

**State of Wisconsin
Department of Natural Resources**

**Response to Comments
Storm Water Discharge Permit Coverage at Solid Waste Landfills
Guidance #3800-2016-01
#PUB-WA-1816**

April 2016

On February 19, 2016, the Wisconsin Department of Natural Resources (Department) issued a public notice for review of the proposed “Storm Water Discharge Permit Coverage at Solid Waste Landfills” guidance. The Department received several comments on the proposed guidance. This document represents the Department’s response. Many of the comments from the commenters are similar in nature or request clarification on the same issue. Therefore, rather than responding to each individual comment, the Department has responded collectively as noted below. Comments were received from the following individuals and are included as attachments with this document:

Neil Carney, Ayres Associates
Evelyn Fisher, Becher-Hoppe Associates, Inc.
Diane Nelson, City of Superior, Environmental Services Division
John Lefebvre, Marinette County Land Information Department & Mar-Oco Landfill
Betsy Powers, SCS Engineers
Dan LeClaire, Waste Management of Wisconsin, Inc.
Lynn Morgan, Waste Management of Wisconsin, Inc.

Response by the Department

[Please note: The General Tier 2 Industrial Storm Water Permit referenced in the guidance and in this response document expires on April 30, 2016, and is in the process of being reissued. The general permit was on public notice from February 12 to March 14, 2016.]

It appears that many of the comments understandably concern specific implementation questions about storm water permitting of solid waste landfills. The guidance is in part a response to the U.S. Environmental Protection Agency’s (EPA) 2011 Wisconsin Pollutant Discharge Elimination System program review. Since the mid-1990s, the Department’s storm water program has been relying on the solid waste program for comparable industrial and construction site storm water regulation at landfills under the “other environmental programs” provisions in ss. NR 216.21(4) and NR 216.42(6), Wis. Adm. Code. In its review, the EPA identified these “other environmental programs” provisions for the regulation of storm water as a deviation from federal requirements. Also, the other purpose of the guidance is to address the implementation of the construction site and post-construction performance standards in subch. III of NR 151, Wis. Adm. Code, which were established in the years since the original arrangement between the Department’s storm water and solid waste programs (see section C. of the guidance). The policy change is not to suggest that there are widespread or significant storm water issues at landfills. The policy change to require storm water permitting of landfills as described in the guidance is to administratively address the EPA issue described above and to consistently apply the construction site and post-construction performance standards statewide. The guidance only applies to landfills and associated non-commercial soil borrow sites and does not address storm water permitting of other solid waste handling facilities such as transfer stations.

The main function of the guidance is to explain in general terms the background of the issues and the reason for the policy change. It is not intended to address all the implications of the policy change as the Department moves forward. However, the commenters have raised important questions and issues, and more will undoubtedly develop. To address ongoing issues and facilitate effective implementation, in the coming months the Department is committed to conferring with landfill operators and their consultants on an as needed basis to answer questions and relay information, as well as performing internal cross-program training and discussion.

For some of the comments and questions, it may be helpful to reiterate that internal drainage within a landfill that is captured and treated through the leachate collection system is managed as a wastewater, not storm water. Therefore, the regulatory framework described in the guidance does not apply to any area where all drainage at all times is captured and treated through the landfill leachate collection system. The General Tier 2 Industrial Storm Water Permit and the General Construction Site Storm Water Permit do not apply to internally drained areas where leachate is collected and treated.

Several commenters inquired about the timeframes for submitting information to the Department to comply with the storm water permitting requirements. After the guidance is finalized, operators of active landfills will be notified by the Department in writing to apply for coverage under the General Tier 2 Industrial Storm Water Permit. The notification will explain the timeframes in which landfill operators will be required to submit an application for permit coverage and to develop and implement a storm water pollution prevention plan. However, as significantly regulated facilities, the Department expects that for the most part, landfill operators are already managing storm water in a manner consistent with the storm water regulations. While the guidance does not specify the time frames, landfill operators will be given a reasonable amount of time after the reissuance of the General Tier 2 Industrial Storm Water Permit to submit a permit application and evaluate existing plans and procedures for compliance the General Tier 2 Industrial Storm Water Permit.

