approval for disposal of waste materials. Please take time to read the information contained so that your disposal request will be complete and approved as quickly as possible.

Hazardous vs Non-Hazardous

It is the responsibility of the generator to determine if his waste material is considered hazardous by federal or state criteria. The single most important key to making this determination is obtaining copies of the federal hazardous waste regulation and rules for Michigan's Act 64. Copies of Act 64 rules may be obtained from the Michigan Department of Natural Resources, Office of Hazardous Waste Management (517) 373-2730. Becoming familiar with Act 64 rules is essential for completing a waste characterization as discussed below. Please be aware that Michigan's "universe" of hazardous/managed wastes includes all RCRA regulated wastes and more. These rules went into effect on April 17, 1981.

Non-Hazardous Wastes

Documentation of non-hazardous determinations for manufacturing wastes must be submitted prior to disposal of these wastes. In order to eliminate all possible hazardous classifications, the generator should complete a Michigan Waste Characterization form (a sample copy has been attached for your use.) Your thoroughness in completing this form will expedite each of your requests.

Any analytical data generated to complete the waste characterization should also be forwarded. Samples of the waste may be requested in specific instances.

Once approved for disposal, each load of non-hazardous manufacturing waste should be accompanied by a bill of lading. See attachment "A" for appropriate information to be included on the shipper. One copy of this shipper will be retained by us for our files. Additional copies will be signed as received and returned to the driver of the truck.

8006 0357 SCF-ALLF-00004

PRODUCED BY FORD

We do not recommend using a manifest for non-hazardous wastes, (unless regulated under Act 136). If you choose to use a manifest for non-hazardous wastes please do not send the DNR copy back to the DNR as this could cause confusion to DNR key-punch operators working the Act 64 and Act 136 programs. (Note: It is not our present policy to issue generator comeback copies on non-hazardous waste manifests. We will retain the green copy for our files. All extra copies of the manifest will be returned to the driver).

Notification Wastes

Act 64 contains rules and other criteria defining this category (see R299.6203, Rule 203 and R299.6201 g(iii) (iv). Some wastes previously not regulated federally may fall into this category under Michigan rules. Basically, a notification waste is one that contains a hazardous constituent(s) in either a concentration or volume that is considered significant (see Act 64 rules Figures A and B). It's important to note that notification wastes are marginally regulated under state law, requiring the forwarding of a characterization to the state. These wastes are not required to be manifested.

Wayne Disposal's policy regarding this waste category is simple. With respect to its acceptability, the waste will be handled the same as regulated hazardous wastes. Frankly, we feel that some notification wastes will be more hazardous than many regulated hazardous wastes.

For shipping purposes, these wastes do not have to be manifested and we prefer that they are not manifested. The acceptable shipping documentation will include the use of a shipper/bill of lading that indicates, "This is an Act 64 Notification waste", the volume, the generator, date of shipment and the waste designation. For our purposes the waste designation will be the state commercial chemical product or other constituent code preceded by the prefix "N", e.g. NP001. The shipper must be signed by the generator. If a generator/transporter wants a record of delivery, provide the appropriate number of shipper copies. Extra copies will be signed upon receipt at the landfill and given to the driver.

Hazardous Wastes

If the generator of the waste determines his waste to be hazardous under federal or state regulation, a completed and signed State of Michigan waste characterization form must be submitted for review. A sample copy of this form has been attached for your use. Please be as complete as possible, attaching all available analytical data. Be sure to also include density of the material (Question 14) as it will enable us to accurately report the weight of material we are handling to the US EPA in our annual report. In addition a 4-8 ounce sample of the waste should be forwarded. (UPS or Perolator shipments should be made to 49350 N. Service Dr. Belleville, Mi. 48111).

Once this information is reviewed, the generator representative will be contacted to clarify any information and a verbal approval (or disapproval) will be issued. A written approval will be issued, as required by federal law, shortly thereafter.

8006 0358

PRODUCED BY FORD

Once approval has been quoted, each load must be delivered with a signed Michigan manifest. Within 10 days after delivery, a Certificate of Disposal (as confirmation of proper disposal pursuant to Act 64) will be issued to the Michigan Department of Natural Resources, transporter and generator of the waste. This should be retained by transporters and generators in accordance with state law. Note: Due to statutory changes, CD's will not be issued after March 31, 1983.