One commenter raised the concern that the guidance does not make a distinction between large complex landfills and smaller landfills and recommended less cumbersome alternatives or exemptions for some existing small landfills. Again, the guidance is in part a response to the EPA 2011 Wisconsin Pollutant Discharge Elimination System program review previously described. Neither the EPA's federal regulations nor ch. NR 216, Wis. Adm. Code, offer an industrial storm water permit exemption for landfills based on size or the level of complexity. Consequently, all active landfills will be required to obtain coverage under the General Tier 2 Industrial Storm Water Permit regardless of the size of the landfill. However, the General Tier 2 Industrial Storm Water Permit does provide sufficient flexibility so that the storm water pollution prevention plan and implementation efforts can be tailored to the relative complexity of the operation.

One commenter asked whether the General Tier 2 Industrial Storm Water Permit applies to closed landfills, and if not, what is the trigger to terminate the permit requirements at a newly closed landfill. "Closed Landfills" are addressed on pages 3 and 4 under section E. of the guidance. Closed landfills with no source areas of storm water contamination do not require coverage under the General Tier 2 Industrial Storm Water Permit. The operator of a closed landfill that has received a Department closure approval letter may terminate the General Tier 2 Industrial Storm Water Permit coverage by submitting a completed Notice of Termination (Form 3400-170) to the Department as provided in section 1.5 of the general permit. Long-term closure requirements and subsequent follow-up will be handled as it is now by the solid water program. The Department added some clarifying language to the closed landfill section of the guidance in response to this comment.

Several comments concerned whether existing storm water treatment practices that may have been in place for several years would now require redesign and/or reconstruction to meet the post-construction performance standards. No, landfill operators will not be required to redesign or reconstruct existing storm water best management practices to meet the post-construction performance standards unless significant deficiencies are identified on a case-by-case basis. However, storm water treatment practices for new landfills and landfill expansions will be required to meet the post-construction performance standards. For landfills, the Department is primarily (but not exclusively) concerned with implementation of the total suspended solids (TSS) performance standard in s. NR 151.122, Wis. Adm. Code, and the peak discharge performance standard in s. NR 151.123, Wis. Adm. Code. The Department will not require nor encourage infiltration as described in s. NR 151.124, Wis. Adm. Code, for landfill operations.

The Department perceives from several of the comments that there is some misunderstanding about the references to the performance standards in NR 151 in both the guidance and in the version of the General Tier 2 Industrial Storm Water Permit that was on public notice from February 15 to March 14, 2016. In the public noticed version of the General Tier 2 Industrial Storm Water Permit, section 3.3.2.7 references the NR 151 post-construction performance standards. The purpose of this section of the general permit is to require industrial storm water permittees to account for and maintain NR 151 compliant storm water best management practices that were installed as the result of coverage under the General Construction Site Storm Water Permit for a construction project. Additionally, under section 3.3.2.9.2 of the General Tier 2 Industrial Storm Water Permit, an industrial facility that has bare soil as an ongoing characteristic of its activity are required to design, install and maintain best management practices to achieve compliance with the construction site performance standards in s. NR 151.11(6m), Wis. Adm. Code. However, due to these comments, the Department realizes that it overlooked including language in the General Tier 2 Industrial Storm Water Permit as suggested in the guidance under E. Guidance, Ensuring Compliance with NR 151 Performance Standards (pages 2 and 3). In response, language has been added to the General Tier 2 Industrial Storm Water Permit requiring that new post-construction storm water best management practices will be required to meet the TSS performance standard in s. NR 151.122, Wis. Adm. Code, and the peak discharge performance standard in s. NR 151.123, Wis. Adm. Code.

Several comments posed questions about which general permit (Tier 2 or construction site) applies to certain activities and whether landfills are now required to retroactively apply for coverage under the General Construction Site Storm Water Permit or retrofit storm water best management practices previously commenced or completed. In response:

- The Department realizes that land disturbance is an ongoing feature of a landfill operation. The disposal area is in a constant state of disturbance and constructing new cells is a common occurrence. Therefore, it is not practical to consider typical and ongoing landfill operational activities as construction activity when by their nature disturb land and will occur over many years. To streamline the approach and avoid regulatory redundancy, the Department intends to cover the ongoing operational aspects of a landfill under the General Tier 2 Industrial Storm Water Permit to avoid the guesswork of how to apply the General Construction Site Storm Water Permit.
- After the guidance is finalized, operators of all active landfills will be required to apply for coverage under the General Tier 2 Industrial Storm Water Permit but will not be required to retroactively apply for coverage under the General Construction Site Storm Water Permit. Section 3.3.2.9.2 of the General Tier 2 Industrial Storm Water Permit requires that storm water discharges contaminated by sediment eroding from areas of bare soil that cannot be stabilized by pavement, gravel, vegetation, or other permanent land cover shall be treated by best management practices designed, installed and maintained to achieve compliance with the construction site performance standards in s. NR 151.11(6m), Wis. Adm. Code, and in accordance with the Department's

Construction Site Erosion and Sediment Control Technical Standards. This excludes areas that drain internally to the landfill and where all sediment is trapped to prevent discharge off-site. In response to the comments, language has been added to the General Tier 2 Industrial Storm Water Permit requiring that new post-construction storm water best management practices will be required to meet the TSS performance standard in s. NR 151.122, Wis. Adm. Code, and the peak discharge performance standard in s. NR 151.123, Wis. Adm. Code. While retrofitting will not be required, it may be cost effective to do so to utilize existing practices to treat runoff from new areas.

- There may be land disturbances of one acre or more on landfill properties for the construction of ancillary areas/activities such as waste processing or storage, road construction, parking, soil berm construction, and soil stockpiling. Again, whenever possible, the Department intends to cover such activities under the General Tier 2 Industrial Storm Water Permit. However, there may be instances where on a case-by-case basis it is more appropriate to cover the activity under the General Construction Site Storm Water Permit.

The final guidance was approved on April 29, 2016.

Prepared by:

Suzan Limberg, Storm Water Specialist
Jim Bertolacini, Storm Water Coordinator
Runoff Management Section, Wisconsin Department of Natural Resources

Joe Lourigan, Hydrogeologist – Plan Review Expert
Solid Waste Program, Wisconsin Department of Natural Resources

From: [Carney, Neil](#)
To: [DNR Guidance Documents](#)
Subject: RE: Storm Water Discharge Permit Coverage at Landfills, Comment Deadline March 11
Date: Tuesday, March 08, 2016 10:13:22 AM
Attachments: [image001.jpg](#)
[image003.jpg](#)

We request that the guidance document include explicit direction on the following items:

- 1) Whether closed landfills will be required to maintain an active Industrial Stormwater Permit and corresponding reporting requirements.
- 2) If a permit is not required for closed landfills, provide the trigger action (i.e. receipt of WDNR closure approval letter) which will terminate permit requirements at newly closed landfills.
- 3) What will be the required timeframe for completion/submittal of the following items related to the permitting process:
 - Stormwater Pollution Prevention Plans
 - BMP implementation following receipt of the industrial stormwater permit

Feel free to contact me with any questions related to these recommendations.

Thanks,
Neil

Neil E. Carney, PE

Supervisor – WI Environmental Services

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From: [Evie L. Fisher](#)
To: [DNR Guidance Documents](#)
Subject: RE: Comments about Storm Water Discharge Permit Coverage at Solid Waste Landfills
Date: Thursday, March 10, 2016 4:31:08 PM
Attachments: [comments_160310_wdnr_draft_Guidance_Landfill_Storm_Water_Permits.pdf](#)

Greetings,

Here is the pdf version of my comments sent earlier. This is probably easier to share with any other interested people.