Waste Containing Asbestos

Pure asbestos is a regulated hazardous waste Under Act 64 and will be reviewed and processed as previously indicated under the hazardous waste section. Other waste products containing asbestos will very likely fall into Michigan's "notification Waste" category. The vast majority of asbestos waste we receive is pipe or tank insulation. Although we are required to have adequate information on file to properly handle hazardous/notification wastes, this is one type of material, because of our standing familiarity, that we will not require the receipt of a "waste characterization form". However, you are still obligated to provide the DNR with this information via submittal of a Michigan Waste Characterization Report.

Like other notification wastes, there is a concentration, volume-weight cutoff for management as a notification waste, e.g. 100 KG @ 99%. If you feel your waste qualifies under this exemption, it will be necessary to document the percentage of asbestos in the waste and the weight. If this is difficult or more trouble than it's worth, we will assume the concentration is between 1-99% and will require you to handle the approval and shipping in the same manner as a true notification waste.

Please contact the landfill office for information on proper packaging and labeling requirements such as:

- (1) Asbestos containing materials must be containerized prior to delivery at the landfill. This may be in bags, drums, cartons, etc.
- (2) Each container of asbestos must be clearly marked with the following warning of:

"CAUTION: CONTAINS ASBESTOS - AVOID BREATHING DUST"

Preprinted asbestos warning labels are available commercially through Labelmaster in Chicago.
(Phone: 800-621-5808)

8006 0359

PRODUCED BY FORD

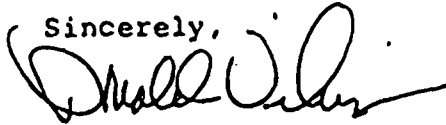
Small Generator Exemptions:

Although both federal and state law recognizes these exemptions, our policy regarding reviewing and handling will not significantly differ from large generator procedures. One exception would be the use of an EPA I.D. number. We require a letter from small generators indicating their status prior to disposal. Please contact the landfill office for more information if you are a small generator. Depending on the specific circumstances, we will try to ease the burden as much as possible. Do not send a shipment of small generator hazardous waste to the landfill and expect disposal unless prior arrangements have been made.

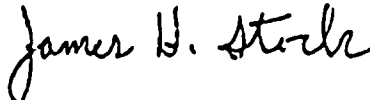
We realize that the maze of federal and state regulations can be confusing, particularly to smaller manufacturers with limited environmental staffs. We will be happy to assist you in any way possible, so feel free to contact us at (313) 697-7830 (Landfill Office) or (313) 326-0200 (General Office.)

Thank you for your cooperation.

Sincerely,



Donald Vilnius
General Manager



James H. Stock
Hazardous Waste Coordinator

8006 0360

PRODUCED BY FORD

NON-HAZARDOUS WASTE

STRAIGHT BILL OF LADING

#1001

SHIPPER/GENERATOR: ABC COMPANY

DATE: 5/1/81

TRANSPORTER: XYZ HAULING

DELIVER TO: WAYNE DISPOSAL SITE#2, BELLEVILLE MI

MATERIAL: PHOSPHATE SLUDGE, "EPA NON-HAZARDOUS"
"NOT MANAGED UNDER ACT 64"

QUANTITY: 20 CUBIC YARDS

AUTHORIZED SIGNATURE:

NOTIFICATION WASTE

STRAIGHT BILL OF LADING

#1002

SHIPPER/GENERATOR: ABC COMPANY

TRANSPORTER: XYZ HAULING

DELIVER TO: WAYNE DISPOSAL SITE#2, BELLEVILLE, MI

MATERIAL: ACT 64 NOTIFICATION WASTE-N1022, PIPE INSULATION CONTAINING
ASBESTOS CONCENTRATION LESS THAN 99%

QUANTITY: 5 CUBIC YARDS

AUTHORIZED SIGNATURE:

8006 0361

EPA - PART A HAZARDOUS WASTE CODE LIST

F001	K001	U013
F002	K005	U051
F004	K024	U052
F005	K035	U054
F006	K048	U061
F008	K049	U073
F010	K050	U122
F012	K051	U147
F016	K052	U159
	K061	U165
D002	K063	U188
D004	K087	U190
D005	K088	U228
D006		U223
D007	P011	
D008	P012	
D009	P015	
D010	P030	
D011	P105	
D012		
D013		
D014		
D015		
D016		
D017		

Please note that F005, F008, F010 are listed as hazardous due to toxicity and either reactivity or ignitability. These wastes would not be acceptable if they are truly ignitable or reactive. Contact the office if your waste falls into one of these categories.

8006 0362

PRODUCED BY FORD

PLAINTIFF'S EXHIBIT

FD-1555

DUMP SITE

8006 0356

PRODUCED BY FORD