Thank you.

Evelyn L. Fisher, PE | Project Engineer
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From: Evie L. Fisher
Sent: Thursday, March 10, 2016 4:16 PM
To: 'DNRGuidanceDocuments@Wisconsin.gov' <DNRGuidanceDocuments@Wisconsin.gov>
Subject: Comments about Storm Water Discharge Permit Coverage at Solid Waste Landfills

Good afternoon,

Thank you for the opportunity to comment about this topic. I have reviewed the draft guidance and related documents, and provided additional information in the attachment to this message.

I recommend that alternatives or exemptions should be allowed for some small existing licensed landfills, as detailed in the attachment.

I would appreciate your sincere consideration in this regard.

Thank you.

Evelyn

Evelyn L. Fisher, PE | Project Engineer

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From: [Nelson, Diane Renee](#)
To: [Bertolacini, Jim K - DNR](#)
Subject: landfill swppp
Date: Monday, February 22, 2016 12:17:07 PM
Attachments: [image001.gif](#)

When will the City of Superior be required to submit a SWPPP for the landfill and obtain coverage under Tier 2?

*Diane Nelson
Stormwater and Administrative Manager
City of Superior, Environmental Services Division
51 E 1st St., Superior WI 54880
715-395-5826*

From: [John Lefebvre](#)
To: [DNR Guidance Documents](#)
Cc: lietze@AyresAssociates.com
Subject: Storm Water Discharge Permit Coverage at Solid Waste Landfills
Date: Monday, February 22, 2016 10:06:23 AM
Attachments: [image002.jpg](#)

The Marinette-Oconto Landfill is concerned with the amount of time that will be granted by the WDNR to an existing solid waste landfill to obtain a Tier 2 general industrial storm water permit and incorporate storm water management practices which will meet the Tier 2 general storm water permit. Has thought been given to an implementation schedule?

With this new regulation comes significant costs. Will existing landfills be given ample time 18-24 months to develop a plan and implement specific storm water management practices? Those landfills not undergoing landfill construction or closure activities should be lower priority for being brought into compliance, one would hope.

Thanks,
John

John Lefebvre, Director
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county color logo



From: [Powers, Betsy](#)
To: [Bertolacini, Jim K - DNR](#)
Subject: Draft Guidance - Storm Water Discharge Permit Coverage at Solid Waste Landfills
Date: Friday, March 04, 2016 3:37:42 PM

Hi Jim,

I was reading through the noted draft guidance and have a follow-up question I was hoping you could help answer. It's noted that existing landfills not submitting a new plan of operation will be required to apply for and obtain permit coverage. Does this mean that they would have to go back and document that their storm water management system meets the NR 151 performance criteria (peak flow for 1 and 2 year events, TSS removal, infiltration) and possibly make modifications to the features to meet these standards? If so, what about features already constructed?

Thanks,

Betsy

Betsy Powers, PE

Senior Civil Engineer

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From: [Leclaire, Dan](#)
To: [Bertolacini, Jim K - DNR](#)
Subject: Storm Water Permits at Solid Waste Facilities
Date: Tuesday, March 08, 2016 12:09:43 PM

Dear Jim:

I have some questions on how the department will handle the transition from storm water being managed by WDNR solid waste to WDNR storm water. I tried calling you several times, but have not been able to connect yet so I am sending you an email with my questions. As you know there is a new Tier 2 general permit and a landfill storm water guidance currently out for public comments that has raised some questions for us. My questions are broken down in to two types of facilities, Solid Waste Transfer Stations/Hauling Locations and Landfills. In order to provide comments on the drafts out for public comment, we would like to have a better understanding on these questions first.

Solid Waste Transfer Stations and Hauling:

Over the years, we have contacted the WDNR for clarification on which facilities WDNR would be issuing separate WDNR storm water permits. The last time we contacted the WDNR was on 3/26/10. The issue is that a number of facilities had the LOI for the industrial storm water permit filed using the 4953 Waste Systems SIC code. The original LOI only had a space for a single SIC code compared to the current form that allows two to be used. The LOIs that used the 4953 SIC code goes back to 1992 – 1996 pre-dating NR 151 and 216. The 1992 submittal was a federal group application before WI had their own program. The majority of these locations are facilities that have a solid waste transfer station and some have a hauling company at the same location. Historically, we have been told by WDNR that since the LOI used the 4953 SIC code, WDNR would not be issuing a separate WDNR storm water permit. For sites with transfer stations, there is a WDNR solid waste permit for the facility. When we last contacted you in 2010, you indicated that WDNR Storm Water and Waste were still sorting out the inter-program concerns. At that time, you felt that we should not re-submit the NOI with an additional SIC code such as 4212 until the WDNR had worked out the details.

Now that WDNR appears to be ready to issue a separate storm water permit, we have questions as to how the WDNR plans to handle the non-landfill facilities with the 4953 SIC code.

- Is WDNR now going to issue storm water permits for these facilities?
- Does it matter for the type of facility? Solid Waste Transfer Station Only? Hauling Only? Transfer Station and Hauling on same property?
- Is the WDNR going to issue Tier 2 industrial general storm water permits based upon the original LOI or do we need to file a new LOI with multiple SIC codes?
- If so, does a SWPPP need to be prepared with a SWPPP summary included with the LOI or will there be a transition period to prepare and implement the SWPPP?
- For these pre NR 151 and 216 facilities that never filed a LOI under subch. III of NR 216 (construction site storm water permit), does that mean that NR 151 does not apply to the

existing facility and would only apply to new construction?

Landfill:

We have some questions on how the WDNR will handle existing facilities. Landfills never filed a LOI under subch. III of NR 216 (construction site storm water permit) as everything was addressed in the approved plan of operation and WDNR approvals. Many landfills did file a NOI for the industrial storm water permit in the 1991-1994 period.

- How are you going to determine applicability with NR 151? I saw language to address performance standards in NR 151.12 or NR 151.121 to 151.128. NR 151 ties all the compliance dates to the subch. III of NR 216 NOI submittal date.
- Do we assume that since we were not required to submit a construction site NOI that this language would only apply to new construction?
- Landfills are a perpetual construction process, what defines new construction?
- Would new construction be a plan of operation approved after a certain date? It is not clear to us what we need to comply with

Please feel free to give me a call at 608-235-4707 to discuss.

Thanks

Daniel J Leclaire, P.E.
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From: [Morgan, Lynn](#)
To: [DNR Guidance Documents](#); [Lourigan, Joseph J - DNR](#); [Bertolacini, Jim K - DNR](#)
Cc: [Hamblin, Gerard](#); [LeClaire, Dan](#)
Subject: Draft Storm Water Guidance and Tier 2 Industrial General Permit to Discharge Storm Water
Date: Friday, March 11, 2016 6:58:48 PM

Jim and Joe, thank you for the opportunity to offer suggestions regarding the draft Storm Water Guidance and Tier 2 Permit. We appreciate the robust effort you're making to seek input by circulating the draft widely, and the insights you offered in discussions with Dan LeClaire. Here are a few ideas and questions for your consideration.

1. Inter-bureau coordination. Ideally the guidance should describe the roles and responsibilities of each bureau, and the timing and process for each bureau's review. This clarity will help both Department staff and applicants carry out their obligations efficiently, and allow the Department to consolidate requests for information needed by both bureaus.
2. Including examples in the guidance would add clarity. For example, consider a permitted landfill with seven years' remaining capacity. Do they need a new permit for the next cell construction, and do they need to redesign existing storm water ditches, ponds and structures? What are the applicable design standards, and how long will they remain in effect? Will updates be needed at closure? What triggers development of a plan, monitoring and upgrades?
3. In other states, too rapid implementation of the federal standards is creating havoc as operators and consultants scramble to understand and comply with state programs. Wisconsin can avoid similar issues by providing a long lead time prior to the effective date.
 - Does this apply only to newly permitted capacity? If it applies to existing sites, how will you determine the applicability of NR 151, given that NR 151 ties compliance dates to the subch. III of NR 216 NOI submittal date? Generally, landfills never filed a LOI under subch. III of NR 216 (construction site storm water permit) as everything was addressed in the approved plan of operation and WDNR approvals. Many landfills did file a NOI for the industrial storm water permit in the 1991-1994 period.
 - Since construction of landfill capacity occurs in multiple stages over the course of years, what constitutes "new construction"?
 - The new WDNR policy or guidance will require landfills to seek coverage under the general Tier 2 industrial storm water permit. In section 3.3.2.7 of the draft general Tier 2 industrial storm water permit, it states that the SWPPP for a facility subject to the performance standards in NR 151.12 or NR 151.121 to 151.128 shall describe the BMP necessary to maintain compliance with those standards for applicable areas as defined in NR 151.12(2) and NR 151.121(2). It also states that the BMPs installed shall meet the performance standards in NR 151.12 or NR 151.121 to 151.128 and be maintained to meet treatment capability as originally design. It would be helpful to include guidance language describing the applicability of NR

151.12(2) and NR 151.121(2) and how this will be interpreted for existing and expanded landfills.

- NR 151.12(2) states that NR 151.12 post-construction performance standards for new development and redevelopment apply to a site that is or was subject to the construction performance standards of NR 151.11. NR 151.121(2) post-construction performance standards state that NR 151.121 to 151.128 apply to a post-construction site that is or was subject to the construction performance standards of NR 151.11 as well. NR 151.11(2) states that this section is applicable to any construction site that consists of one acre or more of land-disturbing construction, but applies differing requirements depending on whether a notice of intent in accordance with NR 216 or SPS 360 was filed before 1/1/11, or on or after 1/1/11.

For landfills where construction site storm water was managed through under waste bureau permit conditions and the plan of operation, there would not have been a NOI filed as listed. Would such sites have to meet the post 1/1/11 requirements because they do not meet the specific NR 151.11(2) requirements, or is the Department going to create a variance for this specific situation?

A key difference is NR 151.11(6) standards for pre 1/1/11 NOI sites (80% sediment load reduction), and NR 151.11(6m) standards for sites with NOIs on or after 1/1/11. NR 151.11(6m) has different standards for sites that submitted an NOI between 1/1/11 and 1/1/13 (80% sediment load reduction) and sites with the NOI submitted after 1/1/13 (No more than 5 tons/year sediment load). Condition 3.3.2.9.2 of the draft general Tier 2 industrial storm water permit requires compliance with NR 151.11(6m), so existing and new landfill would also have to meet this section.

- The guidance document could provide helpful detail on how landfills will comply with the construction site standards beyond meeting the standards in NR 151. Do landfills need to now file NOIs? Which standard applies? Must existing landfills calculate the sediment loads and sediment load reductions? Do they need to calculate pre- and post-discharge rates? Is this going to be a solid waste plan mod, or a separate submittal to RMP? How will compliance be measured?
- NR 151.12(2) states that NR 151.12 is not applicable to sites where an NOI for construction was submitted within 2 years after 10/1/02. What about before 10/1/02? What would be considered a NOI and date for an existing landfill?
- NR 151.12(5)(a) address TSS for post-construction. Are existing landfills considered new development with 80% TSS reduction? Or does this section not apply? This was never a NR 500 series requirement so the calculations have never been completed.
- NR 151.12(5)(b) has a requirement for post-construction runoff to be at or below the pre-construction runoff discharge rates for a 2-year design storm. Similarly, NR 151.123 requires post-construction runoff below the pre-construction runoff discharge rates for 1-year and 2-year design storms.

This was never a NR 500 series requirement so the calculations have never been completed. How will existing landfills comply with this standard?

- NR 151.12(5)(c) and NR 151.124(1) list a requirement for infiltration. How does this requirement apply to landfills?

Thank you for considering these comments and questions.

Lynn

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